

Erickson, Randy

From: Cox, Lee <lee.cox@dhhs.nc.gov>
Sent: Wednesday, February 12, 2014 1:38 PM
To: Erickson, Randy
Cc: Crowe, Randy; Albright, James; Crowe, Randy; White, Duncan; Ford, Monica; Christian, Patsy
Subject: Completed Questionnaire
Attachments: 2014 North Carolina IMPEP Questionnaire Answers (2-7-14).docx

Randy,

Under another major ice/snow storm. Wanted to get this to you in now in case I can't get back to the office this week. Probably several emails to accommodate the attachments. Have a good one. Call me with any questions. Cell 919-413-2506

We will have all accompanying and verifying documents ready for your team's review.

W. Lee Cox, III

N.C. Department of Health and Human Services

Chief, Radiation Protection Section - Division of Health Service Regulation

3825 Barrett Drive, Raleigh, NC 27609

Phone: 919-571-4141 ext. 201

Fax: 919-571-4148

lee.cox@dhhs.nc.gov

www.ncdhhs.gov/dhsr/

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BLVD
ARLINGTON, TEXAS 76011-4511

January 9, 2014

Lee W. Cox, Chief
Radiation Protection Section
Division of Health Service Regulation
North Carolina Department of Health and
Human Services
3825 Barrett Drive
Raleigh, North Carolina 27609-7221

Dear Sir:

The U.S. Nuclear Regulatory Commission (NRC) uses the Integrated Materials Performance Evaluation Program (IMPEP) for the evaluation of Agreement State Programs. Per my previous communications with you, James Albright and Sharn Jeffries, I will be the team leader for the IMPEP review of the North Carolina Agreement State Program scheduled for March 3-7, 2014.

In addition to me, the team will include Monica Ford, NRC Region I State Agreements Officer; Tara Weidner also from NRC's Region I office, Binesh Tharakan from NRC's Region IV office; and, Mike Stephens from the State of Florida.

Enclosed is the document, "Integrated Materials Performance Evaluation Program Questionnaire." The questionnaire and State Regulation Status sheet was previously furnished to you electronically on November 20, 2013. I ask that each program manager send your responses via e-mail to Randy.Erickson@nrc.gov by February 14, 2014. I am sending the document in advance of the IMPEP review in order to provide time for you to allocate the staff resources necessary to complete the document by the requested date.

Also included with the questionnaire is the document "Materials Requested to Be Available for the On-Site Portion of an IMPEP Review." To help facilitate our review, please have the items listed prepared prior to the IMPEP team's arrival. Also included with the questionnaire are the State Regulation Status sheets for the State of North Carolina.

I also request that you set up an appointment with the appropriate State Senior Management Official(s) to discuss the results of the IMPEP review of the North Carolina Agreement State Program on March 7, 2014.

If you have any questions, please call me at 817-200-1143.

Sincerely,

Randy Erickson
State Agreements Officer

Enclosure: As stated

cc w/encl:

Sharn Jeffries
Radioactive Materials Inspection Coordinator
Radiation Protection Section
Division of Health Service Regulation
North Carolina Department of Health and
Human Services
3825 Barrett Drive
Raleigh, North Carolina 27609-7221

James Albright, Manager
Radioactive Materials Branch
Radiation Protection Section
Division of Health Service Regulation
North Carolina Department of Health and
Human Services
3825 Barrett Drive
Raleigh, North Carolina 27609-7221

Internal distribution via e-mail:

- James Clifford, DNMS
- Daniel Collins, DNMS
- Laura Dudes, FSME
- Pamela Henderson, FSME
- Duncan White, FSME
- Lisa Dimmick, FSME
- Monica Ford, SAO
- Randy Erickson, SAO
- Binesh Tharakan, SAO
- Tara Weidner, DNMS
- Michelle Beardsley, FSME
- Karen Meyer, FSME

Mike Stephens, State of Florida
 (Mike_Stephens@doh.state.fl.us)

ML

S:\DNMS\SAO\IMPEPS\2014\North Carolina\2014 North Carolina IMPEP Questionnaire.doc

ADAMS	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> SUNSI Rev Complete	Reviewer Initials.	RRE
Publicly Avail	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Non Sensitive		
RIV:RSAO				
RRErickson				
1/9/14				

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INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM
QUESTIONNAIRE

North Carolina

Reporting Period: February 28, 2009 to March 7, 2014

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.

- (1) It is recommended that the State strengthen its incident response process to ensure that incidents that are reportable to the NRC are reported as required by FSME Procedure SA-300; and,

Radiation Protection Section (RPS) modified its incident response to require all incidents be evaluated against the USNRC reporting requirements and against the reporting requirements in various sections of the North Carolina Regulations for Protection Against Radiation (15A NCAC Chapter 11). The individual designated as the NMED Manager is now ultimately responsible for this reporting evaluation. Chris Fidalgo, Health Physicist, currently holds this title and responsibility.

- (2) It is recommended that the State make appropriate regulatory changes to maintain compatibility with the NRC and to resolve the NRC-generated comments made in 2006 and 2008 on draft rules promulgated by the agency as noted in Section 4.1.2 of the report.

RPS has attacked this on several fronts. The first focus was to make the process as streamlined as possible in a very challenging rule promulgation environment. RPS strived to eliminate having to go back and forth with changes from the USNRC, the NC Radiation Protection Commission and the NC Rules Review Commission. Once the draft rules are developed and have been approved by the Radiation Protection Commission, copies will be sent to the USNRC for review and comment. USNRC comments on the draft rules will be resolved by the agency and the Radiation Protection Commission prior to submitting the draft rules as proposed rules to the NC Rules Review Commission. The Section will work with the

¹ This information request has previously been approved by OMB 3150-0183 and was resubmitted to OMB for review of continued approval of information collection. 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.

Radiation Protection Commission, and the USNRC to resolve any issues identified by the NC Rules Review Commission.

The second focus was to have dedicated staff focused on drafting rules and coordinating the rule writing effort.

Since then RATS-IDs 2006-1 through 2009-1 were promulgated on October 1 2013, the changes included those commented in the letter from the NRC dated October 13, 2011. Comments were addressed for both letters indicated in the recommendation.

Currently James Albright has been assigned as the rules coordinator and RPS has also contracted with Diana Sulas Thompson to help in this effort in James' absence.

B. COMMON PERFORMANCE INDICATORS

I. Technical Staffing and Training

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;
See Attachment A

(b) A chart showing positions of the radiation control program, including management; and
See Attachment B

(c) Equivalent charts for sealed source and device evaluation, low-level radioactive waste and uranium recovery programs, if applicable. Sharn Jeffries, HP and Randy Crowe, HP are currently our only trained SS&D reviewers. We also have a recurring contract with Dr. Murty, NCSU PE for engineering reviews for devices.

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 headings should be:

<u>Name</u>	<u>Position</u>	<u>Area of Effort</u>	<u>FTE%</u>
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See Attachment C

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.

Chris Fidalgo : Converted to Health Physicist via Environmental Specialist
Hire Date: June 29, 1992; transfer to RAM Branch July 1, 2011
Degrees: BS degree in Physics
Years of Experience in Health Physics: 20
Additional Training: NC RPS Environmental Radiation Specialist
Training Since Being Hired: Completed 90% of required license writing OJT
Completion of 30% 3 of 5 courses T-001-R Health Physicist Training
See Training Classes Attachment for all Classes Attended by All HPs.
(See Attachment D)

Patrick Cox : Converted to Health Physicist via Environmental Specialist
Hire Date: June 29, 1992; transfer to RAM Branch July 1, 2011
Degrees: BS degree in ES
Years of Experience in Health Physics: 7
Additional Training: NC RPS Environmental Radiation Specialist
Training Since Being Hired: Environmental Training only

Henry Barnes: Hired as a Health Physicist – No Longer Employed (NLE)
Hire Date: 11-24-08
Degrees: BS in Computer Information Systems; BS in Business Administration
Years of Experience in Health Physics: 16 years of Power Plant Health Physics
Additional Training: Health Physics training as a power plant Health Physicist
Training Since Being Hired: Completed 100% of required license writing OJT;
NRC sponsored courses and 100% of Inspection requirements T-001-R Health
Physicist Training
Program which consists of approx. 2 years of training

Paul Huggins: Hired as a Health Physicist – NLE
Hire Date: 5/01/2010
Degrees: BS in Environmental Health MS Transportation of Radiological
Materials
Years of Experience in Health Physics: 7 years of Emergency Response RAM for
SC-RPS
Additional Training: None
Training Since Being Hired: Completed 100% of required license writing OJT;
NRC sponsored courses and 20% of Inspection requirements T-001-R Health
Physicist Training
Program which consists of approx. 2 years of training.

Sheila Nelson: Hired as a Health Physicist
Hire Date: 05/13/2010
Degrees: BS in Environmental Health AS Nuclear Medicine Technology
Years of Experience in Health Physics: 4 years NM and 18 years of
Environmental Safety
Additional Training: None
Training Since Being Hired: Completed 20% of required license writing OJT;
NRC sponsored courses and 100% of Inspection requirements T-001-R Health
Physicist Training
Program which consists of approx. 2 years of training.

Diana Sulas-Thompson: Hired as a Health Physicist – NLE
Hire Date: 7/11/11
Degrees: BS in Physics
Years of Experience in Health Physics: 4 years; 2 years Wisconsin –RPS and 2
years Auburn University Environmental Safety
Additional Training: None
Training Since Being Hired: Completed 100% of required license writing OJT;

NRC sponsored courses and 40% of Inspection requirements T-001-R Health Physicist Training Program which consists of approx. 2 years of training.

Louis Brayboy: Hired as a Health Physicist

Hire Date: 03/01/2013

Degrees: BS Environmental Health MBA

Years of Experience in Health Physics: 7 years of NCSU State Employee Health Physicist Environmental Safety Program

Additional Training: None

Training Since Being Hired: Completed 70% of required license writing OJT; NRC sponsored courses and 5% of Inspection requirements T-001-R Health Physicist Training

Program which consists of approx. 2 years of training.

Ryan Kapler: Hired as a Health Physicist

Hire Date: 02/15/2013

Degrees: BS Physics/Math MS Astrophysics

Years of Experience in Health Physics: 4 years of DOE;

Training Since Being Hired: Completed 70% of required license writing OJT;

NRC sponsored courses and 5% of Inspection requirements T-001-R Health Physicist Training

Program which consists of approx. 2 years of training.

Mike Lunsford: Hired as a Environmental Specialist/Transferred as a Health Physicist -NLE

Hire Date:09-13

Degrees: BS Env. Science

Years of Experience in Health Physics: 7

Additional Training: None

Training Since Being Hired: Began T-001-R Health Physicist Training

Program which consists of approx. 2 years of training.

5. Please list all professional staff 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.

Included are those that are still employed and those that left since the last IMPEP

Henry Barnes: – License Writer NLE

Henry completed many of the NRC Core courses – see attached courses: Attachment D OJT -100% Completion May 2010

Paul Huggins: – License Writer NLE

Paul completed many of the NRC Core courses – see attached courses: Attachment D OJT -100% for license writing 10% Inspector training. Transferred to contract position with USN prior to completion of Q&A panel

Diana Sulas-Thompson: – License Writer NLE

Diana completed many of the NRC Core courses – see attached courses: Attachment D OJT -100% Completion May 2013

Sheila Nelson - Inspector

Completed many of the NRC Core courses – see attached courses: Attachment D

Sheila has complete the required 50% of NRC Core courses. She completed the entire OJT program and passed the Q&A panel.

OJT -100% Completion May 2013

Chris Fidalgo –License Writer

Chris has completed S-201 Increased Controls; G-108 Fundamentals of Inspections and G109 Fundamentals of Licensing

Chris needs 3 more courses to complete the required 50% of NRC Core courses. He has been submitted for several courses but was only accepted for the three aforementioned courses. He has been resubmitted for FY2014 for the following H-313 Brachytherapy, H-304 Brachytherapy and H-312 Internal Dosimetry OJT -90%

Estimated Completion December 2014

Louis Brayboy – License Writer

Louis has completed H-308 Transportation of RAM

He needs 5 more courses to complete the required 50% of NRC Core courses. He has been submitted for several courses but was only accepted for the one aforementioned course. He has been resubmitted for FY2014 for the following G-108 Fundamentals of Inspections and G109 Fundamentals of Licensing and H-305 Industrial Radiography courses. OJT - 70%

Estimated Completion December 2015

Ryan Kapler – License Writer

Ryan has completed H-308 Transportation of RAM

He needs 5 more courses to complete the required 50% of NRC Core courses. He has been submitted for several courses but was only accepted for the one aforementioned course. He has been resubmitted for FY2014 for the following H-122 Fundamental Health Physics, G-108 Fundamentals of Inspections and G109 Fundamentals of Licensing courses. OJT – 70%

Estimated Completion December 2015

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

With the exception of the addition of our Licensing Tracking System training there were no changes to the qualification and training procedures.

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

Wendy Tingle: Inspector, License Writer; Exit Date: 6-2010

Gerald Speight: Inspector, License Writer; Exit Date: 07/01/2012

Henry Barnes: License Writer, Exit Date: 09/08/2012

Paul Huggins: License Writer, Exit Date: 04/18/2012

Diana Sulas Thompson: License Writer, Exit Date: 09/06/2013

Mike Lunsford: License Writer, Exit Date: 10/18/2013

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.

Environmental Program Consulting (previously held by Diana Sulas Thompson: RAM Draft Regulations, License Tracking System

Submitted freeze release and posting paperwork to HR November, 2013, Position posted and closes February 13, 2014. Will interview and submit recommendation for hire by March 1, 2014. It may take several months to get approval to hire.

Health Physicist (previously held by Michael Lunsford): To have been a license writer and inspector.

To submit freeze release and posting paperwork by mid-February , 2014.

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.

North Carolina does have an oversight board in the NC Radiation Protection Commission. The Commission is currently made up of 1 Chairman and 10 Voting Public Members. There are also 10 Ex Officio Members. There are several committees that report to the commission, of which the Radioactive Materials Committee recommends and reports for the 274b agreement. The committee is composed of licensees and other members of the public and government. Because of this, there is a need for an Ethics Statement and Evaluation of Statement of Economic Interest. The statement below is read by the Chairman prior to each meeting.

"Ethics Awareness and Conflict of Interest Reminder:

In accordance with the State Government Ethics Act, it is the duty of every [board] member to avoid both conflicts of interest and appearances of conflict.

Does any board member have any known conflict of interest or appearance of conflict with respect to any matters coming before the [board] today?

If so, please identify the conflict or appearance of conflict and refrain from undue participation in the particular matter involved. N.C.G.S. §138A-15(e); 138A-36(c)"

In addition, each member has been required to undergo formal, documented ethics training.

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.

RPS Inspections are conducted at the same frequency as the NRCs

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.

Routine Inspections, New License Deliveries, Initial Inspections Priorities 1, 2 & 3

	YearPeriod	Home Office	Delivery	Initial
1	3/1/09 – 2/28/10	100	3	2
2	3/1/10 – 2/28/11	113	4	4
3	3/1/11 – 2/28/12	102	2	2
4	3/1/12 – 2/28/13	106	2	1
5	3/1/13 – 2/28/14	124	0	2
	TOTAL	545	11	11

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:

- (1) Licensee Name
- (2) License Number
- (3) Priority (IMC 2800)
- (4) Last inspection date or license issuance date, if initial inspection
- (5) Date Due
- (6) Date Performed
- (7) Amount of Time Overdue
- (8) Date inspection findings issued

Overdue Inspections Data

Licensee	Lic #	Pr i	Last	NRC Due	Insp Date	Days over	Findings issued
Terracon Consultants	1064-1	1	11/22/11	2/20/13	2/21/13	1	3/31/09
Baker Testing Services, Inc	1441-1	1	8/8/11	11/6/12	2/18/13	104	2/25/13
Acuren Inspection Inc	1466-1	1	9/9/11	12/8/12	2/14/13	68	2/27/13
Moses Cone Regional Cancer Ctr	0021-3	2	1/29/09	7/31/11	3/1/12	214	4/26/13
High Point Regional Hospital	0119-2	2	11/9/10	5/10/13	11/21/13	195	11/21/13
Wake Med Raleigh Campus	0297-6	2	1/6/10	7/7/12	7/25/12	18	7/26/12
Cardinal Health	0794-10	2	11/12/09	5/13/12	6/19/12	37	8/7/12
Cardinal Health	0794-11	2	8/28/09	2/27/12	6/12/12	106	8/6/12
Cardinal Health	0794-5	2	11/10/08	5/12/11	5/27/11	15	6/20/11
Cardinal Health	0794-8	2	8/4/10	2/2/13	2/8/13	6	2/12/13
New Hanover Radiation Oncology	0860-1	2	9/2/07	3/3/10	7/10/12	25	8/20/12
New Hanover Regional Med Ctr	0232-1	3	9/10/08	6/10/12	8/24/12	75	9/18/12
Duke Health dba Cardiac Diagnostics	0582-3	3	7/16/09	4/15/13	8/13/13	120	8/13/12
Duke University Health Systems	0582-4	3	1/6/09	10/6/12	3/1/13	146	3/11/13
Hospital Corp NC dba Brunswick	0779-1	3	12/9/08	9/8/12	9/12/12	4	10/4/13
Dare Medical Technologies	1052-1	3	8/17/06	5/17/10	6/15/10	15	6/17/10
Eastern Carolina Medical Technologies	1052-2	3	3/11/08	12/10/11	5/23/13	530	6/11/13
Carolina Imaging Inc of Fayetteville	1113-1	3	8/6/08	5/6/12	8/8/12	94	5/31/13
Coastal Cardiology	1114-	3	12/19/	9/18/1	8/2/12	59	9/10/12

Associates	2		07	1			
Carolina East Physicians	1233-1	3	11/5/08	8/5/12	8/9/12	4	3/19/13
Carolina Heart Physicians	1263-1	3	12/3/08	9/2/12	9/17/12	15	10/14/13
Sanford Cardiology PLLC	1344-1	3	11/13/08	8/13/12	2/5/13	176	2/5/13
Water Remediation Technology	1406-1	3	9/16/09	6/16/13	10/29/13	135	10/29/13
Ibrahim N Oudeth, MD	1408-1	3	4/9/10	1/7/14	1/8/14	1	1/22/14
Highlands Cashiers Hospital	1438-1	3	2/12/08	11/12/11	3/15/12	124	5/17/12
Direct Diagnostics Services	1443-1	3	5/12/08	2/10/12	3/15/13	399	7/10/13
Premier Cardiovascular PA	1451-1	3	3/9/09	12/7/12	1/17/13	41	1/30/13
Cumberland Cardiology PA	1460-1	3	4/8/09	1/6/13	3/16/13	69	3/28/13

Proportion of Inspections Performed Overdue

Priority	Inspections	Inspections overdue	% inspections overdue
1	72	3	4.2%
2	135	8	5.9%
3	417	17	4.1%
Total	624	28	4.5%

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.

