Approved by OMB¹ No. 3150-0183 Expires 11/30/2013

INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM QUESTIONNAIRE

Name of State:WashingtonReporting Period:May 10, 2008, to April 6, 2013

Note: If there has been no change in the response to a specific question since the last IMPEP questionnaire, the State or Region may copy the previous answer, if appropriate.

A. GENERAL

1. Please prepare a summary of the status of the State's or Region's actions taken in response to each of the open recommendations from previous IMPEP reviews.

There were no previous recommendations.

B. COMMON PERFORMANCE INDICATORS

I. <u>Technical Staffing and Training</u>

- 2. Please provide the following organization charts, including names and positions:
 - (a) A chart showing positions from the Governor down to the Radiation Control Program Director;
 - (b) A chart showing positions of the radiation control program, including management; and

See Appendix 1 for organization charts.

(c) Equivalent charts for sealed source and device evaluation, low-level radioactive waste and uranium recovery programs, if applicable.

See Appendix 1 for organization charts.

Materials Section: For the Materials Section SS&D reviews: Six staff attended the SS&D Workshop: Curt DeMaris, Anine Grumbles, Steve Matthews, Pamela Walsh, Jennifer Serne, and Craig Lawrence.

¹ Estimated burden per response to comply with this voluntary collection request: 53 hours. Forward comments regarding burden estimate to the Records Management Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0183), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

An application for evaluation would go to the applicable program lead. That person would review and be assisted by technical staff. Upon completion, a review concurrence would be performed by the technical staff, another HP or manager.

One SSD amendment was conducted during the review period (IsoRay).

Waste Section: See Appendix 2 for a listing of personnel in the low-level radioactive waste and uranium recovery programs.

3. Please provide a staffing plan, or complete a listing using the suggested format below, of the professional (technical) full-time equivalents (FTE) applied to the radioactive materials program by individual. Include the name, position, and, for Agreement States, the fraction of time spent in the following areas: administration, materials licensing & compliance, emergency response, low-level radioactive waste, uranium recovery, other. If these regulatory responsibilities are divided between offices, the table should be consolidated to include all personnel contributing to the radioactive materials program. If consultants were used to carry out the program's radioactive materials responsibilities, include their efforts. The table heading should be:

Materials Section: See Appendix 2, Materials.

All the Materials Section Radiation Health Physicists (RHP's) conduct inspections, license writing and reviews.

Waste Section: See Appendix 2, Waste, for a listing of personnel in the low-level radioactive waste and uranium recovery programs.

4. Please provide a listing of all new professional personnel hired into your radioactive materials program since the last review, indicate the date of hire; the degree(s) they received, if applicable; additional training; and years of experience in health physics or other disciplines, as appropriate.

Materials Section: Jeff Kulp was hired June 16, 2012. Jeff has a BSAST (Bachelor of Science and Applied Science and Technology) degree in Radiation Protection. Jeff was the Waste Protection Program Manager and Air Emissions Manager at Washington State University.

Rhonda Long was hired June 15, 2012. Rhonda has training from the Department of Defense, Navy Department (PSNSY), Radiological Technician Qualification School (RCTQS), Norfolk Naval Shipyard (NNSY) Bachelor of Science degree from University of Washington in Cellular & Molecular Biology and a Minor in Chemistry. Rhonda's experience includes Radiological Control Supervisor, Shaw Group Inc-Environmental Remediation and Infrastructure Division, San Francisco, CA; Health Physicist/Radiological Controls Supervisor, CH2MHill Plateau Remediation Company (CH2PRC), Richland, WA; Radiological Control Technician (RCT)/ Health Physics Technician (HPT), Fluor Hanford, Richland, WA; and Science Technician, Dept. of Defense, Navy Dept., Puget Sound Naval Shipyard (PSNSY), Bremerton, WA.

Waste Section: Sheila Pachernegg - March 2009. M.S. Geological Engineering (hydrology emphasis)(1987), B.S. Geology. Licensed hydrogeologist (1981). Worked as

consultant for over 25 years, and was a contractor to the Department of Health prior to being hired.

Gregorio Rosado - December 2012. B.S. Radiation and Imaging Science (2011); A.S. Nuclear Medicine Technology (2010). Has six years' experience in the imaging aspect of health physics.

5. Please list all professional staff members who have not yet met the qualification requirements for a radioactive materials license reviewer or inspector. For each, list the courses or equivalent training/experience they need and a tentative schedule for completion of these requirements.

Materials Section:

Curt DeMaris	Qualified for all
Billie Harvey	No licensing or inspection of M&D or Well Logging
Anine Grumbles	No licensing for Gamma Knife/HDR, Pharmacy, or Well Logging
Jenifer Serne	No licensing for Broad Scope, Pharmacy or Well Logging
Steve Matthews	No licensing for Pharmacy
Pamela Walsh	No licensing or inspection for Broad Scope, M&D, or Pharmacy;
	No licensing for Gamma Knife/HDR or Well Logging
Jeff Kulp	Approved for Portable and Fixed Gauge licensing and inspections,
	and Laboratory inspections
James Killingbeck	No licensing or inspection for Gamma Knife, Broad Scope, or M&D
Victoria Dix	No licensing for Broad Scope or Well Logging
Rhonda Long	Only approved for Laboratory inspections

The RHP's are signed off as needed for one or more specific programs (Medical, Labs or Industrial)

Waste Section: Andrew Thatcher, John Riley, Sheila Pachernegg, and Gregorio Rosado have not met the qualification requirements for license reviewer or materials inspector.

Drew Thatcher does performance assessments and dose analysis. Drew has been involved in compliance inspections however he does not perform independent licensing and compliance activities.

John Riley is the program geochemist. He has been involved with inspections with oversight, but does not perform independent licensing or compliance activities.

Sheila Pachernegg is the program engineer She has been involved with inspections with oversight, but does not perform independent licensing or compliance activities. She does, however, perform independent engineering inspections.

Gregorio Rosado was hired into the Waste Management Section in December 2012. He has signed up for the USNRC courses Licensing Procedures and Inspection Procedures. Additionally, prior to becoming a qualified reviewer or inspector he must satisfy the requirements of the Waste Management Sections Procedure WMS 102.

6. Identify any changes to your qualification and training procedure that occurred during the review period.

Materials Section: No changes.

Waste Section: The Waste Section procedure WMS 102, Staff Qualifications and Training, was rewritten in its entirety and has been in use since September 2009.

7. Please identify the technical staff that left your radioactive materials program during the review period and indicate the date they left.

