



Minnesota  
Department  
of Health

PROTECTING, MAINTAINING AND IMPROVING THE HEALTH OF ALL MINNESOTANS

September 14, 2016

Randy Erickson  
State Agreements Officer  
US NRC Region IV  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

Dear Mr. Erickson:

Subject: Integrated Materials Performance Evaluation Program (IMPEP) Questionnaire

Attached is the Minnesota Department of Health's response to the IMPEP Questionnaire. As indicated in the response, the only Non-Common Performance Indicator is Item I, which is Legislation and Program Elements Required for Compatibility.

Also, as requested, an appointment has been established with State Senior Managers to discuss the results of the IMPEP. That meeting is scheduled for 9:00 AM on October 7, 2016.

If you have any questions concerning Minnesota's response, please contact me at 651-201-5826 or Sherrie Flaherty at 651-201-4522.

Sincerely,

A handwritten signature in cursive script that reads "Mary B. Navara".

**Mary B. Navara RN, COHN-S, MPH**  
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Minnesota Department of Health  
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## II. Status of Material Inspection Program

10. All MDH Radioactive Materials licenses are being inspected at the frequency listed in IMC 2800.
11. The following is a summary of the 2012-2016 inspections:

### **2012: Routine Inspections**

Priority 1	8
Priority 2	13
Priority 3	9
<u>Priority 5</u>	<u>12</u>
<b>TOTAL</b>	<b>42</b>

### **Initial Inspections\***

Priority 1	0
Priority 2	0
Priority 3	1
<u>Priority 5</u>	<u>1</u>
<b>TOTAL</b>	<b>2</b>

*\*All new licenses are inspected within 12 months.*

### **2013: Routine Inspections**

Priority 1	10
Priority 2	13
Priority 3	10
<u>Priority 5</u>	<u>22</u>
<b>TOTAL</b>	<b>55</b>

### **Initial Inspections\***

Priority 1	0
Priority 2	0
Priority 3	0
<u>Priority 5</u>	<u>2</u>
<b>TOTAL</b>	<b>2</b>

*\*All new licenses are inspected within 12 months.*

### **2014: Routine Inspections**

Priority 1	9
Priority 2	14
Priority 3	12
<u>Priority 5</u>	<u>25</u>
<b>TOTAL</b>	<b>60</b>

**Initial Inspections\***

Priority 1	0
Priority 2	0
Priority 3	0
Priority 5	1
<b>TOTAL</b>	<b>1</b>

*\*All new licenses are inspected within 12 months.*

**2015: Routine Inspections**

Priority 1	9
Priority 2	15
Priority 3	10
Priority 5	16
<b>TOTAL</b>	<b>50</b>

**Initial Inspections\***

Priority 1	1
Priority 2	0
Priority 3	0
Priority 5	1
<b>TOTAL</b>	<b>2</b>

*\*All new licenses are inspected within 12 months.*

**2016: Routine Inspections Completed through September 6, 2016**

Priority 1	3
Priority 2	6
Priority 3	6
Priority 5	6
<b>TOTAL</b>	<b>21</b>

**Initial Inspections\***

Priority 1	0
Priority 2	0
Priority 3	0
Priority 5	1
<b>TOTAL</b>	<b>1</b>

*\*All new licenses are inspected within 12 months.*

12. MDH has identified two inspections of Priority 1, 2, or 3 that were conducted overdue during this review period.

In 2014, American Engineering Testing was assigned as a training inspection. The trainee and senior inspector lost track of this inspection because the trainee was not ready for this type of inspection. When it was discovered as overdue another qualified inspector performed the inspection.

- American Engineering Testing, Inc. (1089-62)
  - Priority 1
  - Inspection due August 5, 2014
  - Inspection performed December 18, 2014
  - Overdue 44 days
  - Inspection findings issued January 5, 2015 – no violations

Following the 2014 inspection of Braun Intertec, an error was made in the database causing the system to not schedule the next inspection. In August of 2015 a report indicating facilities without an inspection scheduled identified Braun Intertec as not having an inspection due. At that time the inspection was identified as overdue and qualified inspectors were assigned to perform the inspection as soon as possible.