On February 4, 2014 there are no Priority 1, 2 or 3 licenses overdue for inspection.

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.

IMC 1220 Criteria:

- Determine if the reciprocity license has had NRC escalated enforcement in the past 2 years.
- Review the Nuclear Materials Event Database (NMED) to determine if the reciprocity license has had a significant NMED event over the past 2 years.

If the NRC has inspected the reciprocity licensee (in the field), in the last calendar year, and the licensee has not had escalated enforcement or significant NMED event in the past 2 years, then the reciprocity licensee is NOT to be considered a candidate for inspection. All other reciprocity licensees are to be considered candidates for inspection.

The percentages of inspections of reciprocity licensee to be inspected each year are based on the number of candidates for inspection per region. The percentages of inspections by program code and priority should be as follows, with Priorities 1 through 3 as Core Inspections, and the remaining priorities as non-Core Inspections:

Priorities 1, 2 & 3 program codes – 20% of the candidate licensees from the candidate pool are to be inspected each year.

All other program codes are to be inspected each year, as resource and inspection schedules permit.

RPS inspectors conducted 54 reciprocity inspections during the review period, concentrating on Priority 1 licensees, portable gauge licensees (Priority 4), and service companies (Priority 5) for source exchanges involving HDR, Wet Shielded Irradiators, and Shielded Irradiators.

Typically, NC has approximately 50 reciprocity requests from licensees. NC requires all reciprocity licensees to submit a location notification 3 days prior to performing work in NC. Although the statistics are listed below, please see the attached reciprocity logs for a formal listing of our reciprocity tracking program.

2013

STATISTICS	
Number of licenses	48
Number of Candidates	37
Number of inspections	12
% of total license	25%
% of candidates	32%
% of NRC quota	130%

2012

STATISTICS	
Number of licenses	48
Number of Candidates	38
Number of inspections	8
% of total license	17%
% of candidates	21%
% of NRC quota	105%

2011

STATISTICS	
Number of licenses	33
Number of Candidates	18
Number of inspections	11
% of total license	33%
% of candidates	61%
% of NRC quota	305%

2010

STATISTICS	
Number of licenses	49
Number of Candidates	
Number of inspections	11
% of total license	22%
% of candidates	
% of NRC quota	110%

2009

STATISTICS	
Number of licenses	43
Number of Candidates	
Number of inspections	12
% of total license	28%
% of candidates	
% of NRC quota	140%

III. Technical Quality of Inspections

15. What, if any, changes were made to your written inspection procedures during the reporting period?

The RAM Branch is constantly improving the inspection forms, letters of correspondence, and inspection reports for performance, consistency, efficiency, and regulatory accuracy. We have begun to integrate our inspections into LTS, and have successfully required all Portable Nuclear Gauge Inspections to be conducted in LTS.

Inspection procedures have been revised (09/2011), and are currently being upgraded (02/2014) to ensure compliance with NRC Inspection Manual 2800 requirements. Individual reference procedures specified in the Materials Licensees Toolkits will be referenced in the 2014 revision of the NC Radioactive Materials Inspection Procedures.

See Question 15 Attachments:
 NC Radiation Protection Inspection Procedures
 Inspection Guidance
 Inspection Equipment and Dress Code

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

Inspector Supervisor License Category Date

2013			
Inspector	Supervisor	License Category	Date
SM J e f f r i e s	WL Cox	3 Kernodle Clinic 1095-1	02/14
CR H a r r i s	SM Jef frie s	2 Moses Cone Center 0021-3	02/14
SH N e l s o n	SM Jef frie s	3 Physicians East 1334-1	02/14

RD C r o w e	SM Jef frie s	3 Wake Physicians 0160-6	02/14
GT Mills	SM Jef frie s	1 Duke Energy 0379-2	07/13

2012			
Inspector	Supervisor	License Category	Date
Harris	Albright	3 Winston Salem Cardiology 0878-7	1/13
Jeffries	Albright	3 Peak Cardiology 1487-1	1/13
Mills	Albright	1 Professional Service Ind, Inc. 0144-1	2/1/13
Nelson	Albright	3 Premier Cardiovascular 1451-1	1/13

2011			
Inspector	Supervisor	License Category	Date
Barnes	Albright	3 Wake Cardiology 0668-3	12/11
Crowe	Albright	Not Due (Licensing Only Role)	
Harris	Albright	3 Park Ridge Hospital 0370-1	12/11
Jeffries	Albright	3 Granville Medical Center 0642-1	12/11
Mills	Albright	1 ATS 1510-1	12/11
Nelson	Albright	3 ECH Beaufort 0311-2	11/11
Sulas	Albright	3 ECH Beaufort 0311-2	11/11

2010			
Inspector	Supervisor	License Category	Date
Barnes	Albright	3 Carolina Cardiology 1420-1	11/10
Crowe	Albright	3 Sampson Regional Med Cntr 0407-4	11/10
Harris	Albright	2 NC Radiation Therapy Mgmt 1276-1	11/10
Jeffries	Albright	3 Wake Internal Medicine 1309-1	11/10
Mills	Albright	2 Duke University Medical Syst 0247-4	4/10

2009			
Inspector	Supervisor	License Category	Date

Barnes	Albright	3 Fayetteville Heart Center 1280-1	12/09 (T r a i n i n g)
Crowe	Albright	3 Fayetteville Heart Center 1280-1	12/09
Harris	Albright	3 Kernodle Clinic 1095-1	8/09
Jeffries	Albright	1 Mactech 0082-6 Mactech (1)	10/09
Mills	Albright	3 Wake Forest University 0158-1	11/09

17. Describe or provide an update on your instrumentation, methods of calibration, and laboratory capabilities.

RPS possesses survey meters in quantity. Each field inspector is assigned a set of survey meters:

Ludlum 14C with Pancake and GM Probes

Ludlum 19 microR meter

Mini Radiac (Combination GM, Alarming Ratemeter, Direct Reading Dosimeter)

Calibrated Ludlum 6 meters are available by sign out. Four portable multi-channel analyzers (Identifinders) are available for sign out as needed.

All survey instruments are calibrated on an annual basis or more frequent as required. The Agency uses a commercial service or the Manufacturer to calibrate or repair all survey instruments.

RPS utilizes the NC Analytical Laboratory to process laboratory samples taken in the field. RPS also has the ability to contract with private laboratories when the State Laboratory is overwhelmed.

Are all instruments properly calibrated at the present time? Yes

Were there sufficient calibrated instruments available throughout the review period? Yes

IV. Technical Quality of Licensing Actions

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

614-- It fluctuates from ~610-620 with about 90+ Accelerator Licenses

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.

Major Amendment – all 5 broad licenses due to LTS received extensive changes mostly the arrangement of conditions and radioisotopes

Terminated – 115

Decommissioned – 098-0724-1 Terminated then reopened until decommissioned with number 098-0847-1 American Agriculture, Lucama, NC (to be terminated upon disposal of drums)

Bankruptcy - Sichel Technologies Morrisville, NC – removal of JL Shepherd & Associates Irradiator Co-60 source through SCATR

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

None

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

Since August 2012, by the transition of creating templates replacing word documents we have evolved from using word documents with added individual conditions and a supplemental database to an encompassing licensing tracking license module format in which license types are formatted with required conditions to minimize errors. There have been several set-backs, trial and errors and simple successes, and at this time we are approximately 72% complete in the loading of archived data from currently active licenses. It is a work in progress and daily there seems to be on-going measures to enhance the program. The program is now proving itself quite worthy of the day to day uses. With exception of manufacturing and distribution (in which there are only two licenses) we have included all license types.

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.

None

V. Technical Quality of Incident and Allegation Activities

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:

<u>Licensee Name</u>	<u>License #</u>	<u>Date of Incident/Report</u>	<u>Type of Incident</u>
----------------------	------------------	--------------------------------	-------------------------

All reportable incidents have been reported to the NRC
The following is a list of incidents and allegations per year.

From 2/27/2009 for year 2009: 49 incidents and 0 allegations
For year 2010: 54 incidents and 1 allegation
For year 2011: 77 incidents and 0 allegation
For year 2012: 61 incidents and 1 allegation
For year 2013: 24 incidents and 0 allegation

Below are incidents that involved equipment or source failure or approved operating procedures that were deficient.

<u>Incident #</u>	<u>Licensee Name</u>	<u>Licensee #</u>	<u>Date of Incident/Report</u>	<u>Type of Incident</u>
-------------------	----------------------	-------------------	--------------------------------	-------------------------

09-24 Flowserve 092-0121-1 5/29/2009 RMS Licensee NRC notification: 6/4/2009. NMED, NCOSH.
Possibly more of a Program oversight than a Procedure deficiency.

09-35 Phillip Morris 013-0662-1 8/7/2009 Other/ Leaking source NRC notification: 8/10/2009.Source Failure.

12-45 Unilin US MDF 149 Homanit USA Road, Mount Gilead, NC 27306 062-1209-1 July 31, 2012 Possible SS&D Device Failure: Reportable to NRC/ NMEDs. Contacted NRC and will forward the following information along with updated information required by NMEDs to hoo.hoc@nrc.gov Shutter mechanism in a fixed Ohmart Vega level gauge broke loose

12-47 Frye Regional Medical Center / 018-0377-2 / 08/06/2012 MISADMINISTRATION: Mesh Device failure FDA notified NRC Notified possible AO / multiple seed dislodging from mesh/Investigated Cliff Harris NMED Notification and slipped, blocking the source. Bruce Sowards, a maintenance lead and trained RSO went to the gauge and removed the sleeve. The operation took approximately 10 minutes. The source is a 10 mCi Cs-137 isotope. Based on this his exposure was 5.83 mrem.

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

No changes to the incident procedure other than reviewing and updating the date.
See Attachment E

The allegation procedure was revised to require investigation of all allegations, regardless of whether they were written, verbal, anonymous or not.
See Attachment F

C. NON-COMMON PERFORMANCE INDICATORS

I. Compatibility Requirements

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.

The legislature recently passed House Bill (HB) 74, which requires periodic review of all regulations promulgated by the state every ten years. Regulations not reviewed and approved prior to the end of the review period automatically expire. This bill also changes the rules requiring fiscal notes during the rule making process, among a few other minor items. The Agency is required to review all radiation protection rules in July 2018, and to report to the Rules Review Commission whether the rules are necessary or not necessary, and what, if any, public impact (interest) the rule has.

26. Are your regulations subject to a "Sunset" or equivalent law? If so, explain and include the next expiration date for your regulations.

The Agency must report to the Rules Review Commission annually on the status of these rules. Rules will expire at the end of ten years unless re-adopted by the state. The Agency is scheduled to review all of its rules in July 2018, and to report to the Rules review Commission whether those rules are necessary.

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.

The state is currently up-to-date on rule making and has no overdue rules to adopt.

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.

N/A

Rules required for state adoption are brought before the North Carolina Radiation Protection Commission (RPC) and assigned to the Radioactive Materials Control Advisory Committee (Committee). The Committee makes recommendations for rule promulgation, develops rule language, and then presents the proposed rules to the RPC for approval for adoption by the state. Approved rules are submitted to the NRC for review and comment. Comments received by NRC are incorporated into the proposed rules and presented to the RPC for final adoption before submission to the state Rules Review Commission (RRC). The RRC reviews and comments on the rules and forwards these comments to the agency for consideration. Once the agency has satisfied considerations brought up by the RRC the RRC will adopt the rules which become effective thirty days after the RRC adopts them.

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:

<u>SS&D Registry of Number</u>	<u>Manufacturer, Distributor or Custom User</u>	<u>Product Type or Use</u>	<u>Date Issued</u>	<u>Type Action</u>
--	---	--------------------------------	------------------------	------------------------

NC-646-D-128-S / Troxler Electronic Laboratories, Inc. / Asphalt Content Gauge /

02/21/2012 / Update (addition product models)

NC-1311-S-101-S / CivaTech Oncology, Inc. / Manual Brachytherapy (Therapeutic Line Sources) - CivaString® / June 28, 2013 / New

NC-585-D-107-G / SRB Technologies Light Modules and Luminous Devices /

11/12/2013 / Update (additional product models)

30. 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

Technical Staffing and Training - Questions 2-9

Sharn Jeffries, and Randy Crowe are the two SS&D reviewers. Both have attended the NRC one week SS&D Class. Henry Barnes (NLE) and Gerald Speight (Retired) were

also trained to write/evaluate SS&Ds.

A professional engineer, Dr. Murty, at NC State University is under contract to perform engineering reviews of SS&D applications.

Please list all professional staff who have not yet met the qualification requirements for a SS&D reviewer. For each, list the courses or equivalent training/experience they need and a tentative schedule for completion of these requirements.

James Albright, Cliff Harris, Grant Mills, Sheila Nelson, Chris Fidalgo, Ryan Kapler, and Louis Brayboy

All need to take all training. James Albright and Chris Fidalgo are enrolled in the NRC upcoming training. All others will also be enrolled as classes become available.

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

None.

Please identify the technical staff that left your program during the review period. Henry Barnes (NLE), Paul Huggins (NLE), Diana Sulas-Thompson (Transfer), and Gerald Speight (Retired)

Technical Quality of Licensing Actions - Questions 18-22

How many licensees does NC have requiring SS&D reviews?

7 Specific Licensees

Please identify any major, unusual, or complex SS&D reviews.

None

Discuss any variances in SS&D reviews granted during the review period.

None

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

None

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.

None

Technical Quality of Incident and Allegation Activities - Questions 23-24

III. Low-level Radioactive Waste Disposal Program

Not Applicable

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

IV. Uranium Recovery Program

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

Not Applicable

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

MATERIALS REQUESTED TO BE AVAILABLE FOR THE ON-SITE PORTION OF AN IMPEP REVIEW

Please have the following information available for use by the IMPEP review team when they arrive at your office:

- List of open license cases, with date of original request, and dates of follow-up actions.
- List of licenses terminated during review period.
- Copy of current log or other document used to track licensing actions.
- List of all licensing actions completed during the review period (sorted by license reviewer, if possible).
- Copy of current log or other document used to track inspections.
- List of all inspections completed during the review period (sorted by inspector, if possible).
- List of inspection frequencies by license type.
- List of all allegations occurring during the review period. Show whether the allegation is open or closed and whether it was referred by NRC.
- List of all licenses that your agency has imposed additional security requirements upon.

ALSO, PLEASE HAVE THE FOLLOWING DOCUMENTS AVAILABLE

All State Regulations	Documented training plan, if applicable
Statutes affecting the regulatory authority of the State program	Records of results of supervisory accompaniments of inspectors
Standard license conditions	Emergency plan and communications list
Technical procedures for licensing, model licenses, review guides	Procedures for investigating allegations
SS&D review procedures, guides and Standards	Procedures for investigating incidents
Instrument calibration records	Enforcement procedures, including procedures for escalated enforcement, severity levels, civil penalties (if applicable)
Instrument calibration records	Job Descriptions
Inspection report forms	

STATE REGULATION STATUS

Tracking Ticket Number:
Date:

- State: North Carolina
- [# amendment(s) reviewed is identified by a *
- at the beginning of the equivalent NRC requirement.]

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Package	Outgoing Package	Notes
1991-1	Safety Requirements for Radiographic Equipment Part 34 55 FR 843 (Superseded by 1997-5)	01/10/1994	Final	No Comments 8/18/00	North Carolina has adopted Final Regulations equivalent to RATS ID: 1997-5.
1991-2	ASNT Certification of Radiographers Part 34 56 FR 11504 (Superseded by 1997-5)	none	Not Required	Not Required	North Carolina has adopted Final Regulations equivalent to RATS ID: 1997-5.
1991-3	Standards for Protection Against Radiation Part 20 56 FR 23360; 56 FR 61352; 57 FR 38588; 57 FR 57877; 58 FR 67657; 59 FR 41641; 60 FR 20183;	01/01/1994	Final	No Comments 10/25/1995	
1991-4	Notification of Incidents Parts 20, 30, 31, 34, 39, 40, 70 56 FR 64980;	10/15/1994	Final	No Comments 08/18/2000	
1992-1	Quality Management Program and Misadministrations Part 35 56 FR 34104 (Superseded by 2002-2)	01/27/1995	Final	No Comments 08/18/2000	North Carolina has not yet adopted Final Regulations equivalent to RATS ID: 2002-2.
1992-2	Eliminating the Recordkeeping Requirements for Departures from Manufacturer's Instructions Parts 30, 35 57 FR 45566	none	Not Required	Not Required	These regulation changes are not required to be adopted for purposes of Compatibility.
1993-1	Decommissioning Recordkeeping and License Termination: Documentation Additions [Restricted areas and spill sites] Parts 30, 40 58 FR 39628	10/25/1996	Final	No Comments 08/18/2000	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Package	Outgoing Package	Notes
1993-2	Licensing and Radiation Safety Requirements for Irradiators Part 36 58 FR 7715	07/01/1996	Final	No Comments 08/18/2000	
1993-3	Definition of Land Disposal and Waste Site QA Program Part 61 58 FR 33886	07/22/1996	Final	No Comments 08/18/2000	
1994-1	Self-Guarantee as an Additional Financial Mechanism Parts 30, 40, 70 58 FR 68726; 59 FR 1618	none	Final	No Comments 08/18/2000	These regulation changes are not required to be adopted for purposes of Compatibility.
1994-2	Uranium Mill Tailings Regulations: Conforming NRC Requirements to EPA Standards Part 40 59 FR 28220	07/01/1997	Not Applicable	Not Applicable	North Carolina does not have authority to regulate this material under its Agreement.
1994-3	Timeliness in Decommissioning Material Facilities Parts 30, 40, 70 59 FR 36026	08/15/1997	Final	No Comments 08/18/2000	
1995-1	Preparation, Transfer for Commercial Distribution, and Use of Byproduct Material for Medical Use Parts 30, 32, 35 59 FR 61767; 59 FR 65243; 60 FR 322	01/01/1998	Final	No Comments 08/18/2000	
1995-2	Frequency of Medical Examinations for Use of Respiratory Protection Equipment Part 20 60 FR 7900	03/13/1998	Final	No Comments 08/18/2000	
1995-3	Low-Level Waste Shipment Manifest Information and Reporting Parts 20, 61 60 FR 15649; 60 FR 25983	03/01/1998	Final	No Comments 08/18/2000	
1995-4	Performance Requirements for Radiography Equipment Part 34 60 FR 28323 (Superseded by 1997-5)	06/30/1998	Final	No Comments 08/18/2000	North Carolina has adopted Final Regulations equivalent to RATS ID: 1997-5.