Materials Section: Only two people have left since 2008. The Materials Section Manager, Arden Scroggs, retired April 30, 2010. His position was vacant until July 10, 2010, when it was filled by Debra McBaugh. Debra McBaugh terminated on March 31, 2011. During this time she covered both Radioactive Materials and Environmental Sciences Sections.

Waste Section: Jamil Ahmad (retired February 2011) Sean Murphy (resigned January 2013)

8. List any vacant positions in your radioactive materials program, the length of time each position has been vacant, and a brief summary of efforts to fill the vacancy.

Materials Section: The Radioactive Materials Section Manager position was vacant from April 30, 2010 until July 10, 2010, when it was temporarily filled by Debra McBaugh. This position was vacant again from March 31, 2011 until April 16, 2011, when Craig Lawrence accepted it on a temporary basis while double-filling his permanent position as Industrial Program Manager. Then Craig permanently filled the Section Manager position on June 16, 2011, while vacating the Industrial Program Manager position.

The Industrial Program Manager position was vacant from June 16, 2011 until November 15, 2011, when it was filled by Steve Matthews.

Steve Matthews's previous position as Health Physicist 2 was vacant from November 15, 2011 until June 16, 2012, when it was filled by Jeff Kulp. A second HP2 applicant, Rhonda Long, was also hired on July 1, 2012 as a temporary double fill.

Each time these positions were vacant, the positions were filled in accordance with Washington State Department of Personnel recruitment and hiring procedures. Our office advertised the positions with the National Health Physics Society and the Conference of Radiation Control Program Directors.

Waste Section: There is one vacancy in the Waste Section. This position has been vacant since mid-January 2013. The program is tracking the work activities of our licensees and if work picks up, we will evaluate if the position will be filled.

9. For Agreement States, does your program have an oversight board or committee which provides direction to the program and is composed of licensees and/or members of the public? If so, please describe the procedures used to avoid any potential conflict of interest.

Materials Section: We do not have an oversight board or committee providing direction to the program.

Waste Section: The section has no oversight board or committee providing any type of direction to the program.

II. Status of Materials Inspection Program

10. Please identify individual licensees or categories of licensees the State is inspecting less frequently than called for in NRC's Inspection Manual Chapter (IMC) 2800 and explain the reason for the difference. The list only needs to include the following information: license category or licensee name and license number, your inspection interval, and rationale for the difference.

Materials Section: We are not inspecting any license categories at intervals less than NRC IMC 2800, but several at more frequent intervals.

Waste Section: The Waste Section does not inspect any licensee less frequently than called for in NRC's IMC 2800.

11. Please provide the number of routine inspections of Priority 1, 2, and 3 licensees, as defined in IMC 2800 and the number of initial inspections that were completed during each year of the review period.

Materials Section: The number of inspections performed between May 14, 2008 and April 6, 2013 was 1,345.

Date Range	Priority 1	Priority 2	Priority 3	Initial
5/10/08-5/9/09	20	13	36	15
5/10/09-5/9/10	18	16	60	10
5/10/10-5/9/11	20	17	63	11
5/10/11-5/9/12	9	21	58	14
5/10/12-4/6/13	15	29	40	9

Waste Section: See Appendix 3, Waste.

12. Please submit a table, or a computer printout, that identifies inspections of Priority 1, 2, and 3 licensees and initial inspections that were conducted overdue.

At a minimum, the list should include the following information for each inspection that was conducted overdue during the review period:

Materials Section:

- (1) Licensee Name: Quality Inspection Services, Inc.
- (2) License Number: WN-IR074-1
- (3) Priority (IMC 2800): Priority 1
- (4) Last inspection date or license issuance date, if initial inspection: Inspected March 21, 2011
- (5) Date Due: Inspection due June 21, 2012

- (6) Date Performed: Inspection performed November 15, 2012
- (7) Amount of Time Overdue: Overdue by four months and 25 days
- (8) Date inspection findings issued: Findings issued day of inspection, no items cited.
- (1) Licensee Name: Vancouver Radiologists, P. C.
- (2) License Number: WN-M0259-1
- (3) Priority (IMC 2800): Priority 2
- (4) Last inspection date or license issuance date, if initial inspection: January 21, 2011
- (5) Date Due: Inspection due was October 27, 2009 based on April 27, 2007 inspection
- (6) Date Performed: Inspection performed November 2, 2009
- (7) Amount of Time Overdue: Overdue by six days
- (8) Date inspection findings issued: Findings (none) were issued November 2, 2009 (same day). Findings were issued April 30, 2007 after the inspection on April 27, 2007.

Waste Section: There were no overdue inspections during the review period.

13. Please submit a table or computer printout that identifies any Priority 1, 2, and 3 licensees-and initial inspections that are **currently** overdue, per IMC 2800. At a minimum, the list should include the same information for each overdue inspection provided for Question 12 plus your action plan for completing the inspection. Also include your plan for completing the overdue inspections.

Materials Section: We have no Priority 1, 2, or 3 licensees that are currently overdue per IMC 2800.

Waste Section: There are currently no overdue inspections.

14. Please provide the number of reciprocity licensees that were candidates for inspection per year as described in IMC 1220 and indicate the number of reciprocity inspections of candidate licensees that were completed each year during the review period.

Materials Section:

YEAR	CANDIDATES	INSPECTED	PERCENT
2008	42	6	14.29
2009	47	10	21.28
2010	51	9	17.65
2011	48	14	29.17
2012	48	14	29.17

Waste Section: N/A

- III. <u>Technical Quality of Inspections</u>
 - 15. What, if any, changes were made to your written inspection procedures during the reporting period?

Materials Section: During the reporting period, we have updated our desk manuals containing inspection procedures. The most significant change to inspection procedures is becoming more performance based. We added NSTS comparisons to Increased Controls inspections.

Waste Section: The Waste Management Section has rewritten all section procedures, which became effective between 2009 and 2011.

16. Prepare a table showing the number and types of supervisory accompaniments made during the review period. Include:

Materials Section: See Appendix 4, Materials.

Waste Section: See Appendix 4, Waste.

17. Describe or provide an update on your instrumentation, methods of calibration, and laboratory capabilities. Are all instruments properly calibrated at the present time? Were there sufficient calibrated instruments available throughout the review period?

Materials Section: We have ion chambers, various GM detectors, and a neutron detector. Most meters are calibrated by the University of Washington (UW). There has been no change in their procedures or capabilities since prior to the last (2008) IMPEP. Those that need repair or cannot be calibrated by UW are sent to the manufacturer. We have several meters out of calibration at any one time. Those meters are segregated from the calibrated ones and taken to UW as needed. We always have a sufficient number of calibrated meters to meet our needs.