- Braun Intertec Corporation (1082-27)
  - Priority 1
  - Inspection due March 11, 2015
  - Inspection performed August 20, 2015
  - Overdue 71 days
  - Inspection findings issued September 21, 2015 – no violations

13. Currently there are no inspections of Priority 1, 2 or 3 that are overdue.

14. Reciprocity Inspections

**2012 Reciprocity**

Reciprocity Licensees Entering Minnesota

Priority 1, 2, and 3	12
Priority 5	21
TOTAL	33

Reciprocity Inspections

Priority 1, 2, and 3	8	(66.7%)
Priority 5	3	(14.3%)
TOTAL	11	(33.3%)

**2013 Reciprocity**

Reciprocity Licensees Entering Minnesota

Priority 1, 2, and 3	11
Priority 5	21
TOTAL	32

Reciprocity Inspections

Priority 1, 2, and 3	4	(36.4%)
Priority 5	3	(14.3%)
TOTAL	7	(21.9%)

**2014 Reciprocity**

## Reciprocity Licensees Entering Minnesota

Priority 1, 2, and 3	12
Priority 5	20
TOTAL	32

## Reciprocity Inspections

Priority 1, 2, and 3	6	(50.0%)
Priority 5	6	(30.0%)
TOTAL	12	(37.5%)

**2015 Reciprocity**

## Reciprocity Licensees Entering Minnesota

Priority 1, 2, and 3	9
Priority 5	10
TOTAL	19

## Reciprocity Inspections

Priority 1, 2, and 3	7	(53.9%)
Priority 5	2	(20.0%)
TOTAL	9	(47.4%)

**2016 Reciprocity as of September 1, 2016**

## Reciprocity Licensees Entering Minnesota

Priority 1, 2, and 3	16
Priority 5	21
TOTAL	37

## Reciprocity Inspections

Priority 1, 2, and 3	9	(56.3%)
Priority 5	0	(0.0%)
TOTAL	9	(24.3%)

### III. Technical Quality of Inspections

15. New inspection procedures related to the implementation of the new security requirements effective August 17, 2015 were introduced. Inspection reports were developed and staff training on the new procedures occurred in 2015.

16. The following table summarizes the supervisory accompaniments during the review period.

<b>Supervisory Accompaniments</b>			
License Number	Supervisor	Type of Inspection	Date
<b>Brandon Juran</b>			
1089	Sherrie Flaherty	Industrial Radiography	11/19/12
1192	Sherrie Flaherty	Industrial Radiography	10/29/13
1186	Sherrie Flaherty	Industrial Radiography	6/24/15
<b>Lynn Fortier</b>			
1132	Sherrie Flaherty	Medical – Diagnostic	3/12/12
1069	Brandon Juran	Industrial Radiography	7/24/12
1007	Brandon Juran	Medical - Therapeutic	7/17/13
1162	Sherrie Flaherty	HDR	11/15/13
1033	Sherrie Flaherty	HDR	11/1/13
1045	Sherrie Flaherty	Radiopharmaceutical Processing & Distribution	6/5/14
1007	Sherrie Flaherty	HDR	11/7/15
<b>Tyler Kruse</b>			
1104	Sherrie Flaherty	Fixed Gauge	2/12/13
1175	Sherrie Flaherty	Research & Development	3/14/13
1083	Sherrie Flaherty	Irradiators, self-shielded	5/20/13
1195	Brandon Juran	Portable Gauge	7/31/13
1042	Lynn Fortier	Medical – Diagnostic & Therapeutic	7/10/13
1181	Brandon Juran	Industrial Radiography	7/29/13
1026	Sherrie Flaherty	HDR	6/5/14
1192	Sherrie Flaherty	Industrial Radiography	9/10/14
1162	Sherrie Flaherty	HDR	10/21/15