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Package	Outgoing Package	Notes
1995-5	Radiation Protection Requirements: Amended Definitions and Criteria Parts 19, 20 60 FR 36038	08/14/1998	Final	No Comments 08/18/2000	
1995-6	Clarification of Decommissioning Funding Requirements Parts 30, 40, 70 60 FR 38235	11/24/1998	Final	No Comments 08/18/2000	
1995-7	Medical Administration of Radiation and Radioactive Materials Parts 20, 35 60 FR 48623 (Superseded by 2002-2 and 2005-2)	10/20/1998	Final	No Comments 08/18/2000	North Carolina has not yet adopted Final Regulations equivalent to RATS IDs: 2002-2 and 2005-2.
1996-1	Compatibility with the International Atomic Energy Agency Part 71 60 FR 50248; 61 FR 28724 (Superseded by 2004-1)	04/01/1999	Final	No Comments 08/18/2000	North Carolina has not yet adopted Final Regulations equivalent to RATS ID: 2004-1.
1996-2	One Time Extension of Certain Byproduct, Source and Special Nuclear Materials Licenses Parts 30, 40, 70 61 FR 1109	02/15/1999	Not Required	Not Required	These regulation changes are not required to be adopted for purposes of Compatibility
1996-3	Termination or Transfer of Licensed Activities: Record Keeping Requirements Parts 20, 30, 40, 61, 70 61 FR 24669	06/17/1999	Final	No Comments 08/18/2000	
1997-1	Resolution of Dual Regulation of Airborne Effluents of Radioactive Materials; Clean Air Act Part 20 61 FR 65120	01/9/2000	Final	No Comments 08/18/2000	
1997-2	Recognition of Agreement State Licenses in Areas Under Exclusive Federal Jurisdiction Within an Agreement State Part 150 62 FR 1662	02/27/2000	Final	No Comments 08/18/2000	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Package	Outgoing Package	Notes
1997-3	Criteria for the Release of Individuals Administered Radioactive Material Parts 20, 35 62 FR 4120	05/29/2000	Final	No Comments 08/18/2000	
1997-4	Fissile Material Shipments and Exemptions Part 71 62 FR 5907 (Superceded by 2004-1)	02/10/2000	Not Required	Not Required	These regulation changes are not required to be adopted for purposes of Compatibility. (See STP-97-078)
1997-5	Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiography Operations Parts 30, 34, 71, 150 62 FR 28947	06/27/2000	Final	No Comments 08/18/2000	
1997-6	Radiological Criteria for License Termination Parts 20, 30, 40, 70 62 FR 39057	08/20/2000	Final	No Comments 08/18/2000	
1997-7	Exempt Distribution of a Radioactive Drug Containing One Micro curie of Carbon-14 Urea Part 30 62 FR 63634	01/02/2001	Final	No Comments 08/18/2000	
1998-1	Deliberate Misconduct by Unlicensed Persons Parts 30, 40, 61, 70, 71, 150 63 FR 1890; 63 FR 13773	02/12/2001	Final ML061990608	No Comments 08/15/2006 ML062280005	
1998-2	Self-Guarantee of Decommissioning Funding by Nonprofit and Non-Bond-Issuing Licensees Parts 30, 40, 70 63 FR 29535	07/01/2001	Not Required	Not Required	These regulation changes are not required to be adopted for purposes of Compatibility.
1998-3	License Term for Medical Use Licenses Part 35 63 FR 31604 (Superceded by 2002-2)	07/10/2001	Not Required	Not Required	These regulation changes are not required to be adopted for purposes of Compatibility. (See STP-98-074)

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Package	Outgoing Package	Notes
1998-4	Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiographic Operations Part 34 63 FR 37059	07/09/2001	Final ML062840118	No Comments 10/23/2006 ML062970032	
1998-5	Minor Corrections, Clarifying Changes, and a Minor Policy Change Parts 20, 32, 35, 36, 39 63 FR 39477; 63 FR 45393	10/26/2001	Final ML061990608	No Comments 08/15/2006 ML062280005	
1998-6	Transfer for Disposal and Manifests: Minor Technical Conforming Amendment Part 20 63 FR 50127	11/20/2001	Final ML042320535	No Comments 09/02/2004 ML042460091	
1999-1	Radiological Criteria for License Termination of Uranium Recovery Facilities Part 40 64 FR 17506	06/11/2002	Not Applicable	Not Applicable	North Carolina does not have authority to regulate this material under its Agreement.
1999-2	Requirements for Those Who Possess Certain Industrial Devices Containing Byproduct Material to Provide Requested Information Part 31 64 FR 42269	10/04/2002	Not Required	Not Required	These regulation changes are not required to be adopted for purposes of Compatibility.
1999-3	Respiratory Protection and Controls to Restrict Internal Exposure Part 20 64 FR 54543; 64 FR 55524	02/02/2003	Final ML061990608	No Comments 08/15/2006 ML062280005	
2000-1	Energy Compensation Sources for Well Logging and Other Regulatory Clarifications Part 39 65 FR 20337	05/17/2003	Final ML061990608	No Comments 08/15/2006 ML062280005	
2000-2	New Dosimetry Technology Parts 34, 36, 39 65 FR 63750	01/08/2004	Final ML061990608	No Comments 08/15/2006 ML062280005	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Package	Outgoing Package	Notes
2001-1	Requirements for Certain Generally Licensed Industrial Devices Containing Byproduct Material Parts 30, 31, 32 65 FR 79162	02/16/2004	R ¹ ML112200175	No Comments 10/13/2011 ML112510123	
2002-1	Revision of the Skin Dose Limit Part 20 67 FR 16298	04/05/2005	Final ML061790305	No Comments 08/04/2006 ML062160419	
2002-2	Medical Use of Byproduct Material Parts 20, 32, 35 67 FR 20249	10/24/2005	R ¹ ML112200175	No Comments 10/13/2011 ML112510123	
2003-1	Financial Assurance for Materials Licensees Parts 30, 40, 70 68 FR 57327	12/03/2006	Final ML061790305	No Comments 08/04/2006 ML062160419	
2004-1	Compatibility With IAEA Transportation Safety Standards and Other Transportation Safety Amendments Part 71 69 FR 3697	10/01/2007	R ¹ ML112200175	Comments 10/13/2011 ML112510123	
2005-1	Security Requirements for Portable Gauges Containing Byproduct Material Part 30 70 FR 2001	07/11/2008	License Condition ML081680728	No Comments 06/30/2008 ML081820320	
2005-2	Medical Use of Byproduct Material - Recognition of Specialty Boards Part 35 70 FR 16336; 71 FR 1926	04/29/2008	Final ML081680728	No Comments 06/30/2008 ML081820320	
2005-3	Increased Controls for Risk-Significant Radioactive Sources (NRC Order EA-05-090) 70 FR 72128	12/01/2005	License Condition ML052720130	No Comments 10/04/2005 ML052780077	
2006-1	Minor Amendments Parts 20, 30, 32, 35, 40 and 70 71 FR 15005	03/27/2009	Proposed ML112200175	Comments 10/13/2011 ML112510123	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Package	Outgoing Package	Notes
2006-2	National Source Tracking System - Serialization Requirements Part 32 with reference to Part 20 Appendix E 71 FR 65685	02/06/2007	Not Applicable ²	Not Applicable	North Carolina responded on 02/16/2007 to FSME-06-110 stating that they currently had no licensees applicable to this rule. ML070460135
2006-3	National Source Tracking System Part 20 71 FR 65685, 72 FR 59162	01/31/2009	License Condition ML081680728	No Comments 06/30/2008 ML081820320	
2007-1	Medical Use of Byproduct Material - Minor Corrections and Clarifications Parts 32 and 35 72 FR 45147, 54207	10/29/2010	Proposed ML112200175	Comments 10/13/2011 ML112510123	
2007-2	Exemptions From Licensing, General Licenses, and Distribution of Byproduct Material: Licensing and Reporting Requirements Parts 30, 31, 32, 150 72 FR 58473	12/17/2010	Proposed ML112200175	Comments 10/13/2011 ML112510123	
2007-3	Requirements for Expanded Definition of Byproduct Material Parts 20, 30, 31, 32, 33, 35, 61, 150 72 FR 55864	11/30/2010	Proposed ML112200175	Comments 10/13/2011 ML112510123	
2007-4	Order Imposing Fingerprinting Requirements and Criminal History Records Check Requirements for Unescorted Access to Certain Radioactive Material NRC Order EA-07-305 72 FR 70901	06/05/2008	License Condition ML080660061	No Comments 03/20/2008 ML080800385	
2008-1	Occupational Dose Records, Labeling Containers, and Total Effective Dose Equivalent Parts 19, 20 72 FR 68043	02/15/2011	Proposed ML112200175	No Comments 10/13/2011 ML112510123	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Package	Outgoing Package	Notes
2009-1	Medical Use of Byproduct Material – Authorized User Clarification Part 35 74 FR 33901	09/28/2012	Proposed ML112200175	No Comments 10/13/2011 ML112510123	
2011-1	Decommissioning Planning Parts 20, 30, 40, 70 76 FR 35512	12/17/2015			
2011-2	Licenses, Certifications, and Approvals for Materials Licensees Parts 30, 36, 39, 40, 70, and 150 76 FR 56951	11/14/2014			
2012-1	Change of Compatibility of 10 CFR 31.5 and 31.6 (See RATS ID: 2001-1 for Rule text) 77 FR 3640	01/25/2015			
2012-2	Advance Notification to Native American Tribes of Transportation of Certain Types of Nuclear Waste Part 71 77 FR 34194	08/10/2015			
2012-3	Technical Corrections Part 30, 34, 40 and 70 77 FR 39899	08/06/2015			
2012-4	Requirements for Distribution of Byproduct Material Parts 30, 31, 32, 40 and 70 77 FR 43666	10/23/2015			
2013-1	Physical Protection of Byproduct Material, 10 CFR Parts 20, 30, 32, 33, 34, 35, 36, 37, 39, and 71 78 FR 16922	03/19/2016			
2013-2	Distribution of Source Material to Exempt Persons and to General Licensees and Revision of General License and Exemptions, 10 CFR Parts 30, 40, and 70	08/27/2016			

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Package	Outgoing Package	Notes
	78 FR 32310				

¹ R Stands for revisions to final rule

² IMPEP Team: verify that North Carolina does not have any licensees subject to these regulations during each review.

Erickson, Randy

From: Cox, Lee <lee.cox@dhhs.nc.gov>
Sent: Wednesday, February 12, 2014 1:47 PM
To: Erickson, Randy
Cc: Albright, James; Crowe, Randy; White, Duncan; Ford, Monica; Christian, Patsy
Subject: Attachments Supporting Questionnaire
Attachments: Attachment A Org Chart Gov. -RPS.pdf; Attachment B.pdf; Attachment C RAM FTE.xlsx; Attachment D.pdf

Attachment A: Org. Chart from Governor to Radiation Protection Chief

Attachment B: RPS Org. Chart

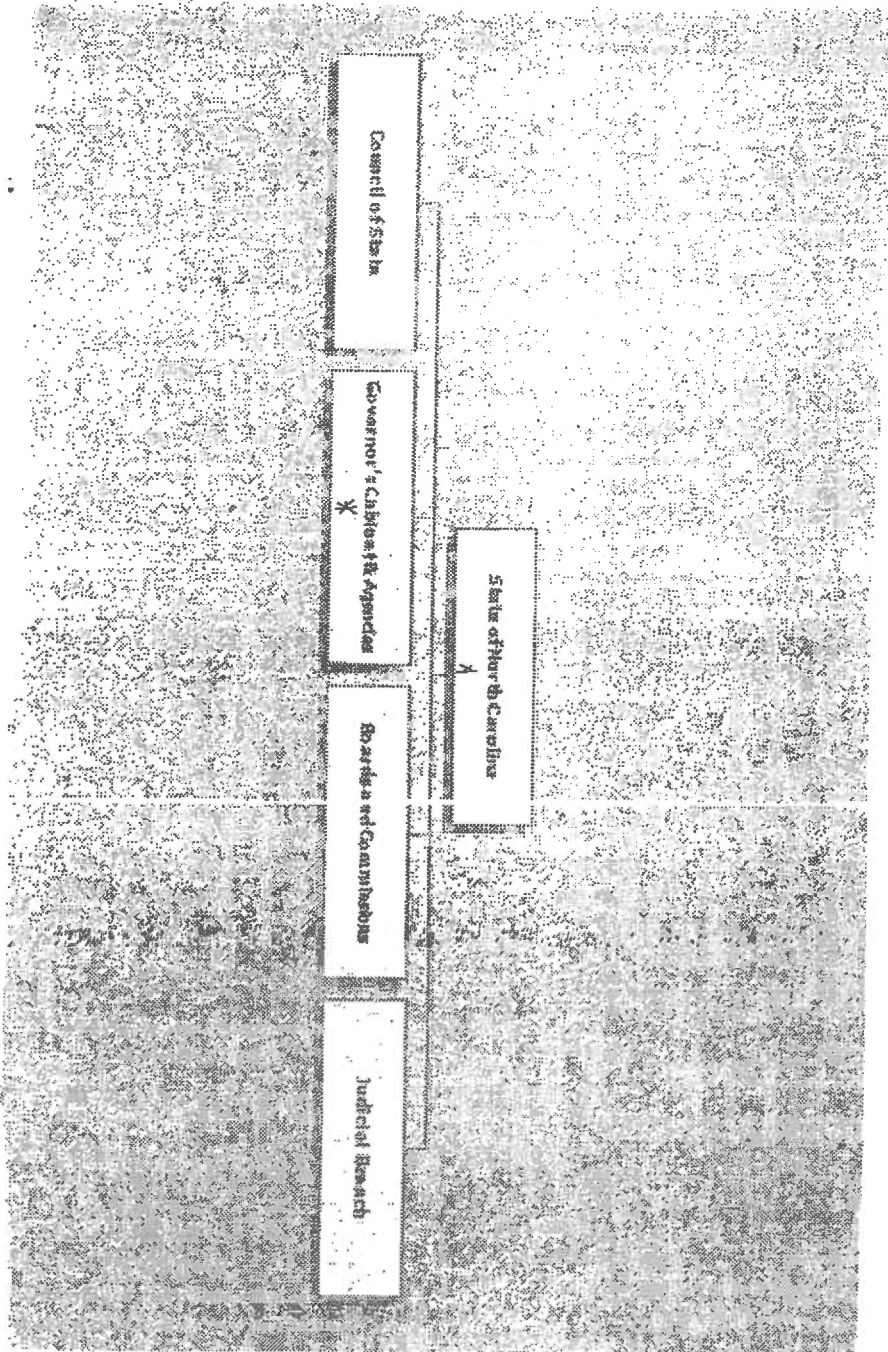
Attachment C: Staffing Plan

Attachment D: Completed Training Classes

W. Lee Cox, III
N.C. Department of Health and Human Services
Chief, Radiation Protection Section - Division of Health Service Regulation
3825 Barrett Drive, Raleigh, NC 27609
Phone: 919-571-4141 ext. 201
Fax: 919-571-4148
lee.cox@dhhs.nc.gov
www.ncdhhs.gov/dhsr/

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Attachment A
Org Chart from Governor
to Radiation Protection
Chief



UNIVERSITY OF CALIFORNIA, AG INDIAS

Office of the Governor

State Personnel
State Finance Resources

Administrative

Environmental & Social Resources

Wildlife Resources Conservation

Health and Human Services

Customer Care

Recreation

Cultural Resources

State Budget Management

State Contracts

Information Technology

Community Colleges

School of Forestry & Wildlife

Transportation

Public Safety

* Health and Human Services

* Adiana Z. Iltis

Secretary of Health & Human Services
HHS Secretary's Office (SOS)

Alabama 2 WWS *

Secretary of Health & Human Services
HHS SECRETARY'S OFFICE (501)

James ASchaker
 Dir, Department Affairs & Legal Coun
 HHS 501 2000 & Community Relations (2020)

Mark A Conrad
 Director's Liaison Health Care
 HHS 501 2000 Public Health (2020)

Shirley Smith Brinkley
 Deputy Secretary for Human Resources
 HHS 501 2000 Human Resources (2020)

Emery E Milliken
 General Counsel
 HHS 501 2000 Legal (2020)

Uma Brennan
 HHS 501 2000 Director's Office

Joseph A Cooney 3
 Chief Information Officer
 HHS 501 2000 Information Systems (2020)

John Mark Payne
 Chief Compliance Officer
 HHS 501 2000 Compliance (2020)

Richard W. Gray
 Communications Director
 HHS 501 2000 Public Affairs (2020)

Paul Rodney Davis
 Chief Financial Officer
 HHS 501 2000 Finance & Procurement

Matthew J McArthur
 Senior Policy Advisor
 HHS 501 2000 Policy

Cheryl Decker 20
 Chief Deputy 20
 HHS 501 2000 Administration (2020)

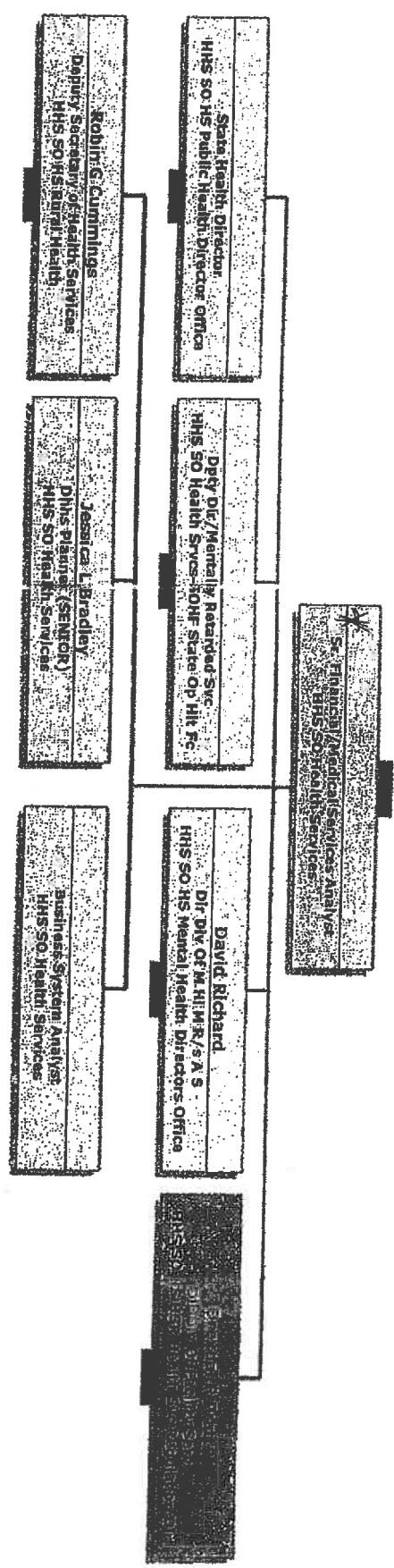
Dr. Thomas M. Anderson *
 Director of Health Services
 HHS 501 2000 Health Services

Kathly N (2) 20
 Administrative Officer to the Secretary
 HHS 501 2000 Administration (2020)

Dr. Thomas M. Anderson
 HHS 501 2000 Administration (2020)

Margaret A. Peck
 Senior Advisor to the Secretary
 HHS 501 2000 Administration (2020)

Dr. Thomas M. Anderson
 HHS 501 2000 Administration (2020)