Waste Section: Instruments in the Waste Management Section are sent directly to Ludlum for calibration. All instruments in use are currently in calibration. Instruments include Eberline R0-2's and Ludlum Models 3, 9, and 19. Backup meters are available.

Environmental laboratory support is provided through a contract arrangement with the state of Colorado Department of Public Health and Environment.

IV. <u>Technical Quality of Licensing Actions</u>

18. How many specific radioactive material licenses does your program regulate at this time?

Materials Section: 383 specific licenses.

Waste Section: The Waste Section currently has five licensees, and issues seven licenses. Two (LLRW and Mixed Waste) to Perma-Fix Northwest (PFNW) radioactive waste processor, one to US Ecology, Inc. (USE) for low-level radioactive waste disposal, one to Dawn Mining Company (DMC) (uranium millsite), one to Puglia Engineering (inactive mineral processor site), and two to General Chemical (inactive and active mineral processing facilities).

19. Please identify any major, unusual, or complex licenses which were issued, received a major amendment, were terminated, decommissioned, submitted a bankruptcy

notification or renewed in this period.

Materials Section: An ongoing major termination is Battelle Pacific Northwest Laboratories to US Department of Energy. In process – trouble with transfer because Battelle has transferred ownership of some small sources to USDOE but is still using them for private work. Since use and possession drives licensing, our Assistant Attorney General believes that Battelle still needs a Washington State license and does not advise terminating their license at this time. Major laboratory amendments or renewals include University of Washington, IsoRay, Fred Hutchinson Cancer Research Center, and Battelle Pacific Northwest Laboratories.

There was a license amendment for our only industrial broad, in which our Environmental Section assisted in verifying Boeing's release of 36 buildings or former areas for unrestricted use.

There was a renewal of our only medical Broad license, Swedish Medical Center.

While it is a first for us, and a large and extensive facility, we issued a license to the ProCure group for a proton-therapy license, but the actual radioactive materials portion is very small with little potential for exposure.

There were the usual terminations, but as far as we know there were no actual bankruptcies.

Waste Section: See Appendix 5, Waste.

20. Discuss any variances in licensing policies and procedures or exemptions from the regulations granted during the review period.

Materials Section: N/A.

Waste Section: See Appendix 6, Waste.

21. What, if any, changes were made in your written licensing procedures (new procedures, updates, policy memoranda, etc.) during the reporting period?

Materials Section: We routinely update our templates, not so much our procedures, to reflect current licensing policy, etc. We have removed all references to "Licensing State" from our licensing documents. We have instituted specific license conditions for various modalities which have appeared during the review period such as use of microspheres for therapy, GliaSite license conditions, etc. We have added language to our license applications to reflect three-year hazmat training requirements for transporting radioactive materials.

Waste Section: Waste Management Section Procedures have been rewritten and were effective September 2009.

22. Identify by licensee name and license number any renewal applications that have been pending for one year or more. Please indicate why these reviews have been delayed and describe your action plan to reduce the backlog.

Materials Section: There have been three renewals pending for more than one year.

- 1. The Boeing Company (1005) has been under timely renewal since February 28, 2006. The reason for the delay is due to new air emission rules, new decommissioning funding rules, and staff turnover in the industrial section. We currently have a renewal drafted.
- 2. The second licensee, Bradken Atlas (IR006), has been under timely renewal since June 30, 2011. No reason for delay. Renewal application has been assigned to staff. New license is expected in the next several months.
- 3. The third licensee, Oregon Washington Laboratories (IR070), has been under timely renewal since December 31, 2011. No reason for delay. Review has been assigned to staff to complete.

The plan for remedial action is an electronic tickler system alerting staff of pending renewal before one year.

Waste Section: Two licenses have been pending for renewal for a period greater than one year. Please see Appendix 7.

V. <u>Technical Quality of Incident and Allegation Activities</u>

23. For Agreement States, please provide a list of any reportable incidents not previously submitted to NRC (See Procedure SA-300, *Reporting Material Events*, for additional guidance, OMB clearance number 3150-0178). The list should be in the following format:

Materials Section: In 2009, there were two incidents involving loss of tritium exit signs that were not sent to NMED or reported to the HOO:

- There were five tritium exit signs Georgia Pacific could not account for (WA-09-017). They found disposal records for other tritium exit signs so it is possible these were disposed of properly and could not find disposal records. (This incident was reported to NMED in April 2013 after the questionnaire cut-off date.)
- 2. The second incident involved Wal-Mart losing a total of 513 tritium exit signs in Washington (Incident #WA-09-001). This incident was part of a larger nationwide Walmart incident that the NRC was investigating. The NRC reported the incident to the state of Washington. DOH chose not to report to NMED because DOH concurred with the NRC's investigation from December of 2008 to August of 2009. The NRC cited Wal-Mart for losing many tritium exit signs in the USA. Wal-Mart's corrective actions appeared adequate so no further Washington corrective actions were necessary.

Waste Section: All reportable incidents have been submitted to the NRC.

24. Identify any changes to your procedures for responding to incidents and allegations that occurred during the period of this review.

Materials Section: Office of Radiation Protection, Radioactive Materials Section has a new policy of asking scrapyards not to call us unless they measure greater than twice background with a hand held microR on incoming shipments that set off their truck/rail alarms. We have informed them that a special DOT permit is not necessary for shipments of this nature returning to public highways.

Waste Section: Waste Management Section procedures have been rewritten and were effective September 2009.

C. NON-COMMON PERFORMANCE INDICATORS

I. <u>Compatibility Requirements</u>

25. Please list all currently effective legislation that affects the radiation control program. Denote any legislation that was enacted or amended during the review period.

Legislation

In 2011, the Legislature gave the Department of Health (the department) the authority (under second engrossed substitute house bill 1087) to increase the radioactive waste site surveillance fee to "meet the actual costs of conducting business," which is consistent with the underlying statues. The department adopted the fee increase on August 1, 2012.

During the 2012 legislative session, the Legislature passed house bill 2304, chapter 19, laws of 2012, low-level radioactive waste site use permit program. The new law transfers authority for the low-level radioactive waste site use permit program from the Department of Ecology to the department. This allows the department to review permit applications and issue the site use permits. The department anticipates adopting these changes in July 2013.

