

From: [Dimmick, Lisa](#)
To: [Meyer, Karen](#)
Subject: FW: Comments on draft NY IMPEP report
Date: Tuesday, June 03, 2014 4:17:38 PM

DOH's comments

From: Gavitt, Stephen M (HEALTH) [mailto:stephen.gavitt@health.ny.gov]
Sent: Tuesday, June 03, 2014 4:11 PM
To: Dimmick, Lisa
Cc: Dansereau, Robert E (HEALTH); Salame-Alfie, Adela (HEALTH); Christopher Boyd; Sandy Hinkel; White, Duncan
Subject: Comments on draft NY IMPEP report

Lisa,

Here's our comments on the draft report:

- The org charts for both NYS DOH Center for Environmental Health and our Bureau are outdate (not sure how that happened). I'll send you updated charts.
- Introduction, 3rd paragraph. Last paragraph, 3rd sentence - It is unclear what you intend to convey with the word "utilization". If you delete that word then the sentence will be clear and accurate.
- 3.3 page 8, 3rd paragraph – instrumentation. We believe the word "adequate" in the first sentence should be replaced with "ample". Adequate conveys have meet a minimum standard. Also the ion chamber should be changed to pressurized ion chamber and the portable multi-channel analyzers should indicate both HPGe as well as NaI types. Also the latter only effective for photons and they are not used to analyze wipes. DOH utilizes the Department's Wadsworth Center, Laboratory of Inorganic and Nuclear Chemistry for analysis of samples, including wipe, for routine inspections as well as for incident response.
- 3.4, page 8, first paragraph, 3rd sentence – "The casework was also reviewed for timeliness..... Please indicate where in SA-104, or elsewhere, where a timeliness standard exists.
- Page 9, 1st paragraph: $7+2+3=12$, not 9.
- Second paragraph, 1st sentence – It should be noted in the report that DOH requires original documents before a license action is approved. (n email or fax may certainly start the process.)
- Last sentence is incorrect. The Section Chief, Director and Assistant Director have signature authority and have signed numerous licensing actions for this IMPEP review period.

- 4th sentence. “Routinely staff used electronic mail and phone calls to follow up with deficiency notices.” For DOH, follow up requests are fully documented in the license files, and this should be noted.
- Overdue regs. Pages 14-15. The first one listed as overdue for DOH on page 15 should be listed under the prior listing that is on page 14 –Partial Amendments (10 CFR 35 only). Also it is unclear why the 4 (now 5 with the above correction) are listed again on page 15 as well.

Thank you for the opportunity to review and comment. If you have any questions, please contact Robert Dansereau or myself.

Steve.

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