DEPARTMENT OF HEALTH AND HUMAN SERVICES

DIVISION OF HEALTH SERVICE REGULATION DHSR Overall Structure

Division Director, DHSR
Drexdal Pratt
60053821 SG85

Executive Assistant
Diana Barby
60053818 SG64

Deputy Director, DHSR
Cheryl Oulmet
60053817 SG83T
Chief Operating Officer

**FACILITIES
FINANCE ACT**

Audit Manager
Chris Taylor
60053819 CB-A

**MEDICAL CARE
COMMISSION**

Program Assistant V
Alice Creech
60053827 SG61

Chief
Craig Smith
60053837 SG80
Certificate of Need

Auditor
Kathy Lamson
60054225 CB-J

Auditor
Crystal Watson-Abbott
60088947 CB-J

Chief
Jesse Goodman
60053817 SG80
HI-FPR

Administrative Assistant (II)
Patricia Bryant
60053820 SG67

Chief
Bert Ryan
60063962 SG80
Adult Care & Licensure

Chief
Stephanie Gilliam
60054074 SG80
MH Licensure & Cert

Manager
Rita Jordan
60053961 SG77
Complaint Intake Unit

Special Executive
Patsy Christian
60043292 SG95

Human Resources Manager
Mary Healy
60053822 SG76
(Personnel Officer III)

Chief
Azale Conley
60054002 SG80
Acute & Home Care L&C

Chief
Reyna Godette-Crawford
60053847 SG81
Emergency Medical Services

Chief
Lee Cox
60094311 SG81
Radiation Protection Section

Business Officer
Kyle Fay
60053887 CB-A
Budget Office

Chief
Steven Lewis
60053973 SG82
Construction

HS Planning Supervisor III
Nadine Pfeiffer
60091061 SG78
Medical Facilities Planning

Chief
Beverly Speer-Murphy
60053949 SG80T
Nursing Home L&C

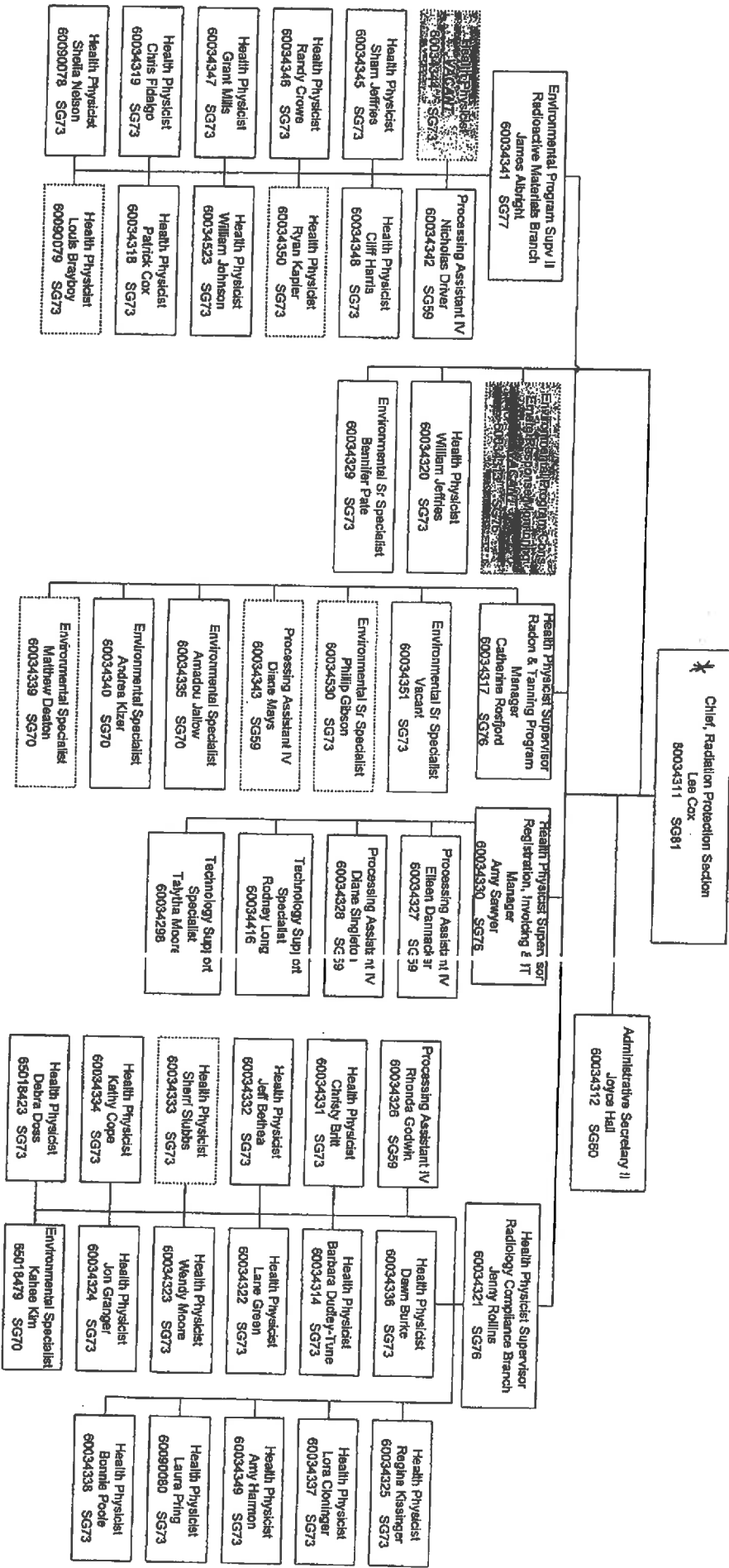
Nurse Consultant
Vacant
60053988 CB-A

Attachment B

RPS Org Chart

DEPARTMENT OF HEALTH AND HUMAN SERVICES DIVISION OF HEALTH SERVICE REGULATION Radiation Protection Section

Attachment B



Attachment C

Staffing Plan

Name	Position	Area of Effort	FTE%	YRS	NRC Classes Comp
Lee Cox	Chief/Interim Man.	Section/RAM Admin	25	21	9
Randy Crowe	Health Physicist	Lead RAM Licensing/SS&D	100	8	17
Sharrn Jeffries	Health Physicist	Lead RAM Inspections/SS&D	100	20	12
Chris Fidalgo	Health Physicist	RAM Licensing	100	2	3
Patrick Cox		Lead Environmental Prog.	100	N/A	
Ryan Kapler	Health Physicist	RAM Licensing	100	1	1
Louis Brayboy	Health Physicist	RAM Licensing	100	1	1
William Johnson	Health Physicist	RAM General Licensing	50	38	0
Vacant	Health Physicist	RAM Licensing	100	N/A	
Grant Mills	Health Physicist	RAM Inc. Security Insp.	100	27	10
Cliff Harris	Health Physicist	RAM Inspections	100	12	2
Sheila Nelson	Health Physicist	RAM Inspections	100	3	7
James Albright	Interim Env. Prog. Consul	RAM Regulation/LTS	100	22	5
Diana Sulas Thompson	Temporary Consultant	RAM LTS/Envir. Projects	20	4	7
Dr. Murty	Temporary Consultant PE	RAM SS&D	10	32	N/A
Nick Driver	Administrative Asst.	RAM Administration	100	7	N/A
Bennifer Pate	Section Enforcement Coord	Section Enforcement	100		

	% Admin	% LIC	% INSP	% ER	% LLRW	% ENFO	% SSD	% ENVIR
	70	5	5	10	2	7	1	0
	40	40	5	5	2	3	5	0
	10	5	55	20	0	5	5	0
	0	80	2	10	0	5	0	3
	0	0	0	10	0	0	0	90
	0	80	0	5	10	5		
	0	80	0	10	0	10	0	0
	10	30	30	10	10	10	0	0
	0	80	0	10	0	10	0	0
	10	20	40	20	0	10	0	0
	0	0	80	10	0	10	0	0
	0	0	80	10	0	10	0	0
	10		80	10	0	10	0	0
		45	45					10
	33	33	33			1	100	
						100		
						1		
						100		

Attachment D
Completed Training
Classes

Training Lists by Inspector

Student Name *Chris Fidalgo*

Date of Class	Class Name	Days	Supplier
5/15/1994	RERO	5	FEMA
3/15/2011	Licensing	5	NRC
6/15/2011	Environmental Monitoring for Radioacti vity	5	NRC
5/15/2013	Increased Controls-Materials Control & Security	5	DOE

Student Name *Cliff Harris*

Date of Class	Class Name	Days	Supplier
8/6/2003	Troxler - Portable Gauge	1	Manufacturer
4/2/2004	Basic ISOCs Measurements	1	Manufacturer
4/19/2004	Safety Aspects of Industrial Radiograp hy	5	NRC
4/28/2004	Incident Command	1	Other
6/29/2004	24 hr HAZWOPER	3	Other
2/1/2005	Transportation of Radioactive Material	1	Other
10/27/2006	Material Control & Security Systems & Discipline	5	DOE
11/16/2007	Defensive Driving	1	Other
6/25/2008	Interaction Skills for Success	1	DDI online
6/25/2008	Essentials of Leadership	1	DDI online
6/25/2008	Feedback Fundamentals	1	DDI online
7/9/2008	Listening	1	DDI online
7/10/2008	Creating a Service Culture	5	OSP-HRD
11/13/2008	NSTS Agency Training	1	NRC
2/5/2009	ITS Outlook Mandatory	1	Other

Student Name *Diana Sulas*

Date of Class	Class Name	Days	Supplier
8/12/2008	New Employee Orientation	1	OSP - State
9/14/2008	Fundamentals of Inspections	5	NRC
9/21/2008	Licensing	5	NRC
12/2/2008	NSTS Training	2	NRC
3/8/2009	Prairie Island NPP Orientation	5	OSP - State

3/22/2009	Industrial Radiography	5	NRC
8/23/2009	Increased Controls-Materials Control & Security	5	DOE
11/1/2009	Diagnostic/Therapeutic NM	5	NRC
11/16/2009	Root Cause Workshop	5	NRC
12/6/2009	Brachy Therapy & Gamma Knife	5	NRC

Student Name *George Accattato*

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
2/1/1999	Troxler Portable Nuclear Gauge User	1	Troxler
3/18/1999	Unlawful Workplace Harrassment	1	DENR
6/19/1999	MS Access, Intermediate	1	ITS, Inc.
7/16/1999	Licensing Practices & Procedures	5	NRC
8/13/1999	Safety Aspects of Industrial Radiograp	5	NRC
11/1/1999	Intro To Service Excellence	1	DENR
3/10/2000	Diagnostic & Therapeutic Nuclear Medi	5	NRC
5/23/2000	MS Word 97, Level I	1	Wake Tech/ State NC
7/18/2000	MS Word 97, Level II	1	Wake Tech/State NC
12/7/2000	Inspection For Performance	3	NRC
9/26/2003	SS&D Workshop	5	NRC
4/28/2004	Incident Command System Orientation	.5	State Em Mgt
7/16/2004	NRC Security Systems & Principles	8	NRC
2/5/2005	Transportation of Radioactive Material	1	Other

Student Name *Gerald Speight*

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
8/1/1996	Troxler - Portable Gauge	1	Private Supplier
8/16/1996	RERO	5	FEMA
9/8/1996	Diagnostic and Therapeutic Nuclear M	5	NRC
10/9/1996	Windows 95 intro	1	Other
10/18/1996	OHSA 24 hour	2	Private Supplier
4/15/1997	Access 2.0 Introduction Workshop	1	Other
4/15/1997	SS&D Workshop	5	NRC
5/13/1997	Microsoft Access 2.0 Intermediate	1	
6/15/1997	Word 6.0 Intermediate	1	Other
7/10/1997	Transportation	4	DOE

10/15/1997	8 Hour Annual Hazwoper Update	1	NC Div. Of Waste Managemen
3/9/1998	Inspection Procedures	5	NRC
4/16/1998	Inspecting for Performance	3	NRC
7/23/1998	NRC Licensing Practices	5	NRC
8/10/1998	Safety Aspects of Industrial Radiograp	5	NRC
7/22/2003	NMED	2	NRC
12/18/2003	RASCAL	2	NRC
4/28/2004	IS-100 Incident Command	1	Other
6/29/2004	24 Hr. HAZWOPER	3	Other
2/1/2005	Transportation of Radioactive Material	1	Other
6/14/2005	IS 700 (NIMS)	1	FEMA
6/15/2005	DENR Enforcement	1	Other
6/16/2005	IS-200 Incident Command System	1	FEMA
4/28/2006	NRC Materials Control and Security Sy	5	NRC
8/29/2006	NC Rulemaking Process	1	OAH
7/25/2007	ERIT Training	1	DENR
11/16/2007	Defensive Driving	1	DEH
6/12/2008	Interaction Skills for Success	1	Online
6/12/2008	Feedback Fundamentals	1	Online
6/13/2008	Communicating and Listening	1	Online
7/10/2008	Customer Service	5	OSP
10/23/2008	NC State Pulstar Rx Training	1	Other
2/3/2009	Outlook 2007	1	OSP - State
2/20/2009	Diversity-Valueing Differences	1	OSP - State
11/3/2009	NC State Pulstar	1	Other
11/10/2010	DENR Fleet & Vehicle Awareness	1	OSP - State
2/14/2011	MARSSIM	5	NRC
4/25/2011	RESRAD	4	NRC
4/12/2012	FSME Rulemaking Overview	1	NRC

Student Name Grant Mills

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
5/4/1990	Troxler	1	Private Supplier
7/15/1990	Inspection Procedures	5	NRC
3/8/1991	Applied Health Physics	25	NRC

6/15/1991	Safety Aspects of Industrial Radiograp h	5	NRC
8/15/1991	Diagnostic and Therapeutic Nuclear M edical	5	NRC
10/25/1991	NC Div. EM Incident Comand	1	NCEM
11/15/1991	HazMat First Responder	1	Other
5/15/1992	Licensing Practices	5	NRC
12/11/1992	Radiation Protection Engineering	5	NRC
3/3/1994	RESRAD Training Workshop	3	DOE
8/18/1995	DOT Regs / Envir Compliance	2	US Army
8/18/1995	Handshake II Drill	4	DOE
2/22/1996	Transportation Seminar H-401	1	NRC
4/11/1996	Inspecting for Performance-Material G 201	3	NRC
9/20/1996	24 Hour Limited Site Worker	5	Private Supplier
5/1/1997	Excel 5.0 Intro. Workshop	1	Other
5/15/1997	Windows 95 Intro. Workshop	1	Other
3/13/2000	Teletherapy/Brachytherapy	five	usnrc
9/6/2002	Response to Rad Terror Capability Ex 200	1	MCTFER
2/27/2003	Radiation Technologies	3	DTRA
4/1/2003	Fundamentals of Radological Respons e	1	NCEM
10/1/2003	Foodborn Outbreak Investigation	3	CDC
10/28/2003	RDD	1	NCEM
12/4/2003	WMD Incident Command	3	ODP
2/13/2004	Clandestin Lab/Suicide Bombing	1	NCSBI
4/28/2004	Basic Incident Command (ICS 100)	1	NCEM
5/28/2004	"RAPTER"	5	DOE/NISA
7/1/2004	24 Hr HAZWOPPER Training	2	NCSU
8/27/2004	"COBRA" WMD Technical Response	5	DHS/CDP
10/22/2004	Basic IC I-200 (T-T-T)	1	NCEM
2/1/2005	Heartbreaker Exercise	2	Gaston College
2/1/2005	IATA/DOT RAM Shipment Training	1	NC-RPS
2/22/2005	WMD Terrorism Awareness for ER	1	DHS/TEEX
2/25/2005	State & Local Prepardness (SLGCP)	1	DHS/TEEX
3/2/2005	Intro to Radiation (OER-105DW)	1	DOE/NISA
3/2/2005	Vehicle Bomb Search Methods CIP-11 n	1	DOE/NISA
3/4/2005	WMD for Emerg Responders	1	DOE/NISA

3/7/2005	DAP Indoctrination (CMP-106DW)	1	DOE/NISA
3/15/2005	Disaster Tabletop Exercise	1	Carteret CC
5/28/2005	IS-00700 NIMS Intro	1	FEMA
5/31/2005	IS-0800 NRP	1	FEMA
6/10/2005	Health Physics in Radiation Emerg	5	REAC/TS
6/17/2005	National WMD Std Awareness Prog	1	DHS/CDP
7/21/2005	Basic Incident Command I-200	1	NCEM
8/26/2005	Prevention & Response Suicide Bombi ^^	1	NM Tech
8/26/2005	Suicide Bombing - Performance Level	1	NM Tech
6/23/2006	NRC Security Systems Principles Cour ^^	5	NRC
9/22/2006	MA Security Studies (HSD)	324	NPS -DHS
11/18/2007	NRC Safe-Guard Practices (DVR Trai n(ing))	1	NRC
6/23/2008	Irradiation Facility Mgt. Course	5	MDS Nordion
7/10/2008	Creating a Service Culture	6	OSP-HRD
8/2/2008	State Reachback Spectroscopy	5	DNDO

Student Name Henry Barnes

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
	Basic Health Physics	10	NRC
	Incident Command for Federal Disaste		FEMA
11/26/2008	Basic Incident Command	.5	FEMA
1/21/2009	Intro to Access 2003		Other
1/27/2009	Transportation of Rad Mat	1	Private Supplier
2/4/2009	Customer Service Excellence	1	OSP
3/10/2009	Intermediate Access 2003		Other
3/13/2009	Licensing Procedures	5	NRC
3/20/2009	Brachytherapy & Gamma Knife	5	NRC
4/21/2009	CPR/AED	1	Other
5/1/2009	Inspection Procedures	5	NRC
5/15/2009	SS&D Evaluation Workshop	5	NRC
6/30/2009	Dealing with the Difficult Customer	1	OSP
11/11/2009	NC State PulStar Emerg. Plan	1	Other
4/12/2010	Thermo-Fisher Rad equipment	2	Manufacturer
4/19/2010	NRC - Radiography Safety	5	NRC
5/3/2010	NRC - Environmental Sampling	5	NRC

5/18/2010	EPA - Air Sampling	2	EPA
6/7/2010	NRC - Air Sampling for Radiological E mergency	5	NRC
10/21/2010	DENR Fleet & Vehicle Awareness	1	Other
12/13/2010	Radiological Emergency Management	1	FEMA
12/13/2010	ICS for Single Response & Initial Actio n Incident	1	FEMA
12/16/2010	National Incident Management System (NIMS)	1	FEMA
12/17/2010	Radiological Emergency Response	1	FEMA
12/30/2010	National Response Framework - An Int m	1	FEMA
12/30/2010	Nuclear Radiological Incident Annex	1	FEMA
1/29/2011	Radiological Emergency Response Op erations	5	FEMA
3/3/2011	RESRad Off-Site	4	NRC
3/11/2011	Increased Controls	5	NRC
3/25/2011	Nuclear Medicine	5	NRC
1/18/2012	RASCAL	3	NRC
2/27/2012	H308 Transportation of radioactive Ma terial	5	NRC
3/20/2012	H410 RESRAD	5	NRC
6/10/2012	H120 MARSAME	4	NRC