Statutory Authority

<u>Chapter 70.98 RCW Nuclear Energy and Radiation</u> <u>Chapter 70.121 RCW Mill Tailings – Licensing and Perpetual care</u> <u>RCW 70.94 Washington Clean Air Act</u> <u>RCW 70.98 was revised in 2012 to transfer the radioactive waste site use permit</u> <u>program from the Department of Ecology to the Department of Health.</u>

Washington Administrative Code

- <u>246-220</u> Radiation protection General provisions.
- <u>246-221</u> Radiation protection standards.
- <u>246-222</u> Radiation protection Worker rights.
- 246-229 Radiation protection Particle accelerators.
- <u>246-231</u> Packaging and transportation of radioactive material.
- <u>246-232</u> Radioactive material Licensing applicability.
- 246-233 Radioactive materials General licenses.
- 246-235 Radioactive materials Specific licenses.
- <u>246-239</u> Radiation protection for subsequent use.

- <u>246-240</u> Radiation protection Medical use of radioactive material.
- <u>246-243</u> Radiation protection Industrial radiography.
- 246-244 Radiation protection Wireline services.
- 246-246 Radioactive criteria for license termination.
- 246-247 Radiation protection Air emissions.
- <u>246-249</u> Radioactive waste Use of the commercial disposal site.
- 246-250 Radioactive waste Licensing land disposal.
- 246-252 Radiation protection Uranium and/or thorium milling.
- 246-254 Radiation protection Fees.
- 26. Are your regulations subject to a "Sunset" or equivalent law? If so, explain and include the next expiration date for your regulations.

No, our state radiation regulations are not subject to "Sunset" or equivalent laws.

27. Please review and verify that the information in the enclosed State Regulation Status (SRS) sheet is correct. For those regulations that have not been adopted by the State, explain why they were not adopted, and discuss actions being taken to adopt them. If legally binding requirements were used in lieu of regulations and they have not been reviewed by NRC for compatibility, please describe their use.

Materials Section: The State Regulation Status sheet is correct. Delay in adoption was partial due to a rules moratorium imposed by the Governor's Office. An exception to this state rules moratorium needed to maintain compatibility with federal rules was eventually issued. See additional status material in the answer to Question #28.

Waste Section: RATS 2007-3, Requirements for Expanded Definition of Byproduct Material, has been completed and adopted. The NRC issued a No Comment letter dated 9/5/12, ML12228A415.

28. If you have not adopted all amendments within three years from the date of NRC rule promulgation, briefly describe your State's procedures for amending regulations in order to maintain compatibility with the NRC, showing the normal length of time anticipated to complete each step.

Materials Section: The department is currently adopting five NRC rules.

Description	Comments
2009-1: Medical use of byproduct material – authorized user clarification, Part 35 (74 FR 33901) NRC Effective Date: 9/28/09 State Adoption Date: 9/28/12	 Anticipating filing CR102: March 2013 Public hearing: April 2013 Anticipate adopting: May 2013 Tentative effective date: June 2013
2001-1: Requirements for certain generally licensed industrial devices containing byproduct material (65 FR 79162) NRC Effective Date: 2/16/01 State Adoption Date: 1/25/15 2007-2: Exemptions from licensing, general licenses and distribution of byproduct material: licensing and reporting requirements 10 CFR Parts 30, 31, 32, 150 (72 FR 58473) NRC Effective Date: 12/17/07 State Adoption Date: 12/17/10 2012-1: Change of compatibility of 10 CFR 31.5 and 31.6 (See RATS ID: 2001-1 for rule text) (77 FR 3640) NRC Effective Date: 1/25/12 State Adoption Date: 1/25/15	 Anticipating filing CR102: June 2013 Public hearing: July 2013 Anticipate adopting: September 2013 Tentative effective date: October 2013
2008-1: Occupational dose records, labeling containers, and total effective dose equivalent – Parts 19 and 20 (72 FR 68043) NRC Effective Date: 2/15/08 State Adoption Date: 2/15/11	 Anticipating filing CR102: June 2013 Public hearing: July 2013 Anticipate adopting: September 2013 Tentative effective date: October 2013

Rulemaking is the process the department uses when it proposes to create, change, or delete rules in order to protect public health. The department must follow the procedural requirements set out in the Administrative Procedure Act, chapter 34.05 RCW when conducting rulemaking. It takes 6 to 12 months to adopt a federal rule change.

There are three major phases in the rulemaking process:

a) **Notification of intent to do rulemaking:** The department notifies stakeholders about the intent to adopt a new rule, amend, or repeal an existing rule through appropriate ListServs, postings on the department's websites, and by filing the appropriate forms with the Office of the Code Reviser.

- b) **Proposition of rule changes and opportunity to provide formal input**: The department provides stakeholders and interested parties the opportunity to submit formal comments on proposed rules before the department makes a final decision to adopt rules. An individual may provide comments either by attending the public hearing, submitting written comments using the department's online rules comment site, or by mailing or faxing the comments to the department by the specified deadline.
- c) **Adoption of final rule**: At the conclusion of the public comment period, the department must consider all formal comments received and must file the adopted rule language with the Office of the Code Reviser.

II. Sealed Source and Device (SS&D) Evaluation Program

29. Prepare a table listing new and amended (including transfers to inactive status) SS&D registrations of sources and devices issued during the review period. The table heading should be:

SS&D Registry Number	Manufacturer, Distributor, or Custom User	Product Type or Use	Date Issued	Type of Action
WA-1220-D-102-S	IsoRay	GliaSite® Radiation Therapy System	11-16-11	Low Dose Rate Brachytherapy
WA-1220-D-102-S, Amendment 1	IsoRay	GliaSite® Radiation Therapy System	2-15-12	Low Dose Rate Brachytherapy

Materials Section:

 Please include information on the following questions in Section A, as they apply to the SS&D Program:

Technical Staffing and Training - Questions 2-9 Technical Quality of Licensing Actions - Questions 18-22 Technical Quality of Incident and Allegation Activities - Questions 23-24

Materials Section: Answers applicable to the SS&D Program are incorporated within the sections listed above.

III. Low-level Radioactive Waste Disposal Program

31. Please include information on the following questions in Section A, as they apply to the Low-Level Radioactive Waste Disposal Program:

Technical Staffing and Training - Questions 2-9 Status of Materials Inspection Program - Questions 10-14 Technical Quality of Inspections - Questions 15-17 Technical Quality of Licensing Actions - Questions 18-22 Technical Quality of Incident and Allegation Activities - Questions 23-24

Waste Section: Answers applicable to the LLRW Program are incorporated within the sections listed above, and Appendices 2, 3, 4, 5, 6, , and 7.

