



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 23, 2014

ALL AGREEMENT STATES

OPPORTUNITY TO COMMENT ON THE PROPOSED REVISIONS TO INSPECTION  
PROCEDURE 87121: "INDUSTRIAL RADIOGRAPHY PROGRAMS" (FSME-14-090)

**Purpose:** To provide the Agreement States with the opportunity to comment\* on the proposed revisions to the Inspection Procedure (IP) 87121, "Industrial Radiography Programs."

**Background:** The U.S. Nuclear Regulatory Commission (NRC) is revising Inspection Procedure (IP) 87121, "Industrial Radiography Programs." The NRC originally issued IP 87121 in August 2005.

On June 28, 2012, the Office of Inspector General (OIG) issued an Audit Report on the NRC's oversight of Industrial Radiography (OIG-12-A-15). The objective of the audit was to determine the adequacy of NRC's processes for overseeing licensee activities addressing the safety and control of radiography sources. OIG identified eight areas in licensing and inspections that could be improved. As of today, two recommendations have been closed. The remaining six open recommendations involve the revision of NUREG-1556 Volumes 2 and 20, and Inspection Procedure (IP) 87121, "Industrial Radiography Programs." Links to the documents related to the Audit Report OIG-12-A-15 are listed below.

Link to the Audit Report OIG-12-A-15 dated June 28, 2012:

<http://www.nrc.gov/reading-rm/doc-collections/insp-gen/2012/oig-12-a-15.pdf>

Link to the Status of the Recommendations, Memorandum dated February 24, 2014:

<http://pbadupws.nrc.gov/docs/ML1405/ML14055A471.pdf>

**Discussion:** Enclosed for your review and comment is the revised draft of IP 87121, "Industrial Radiography Programs." The update to IP 87121 addresses four of the recommendations listed in the Audit Report OIG-12-A-15 and reflects the current regulation requirements of 10 CFR Part 37. The recommendations and the update to address the recommendations are listed below.

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\*This information request has been approved by OMB 3150-0029 expiration 4/30/2017. The estimated burden per response to comply with this voluntary collection is approximately 8 hours. Send comments regarding the burden estimate to the Records and FOIA/Privacy Services Branch (T-5F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet e-mail to [infocollects@nrc.gov](mailto:infocollects@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0029), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

- Recommendation 2: Revise NRC inspection guidance to define the NRC radiography licensees' location(s) that must be inspected each inspection cycle
- Recommendation 3: Revise NRC inspection guidance to include a reliable methodology to select NRC radiography licensee field stations for inspection.

To address Recommendations 2 and 3, IP 87121 was revised to indicate that the inspector should consider the following criteria when selecting inspection locations:

- (1) risk significance of the operations performed at the location,
- (2) work location of the radiation safety officer (RSO), in order to assess the RSO's oversight of the radiation safety program, and
- (3) field office locations that have not been inspected within the last five inspections using risk significance of operations at field office.

IP 87121 also was revised to indicate that the inspector should coordinate and interface with the licensee's primary RSO as part of every inspection

- Recommendation 4: Revise NRC inspection guidance to require NRC inspectors to take additional steps to arrange a temporary job site inspection for a NRC licensee that has not had a temporary job site inspection for a defined minimum number of consecutive inspections.

In order to address Recommendations 4, IP 87121 was revised to indicate that the inspector should take additional steps to arrange an inspection at a temporary job site for licensees whose primary operations are conducted at these sites and have not had sites inspected for the last three consecutive routine inspections.

- Recommendation 8: Revise NRC inspection guidance to include guidance for inspectors conducting inspections when the NRC licensee's facility is located in an Agreement State.

To address Recommendations 8, IP 87121 was revised to clarify that in the case that a licensee's main office is located in an Agreement State jurisdiction; the inspection may include the main office location to inspect its oversight of field office activities.

We would appreciate receiving your comments within 30 days from the date of this letter.

If you have any questions regarding this communication, please contact me at 301-415-3340 or the individual named below:

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Enclosure:  
Draft Inspection Procedure 87121

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**ML14239A239**

<b>OFC</b>	MSSA/LB	MSSA/LB	FSME/MSSA	OMB Approval
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<b>DATE</b>	8/28/2014	8/28/2014	9/5/2014	9/23/14

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