



COMMONWEALTH of VIRGINIA

Department of Health

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November 25, 2014

Duncan White, Chief
Agreement State Programs Branch
Division of Materials Safety, State, Tribal and Rulemaking Programs
Office of Nuclear Material Safety and Safeguards
Mailstop: TWFN 8-E18
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. White:

Thank you for the opportunity to comment on the NRC's draft Integrated Materials Performance Evaluation Program (IMPEP) report dated November 24, 2014. We appreciate the comprehensive review that the IMPEP team, lead by Mr. Randy Erickson, performed on our program and shared with us during the November 7, 2014 exit meeting with Virginia Department of Health management.

We have reviewed the report and offer the following comments for your consideration:

1. In Section 1.0, "Introduction," the last paragraph on page 1 states "Section 2.0 of this report covers the Commonwealth's actions...". We recommend that "Commonwealth's" be changed to "Program's" since the item pertains to corrective action taken by the Radioactive Materials Program.
2. In Section 2.0, "Status of Items Identified in Previous Reviews" under "Status" on page 2, licensing and inspection qualification training, including on the job training, and prior experience are not tracked in a database but instead using a spreadsheet. We recommend "database" be changed to "spreadsheet" in this sentence.
3. In Section 3.1, "Technical Staffing and Training" on page 3 at the end of the third paragraph, staff member training and licensing activities are not tracked using the RAM database. We recommend the end of the paragraph be changed to read, "The Program Director tracks each member's training electronically using an Excel spreadsheet. The Program Director maintains a password protected electronic Excel spreadsheet tracking the member's licensing and inspection qualification approvals. Members have "read only" access to view their approvals."

4. In Section 3.2, “Status of the Materials Inspection Program” on page 4, the last sentence of the section reads “Based on the IMPEP evaluation criteria, the review team recommends that Virginia's performance with respect to the indicator, Status of Materials Inspection Program, be found satisfactory but needs improvement.” We respectfully request that the report, either here or in the Executive Summary, be strengthened by reflecting that this issue occurred early in the evaluation period and that appropriate corrective action was taken by the Program at that time to address the delinquency in inspections.
5. In Section 3.4, “Technical Quality of Licensing Actions” on page 6, second paragraph, we recommend that “Bureau’s” be changed to “Program’s” since this particular item deals with the Radioactive Materials Program, and that the three (3) references to “RAM 2000” be changed to “RAM Database.”
6. In Appendix C, on page C.4 under accompaniment No. 2, the Licensee’s name, “University of Virginia Radiosurgery Center,” should be corrected to read “Chesapeake Regional, Riverside & University of Virginia Radiosurgery Center.”

Once again, we thank you for this opportunity to comment and look forward to the Management Review Board’s conclusion regarding the adequacy and compatibility of Virginia’s Radioactive Materials Program.

Sincerely,

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