IV. Uranium Recovery Program

32. Please include information on the following questions in Section A, as they apply to the Uranium Recovery Program:

Technical Staffing and Training - Questions 2-9 Status of Materials Inspection Program - Questions 10-14 Technical Quality of Inspections - Questions 15-17 Technical Quality of Licensing Actions - Questions 18-22 Technical Quality of Incident and Allegation Activities - Questions 23-24

Waste Section: Answers applicable to the Uranium Recovery Program are incorporated within the sections listed above, and Appendices 2, 3, 4, 5, and 7.

3. Please provide a staffing plan, or complete a listing using the suggested format below, of the professional (technical) full-time equivalents (FTE) applied to the radioactive materials program by individual. Include the name, position, and, for Agreement States, the fraction of time spent in the following areas: administration, materials licensing & compliance, emergency response, low-level radioactive waste, uranium recovery, other. If these regulatory responsibilities are divided between offices, the table should be consolidated to include all personnel contributing to the radioactive materials program. If consultants were used to carry out the program's radioactive materials responsibilities, include their efforts. The table heading should be:

NAME	POSITION	AREA OF EFFORT	FTE %
Craig Lawrence	RHP4*	Section Manager	1
Curt DeMaris	RHP3	Medical Program Manager	1
Billie Harvey	RHP2	Medical Inspector/General Licensing	1
Anine Grumbles	RHP3	Laboratory Program Manager	1
Jennifer Serne	RHP2	Laboratory/Medical Inspector	1
Steve Matthews	RHP3	Industrial Program Manager	1
Pamela Walsh	RHP2	Industrial Inspector/Reciprocity	1
Jeff Kulp	RHP2	Industrial Inspector	1
James Killingbeck	RHP2	Inspector	1
Victoria Dix	RHP2	Regulation Revisions/Inspector	1
Rhonda Long	RHP2	Inspector/Administrative Technical	1
		(temp)	double fill
Joy Redman	Admin.	Administrative	1
	Asst. 3		
Brandin Ketter	RA1**		

*(RHP) Radiation Health Physicist

**(RA1) Research Analyst 1

Question #3

3. Please provide a staffing plan, or complete a listing using the suggested format below, of the professional (technical) full-time equivalents (FTE) applied to the radioactive materials program by individual. Include the name, position, and, for Agreement States, the fraction of time spent in the following areas: administration, materials licensing & compliance, emergency response, low-level radioactive waste, uranium recovery, other. If these regulatory responsibilities are divided between offices, the table should be consolidated to include all personnel contributing to the radioactive materials program. If consultants were used to carry out the program's radioactive materials responsibilities, include their efforts. The table heading should be:

Name	Position	Area of Effort	FTE%

Waste Section's current staffing levels:

(Radwaste)

M. Elsen	HP4	Administration	50%
K. Schwab	HP3	Licensing/Compliance	55%
A. Thatcher	HP3	Performance Assess.	42%
G. Rosado	HP2	Licensing/Compliance	20%
J. Riley	Geochem.	Geohydrology	20%
S. Pachernegg	Engineer	Engineering	20%
D. Stoffel	Geohydr.	Lic/Comp/Closure	3%
Vacant	HP-3	Licensing/Compliance	45%

(Uranium Mills)

M. Elsen	HP4	Administration	22%
K. Schwab	HP3	Compliance	5%
A. Thatcher	HP3	Performance Assess.	25%
G. Rosado	HP2	Licensing/Compliance	20%
J. Riley	Geochem.	Closure	52%
S. Pachernegg	Engineer	Engineering	60%
D. Stoffel	Geohydr.	Lic/Comp/Closure	97%
Vacant	HP-3	Licensing/Compliance	5%

(Radioactive Waste Processor)

M. Elsen	HP4	Administration	23%
K. Schwab	HP3	Licensing/Compliance	30%
A. Thatcher	HP3	Performance Assess.	23%
G. Rosado	HP2	Licensing/Compliance	50%
J. Riley	Geochem.	Geohydrology/Comp.	8%
S. Pachernegg	Engineer	Engineering/ Comp.	16%
Vacant	HP-3	Licensing/Compliance	25%

(Mineral Processors)

M. Elsen	HP4	Administration	5%
K. Schwab	HP3	Licensing/Compliance	10%
A. Thatcher	HP3	Performance Assess.	10%
G. Rosado	HP2	Licensing/Compliance	10%
J. Riley	Geochem.	Licensing/Compliance	20%
S. Pachernegg	Engineer	Engineering	4%
Vacant	HP-3	Licensing/Compliance	25%

QUESTION 11

11. Please provide the number of routine inspections of Priority 1, 2, and 3 licensees, as defined in IMC 2800 and the number of initial inspections that were completed during each year of the review period.

For the Waste Section, the following inspections have been conducted since April 2008:

<u>US Ecology (USE) LLRW Disposal Facility License # WN-I019-2 (includes</u> Routine on-site inspector monthly inspections)

- 2008 3 routine; 12 monthly
- 2009 4 routine; 12 monthly
- 2010 4 routine; 12 monthly
- 2011 5 routine; 12 monthly
- 2012 3 routine; 12 monthly
- 2013 2 monthly

Dawn Mining Company (DMC) License # WN-I043-2 (includes routine health physics and field inspections)

- 2008 1 routine, and 6 Engineering field inspections
- 2009 1 routine, and 9 Engineering field inspections
- 2010 1 routine, and 1 Engineering field inspection
- 2011 1 routine, and 1 Engineering field inspection
- 2012 1 routine, and 2 Engineering field inspections
- 2013 –

Perma-Fix Northwest (PFNW) License # WN-I0393-1 and WN-I0508-1 (includes routine surveillances)

- 2008 7 routine; 12 monthly
- 2009 6 routine; 12 monthly
- 2010 6 routine; 12 monthly
- 2011 6 routine; 12 monthly
- 2012 3 routine; 12 monthly
- 2013 2 monthly