Student Name J Robin Haden

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
2/5/1987	Troxler Electronics	1	Private Supplier
7/20/1987	Health Physics & Radiation Protection	25	NRC
11/9/1987	Radiation Protection Engineering	5	NRC
6/5/1988	Inspection Procedures	5	NRC
12/4/1988	Introduction to Licensing Practices and Procedures	5	NRC
3/4/1989	RERO	10	FEMA
3/26/1990	Medical Uses of Radioisotopes	5	NRC
9/24/1990	Principles of Industrial Radiography	5	NRC

Student Name James Albright

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
	Programming in Windows: Visual Basic	Semester	Private Supplier
	HTML Basics: Level 1	Semester	Private Supplier
2/2/1988	Rad Prot for Use of RAM in Research	1	Private Supplier
1/15/1993	Meeting Facilitation Skills	3	Private Supplier

1/5/1994	Radiological Emergency Management	12	FEMA
3/3/1994	RESRAD Training Workshop	2	DOE
3/25/1994	Radiological Emergency Preparedness Planning	5	FEMA
1/6/1995	Hazardous Materials Orientation	12	FEMA
6/30/1995	Developing Plans	3	Private Supplier
8/18/1995	Radiological Accident Assessment -- P Luna Dhaan	5	FEMA
9/22/1995	Advanced Radiological Accident Assessment Part	5	Fema
10/19/1995	Building Your Workplace Safety Program	1	Private Supplier
4/5/1996	Radiological Emergency Response	12	FEMA
8/16/1996	Radiological Emergency Response Operations	5	FEMA
11/5/1996	Advanced Access	1	Private Supplier
5/5/1997	Excel 5.0 Introductory Workshop	1	Private Supplier
5/22/1997	Hardware Troubleshooting and Repair	semester	Private Supplier
5/22/1997	Networking	semester	Private Supplier
6/6/1997	Windows NT 4.0 Administration Workshop	1	Private Supplier
6/13/1997	RAM Transportation (49CFR 172(H))	4	Private Supplier
6/20/1997	Visualizing Data With ArcView 3	5	Private Supplier
7/11/1997	Communicating Effectively with your Public	3	Private Supplier
1/14/1998	Defensive Driving	1	Other
4/3/1998	Applied Health Physics	25	NRC
4/3/1998	5 Week HP and Rad Prot Course	25	DOE
4/3/1998	Health Physics & Radiation Protection	25	Private Supplier
8/14/1998	Diagnostic and Therapeutic Nuclear Medicine	5	NRC
10/2/1998	Licensing Practices and Procedures	5	NRC
5/1/1999	MS Access, Intro	1	ITS, Inc.
6/2/1999	MARSSIM	3	DOE
5/24/2001	NMED Training Course - Atlanta, GA	4	NRC
11/2/2001	Emergency Response to Terrorism	Independent Study	FEMA
4/23/2002	SRS Joint Venture Drill	3	FEMA
10/15/2003	MERRT Train-the-Trainer	2	DOE
4/28/2004	Basic Incident Command	1	Other
7/1/2004	24 Hour HAZWOPER	3	Private Supplier
2/1/2005	IATA/DOT RAM Shipment Training	1	Private Supplier
6/17/2005	Environmental Monitoring Course	5	NRC

7/21/2005 Basic Incident Command System 1 Other

Student Name Lee Cox

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
3/1/1993	Medical Use of Radionuclides	5	NRC
3/4/1993	Nuclear Testing Equipment	1	Troxler
4/15/1993	Inspection Procedures	5	NRC
7/26/1993	Safety Aspects of Ind. Radiography	5	NRC
9/2/1993	RESRAD 4.6	20	NRC
2/14/1994	Safety Assessment Methodologies for Near Surface Dis	19	Other/IAEA
3/15/1994	RESRAD 5.0	20	NRC
4/25/1995	Adult CPR	1	Red Cross
5/15/1996	Hazmat 24 hour	1	Other
5/15/1996	DOE Handshake II	4	DOE
10/9/1996	Windows 95 Introduction	1	State Perso
1/15/1997	Internet Introduction	1	Private Supplier
4/15/1997	Hazmat 8 hour	1	Other
5/15/1997	Excel 5.0	1	Other
4/14/1998	inspecting for Performance	3	NRC
7/23/1998	Radioactive Material Licensing	5	Other/self study
9/10/1998	Transportation Training Equiv to NRC H 309	1	Other
5/31/2000	Service Excellence in the Field	3	other/NC
3/18/2003	Intro to Supervision	7	NC OSP
5/28/2003	Supervision of Managers/Prof	7	NC OSP
10/16/2003	DENR Supervisory Development Progr am	12	DENR
12/18/2003	RASCAL Training	2	NRC
4/28/2004	Incident Command System (Module 1)	1	NCEM
6/29/2004	24 Hour Hazwoper Training	3	Private Supplier
12/23/2004	Nuclear Gauge Use and Safety Trainin g	1	American Tech Inst
2/1/2005	Transportation of Radioactive Material	1	Other
2/24/2005	Effective Discipline	1	DENR
6/15/2005	DENR Enforcement	1	DENR
7/21/2005	IS-200 Incident Command System	1	NCDEM
10/25/2005	NRC Security Systems & Principal Co mpany	8	NRC
5/4/2006	AIDS in the Workplace	1	State Pers

6/21/2006	Equal Employment Opportunity	3	State Per
12/18/2006	IS-700	1	FEMA
8/5/2007	Web EOC	1	Emerg Mgt
11/5/2007	NRC Safeguards On-line training		NRC
11/23/2007	Defensive Driving Course Sec. # 4988 nn		Industrial Comm
8/5/2008	Managing Multiple Generations at Wor lv	1	State Perso

Student Name Louis Brayboy

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
9/23/2013	Transportation of RAM	5	NRC

Student Name Marion Eaddy

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
4/15/1995	Inspection Procedures	5	NRC
8/15/1995	Applied Health Physics	5	NRC
9/15/1995	SS&D Workshop	5	NRC
9/27/1995	Radiological Emerg. Response	4	NRC
10/15/1995	RERO	5	FEMA
8/1/1996	Troxler User Course	1	Manufacturer
8/20/1996	24 Hour Limited Site Worker	5	Private Supplier
2/5/1997	Windows 95 Introduction	1	Other
3/15/1997	Medical Use of Radionuclides	5	NRC
4/15/1997	Access 2.0 Introduction	1	Other
5/15/1997	Access 2.0 Intermediate	1	Other
6/10/1997	Transportation	4	DOE
6/30/1997	Word 6.0 Intermediate	1	Other
4/14/1998	Inspection for Performance - Mateirals Version	3	NRC
7/23/1998	NRC Licensing Practices	5	NRC
10/5/1998	Front Page '98	2	Private Supplier
10/8/1998	MS Access 8.0 Advanced Workshop	1	Private Supplier
5/21/1999	Intorduction to Supervision Managemen **	10 total days	Other
7/29/1999	Microsoft Access 97, Level 4	1	Other
4/18/2000	Project Management	1	Private Supplier
10/4/2000	Niton XRF User Training	1	Manufacturer
3/7/2002	Supervision for Managers and Professi nnnn	10 total days	Other

7/9/2002	Radiation Protection Emergency Resp Area GDS Field	1	Other
12/18/2003	Rascal	2	NRC
4/28/2004	Incident Command System (Module 1)	1	NCEM
6/29/2004	24-hr HAZWOPER Training	3	Private Supplier
2/1/2005	Transportation of Radioactive Material	1	Other
6/15/2005	DENR Enforcement Training	1	Other
7/21/2005	ICS-200	1	FEMA
1/31/2008	Pre-licensing guidance teleconference	1	NRC

Student Name Paul Huggins

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
6/5/2006	Intro to the Incident Command System	3 hours	FEMA
6/11/2006	ICS for Agroterrorism	2	FEMA
6/12/2006	A National Response Plan, A Intro.	3 contact hours	FEMA
6/12/2006	ICS for Single Resources & Initial Acti on Incident	3 hours	FEMA
6/12/2006	Intro. To ICS/ Law Enforcement		FEMA
6/12/2006	NIMS, An Introduction	3 contact hours	FEMA
7/6/2006	Basic Customer Service	3 hours	OSP - State
7/10/2006	Basic cultural Competence	1	OSP - State
7/13/2006	First Aid/CPR/AED	6 hours	Private Supplier
8/11/2006	40-Hr HAZWOPER Certification	5	Private Supplier
8/30/2006	MERRTT Train-The-Trainer	2	DOE
9/8/2006	Defensive Driving	1	OSP - State
10/25/2006	OSHA Hazard Communication Standa rd	1 hour	Other
11/14/2006	RASCAL Training	2	NRC
1/11/2007	HIPPA Privacy and Security	0.5	Other
1/11/2007	Cultural & Linguistically Appropriate S ervices Del	0.5	OSP - State
2/8/2007	8-Hr HAZWOPER Refresher	1	Private Supplier
2/16/2007	Health Physics in Rad Emergencies	1	REAC/TS
3/7/2007	Environmental Quality Control	4.5	Private Supplier
3/20/2007	Customer Service Excellence-Kicking i t up a notch	6 hours	OSP - State
4/25/2007	Sexual Harassment Prevention throug h Awareness	3 hours	Other
5/1/2007	GAMEO Training	3	Private Supplier
6/21/2007	Chemistry for Emergency Response	1	Private Supplier
7/30/2007	Incident Command System Expanding Incidents	2	FEMA

8/28/2007	Advanced Incident Command Sys. Co mmand Incidents	2	FEMA
9/27/2007	Law Enforcement Vehicle Utilization	4 contact hours	Other
10/17/2007	Intro to Public Participation	.25 hours	Other
11/9/2007	Rad. Emerg. Response Operations	3	Other
3/18/2008	8-Hr HAZWOPER Refresher	1	Private Supplier
7/31/2008	First Aid/CPR/AED	6 hours	Private Supplier
8/12/2008	Introduction of Assessment Science	3	DOE
8/22/2008	Radiological Emerg. Preparedness Plan ning	1	FEMA
12/4/2008	Negotiation Skills	3 contact hours	Other
1/21/2009	RadMat Packaging&Trans Non-Trans Professionals	2	DOE
2/6/2009	8-Hr HAZWOPER Refresher	1	Private Supplier
3/18/2009	WIPP Controller/Evaluator Training	4 hours	DOE
3/24/2009	Defensive Driving Refresher	4 hours	OSP - State
5/14/2009	Time Management	5 hours	Other
7/16/2009	OSHA Annual Update Training Blood borne Pathogens	1.5 contact hours	Other
11/16/2009	Rail Car Incident Response	1	FEMA/DHS
12/10/2009	Public Safety WMD Response-Sampli ng Techniques	1	FEMA
1/7/2010	Short Term Enrichment Program-Rad Materials Insp	9.5	Other
11/1/2010	PULSTAR REACTOR EMERGENCY OPERATIONS	0.5	NC State Univ
11/15/2010	FLEET AND VEHICLE AWARENESS T RAINING	0.1	OSP - State
2/18/2011	MARSSIM	5	NRC
3/11/2011	INCREASED CONTROLS TRAINING	5	NRC
5/20/2011	IRRADIATOR TECHNOLOGY	5	NRC
6/17/2011	ENVIRONMENTAL MONITORING FO R RADIOACTIVITY	5	NRC
8/31/2011	Emergency Management of Radiation Accident Mitigation	2	REAC/TS
9/16/2011	Sealed Source & Device Workshop	5	NRC

Student Name Randy Crowe

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
6/9/2006	Introduction to the Incident Command System	1	FEMA
6/12/2006	National Incident Management System /NIMS	1	FEMA
6/12/2006	ICS Single resources & Initial Action In cidents	1	FEMA
6/14/2006	Radiological Emergency Response	1	FEMA
9/15/2006	Licensing	5	NRC
9/22/2006	Fundamentals of Inspections	5	NRC

10/27/2006	Materials Control & Security Systems Principles	5	DOE
1/12/2007	Central Branch Incident Mgmt Team Exercise	48 hours	NC Div Em Mgmt
2/16/2007	Basic Health Physics Tech	10	NRC
4/6/2007	RERO	5	FEMA
9/10/2007	Inspecting for Performance-Material V ersion	3	NRC
10/22/2007	Transportation of Radioactive Material	5	NRC
11/16/2007	Defensive Driving Course	.5	Other
12/3/2007	CPR/AED	.5	Other
12/11/2007	Fundamentals of Liquid Scintillation C ounting	2	Private Supplier
2/11/2008	IdentiFinder Fundamentals	1	Private Supplier
6/2/2008	Air Sampling for Radioactive Materials	5	NRC
6/9/2008	Environmental Monitoring Course	5	NRC
7/10/2008	Creating A Service Culture	5 day 05/28,06/11,06/25,0	DDI OSP-HRD Susan Adams
7/14/2008	Root Cause Workshop	5	NRC
1/27/2009	Transportation of Radioactive Material	1	Private Supplier
2/20/2009	Dealing with the Difficult Customer	1	OSP - State
2/20/2009	Diversity-Valuing Differences, Employ ment & Safety		NCDENR
2/20/2009	ITS Outlook		NCDENR
8/17/2009	Diagnostic/Therapeutic NM Course	5	NRC
9/11/2009	Basic Ethics Education & Lobbying Pr actitioner	.5	OSP - State
9/21/2009	Safety Aspects of Industrial Radiograp hy	5	NRC
8/13/2010	Brachytherapy & Gamma Knife Cours e	5	NRC
10/21/2010	Fleet & Vehicle Awareness	1	OSP - State
5/12/2011	Nuclear/Rad Incident Annex	.5	FEMA
9/16/2011	Sealed Source & Device Workshop	5	NRC
11/28/2011	Internal Dosimetry	5	NRC
1/11/2012	DOT/IATA training	1	Private Supplier
6/29/2012	Fundamentals Health Physics III	5	NRC
9/24/2012	Basic CLEAR Training	3	Private Supplier
10/9/2012	Learning ArcGIS Desktop 10.1	120	Other
11/9/2012	Characterization & Planning for Deco mmissioning	5	NRC
2/1/2013	Visual Sample Plan Training	4	DOE
2/15/2013	MARSSIM Course	5	NRC
4/29/2013	Safety Aspects of Well Logging	5	NRC

Student Name Ryan Kapler

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
6/10/2013	Transportation of RAM	5	NRC

Student Name Sharn Jeffries

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
10/28/1994	RERO	5	FEMA
12/1/1994	Troxler - Nuclear Testing Equip.	2	Private Supplier
4/15/1995	Inspection Procedures	5	NRC
8/15/1995	Safety Aspects of Industrial Radiograp hy	5	NRC
1/26/1996	REACTS	4	DOE
2/9/1996	Radiological Accident Assess.	5	NRC
3/8/1996	Adv. Rad. Accident Assessment	4	NRC
6/15/1996	Diagnostic and Therapeutic Nuclear M edicine	5	NRC
6/15/1996	Teletherapy and Brachytherapy	5	NRC
9/15/1996	Licensing Practices	5	NRC
10/9/1996	Windows 95 Intro	1	Other
6/10/1997	Transportation	4	DOE
10/15/1997	HAZWOPER 8 hour	1	Other
1/14/1998	Defensive Driving	1	Other
4/18/2000	Project Management	1	Private Supplier
4/1/2001	SS&D workshop	5	NRC
4/7/2003	Emergency Response to Terrorism	3	FEMA
7/21/2003	Radiological Train the Trainer	3	Other
12/18/2003	RASCAL	2	NRC
4/28/2004	Incident Command System	1	Private Supplier
6/29/2004	24hr Hazwoper	3	Other
2/1/2005	Transportation of Radioactive Material	1	Other
6/21/2005	DENR Enforcement/Warrants	1	DENR
7/21/2005	IS-200 Incident Command System	1	NCDEM
11/1/2005	NIMS National Incident Management System	1	FEMA
6/19/2006	NRC Security Systems & Principles co urse	5	NRC
7/10/2008	Creating a Service Culture	6	OSP-HRD

Student Name *Sheila Nelson*

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
1/24/2011	RERO	5	FEMA
2/7/2011	Inspection Procedures	5	NRC
2/28/2011	Industrial Radiography	5	NRC
7/11/2011	Irradiator Technology	5	NRC
9/26/2011	Transportation of RAM	5	NRC

Student Name *Wendy Tingle*

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
3/22/1991	Medical Uses of Radionuclides	5	NRC
4/5/1991	Inspection Procedures	5	NRC
4/28/1991	Introduction to Licensing	5	NRC
6/7/1991	Radiological Accident Assessment	5	FEMA
3/6/1992	Five Week Health Physics Course	25	NRC
4/10/1992	Radiological Emergency Response Op ~	7	FEMA
7/2/1992	Troxler Nuclear Gauge Training	1	Troxler
8/28/1992	Industrial Radiography	5	NRC
12/10/1993	One Week Radiation Protection	5	NRC
1/28/1994	Health Physics in Radiation Accidents	5	REAC/TS
5/1/1999	Introduction to Supervision	5	NC OSP
11/26/2003	Supervision for Managers/Professional ~	10	NC OSP
4/28/2004	Basic Incident Command	1	NCEM
5/28/2004	RAPTER	5	DOJ FBI
7/1/2004	Hazwoper Training	3	NCSU
9/10/2005	National Incident Command	1	FEMA
9/10/2005	Incident Command for Federal Disaste ~	1	FEMA
12/5/2005	Haz Mat Worker Training	1	UNC
4/28/2006	EEO	2	NC OSP
8/21/2006	Introduction to Mitigation	1	FEMA
8/21/2006	Emergency Operations Centers	1	FEMA
8/21/2006	Voluntary Agencies in Emergency Mg ~	1	FEMA
8/21/2006	Disaster Basics	1	FEMA
8/21/2006	Radiological Emergency Response	1	FEMA

8/21/2006	Effective Communication	1	FEMA
8/21/2006	Emergency Program Manager	1	FEMA
8/21/2006	Radiological Emergency Management	1	FEMA
8/21/2006	Animals in Disaster - Awareness and Plan	1	FEMA
8/21/2006	Decision Making & Problem Solving	1	FEMA
8/21/2006	Animals in Disaster - Community Plan Plan	1	FEMA
8/21/2006	Community Disaster Exercises	1	FEMA
8/21/2006	Leadership & Influence	1	FEMA
10/1/2006	Certified Emergency Manager	80	CEM
10/1/2006	Public Managers Program	60	NC OSP
12/3/2007	CPR/AED	.5	Other
7/10/2008	Creating a Service Culture	6	OSP-HRD

