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Thomas Herrera
Division of Intergovernmental Liaison and Rulemaking
Office of Federal and State Materials
And Environmental Management Programs
U. S. Nuclear Regulatory Commission
Washington, DC 20555

RE: Opportunity to Comment on the Formation of the Inspection Manual Chapter 1246 Working Group and Request for Input on the Courses Currently Included in the Training Curriculum for Materials License Reviewers and Materials Inspectors (FSME-10-058)

Dear Mr. Herrera,

The State of Wisconsin, Radioactive Materials Program has reviewed the above document and offers the following comments:

- 1) We wholeheartedly support the Organization of Agreement States comments. Wisconsin has been an Agreement State since 2003. Although the radiation control program management has two management staff with 25 plus years experience-including attending the 5 week course-the most senior person in the licensing and inspection ranks has 7 years of experience and the next individual in seniority has 3 years of experience. The remaining professional staff, (5.5 FTE), has 2 years or less of experience. We are experiencing an unprecedented amount of staff turnover due to retirements, leaving for better job opportunities or educational endeavors. The 5 Week Course, or its equivalent, is needed to prepare the "next generation" to assume radiation protection management responsibilities.
- 2) The 5 week course, or its equivalent, is needed for Agreement State staff as the two week Health Physics Technology course, (an NRC core course), is not appropriate for a new staff hire just out of school and in the process of learning health physics and radiation protection basics. We urge the working group to consider the Agreement State need for a core course, or courses, that cover health physics and radiation protection-including hands on laboratories.
- 3) Since the new license reviewers and inspectors, (both duties performed by all staff), have recently attended the core courses, we offer the following comments, as requested, for the core courses.

a) Should any courses be added to the qualification requirements?

Staff are very supportive of the Root Cause (G-205) course for inspectors as “required” in order to perform Investigations.

The Increased Controls course should be added as a required core course for inspectors. A recent attendee was supportive or retaining 5 days as the time period.

b) Should any courses be removed?

Licensing (G-109) course is the weakest course and is a candidate for removal. It would be more useful if recent license conditions used by the NRC Regions were shared at the class. NUREG 1556 does contain sample licenses but these are now about 10 years out-of-date. If one course were to be eliminated this should be the one. If not, it should be modified to make it more timely and up-to-date with current licensing practices.

The Inspections (G-108) course is more popular as there is an opportunity to perform a mock inspection and receive a critique. It can be quite useful if the individual attends “early” rather than after working for 2 or more years and performing inspections. Also, the performance based approach should be emphasized.

c) Should any new courses be created and should they be required for license reviewer or inspector qualifications?

Agreement State staff recently attended the Nuclear Pharmacy course at NRC Region III Office in Lisle, IL (9/8-10). Staff thought it was a very good course and mentioned several ideas for reviewing, and inspecting, current licensees. Much of the new input came as a result of NRC adding PET Cyclotrons and Pharmacies to their regulatory purview. In addition, Wisconsin contributed a talk on licensing a pharmacy for a large quantity of I-131 and received favorable comments from participants.

See comments 1 and 2. The 5 Week Course, or its equivalent, should be required for license reviewer and/or inspector qualifications.

4) We support continuing the remaining core courses as valuable and necessary for qualification courses as currently listed. These are: Industrial Radiography (H-305), Transportation (H-308), Diagnostic and Therapeutic Nuclear Medicine (H-304), and Brachytherapy, Gamma Knife and Emerging Technologies (H-313).

5) We have not attended, and therefore have no comment on OSHA Indoctrination (G-111) or Effective Communications for NRC Inspectors.

Thank you for the opportunity to comment. Please contact me if you have questions.

Sincerely,

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