Inspector	Accompanied by	Place	License #	Date	Туре
DeMaris	Scroggs	Pat Murphie IR	I=Industrial	12/01/08	Supervisor
DeMaris	Grumbles	UW Med	L=Lab	12/01/09	Peer
DeMaris	Matthews	Swedish Broad	M=Medical	01/01/10	Peer
DeMaris	Scroggs	Tacoma Rad Oncology	M0154	11/13/09	Supervisor
Demaris, Serne, Harvey	Grumbles	University of Washington	C001	12-14 Sept. 2011	Peer
Dix	DeMaris	Statewide	I=Industrial IC	08/01/10	Supervisor
Dix	Scroggs	Evergreen Hospital	M0116	12/01/09	Supervisor
Dix	Scroggs	Dr. Gottlieb	M0288	12/31/08; 01/13/09	Supervisor
Dix	Matthews, Harvey, Serne	Cardinal Health	NP005	03/23/10	Supervisor
Dix	Grumbles	Washington State University	C003	10/08/08	Supervisor
Dix	Grumbles	Pacific Lutheran University	C011-Special Nucl	03/17/11	Supervisor
Dix	Grumbles	Tacoma Pierce County Blood Bank	L0141	07/13/11	Supervisor
Grumbles	Scroggs	Seattle University	C026	11/05/08	Supervisor
Grumbles	McBaugh	Radiological Emergency Preparedness	L0236	12/02/10	Supervisor
Harvey	Serne	Comprehensive Clinical Develop	M0272	11/20/12	Peer
Harvey	DeMaris	Friday Harbor	M-Medical	09/15/12	Supervisor
Harvey	Matthews	Mistras Group Inc.	IR011	05/30/12	Supervisor
Harvey	Lawrence	Engineering and Testing Innovations	IR072	01/26/10	Supervisor
Harvey	Serne, Grumbles	Fred Hutchinson Cancer Research Center	L042	05/25/11	Supervisor
Harvey	DeMaris	UW Valley Medical Center	M0106	01/11/11	Supervisor
Harvey	DeMaris	Tacoma/Valley Rad Oncology	M0154	02/17/11	Supervisor
Harvey	Serne	UW Harborview Gamma Knife	M0219	08/02/12	Peer
Harvey	Scroggs	Tacoma Rad Assoc	M0236	12/03/09	Supervisor
Harvey	DeMaris	Seattle ProCure Management	M0312	06/26/12	Supervisor

Inspector	Accompanied by	Place	License #	Date	Туре
Harvey	Serne, DeMaris	Cardinal Health-Fife	NP005	02/28/11	Supervisor
Harvey	Grumbles	Acium	L0221	11/19/09	Supervisor
Harvey	Grumbles	Fred Hutchinson Cancer Research Center	L042	23-25 May 2011	Supervisor
Harvey, Long	Serne	Cardinal Health	NP011	08/16/12	Peer/Training
Harvey, Long, Kulp	Serne	Cardinal Health	NP010	08/16/12	Peer/Training
Killingbeck	Scroggs	Emerald Kalama	10405	07/01/09	Supervisor
Killingbeck	Scroggs	Steelscape	10489	11/08/09	Supervisor
Killingbeck	Scroggs	Amen Clinic NW	M0249	10/27/08	Supervisor
Killingbeck	Scroggs	Doctor's Clinic	M0254	11/09/13	Supervisor
Killingbeck	Matthews	Ash Grove Cement	10374	10/11/12	Supervisor
Killingbeck	Grumbles	AMRI	L0211	11/17/09	Supervisor
Killingbeck	Grumbles	Brooks Rand Laboratory	L0240	10/24/12	Supervisor
Kulp	DeMaris	Mason General	M0214	01/01/13	Supervisor
Lawrence	Scroggs	NW Tech Services	10570	10/20/08	Supervisor
Long	Grumbles	Dendreon	L0187	10/23/12	Lab Insp. Sign Off
Matthews	Scroggs	W. WA PET/CT	M=Medical	11/12/09	Supervisor
Matthews	DeMaris	Swedish Medical Center	M008	01/29/10	Peer
Serne	Grumbles	Childrens Hospital	M098	12/01/09	Supervisor
Serne	Grumbles	Legacy Health System	M0267	06/11/09	Supervisor
Serne	Lawrence	Anvil	IR031	03/30/10	Supervisor
Serne	Lawrence	Northwest Inspection	IR065	10/20/19	Supervisor
Serne	Lawrence	University of WA	C001	09/13/11	Supervisor
Serne	Walsh	Western Washington University	C007	10/17/12	Peer
Serne	DeMaris	Corwin Health Physics	10521	01/24/13	Supervisor

Inspector	Accompanied by	Place	License #	Date	Туре
Serne	Scroggs	Cardiology Associates	M0215	12/15/09	Supervisor
Serne	Walsh	Family Care Network	M0270	10/18/12	Peer
Serne	Walsh	Bellingham Urology Specialists	M0301	10/16/12	Peer
Serne	Matthews	Procure	M0312	01/04/13	Supervisor
Serne	Harvey	Crane Electronics	10592	05/19/11	Peer
Serne	Killingbeck	Immunex	L0102	07/21/08	Peer
Serne	Scroggs	Cats Exclusive	L0158	12/10/08	Supervisor
Serne	Harvey	Theraclone	L0229	02/04/10	Peer
Serne	Lawrence	Lourdes Medical Center	M0147	10/22/12	Supervisor
Serne	Harvey	Charles River	M0272	08/29/10	Peer
Serne	Harvey	Virginia Mason	M048	09/01/09	Peer
Serne	Grumbles	Overlake Medical Center	M065	09/28/09	Supervisor
Serne	Matthews	International Inspection	R1157	05/29/12	Supervisor
Serne	DeMaris	Alpha Omega Services	Recip-002	05/19/10	Supervisor
Serne	Harvey	Alpha Omega Services	Recip-002	05/15/10	Peer
Serne	Matthews	International Inspection	IR066	05/29/12	Supervisor
Serne	Grumbles	IsoRay	L0213	11/24/08	Supervisor
Serne	Matthews	WA Public Health Lab	L074	01/03/13	Supervisor
Serne	Grumbles	Amgen (Immunix)	L0102	03/24/11	Supervisor
Serne	Grumbles	Cardinal Health Seattle (NP003)	NP003	03/03/11	Supervisor
Walsh	Scroggs	Adapt	I=Industrial	10/08/08	Supervisor
Walsh	Harvey	Materials Testing & Consulting	10175	09/13/10	Peer
Walsh	Matthews	AAR Testing Labs	10353	02/21/12	Supervisor
Walsh	Lawrence	Clark Regional Wastewater	10376	01/26/11	Supervisor