Student Name William Johnson

<i>Date of Class</i>	<i>Class Name</i>	<i>Days</i>	<i>Supplier</i>
11/8/1971	Basic Radiological Health	12	EPA
5/22/1972	Advanced Medical X-ray Protection Su Course	4	Other
1/23/1973	Federal Performance Standard for Dia gnostic X-ray	3	Other
2/10/1973	Next Symposium	4	Other
5/16/1977	Industrial Radiography Safety	5	NRC
8/22/1977	Rero, Las Vegas	10	FEMA
10/21/1977	Using a Computer as a Management T ool	1	Private Supplier
2/20/1978	Development & Operation of Radiation Program	4	NC State University
12/15/1980	Radiolotope Techniques	5	NC State University
2/2/1981	Radiological Accident Assessment	5	FEMA
4/19/1982	Quality Control, Kodak Course	5	Manufacturer
12/6/1983	Advanced Medical X-ray	3	Region IV, CRCPD
7/14/1984	New Next Survey Procedures	3	FDA, Atlanta Ga
10/24/1984	Radiation Therapy	3	Region IV, CRCPD
10/24/1984	Radiation Therapy	3	Region IV, CRCPD
11/16/1984	Emergency Plan Overview	1	CP&L, Harris Plant
11/16/1984	Emergency Plan Overview	1	CP&L, Harris Plant
4/22/1985	Highway Patrol Communcations	1	Highway Patrol, Raleigh
6/3/1985	CT Dosimetry Survey	4	Region IV, CRCPD
1/11/1991	Fluroscopy NEXT X-Ray Systems	4	Region IV, CRCPD

9/9/1992	Introduction to Supervision	5	State Personnel, Raleigh, NC
11/16/1996	Equal Employment Opportunity	1	State Personnel, Raleigh, NC
1/16/1999	Supervision of Managers & Professionals	1	State Personnel, Raleigh, NC
1/16/1999	Supervision of Managers & Professionals	1	State Personnel, Raleigh, NC
10/4/2002	Public Manager Program	Two Years	State Personnel, Raleigh, NC
10/4/2002	Advanced RERO	5	FEMA
4/28/2004	Basic Incident Command	1	Other
8/22/2005	Incident Command System, Basic	3	FEMA
12/19/2006	National Incident Management System (NIMS) Intro	3	FEMA
11/16/2007	Defensive Driving Course	1	NC Industrial Commission
7/10/2008	Creating A Service Culture	6	OSP-HRD
11/22/2010	DENR Fleet and Vehicle Awareness Training	1	DENR
9/19/2011	Annual Fire Extinguisher and Life Safety Training	1	DHHR
11/30/2011	Excels	1	NC DHHS HR
9/24/2012	Basic CLEAR Training	3	Other

Erickson, Randy

From: Cox, Lee <lee.cox@dhhs.nc.gov>
Sent: Wednesday, February 12, 2014 1:57 PM
To: Erickson, Randy
Cc: Crowe, Randy; Albright, James; Ford, Monica; White, Duncan; Christian, Patsy
Subject: Attachments Continued for Questionnaire
Attachments: INCIDENT RESPONSE PROCEDURE.docx; N-008-R Investigation of Allegations.pdf

This is the last of it. We will have all other inspection procedures available for review. We are still tweaking some after our most recent review. Thanks!

Attachment E: Incident Procedure
Attachment F: Allegation Procedure

W. Lee Cox, III
N.C. Department of Health and Human Services
Chief, Radiation Protection Section - Division of Health Service Regulation
3825 Barrett Drive, Raleigh, NC 27609
Phone: 919-571-4141 ext. 201
Fax: 919-571-4148
lee.cox@dhhs.nc.gov
www.ncdhhs.gov/dhsr/

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Attachment E

Incident Procedure

**INCIDENT RESPONSE PROCEDURE
FOR INCIDENTS INVOLVING RADIOACTIVE
MATERIALS**

Issued: January 2014
Revision: 1

DIVISION PROCEDURE APPROVAL

Issued by

_____ Date _____
James D. Albright, Radioactive Materials Branch Manager

_____ Date _____
Chris Fidalgo, Health Physicist

_____ Date _____
Randy Crowe, Health Physicist

_____ Date _____
Ryan Kapler, Health Physicist

_____ Date _____
Louis Brayboy, Health Physicist

_____ Date _____
Sharn Jeffries, Health Physicist

_____ Date _____
Clifford Harris, PhD, Health Physicist

_____ Date _____
Sheila Nelson, Health Physicist

_____ Date _____
Patrick Cox, Environmental Health Technologist

_____ Date _____
William, Jeffries, Radiation Emergency Coordinator

_____, Radiation Emergency Coordinator Date _____

Approved by _____ Date _____
W. Lee Cox, Section Chief

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1.0 PURPOSE:

The purpose of this document is to establish a protocol in which incidents involving radioactive materials may be dealt with timely and appropriately. It is also the purpose of this protocol to ensure consistency on how the agency responds to incidents. Please note, this procedure does not account for incidents which occur at fixed nuclear facilities, i.e. nuclear power plants.

2.0 GENERAL REQUIREMENTS:

It is the responsibility of this agency to ensure that any incident involving radioactive material that the agency is aware of be dealt with timely and appropriately. All responses are conducted in the interest of public health, safety, and the environment.

3.0 INCIDENT PROCEDURE OUTLINE:

The following is the basic framework of this incident response procedure:

I. Incident Call

- A. Call directed to Radioactive Materials Section (RMS).

II. Radioactive Materials Section (RMS) Receives Call

- A. Fill out DRP's "Incident Reporting Form."

III. Incident Response Assessment

- A. Inform DRP personnel.
- B. Incident Assessment Team (IAT) transfers incident to appropriate section as needed.
- C. The IAT should decide whether the call is an incident or not.
 - 1. If the call is deemed not an incident:
 - a. Respond as appropriate to the situation.
 - 2. If the call is deemed an incident:
 - a. The IAT shall assess situation and formulate an opinion on type of response and external notifications:
 - i. Determine type of call, and
 - ii. Apply the appropriate guidance to the current situation and generate opinions.
 - b. The IAT should decide on the type of response and external notifications.
 - c. Inform the Division Director, or his designee, of the incident and decisions made.
 - d. Document incident in "Incident Log" and have incident file generated.

IV. Execute Response

- A. The incident leader, or his designee, shall make the external notifications as determined by the IAT.
- B. Respond.

V. Follow up

VI. Close Incident

- A. IAT decides on closure
- B. Issuance of memorandum to file to officially close incident
- C. Incident file to be organized chronologically
- D. Incident log closed
- E. Incident file to Nuclear Material Events Database (NMED) manager

VII. Lessons Learned

VIII. Incident File Management

4.0 DISCUSSION:

I. Incident Call:

A. Policy for Referral of Incoming Calls Related to Incidents:

As the general protocol, all incident calls placed to the Division, should be initially routed to the Radioactive Materials Section (RMS) for handling.

Possible exceptions that are permissible to this policy are the following:

1. If a caller requests a specific person, then the call should be forwarded to that particular person.
2. If there are no RMS technical staff members available to take the call then the call should be routed to either the Radiation Emergency Coordinator or Division Director. If the Radiation Emergency Coordinator or Division Director are not available, route the call to a technical staff member in another section. (Technical staff talking on the phone constitutes being available and the caller should be told that someone will be with them shortly and then place the caller on hold, alert staff member of incident call, and then transfer the call when the staff member is off the phone. As a general rule of thumb, do not place an incident call on hold for longer than one (1) minute.)

II. RMS receives call:

- A. The RMS technical staff member who takes the call will be designated the incident leader. He will fill out the "Incident Reporting Form," ensuring he obtains a call back telephone number in the event contact has to be re-established. (See Appendix A for "Incident Reporting Form")

III. Incident Assessment:

- A. Upon completing the reporting form, notify at least the Section Chief, or his designee, and one other technical staff member; hereafter, this group will be referred to as the Incident Assessment Team (IAT).
- B. When IAT is formed, the incident leader will present the facts regarding the incident to the team. The team should quickly determine if the incident is in the appropriate section. If it is not, transfer it to the appropriate Section Chief, or his designee.

PROCEDURE NOTE:

If the incident call is clearly not in the appropriate section, the incident leader may transfer it to the appropriate section without establishing IAT.

- C. If the call is determined to be in the appropriate section, IAT must decide whether the call is actually an incident or not. IAT should use the following examples in making their determination:

Incidents:

- Misuse, loss of control over, or loss of licensed radioactive material
- Unknown package labeled as radioactive materials
- Member of the public calls concerning something they saw, or know of, that is radioactive material related
- Scrap-yard and landfill alarms
- Transportation accidents
- Possible radioactive contamination

Events:

- Members of the public who call in and have a concern (real or imaginary) regarding ionizing radiation or radioactive materials
- Members of the public who have non-licensable radioactive material in their possession and have questions about it, e.g. heirlooms

1. Events:

- a. If the call is classified as an event, IAT should determine a course of action to handle the situation. Events should be documented and records maintained in a separate file.

PROCEDURE NOTE:

The event classification is being used and documentation being maintained in order to maintain a record of all events. In the past, information has been lost because the event was considered not an incident. It should be noted that an event may be reclassified as an incident if more information reveals it to be an incident.

2. Incidents:

- a. If the call is classified as an incident, IAT should begin to form opinions on the type of response and external notifications.
- i. Before opinions should be reached, IAT should classify the call in one of the four categories. Associated with each category is guidance on type of response, etc.:
- General Public or Other (See Appendix B)
 - Scrap-yard (See Appendix C)
 - Landfill (See Appendix D)
 - DRP Licensee (See Appendix E)
- ii. IAT should then apply the appropriate guidance to the situation and form opinions on the type of response and external notifications.
- b. IAT shall then make the decisions on type of response and notifications.

PROCEDURE NOTE:

All decisions made by IAT shall be made such that they are the consensus of the team members. IAT was designed to ensure that decisions on type of response and notifications are made consistently from one incident to the next. The Section Chief, or his designee, is a member of all teams such that there is one individual who remains constant throughout all incidents. The addition of another technical person also brings insights on previous incidents.

- c. Once the decisions on response and notifications are made, the Division Director, or his designee, should be immediately

notified. The State Radiation Emergency Coordinator should also be notified.

- d. The incident leader should then document the incident in the incident log (See Appendix F for Incident Log Form) and have an incident file generated.

IV. Execute Response:

- A. The incident leader, or his designee, shall make all external notifications, deemed immediate, as decided by IAT.
- B. The incident leader shall coordinate the response.
- C. Inform the State Radiation Emergency Coordinator and Division Director of progress.

PROCEDURE NOTE:

It should be noted that the Agency responds to all incidents; however, the form of the response may vary. The Agency typically responds to all incidents in one of three ways:

- Telephone Consult,
- DRP physical response, and/or
- DRP facilitated Third Party response, e.g. emergency management and/or consultant(s).

IAT should take into consideration these three response types when deciding on how to respond to certain situations.

When a DRP physical response is decided, ensure that qualified personnel respond (See Appendix G for the training requirements for response personnel).

V. Follow-up:

Follow-up actions to incidents will be situational. Follow-up actions are essentially any action, subsequent to the initial response, to resolve and/or bring closure to the incident, and may include:

- Maintaining communications with affected parties while the incident is still ongoing,
- DRP physically responding following an investigation by a third party,
- Enforcement actions against DRP licensees, and
- Maintaining the incident file, e.g. reports, photographs, etc.

VI. Close Incident:

- A. Once all information is gathered which the incident leader determines is adequate to close the incident, he must present the information to IAT and recommend closure. This will allow the incident leader the opportunity to have a second review and ensure nothing has been missed.
- B. Once IAT agrees to close the incident, the incident leader will be required to generate a memorandum and/or report, summarizing events, to officially close the incident.
- C. All reports, correspondence, and information should be assembled in chronological order with the reporting form maintained in front.
- D. Inform State Radiation Emergency Coordinator and Division Director of incident closure.
- E. Document closure of the incident in the incident log book.
- F. Incident file should then be distributed to the Nuclear Material Events Database (NMED) Manager for input into the database.

VII. Lessons Learned:

In an interest to learn from each other, mistakes or not, it is strongly recommended that on a quarterly basis all qualified incident response personnel, as well as those individuals training to become qualified, meet to discuss the incidents which were closed out during the previous quarter. This meeting shall be convened and moderated by the State Radiation Emergency Coordinator. The incident leader of each incident should present, in brief, a summary of how the incident was handled. It is hoped that these meetings will aid the incident response system in making consistent decisions by learning how each incident is responded to and, in general, how they are handled.

VIII. Incident File Management:

It shall be the responsibility of the NMED Manager to review the incident files and logs semiannually to ensure that the files and log are being properly maintained and closed. A report will be generated semiannually giving status and distributed to the Division Director.

APPENDIX A: INCIDENT REPORTING FORM

DIVISION OF RADIATION PROTECTION

INCIDENT REPORTING FORM

DRP PERSONNEL TAKING CALL: _____

INCIDENT NO. ICD - ___ - ___ DATE: __/__/__ TIME: ____ AM/PM

Incident Reported by:

Name & Title: _____

Organization: _____

Phone No.: _____

Alternate Contact:

Name & Title: _____

Organization: _____

Phone No.: _____

Location of Incident (Address and Directions):

Incident Type (Check One):

LANDFILL

SCRAP YARD

TRANSPORTATION

RMS LICENSEE

INDUSTRIAL

OTHER

Brief Description of Incident:

INCIDENT STATUS:

1. Is the event over or ongoing? ONGOING OVER UNKNOWN
2. Is the event an immediate threat for injury or death? YES NO UNKNOWN
If yes or unknown, explain: _____

3. Is there any threat for fire or explosion? YES NO UNKNOWN
If yes or unknown, explain: _____

4. Are other hazardous materials or hazards involved? YES NO UNKNOWN
If yes or unknown, explain: _____

5. Has anyone been injured by the event (non-radiological)? YES NO
If yes, explain: _____

6. Has anyone been injured by radiation? YES NO UNKNOWN
If yes or unknown, explain: _____

7. Has anyone been contaminated? YES NO UNKNOWN
If yes or unknown, explain: _____

8. Radiological information available (e.g. shipping papers):
 - Isotope(s): _____
 - Activity: _____
 - Device (Make, Model, Ser. No.): _____
 - Other: _____
9. Radiation Survey:
 - A. Has a survey been performed? YES NO
 - B. Survey Information:
 - Performed by: _____
 - Survey Meter (Make, Model, Ser. No.): _____
 - Background Reading: _____
 - Results: _____

INCIDENT STATUS: (Continued)

10. Have other agencies been notified? YES NO UNKNOWN
If yes, who? _____

11. What other agencies are on site?

12. Was assistance requested by caller? YES NO
If yes, describe type of assistance requested and by whom: _____

13. Additional Information: _____

INCIDENT ASSESSMENT:

14. Incident Leader: _____

15. Incident Assessment Team (IAT):

- Section Chief or designee: _____
- Additional Technical Staff Members (at least one): _____

16. Is there a significant radiation exposure hazard? YES NO UNKNOWN
If yes or unknown, explain: _____

17. Is there a significant contamination hazard? YES NO UNKNOWN
If yes or unknown, explain: _____

INCIDENT ASSESSMENT: (Continued)

18. Classify the event in regard to risk to persons, environment and facilities or equipment at scene:

- HIGH - Significant risk
- MEDIUM - Potential risk
- LOW - Minimal or no risk

19. IAT decision on type of response:

- Telephone consultation
- Third party response (e.g. County emergency management or consultant)
If a third party response, then who? _____

- DRP physical response
If a DRP physical response, then who? _____

20. IAT decision on priority of response if Third Party or DRP Physical Response is decided:

- Emergency
- As soon as practicable
- Schedule
- Check when in the area

21. IAT decision on immediate external notifications:

- NRC Operations Center
- State Emergency Management Operations Center
- EPA
- Other(s): _____

NOTIFICATIONS:

22. Has the Division Director, or his designee, been informed of the incident? YES NO

Give name of designee if notified: _____

23. What agencies need to be notified immediately?

Nuclear Regulatory Commission: (301)816-5100
Date: __/__/__ Time: _____ AM/PM
Name & Title: _____
Comments: _____

State Emergency Management: (919)733-3943 or (800)858-0368
Date: __/__/__ Time: _____ AM/PM
Name & Title: _____
Comments: _____

Other:
Date: __/__/__ Time: _____ AM/PM
Name & Title: _____
Comments: _____

Other agencies which may need to be notified immediately:

- EPA (Atlanta-Region IV): (404)562-9100
- DOE (SRS-Region III): (803)725-3333
- DOT (State and/or Federal)
- Solid Waste Section (Landfills): (919)733-0692
- Public Water Supply: (919)715-3237
- DEHNR Public Information Office (919)715-4112
- Local Health Department
- Highway Patrol (Warning Point): (919)733-3861
- County Emergency Management

CLOSE OUT INFORMATION:

24. Date incident report closed: ___/___/___

25. What was the disposition of the radioactive material?

- Returned to owner via a CRCPD exemption
- Secured at site
- Picked up by licensee
- Picked up by vendor
- Transported to DRP for storage
- Other: _____

Comments: _____

26. Is there any follow up needed for this incident? YES NO
If yes, describe what is needed below: _____

27. Were there any lessons learned, procedure changes or other corrections/changes that need to be addressed by the staff? YES NO
If yes, provide comments below: _____

**APPENDIX B: GUIDANCE ON RESPONDING TO
GENERAL PUBLIC OR OTHER CALLS**

1.0 Purpose:

The purpose of this guidance directive is to provide guidance on responding to general public or other calls for the Division of Radiation Protection (DRP).

2.0 General Requirements:

Response to general public or "other" calls is to be performed in the interest of public health, safety, and the environment.

3.0 Responsibilities:

3.1 Response time: Qualified DRP personnel should respond as applicable as soon as possible but no longer than 5 working days from when a physical response was warranted. When a remote response can be coordinated, the response should be within 24 hours of the incident call.

3.2 Physical response: A physical response should occur when warranted pursuant to Section 5.0 below.

3.3 Record Keeping: The incident leader shall ensure that the Incident Reporting Form and Incident Log are complete, as well as any other reports, i.e. interim and closeout, necessary to document the incident.

3.4 Notification: It shall be the responsibility of the incident leader to notify personnel from the appropriate outside agency, e.g. NRC, EPA, NCDER, county emergency management, etc., per the appropriate section of Appendix G, Notifications.

4.0 Precautions:

4.1 The number of DRP response personnel responding to an incident shall be determined by IAT. The standard DRP response team should include two individuals with at least one individual who has been determined to be qualified pursuant to Appendix H.

4.2 Appropriate radiation protection and safety precautions, e.g. ALARA, should be applied by incident response personnel. If third parties are enlisted to respond, DRP incident response personnel should determine that the third party responder has the minimum required qualifications, experience, etc., to adequately complete tasks required.

5.0 General Guidance:

These types of calls should be handled on a case-by-case basis. It shall be up to the Incident Assessment Team's discretion to determine the type of response, i.e. via telephone, third party--to include local emergency management officials, or a DRP physical response. Some determinants for response include: the potential for licensed material to be involved; possible media event; and potential risks to the general public, environment, and/or property.

Note: If a call is taken from a member of the general public and it is likely that the individual has in their possession licensed radioactive material, DRP should physically respond as soon as possible but no longer than within 5 business days.