Inspector	Accompanied by	Place	License #	Date	Туре
Walsh	Serne	Merit Engineering	10474	10/18/12	Peer
Walsh	Matthews	Granite Construction	10591	03/27/12	Supervisor
Walsh	Matthews	Earth Engineers	10593	07/27/11	Supervisor
Walsh	Matthews	IRZ Consulting	10596	06/15/11	Supervisor
Walsh	Matthews	OWL	IR070	11/20/12	Supervisor
Walsh	Scroggs	City of Bellevue	L060	10/28/09	Supervisor
Walsh	Harvey	Pierce Co. Public Works	L075	11/27/12	Peer
Walsh	Matthews	Olympic Medical Center	M0150	10/05/11	Supervisor
Walsh	DeMaris	NW Hospital Gamma Knife	M0201	12/10/08	Supervisor
Walsh	Killingbeck	UW Harborview Gamma Knife	M0219	11/19/09	Peer
Walsh	Harvey	Rainland Farm	M0285	08/29/11	Peer
Walsh	Serne	Geotest Services	10425	10/16/12	Peer

QUESTION 16

16. Prepare a table showing the number and types of supervisory accompaniments made during the review period. Include:

Inspector	<u>Supervisor</u>	License Category	<u>Date</u>			
<u>2008</u>						
Schwab Stoffel Murphy	Elsen Elsen Elsen	LLRW U-Mill Waste Processor	10/08 10/08 09/08			
<u>2009</u>						
Schwab Stoffel Murphy	Elsen Elsen Elsen	LLRW U-Mill Waste Processor	09/09 10/09 11/09			
<u>2010</u>						
Schwab Stoffel Murphy	Elsen Elsen Elsen	LLRW U-Mill Waste Processor	10/10 10/10 10/10			
<u>2011</u>						
Schwab Stoffel Murphy	Elsen Elsen Elsen	LLRW U-Mill Waste Processor	10/11 11/11 10/11			
<u>2012</u>						
Schwab Stoffel Murphy	Elsen Elsen Elsen	Waste Processor U-Mill LLRW	11/12 11/12 11/12			
Two peer accompaniments also performed this year						
Murphy Schwab	Schwab Murphy	LLRW Waste Processor	8/12 9/12			

QUESTION 19

19. Please identify any major, unusual, or complex licenses which were issued, received a major amendment, were terminated, decommissioned, submitted a bankruptcy notification or renewed in this period.

US Ecology - Washington, Inc., WN-I019-2 (Waste Disposal Operator)

- Amendment 37 January 26, 2009 administrative amendment RE: nationally tracked sources.
- Amendment 38 July 28, 2009 license amendment authorize updated Facility Standards Manual, and change in facility layout.
- Amendment 39 August 31, 2010 license amendment updated Facility Standards Manual, and new corporate structure.
- Placed in Timely Renewal January 24, 2011.

Dawn Mining Company, WN-I043-2 (Uranium Mill)

- Amendment 25 April 15, 2009 license amendment sludge disposal.
- Amendment 26 August 16, 2011 license amendment sludge disposal.
- Placed in Timely Renewal January 26, 2012.

Dawn Mining Company, WN-I0390-1 (Water Treatment Plant)

• License Terminated - December 31, 2008 - CERCLA facility transferred to EPA.

Perma-Fix Northwest, WN-I0393-1 (Low-level radioactive waste processor/broker)

- Amendment 29 July 17, 2008 license amendment updating authorized users.
- Timely Renewal letter September 12, 2008.
- Amendment 30 October 28, 2009 license amendment updating authorized users.
- Amendment 31 January 26, 2009 administrative amendment RE: nationally tracked sources.
- Amendment 32 February 9, 2009 license amendment adding check sources.
- Amendment 33 January 26, 2010 license amendment updating authorized users, and Operating Manual change.
- Amendment 34 April 27, 2010 license amendment authorizing Philotechnics waste storage/possession limits.
- Amendment 35 October 14, 2010 license amendment updating authorized users, change in storage location, add receipt by rail, removal of a guard shack.
- Amendment 36 March 21, 2011 license amendment in its entirety. Update authorized users.
- Amendment 37 July 21, 2011 license amendment increasing possession quantity for atomic numbers 84-103, except Special Nuclear Material and Source Material.
- Amendment 38 June 18, 2012 license renewal.

Perma-Fix Northwest, WN-I0508-1 (Mixed waste processor/broker)

• Amendment 26 - July 17, 2008 - license amendment updating authorized users.

- Timely Renewal letter August 28, 2008.
- Amendment 27 October 28, 2008 license amendment updating authorized users.
- Amendment 28 January 26, 2009 administrative amendment RE: nationally tracked sources.
- Amendment 29 July 28, 2009 license amendment revising Operating Manual.
- Amendment 30 March 23, 2010 license amendment authorizing increase in possession limit and update authorized users.
- Amendment 31 October 14, 2010 license amendment updating authorized users, and add receipt by rail.
- Amendment 32 December 2, 2010 license amendment authorizing increase in possession limit and updating authorized users.
- Amendment 33 February 8, 2011 license amendment in its entirety. Updating authorized users, increasing possession quantity for atomic numbers 84-103, except Special Nuclear Material and Source Material.
- Amendment 34 June 20, 2012 license renewal.

1410 Thorne Road LLC, WN-I0604-1 (Former Mineral Processing facility - bauxite)

• April 23, 2012 - New license issued for possession only of radioactive material generated by past operations at that location.

<u>General Chemical Hedges Facility, WN-I0602-1 (Former Mineral Processing facility -</u> <u>Bauxite)</u>

• April 23, 2012 - New license issued for possession only of radioactive material generated by past operations at that location.

QUESTION 20

20. Discuss any variances in licensing policies and procedures or exemptions from the regulations granted during the review period.

WASTE SECTION: US ECOLOGY LICENSE VARIANCES REQUESTED 2008-2013

ACTION #	DATE	COMPANY	SUBJECT	APPROVED	
	REC D			(tes or No)	
			2008		
		Only iss	sued Specific Approvals - no variances		
			2009		
V-3-09	2/9/09	PFNW	Five boxes of ash, not solidified	Y	
V-6-09	3/24/09	PFNW	Twenty boxes of ash not solidified	Y	
V-11-09	9/16/09	Energy Northwest	Ship Class A valves unpackaged and with > 15% void space	Y	
V-13-09	10/12/09	US Ecology	Trench 19 Design	Y	
			2010		
V-8-10	10/13/10	PFNW	Reduce cure time for Class C transuranics	Ν	
	2011				
V-4-11	2/28/11	US Ecology	Container inspections	Y	
V-12-11	12/1/11	Westinghouse	Twenty packages Class A with > 15% void- hoses	Y	
2012					
V-1-12	1/11/12	US Ecology	Temporary removal of trench corner posts	Y	

WASTE SECTION: PERMA-FIX NORTHWEST MW and LLW LICENSE VARIANCES REQUESTED 2008-2013

ACTION	DATE	COMPANY	SUBJECT	APPROVED			
	REC'D			(Yes or No)			
	2008						
PV-08-02	2-18-08,	Perma-Fix	DU from Hanford,	No- 3-13-08 Yes, 4-9-08			
	4-1-08						
PV-08-03	5/19/2008	Perma-Fix/Fluor	Receipt by rail, 3 cars of various solid waste.	6/30/2008			
PV-08-04	5/19/2008	Perma-Fix/Fluor	Receipt by rail, 3 cars of various solid waste.	6/30/2008			
PV-08-05	7-24-08,	Perma fix/DuPont	Increase Am on LL side, LLR06-059 sources,	Yes, 2-1-09			
	8-6-08	and Philo	process by 9-30-08.				
PV-08-06		PFNW	Legacy until March 1, 2009.	No, but approval to receive was			
				granted.			
PV-08-07	8/12/2008	LLNL, PNNL, MW	84-103 to 3.6 Ci, mainly filters from Lawrence	11-4-08 (delayed due to supplemental			
			Livermore and glove boxes from PNNL.	vent approval.)			
			Updated to 6.5 Ci.				
	1		2009				
PV-09-01	1/16/2009	DuPont, PFNW	Extend the PV-08-05 until 5-1-09	Yes, May 1, 2009			
PV-09-02	3/24/2009	DOE, PFNW	Railroad receipt of material	Yes, July 31, 2009 or when shipment			
				is received.			
PV-09-03	4/25/2009	DuPont, PFNW	Extend the PV-08-05 for another 3 months.	Yes, Until August 1, 2009			
PV-09-04	6/5/2009	PFNW, PNNL	Extend PV-08-07, 6.5 Ci until 3-31-2010.	Yes, March 31 2010			
PV-09-05		PFNW	Heel jet pump	Denied, > IC quantity			
PV-09-06	7/7/2009	DuPont, PFNW	Extend PV-08-05 until 9-30-2009, sources	Yes, 10-1-09			
			only, stand alone.				
PV-09-07	7/7/2009	DuPont, PFNW	Extend PV-08-05 until 9-30-2009,	Yes 10-1-09			
			DAW only, stand alone.				
PV-09-08	9/1/2009	PFNW	Heel jet pump, 84-103 isotopes >100mCi	Yes, 6 months			
PV-09-09	9/29/2009	PFNW, DuPont	Extend PV-09-06	Yes, 6 months			
PV-09-10	9/29/2009	PFNW, DuPont	Extend PV-09-07	Yes, 6 months			
PV-09-02	3/24/2009	DOE, PFNW	Railroad receipt of material	Yes, July 31, 2009 or when shipment			
				is received.			
PV-09-03	4/25/2009	DuPont, PFNW	Extend the PV-08-05 for another 3 months.	Yes, Until August 1, 2009			
PV-09-04	6/5/2009	PFNW, PNNL	Extend PV-08-07, 6.5 Ci until 3-31-2010.	Yes, March 31 2010			

PV-09-05		PFNW	Heel jet pump	Denied, > IC quantity
PV-09-06	7/7/2009	DuPont, PFNW	Extend PV-08-05 until 9-30-2009, sources	Yes, 10-1-09
			only, stand alone.	
PV-09-07	7/7/2009	DuPont, PFNW	Extend PV-08-05 until 9-30-2009, DAW only,	Yes 10-1-09
			stand alone.	
PV-09-08	9/1/2009	PFNW	Heel jet pump, 84-103 isotopes >100mCi	Yes, 6 months
PV-09-09	9/29/2009	PFNW, DuPont	Extend PV-09-06	Yes, 6 months
PV-09-10	9/29/2009	PFNW, DuPont	Extend PV-09-07	Yes, 6 months
			2010	
PV-10-01		PFNW, AECL	Store large container from AECL outside of	Yes, July 31
			the bermed area.	
PV-10-02	2/8/2010	PFNW, DuPont	sources, extends PV-09-09	Yes 10-1-2010
PV-10-03	2/15/2010	PFNW, Dupont	DAW, extends PV-09-10	Yes 10-1-2010
PV-10-04	4/29/2010	PFNW (wn-10508),	Salt well screen, activity greater than license	No, IC requirements not met
		DOE	limits	
PV-10-05	8/13/2010	PFNW (10508) DOE	Salt well screen, activity greater than license	Yes 2-1-2011
			limits.	
			2011	
PV-11-01	3/9/2011	ENW/PFNW	Condenser tubes, weight, storage, activity	yes
PV-11-02	9/10/2011	PFNW	USE of FRAC tank for liquid storage	Yes, until 1-1-12
			0040	
		DC1.04/	2012	1.00.10
PV-12-01	1/9/2012	PENW	Possess 4.2 mg of source material for 6	yes 1-26-12
			months.	
PV-12-02	4/25/2012	PFNW	USE of FRAC tank for liquid storage	Yes, until license issued.

QUESTION 22

22. Identify by licensee name and license number any renewal applications that have been pending for one year or more. Please indicate why these reviews have been delayed and describe your action plan to reduce the backlog.

US Ecology – Washington, WN-I019-2

The US Ecology license has been in Timely Renewal since January 24, 2011. The US Ecology site is an active low-level radioactive waste disposal facility, receiving approximately 20,000 cubic feet of waste annually. The department maintained a designated onsite inspector for the US Ecology site until mid-January 2013, and currently maintains a monthly presence at the site. The review of the license renewal application was thorough and entailed the review of all low-level radioactive waste site governing licensing documents, regulatory guidance documents, and regulations, as well as a complete review of all of the licensee's governing documents and operating procedures. The department has completed its review and the license is in the final stages of comment resolution. Once all comments have been resolved, there will be a public process as required by the state environmental policy Act (SEPA). We anticipate that the license renewal process will be complete by summer 2013.

Dawn Mining Company, WN-1043-2

Dawn Mining Company's license has been in Timely Renewal since January 2012. DMC's uranium mill was decommissioned and buried in 2003. The only activities that remain at the millsite are related to surface reclamation and ground water analyses. The primary goal of this license renewal is to establish milestones to ensure timely reclamation and construction of the final radon barrier. The department is in the final review stage of engineering and hydrogeologic reviews that will be the basis for establishing realistic milestones to keep the company moving forward with timely reclamation and closure. Once the engineering and hydrogeologic reviews are completed, there will be a public participation process as required by uranium mill regulations. We anticipate that the license renewal process will be completed by August 2013.