APPENDIX C: GUIDANCE ON RESPONDING TO SCRAP-YARDS

1.0 Purpose:

The purpose of this guidance directive is to provide guidance on scrap-yard incident response policy for the Division of Radiation Protection (DRP). This includes guidance on when to respond, what type of response to use, and who at DRP should respond.

2.0 General Requirements:

Response to scrap-yard incidents by DRP personnel is to be performed in the interest of public health, safety, or the environment.

3.0 Responsibilities:

3.1 Response time: Qualified DRP personnel should respond to scrap-yard incidents within 5 working days when a physical response by DRP personnel is determined to be necessary. When remote response (i.e., telephone) is determined to be satisfactory, response should be within 24 hours.

3.2 Physical response: A physical response should occur when the incident assessment team (IAT) determines that a such a response is necessary. The IAT should use the criteria listed below in Section 5.2 to make such a determination.

3.3 Record Keeping: The incident assessment team leader has primary responsibility for completing the Incident Reporting Form, the Scrap-yard/Landfill Information Survey, and all other appropriate paperwork required by the particular scrap-yard incident. This can include CRCPD DOT exemption forms, incident closeout paperwork, etc. The IAT leader may delegate record keeping tasks to other team members if circumstances require it. Furthermore, DRP IAT personnel are to keep the Incident Log current. In addition, the IAT leader should submit the appropriate information to the NMED manager for incorporation into the NMED database.

3.4 Notification: DRP IAT members are to notify personnel from the appropriate outside agency (e.g., NRC, EPA, NCDDEM, county emergency management personnel, etc.) per the appropriate section of Appendix G, Notifications.

4.0 Precautions:

4.1 The number of DRP response personnel responding to an incident shall be determined by IAT. The standard DRP response team should include two individuals with at least one individual who has been determined to be qualified pursuant to Appendix H.

4.2 Appropriate radiation protection and safety precautions (e.g., ALARA, time-distance-shielding, dosimetry, etc.) should be applied by incident response

personnel. If third parties, particularly other public sector employees (e.g., emergency management personnel), are enlisted to respond to scrap-yard incidents (see situational bases, Section 5.6 below), DRP IAT members should determine that, to the fullest extent possible, the third party responder has the requisite knowledge/experience to adequately complete tasks required by a given scrap-yard incident.

5.0 Type of Response: Following receipt of incident call by Radioactive Materials Section (RMS) personnel, RMS personnel involved will form IAT for determination of type of response. This team will use the following procedure to make this determination.

5.1 First Call: If the scrap-yard facility is a first time caller (i.e., DRP has no information concerning this scrap-yard and/or the most recent incident for this scrap-yard was closed out prior to the adoption of this new procedure), the first determination to make is if a CRCPD DOT exemption is appropriate. If the scrap-yard facility is a first time caller under the definition given above, proceed to Section 5.2 below. If the scrap-yard facility is not a first time caller under the definition given above proceed to Section 5.4 below.

5.2 DOT Exemption for first time callers: If the scrap-yard caller is a first time caller under the definition given in Section 5.1, the incident assessment team needs to determine if a CRCPD DOT exemption is appropriate. Such an exemption is appropriate under the following circumstances:

- Radiation monitors at the scrap-yard have tripped on an incoming load of scrap and the scrap-yard does not want to take possession of the possibly radioactive material.
- The source of the incoming load of scrap in question is traceable.
- The scrap-yard owner or management understands that an exemption is possible and wants to obtain an exemption. IAT personnel may wish to contact said management and explain or suggest this course of action.
- The caller or other agent working at the scrap-yard or on behalf of the scrap-yard has prior experience with completion of a CRCPD DOT exemption or at least enough experience to reliably complete the paperwork required for the CRCPD DOT exemption. Responsibility for gathering information for the CRCPD exemption request will reside with the party requesting the exemption (in most cases the scrap-yard). This determination will be made by the members of the IAT.
- The members of the IAT feel confident in the known information concerning the detector trip such as count rate, exposure rate, type of detector, etc.

If a CRCPD DOT exemption is deemed to be appropriate by the incident assessment team, team members should consult the CRCPD DOT exemption work instruction on how to complete the exemption. If the CRCPD DOT exemption can be successfully completed per the work instruction, the incident

should be logged with the appropriate notations made in the incident log. The incident will be closed out when a letter received by DRP from the scrap-yard confirming shipment of the rejected load back to its source. Additionally, a scrap-yard/landfill information survey form will need to be mailed to the scrap-yard for completion by their personnel. The completed survey form when returned to DRP should be added to the scrap-yard/landfill database. If an exemption is not appropriate for an incident or if some part of the work instruction requirements disqualify the scrap-yard from obtaining a CRCPD DOT exemption, please proceed to Section 5.3.

- 5.3 First Call/No CRCPD DOT exemption:** Before proceeding any further, members of IAT should confirm that a CRCPD DOT exemption cannot be issued for the incident in question. If an exemption can be issued, please refer to Section 5.2. However, if an exemption cannot be issued and the facility in question meets the first time caller criteria as defined above, DRP will physically respond to the scrap-yard incident. Contact the affected scrap-yard and inform the contact person that DRP will be responding to the incident as soon as possible but at least within the next five working days. The incident leader, or his designee, should form an Incident Response Team with other qualified incident response personnel from DRP. The response should be carried out in accordance with DRP Incident Response Policy. Additionally, if a completed scrap-yard/landfill information survey form does not exist for this facility, it should be completed by incident response members while at the scrap-yard. This form should be filed upon return to DRP for later use should another incident occur at this scrap-yard. If a scrap-yard/landfill survey form has been completed for this facility, incident response team members should make revisions to the survey form if any changes in survey information are noted.
- 5.4 "Nth call"/All previous incidents DOT exemptions:** If the scrap-yard caller is not a first time caller under the definition given in 5.1, members of IAT need to consult the incident log for records of previous incidents involving this scrap-yard. If all previous incidents at this scrap-yard were resolved using a CRCPD DOT exemption and this incident can also be resolved using a CRCPD DOT exemption (see Section 5.2 for exemption criteria), it is acceptable to proceed with the exemption. However, if all previous incidents were resolved using a CRCPD DOT exemption and this incident cannot be resolved with an exemption, a physical response will be necessary (see Section 5.3 for details). If at least one previous incident has required a physical response, proceed to Section 5.5 below.
- 5.5 "Nth call"/Previous physical response required:** If at least one previous incident at this scrap-yard required a physical response, but for this incident a DOT exemption is sufficient for incident resolution, it is acceptable to proceed with a CRCPD DOT exemption. If at least one previous incident required a physical response, and a CRCPD exemption is not possible, a physical incident response may be necessary. For criteria on when a physical response may be

necessary proceed to Section 5.6 below.

5.6 Situational Bases for Incident Response: When considering whether or not to make a physical response, the following questions should at least be considered by the incident assessment team:

- Have the CRCPD DOT exemption requirements (consult CRCPD DOT work instruction) been exceeded?
- Is a licensed device involved (e.g., moisture density gauge, etc.)? If so, the device will probably need to be traced back to its source.
- Is the exposure rate near the material in question high enough to be of any concern, and/or is contamination of the public a possibility?
- Are adequate instrumentation and properly trained personnel available to handle the scrap-yard incident? The answer to this question may be influenced by DRP's previous experience with this scrap-yard.
- Is this incident part of an ongoing negative trend? In other words, are multiple incidents of a similar nature happening at scrap-yards statewide?
- Could this incident become a media event?
- Is this incident of exceptional interest to DRP personnel?
- Does the scrap-yard in question have the financial means to resolve the incident on its own or with remote guidance from DRP?

If after considering the above criteria and any other pertinent information, IAT does not feel that a physical response is necessary, other means to resolve this incident will have to be employed. These methods can involve the use of third parties (such as consultants, local or regional emergency response officials, etc.), outside technical assistance from sources such as consultants or scrap-yard dealers associations, or incident response training for scrap-yard employees (available from consultants or possibly by arrangement with professional associations and/or DRP). If means other than a physical response by DRP are employed to resolve an incident, some record of the method should be added to the incident file so that if similar incidents occur in the future the same method can possibly be applied. For example, if a particular county or regional emergency response official is used to respond to an incident, for consistency and efficiency, it would be ideal to utilize that same official if similar incidents occur in the future in that same county/region. Finally, it may be necessary for DRP to physically respond to an incident even if other means have been utilized in an attempt to resolve a particular incident.

Figure C-1: Scrap-yard/Landfill Information Survey

Facility Name: _____

Address: _____

Mailing: _____

Physical: _____

(Attach a detailed map showing the location of the facility from a major highway.)

Contact Persons and Telephone Numbers:

Primary: _____

Alternate: _____

Fax: _____

Radiological Instrumentation On Site:

Survey Meters:

Make: _____

Model: _____

Serial No.: _____

Range: _____

Calibration: _____ Frequency: _____

Payload Monitors:

Make: _____

Model: _____

Background: _____

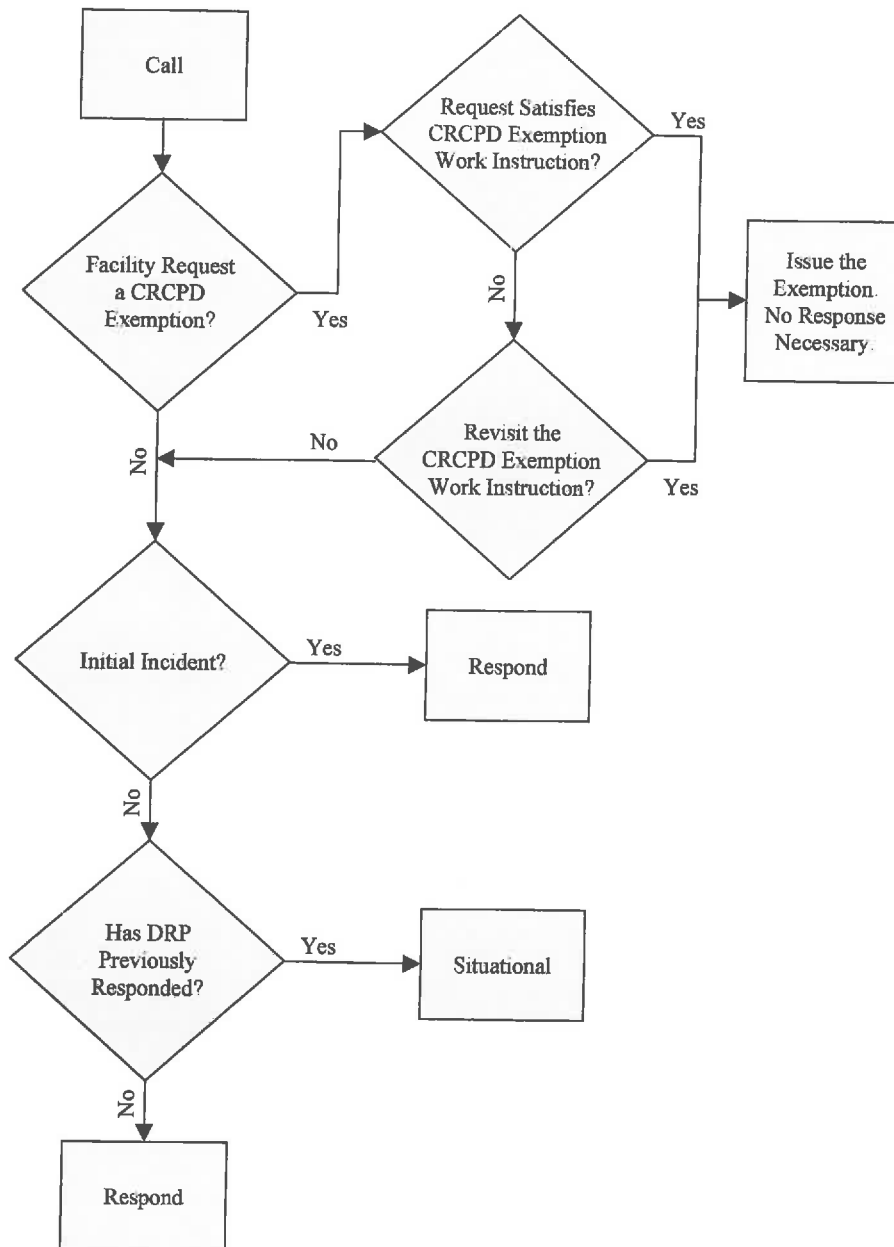
Calibration: _____ Frequency: _____

Other Monitors or Instrumentation:

NOTE:

1. Obtain a map of the facility and indicate the location of all fixed radiation monitors.
2. Have the facility representative explain, or obtain a copy of their procedure used to handle radiation survey alarms, to include validating the alarm, who do they contact in the event of an alarm, etc. Obtain a copy of the facility's written procedures.

Figure C-2: Flow Chart for Scrap-yard Incidents



APPENDIX D: GUIDANCE ON RESPONDING TO LANDFILLS

1.0 Purpose:

The purpose of this guidance directive is to provide guidance on landfill incident response policy for the Division of Radiation Protection (DRP). This includes guidance on when to respond, what type of response to use, and who at DRP should respond.

2.0 General Requirements:

Response to landfill incidents by DRP personnel is to be performed in the interest of public health, safety, or the environment.

3.0 Responsibilities:

- 3.1 Response Time:** Qualified DRP personnel should respond to landfill incidents within 5 working days when a physical response by DRP personnel is determined to be necessary. When a remote response is determined to be satisfactory, the response should be within 24 hours. Any response should be executed as quickly as possible in order to return personnel and vehicles to normal operation. If a response is not immediate, arrangements should be made with the landfill as to a mutually convenient time for the response to be made.
- 3.2 Physical Response:** A physical response should occur when warranted pursuant to Section 5.0 below.
- 3.3 Record Keeping:** The incident leader is responsible for completing the Incident Reporting Form, the Scrap-yard/Landfill Information Survey, and all other appropriate paperwork required by the particular landfill incident. This can include CRCPD DOT exemption forms, incident closeout paperwork, etc. Furthermore, DRP incident response personnel are to keep current the Incident Log and appropriate databases such as NMED.
- 3.4 Notification:** DRP incident response personnel are to notify personnel from the appropriate outside agency (e.g., NRC, EPA, NCDDEM, county emergency management personnel, etc.) per the appropriate Section of Appendix G, Notifications.

4.0 Precautions:

- 4.1** The number of DRP response personnel responding to an incident shall be determined by IAT. The standard DRP response team should include two individuals with at least one individual who has been determined to be qualified pursuant to Appendix H.
- 4.2** Appropriate radiation protection and safety precautions (e.g., ALARA, time-distance-shielding, dosimetry, etc.) should be applied by incident response personnel. If third parties are enlisted to respond to landfill incidents, DRP incident response personnel should enlist those with appropriate training and experience to adequately complete the tasks required.

5.0 General Guidance:

5.1 Type of Response: Following receipt of the incident call by Radioactive Materials Section (RMS) personnel, RMS personnel involved will form an incident assessment team for determination of type of response. This team will use the following procedure to make this determination.

5.1.1 First Call: If the landfill caller is a first time caller, DRP will respond. If the facility has not completed a Scrap-yard/Landfill Information Survey, it will be done at this time. This will be an opportunity to develop a relationship with the personnel at the landfill, to get to know their procedures and make suggestions, to learn what instrumentation they have and how much expertise they have in using it. This first contact will be important in setting up good communications with the facility.

5.1.2 "Nth call"/ Residential Waste: The Incident Assessment Team (IAT) analyzing the information will determine whether a physical response is required based on meter readings and an understanding of the facility obtained in the Scrap-yard/Landfill Information Survey and in the previous response.

- If the meter reading at the surface of the vehicle is less than 10 mR/hr, the material can be disposed of in the landfill.
- If the meter reading at the surface of the vehicle is greater than 10 mR/hr, a physical response is warranted according to current DRP guidelines. Proper disposition of the material will be determined at the site by all agencies involved.
- A physical response may be necessary if the landfill refuses to accept any type of radioactive waste.

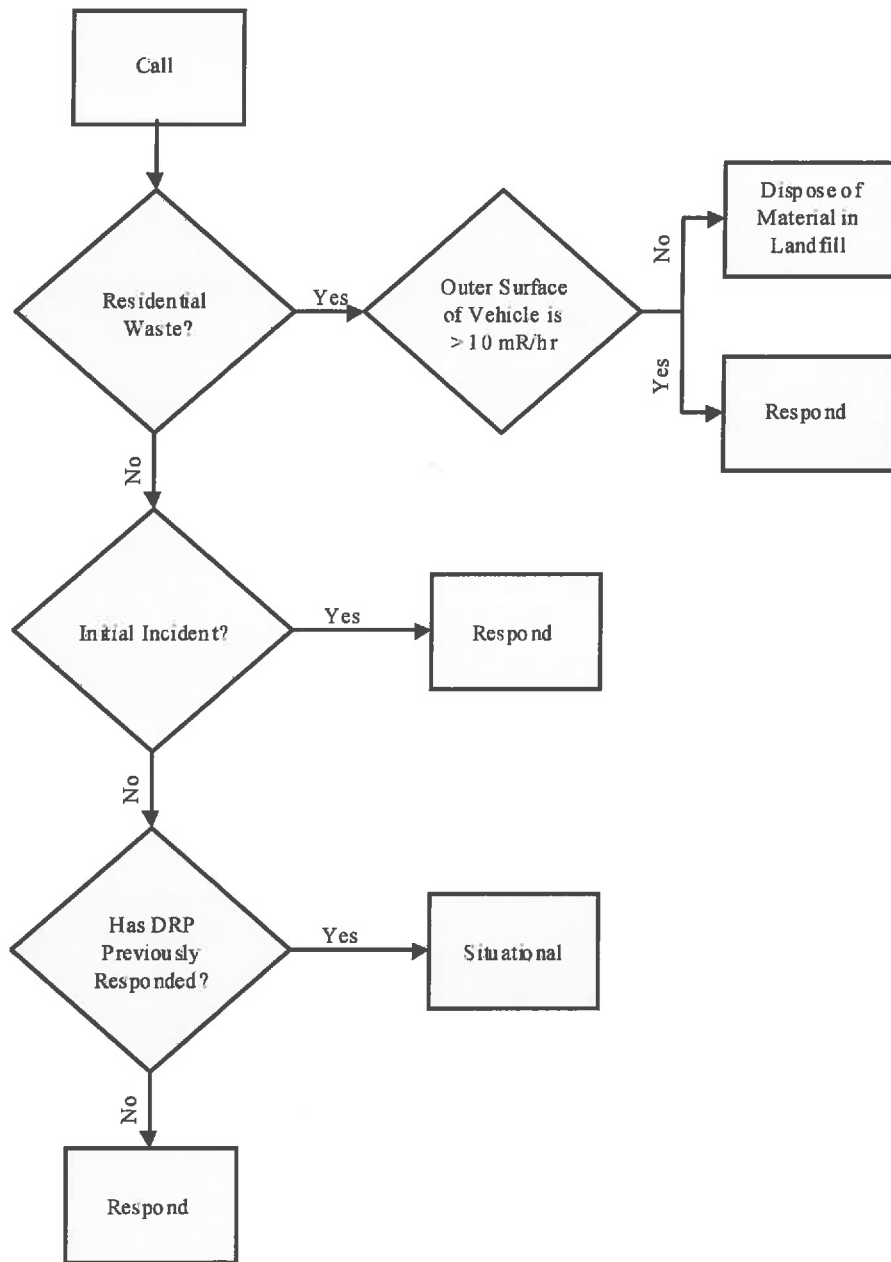
5.1.3 "Nth call"/ Nonresidential Waste (i.e., hospital/industrial):

IAT will determine whether a response is necessary based on the situation, taking into consideration the information obtained about the facility in the survey and in the previous response(s). A physical response may be necessary in the following situations:

- The landfill may refuse to accept the waste.
- The landfill may request a physical response.
- The type of material may be questionable.

5.2 No Physical Response: If IAT determines that no physical response is necessary, the person in charge of the call should contact the facility, make notifications, if any, and close the incident as directed by the Incident Reporting Form.

Figure D-1: Flow Chart for Landfill Incidents



**APPENDIX E: GUIDANCE ON RESPONDING TO DRP
LICENSEES**

1.0 Purpose:

The purpose of this guidance directive is to provide guidance on responding to incident calls from Division of Radiation Protection (DRP) licensees.

2.0 General Requirements:

Response to DRP licensees is to be performed in the interest of public health, safety, and the environment.

3.0 Responsibilities:

3.1 Response time: Qualified DRP personnel should respond as discussed in Section 5.0.

3.2 Physical response: A physical response should occur when warranted pursuant to Section 5.0 below.

3.3 Record Keeping: The incident leader shall ensure that the Incident Reporting Form and Incident Log are complete, as well as any other reports, i.e. interim and closeout, necessary to document the incident. Also, the incident leader shall follow up on noncompliance items issued to DRP licensees.

3.4 Notification: It shall be the responsibility of the incident leader to notify personnel from the appropriate outside agency, e.g. NRC, EPA, NCDER, county emergency management, etc., per the appropriate section of Appendix G, Notifications.

4.0 Precautions:

4.1 The number of DRP response personnel responding to an incident shall be determined by IAT. The standard DRP response team should include two individuals with at least one individual who has been determined to be qualified pursuant to Appendix H.

4.2 Appropriate radiation protection and safety precautions, e.g. ALARA, should be applied by incident response personnel. If third parties are enlisted to respond, DRP incident response personnel should determine that the third party responder has the minimum required qualifications, experience, etc., to adequately complete tasks required.

5.0 General Guidance:

Incident calls from DRP licensees should be handled on a case-by-case basis. DRP licensees are more apt to have the capabilities to react to emergency situations without DRP physically responding. However, if the licensee is reporting per the reporting

requirements set forth in 15A NCAC 11 .0357, "Reporting Requirements;" .1645, "Reports of Theft or Loss of Licensed Radioactive Materials;" or .1646, "Notification of Incidents;" then it should be up to IAT to determine if an investigation is warranted. If an investigation is deemed necessary, the Agency should respond within 5 business days.

Note: Pursuant to NRC Inspection Manual Chapter 1301 (Issued 7/25/95), the NRC will consider the "immediate dispatch (typically within 2 days) one or more inspectors" for the following:

- a. Single exposure of an occupational worker in excess of the dose limits in 10 CFR 20.1201 [15A NCAC 11 .1604];
- b. Loss of control of radioactive material that caused a member of the public to receive an exposure in excess of the limits in 10 CFR 20.1301 [15A NCAC 11 .1611];
- c. Discovery of NRC licensed material in an unrestricted area;
- d. An unplanned contamination event that requires reporting as per 10 CFR 30.50(b) [15A NCAC 11 .0357], 40.60(b) [15A NCAC 11 .0357], or 70.50(b) [15A NCAC 11 .0357], as applicable.

The NRC also considers a "special inspection before the next routine inspection," generally within a few weeks of the report. Several examples include the following:

- a. When an "immediate" response to the above is deemed not warranted;
- b. Medical misadministrations that meet the abnormal occurrence threshold. See MD 8.1, "Abnormal Occurrence Reporting Procedure," and MD 8.10, "NRC Medical Event Assessment Program" [See the "NRC Inspection Manual" for MD (Management Directive) 8.1 & 8.10];
- c. Release of radioactive material to an unrestricted area in excess of 2 times the concentration limits in 10 CFR 20.1302 [15A NCAC 11 .1612];
- d. Disposal of license material in quantities or concentrations in excess of the limits in 10 CFR 20.2003 [15A NCAC 11 .1630], 2004 [15A NCAC 11 .1631], or 2005 [15A NCAC 11 .1632]; or
- e. Loss of control of radioactive material that could have caused a member of the public to receive an exposure in excess of the limits in 10 CFR 20.1301 [15A NCAC 11 .1611].

APPENDIX F: INCIDENT TRACKING LOG FORM

INCIDENT TRACKING LOG

Incident Number	Incident Description	Date Incident Reported	Immediate Notifications (Check all that apply.)	Incident Leader and Alternate(s)	Date Incident Closed	Comments
			<input type="radio"/> NRC <input type="radio"/> EPA <input type="radio"/> State Emergency Op. Center _____ <input type="radio"/> _____	Lead: _____ Alternate(s): _____		
			<input type="radio"/> NRC <input type="radio"/> EPA <input type="radio"/> State Emergency Op. Center _____ <input type="radio"/> _____	Lead: _____ Alternate(s): _____		
			<input type="radio"/> NRC <input type="radio"/> EPA <input type="radio"/> State Emergency Op. Center _____ <input type="radio"/> _____	Lead: _____ Alternate(s): _____		
			<input type="radio"/> NRC <input type="radio"/> EPA <input type="radio"/> State Emergency Op. Center _____ <input type="radio"/> _____	Lead: _____ Alternate(s): _____		

APPENDIX G: NOTIFICATIONS

1.0 Purpose:

The purpose of this guidance directive is to provide guidance for the notification of outside agencies regarding incidents reported to the Division of Radiation Protection (DRP). Included in this guidance directive is the supporting information needed to make these notifications.

2.0 General Requirements:

Once an incident call has been received at DRP, there may be further notifications that need to be made to other agencies outside of DRP. These notifications may be in the form of phone calls and/or written reports made immediately, in the interim, or after closure.

3.0 Notification Procedure:

Once the IAT has classified the incident call, notifications to external agencies should be made by the IAT Leader following the procedure outlined below:

3.1 General Public Call or Other: If it has been determined by the IAT that a response is needed, whether DRP or third party, physical or other, a telephone notification should be made to State Emergency Management Operations Office (24 hour facility). There may be exceptions for situations to be determined by the IAT (overexposures, misadministrations, etc.). In some cases a direct notification to the County Emergency Management Office may be needed. Further notifications may need to be made after the response, based on the assessment of the incident.

If the IAT determines that no response is needed then no notifications are necessary.

3.2 Landfill or Scrap-yard: In general, there will always be a least one notification that will have to be made for all landfill and scrap-yard incidents. This notification is to the Environmental Protection Agency and should be made after the closure of the incident by telephone and then followed up with a copy of the final report sent via mail. The EPA personnel that you need to talk to are located in Paul Wagner's group - Air and Radiation Technology Branch, Region IV, EPA.

Notification of other agencies will be based on the situation. The State and County Emergency Management Offices will be notified if a third party response is implemented. The Nuclear Regulatory Commission may need to be notified, especially if there is a loss of material from a container or if there was an overexposure related to the incident. All initial notifications should be by telephone to the NRC HQ Operations Center. Follow up correspondence should be by phone to the NRC Regional Operations Officer or by submitting reports to the Regional NRC office or the Office for the Analysis and Evaluation of Operational Data (AEOD) located at NRC HQ. If the NRC is called, a follow up report must be sent so that the NRC can close their file of the incident.

- 3.3 DRP Licensee:** If the incident involves a Division licensee, then notifications by the licensee to us are governed by 15A NCAC 11 and this drives the outside notification for the NRC as follows: If the incident requires the licensee to notify us with in 24 hours or less (i.e. immediate notice) or if the incident has the potential for significant media interest, then the NRC needs to be notified by phone immediately through the NRC HQ Operations Center. If not, then the reporting is by monthly reporting requirements within the RMS section.

Notify the Environmental Protection Agency of all incidents after the incident has been closed, unless there has been a confirmed release to environment, then notify the EPA immediately. The initial notification should be by telephone with a follow up copy of the written report being sent later. Make this notification as stated in 3.2 above. Other notifications for this type of call should be based on the situation and the licensees ability to handle it. In particular, the State and County Emergency Management offices should be notified if the problem was not contained to the licensees facility/site.

PROCEDURE NOTE:

The EPA must be notified immediately in the event of a release (loss of control of radioactive material to the environment in the form of a gas, liquid, or solid) of a hazardous substance in an amount equal to or greater than the reportable quantity (see attached list). Notification shall be made by the responsible party (licensee in most cases) and be made to the National Response Center Duty Officer, Head Quarters United States Coast Guard, Washington, DC; telephone: (800) 424-8802 or (202) 267-2675. It will be the policy of DRP to contact the responsible party and make sure they are aware of this requirement.

3.4 Miscellaneous Contact Information:

For all incidents that may have significant media interest contact the DEHNR Public Information Office through Division management and the NRC HQ Operations Center.

4.0 Agency Names and Contact Telephone Numbers:

- **STATE EMERGENCY MANAGEMENT** (24 Hour - Raleigh Operations Center): (919)-733-3943, 3300 or (800)-858-0368 in NC
- **NUCLEAR REGULATORY COMMISSION** (Washington 24 Hour Operations Center): (301)-816-5100
- **ENVIRONMENTAL PROTECTION AGENCY** (Region IV Atlanta): (404)-562-9100 or (404)-562-9105 (call between 8 A.M.-5 P.M. M-F only)
- **COUNTY EMERGENCY MANAGEMENT** (Phone book in admin. sect.)

- **HIGHWAY PATROL/STATE WARNING POINT:**
(919)-733-3861 / (800)-662-7956
- **DOE:** (803)-725-3333 (Savannah River)
- **DOT:** (919)-733-2522 (State)
- **SOLID WASTE:** (919)-733-0692
- **PUBLIC WATER SUPPLY:** (919)-715-3232
- **DEHNR PUBLIC INFORMATION OFFICE:** (919)-715-4112
- **LOCAL HEALTH DEPARTMENTS:** (Refer to listings kept in administrative section)

LIST OF HAZARDOUS SUBSTANCES AND REPORTABLE QUANTITIES
(49 CFR 172.101, Appendix A, Table 2)

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(49 CFR 172.101, Appendix A, Table 2)

APPENDIX H: INCIDENT RESPONSE TRAINING

1.0 Purpose:

To establish the minimum training and experience requirements for DRP personnel to become qualified to physically respond to incidents involving radioactive material.

2.0 General Requirements:

Before an individual can lead a response team on an incident involving radioactive materials, the individual must meet the following minimum requirements.

3.0 Training and Experience:

Before an individual is considered to be qualified to respond to incidents involving radioactive materials, the individual must:

- complete the following training:
 - incident response procedure,
 - hazardous material awareness,
 - incident command system,
 - emergency response survey team,
 - R.E.R.O.,
 - portable gamma spectroscopy (“Scout”), and
 - survey instrumentation;
- have physically responded to three incidents with a qualified responder, and of the three responses, have led one;
- certify that he has completed the training and is ready to respond to an incident as a qualified incident responder; and
- be authorized by DRP management to physically respond to incidents involving radioactive materials as a qualified responder; OR
- authorized by the Division Director as having equivalent training and experience.

4.0 Documentation:

All training and experience shall be documented on the “Incident Response Qualification Record” (See Figure H-1), and shall be the responsibility of the individual to document his training and experience.

Figure H-1: Incident Response Qualification Record

**DIVISION OF RADIATION PROTECTION
INCIDENT RESPONSE QUALIFICATION RECORD**

Trainee Name: _____

Training:

Topic	Date Completed
Incident Response Procedure	
Hazardous Material Awareness Level	
Incident Command System	
Emergency Response Survey Team Member	
R.E.R.O. Course (F.E.M.A.)	
Portable Gamma Spectroscopy ("Scout")	
Survey Instrumentation	

Experience:

Incident Number	Observe or Lead	Preceptor

Certifying Statement:

I _____ have completed the appropriate training and experience necessary to be a "Qualified DRP Incident Responder" as defined in the "Incident Response Procedure for Incidents involving Radioactive Materials."

Signature: _____ Date: _____
Trainee

Authorization:

The individual noted above is authorized to act as a "Qualified DRP Incident Responder" as defined in the "Incident Response Procedure for Incidents involving Radioactive Materials."

Signature: _____ Date: _____
Division Management

APPENDIX I: GLOSSARY

As Low As Reasonably Achievable (ALARA): Operations shall be conducted in a manner to assure that radiation exposure to individuals and population groups is limited to the lowest levels technically and economically practicable.

CRCPD DOT Exemption: An exemption to Department of Transportation regulations, to include classification, packaging, and hazards communication requirements, when shipments of scrap/waste are found to contain detectable quantities of radioactive material. Refer to Work Instruction No.: RMS 97-001 for the provisions of the exemption. The exemption allows the return of the radioactive material to origination of shipment without meeting all the DOT shipping regulations as long as certain criteria are satisfied.

DRP Licensee: Any person who is licensed by the agency pursuant to 15A NCAC 11 .0300.

Events: Refer to Section 4.0(III)(C).

External Notifications: Notifications made to agencies external to the Division of Radiation Protection; these may include the State Emergency Operations Center, NRC Operations Center, EPA, and County Emergency Management coordinators.

First-time Caller: Facility is calling concerning a radiation incident for the first time according to our records/files. Or, the call is a first call from the facility since new incident procedure was placed into effect.

General Public: An individual who is not receiving an occupational dose.

Incident: Refer to Section 4.0(III)(C).

Incident Assessment Team (IAT): A group of at least three individuals to include the incident leader, the Section Chief, or his designee, and one other technical staff member. It is the responsibility of this group to make decisions regarding the type of response, when to respond, and what external notifications need to be made.

Incident File: The document containing all information regarding the incident, from initial call to closure, to include the incident reporting form, follow up correspondence, memos, and final report/memo.

Incident Leader: The technical staff member who either takes the initial incident call, or has the incident delegated to him by the Section Chief. The responsibilities of the incident leader shall include establishing IAT, notifying the Division Director of decisions made, carrying out the decisions of IAT, coordinating response, maintaining the incident file, and closing the incident.

Incident Log: A log to be used as a quick reference to obtain incident information such as: a brief description of the incident, incident report date, notifications that have been made, incident leader designation and alternate(s), and incident closure. (See Appendix F)

Incident Reporting Form: Form to be used to document incident information, incident assessment

(i.e. IAT decisions), and immediate external notifications. (See Appendix A)

Nuclear Material Events Database (NMED): A NRC supplied computer database program for the documentation and tracking of incidents involving radioactive materials in the U.S. and its territories.

Qualified DRP Personnel: Any DRP staff member who has been approved (by management) for incident response. Approval will be based upon that person having appropriate education, training and experience for incident response as outlined in Appendix H.

Remote Response: A response which can be coordinated with qualified DRP personnel by telephone and/or facsimile.

Scrap-yard and Landfill Alarm: A valid radiation level (as measured from the vehicle waste containment) above a predetermined trip point established by the facility and defined in their radiation alarm procedure. In some case a confirmation survey will be performed using a portable radiation survey meter.

Scrap-yard/Landfill Information Survey: Survey to document basic information in an effort to better understand the facilities radiological detection, monitoring and response capabilities. This document is to be maintained as a file unto its own in an effort to develop a database.

Technical Staff Members: Any person employed by DRP who by virtue of his staff position has the authority to evaluate technical and regulatory information, as submitted to or collected by DRP, for the purpose of protecting life, health, and property from the effects of radiation.

Third Party: Any person who is not an agency representative pursuant to 15A NCAC 11 .0112.

Traceable: The ability to locate an individual or entity for purposes of ownership/responsibility regarding disposition of the radioactive material in an approved regulatory or environmentally safe manner for any device or material containing radioactive material.

Attachment F

Allegation Procedure



POLICY AND PROCEDURE STATEMENT

POLICY NUMBER <i>(See below for last digit)</i> N-008-R	REVISION NUMBER 2	APPROVAL DATE February 6, 2014
A=ALL	E=ENVIRONMENTAL/EMERGENCY RESPONSE	M=MAMMO
		R=RAM
		T=TANNING
		X=XRAY

SUBJECT: INVESTIGATION OF ALLEGATIONS

POLICY: The Radioactive Materials Branch (RMB) shall investigate all allegations involving radioactive material or radioactive material licensees. Investigations shall be in accordance with 15A NCAC 11 .1007, Requests For Inspections. Any allegations received by the RMB that do not involve radioactive materials shall be transferred to the appropriate branch within the Radiation Protection Section.

- PROCEDURE:**
- a. Upon receiving notification of an allegation, the health physicist shall form an Incident Assessment Team (IAT) as outlined in "Incident Response Procedure for Incidents Involving Radioactive Materials."
 - b. The allegation shall be logged into the Incident Tracking Log.
 - c. The IAT shall determine the appropriate measures to investigate the allegation.
 - d. All allegation investigations shall be in accordance with 15A NCAC 11 .1007; NRC Management Directive 8.8, Management of Allegations; and STP Procedure SA-400, Management of Allegations. The NRC Management Directive 8.8 and STP Procedure SA-400 are filed in the Incident Tracking Logbook.
 - e. The identity of the person making the allegation shall be kept confidential, if so requested.
 - f. After the investigation is complete, follow-up shall be made with the individual making the allegation to inform them of the findings. Documentation of the follow-up shall be placed in the allegation file. If the allegation was anonymous, or if the individual did not provide an address of phone number for follow-up, a memo shall be placed in the allegation file stating why follow-up could not be made.
 - g. All information regarding the allegation shall be placed in a red folder and kept in the locked allegation file cabinet. The locked file cabinet shall be secured by a combination lock. The Radioactive Material Branch Support Assistant shall have the combination to the lock.

BASIS: Recommendation from the 2004 IMPEP Review, Review after 2014 IMPEP Accompaniments 15A NCAC 11 .1007

POLICY NUMBER	REVISION NUMBER	APPROVAL DATE:
N-008-R	2	February 6, 2014

COMMITTEE MEMBER	SIGNATURE	DATE
Radiology Compliance Manager	<i>Jenny Rollins</i>	2-6-2014
Radioactive Materials Branch Manager (acting)	<i>W. [Signature]</i>	2-6-2014

SECTION APPROVAL	SIGNATURE	DATE
Section Chief	<i>W. [Signature]</i>	2-6-2014