<b>Matt Duff</b>			
1187	Sherrie Flaherty	Portable Gauge	11/15/14
1033	Sherrie Flaherty	Medical –Diagnostic	9/28/15
<b>Martha Steinhart</b>			
1054	Brandon Juran	Medical – Diagnostic	6/30/16
1013	Sherrie Flaherty	Portable Gauge	9/7/16
<b>Teresa Purrington</b>			
1033	Sherrie Flaherty	Medical – Diagnostic & Therapeutic	1/23/12
1186	Sherrie Flaherty	Industrial Radiography	6/14/12
1037	Sherrie Flaherty	Radiopharmaceutical Processing & Distribution	10/23/13

17. MDH maintains a sufficient number of detectors and dosimeters to meet the normal activities of the Unit as well as any potential emergency response requirements. Included in the inventory are a neutron detector, two alpha detectors, and two 2" NaI scintillation detectors. MDH has five hand-held instruments for gamma spectrometry. Two of the instruments have a medical library. The other two have an industrial library of radionuclides. To facilitate the identification of low activity radionuclides, an InSpector 1000 was purchased. Recently MDH added another instrument with radionuclide identification capabilities, FLIR – identiFINDER2.

MDH has implemented a program that provides Emergency Response Kits to state responders. The loan program ensures that the MnDOT Hazardous Materials Inspectors and the State Patrol Commercial Vehicle Inspection Section staff have up-to-date equipment to assess radiological hazards. Included in the Response Kits are a Ludlum 2241-2 scaler, a pancake probe, and a 1" NaI scintillation detector.

The following table summarized the Radioactive Materials Unit's instrumentation.

<b>Instrument Mfgr.</b>	<b>Model</b>	<b>Serial No.</b>	<b>Last Cal. Date</b>
Global Dosimetry	DMC2000X	254690	8/5/16
Global Dosimetry	DMC2000X	258862	8/5/16
Global Dosimetry	DMC2000X	258846	11/21/15
Global Dosimetry	DMC2000X	267295	12/2/15
Exploranium	GR-130 Minispect	9913	4/28/14
Exploranium	GR-130 Minispect	9612	10/21/11
Exploranium	GR-135 Minispect	2596	4/28/14

Exploranium	GR-135 Minispect	2595	4/22/13
NDS Products	RA-500	44036	04/20/15
NDS Products	RA-500	44037	04/20/15
NDS Products	RA-500	44038	08/05/16
NDS Products	RA-500	44039	08/05/16
NDS Products	RA-500	66055	03/21/16
NDS Products	ND-2200	55872	12/01/15
NDS Products	ND-2200	55873	04/20/15
Victoreen	190	107367	03/21/16
Victoreen	190	107737	08/11/16
Victoreen	190	107738	11/24/14
Victoreen	450P	2378	04/20/15
Victoreen	450P	2381	04/20/15
Victoreen	450P	2363	03/21/16
Victoreen	450P	1029	08/05/16
Ludlum	2241-2	217968	05/13/16
Ludlum	2241-2	217822	05/10/16
Ludlum	2241-2	241180	05/13/16
Ludlum	2241-2	217896	06/28/16
Ludlum	2241-2	232708	06/24/16
Ludlum	2241-2	228418	06/27/16
Ludlum	2241-2	228295	12/01/15
Ludlum	2241-2	217853	11/25/15
Ludlum	2241-2	217821	04/19/16
Ludlum	2241-2	232681	04/19/16
Ludlum	2241-2	232667	04/19/16
Ludlum	2241-3	220224	05/09/16
Ludlum	2241-3	220176	06/29/16
Ludlum	2241-3	220152	11/23/15
Ludlum	2241-3	220193	11/27/15
Ludlum	2241-3	228168	05/12/16
Ludlum	2241-2 w/ AC-3 probe (457975) and NaI probe Model SPA-4 (159)	228381	11/03/15
Ludlum	2241-2 w/ AC-3 probe (457979) and NaI probe Model SPA-4 (160)	228391	03/28/16
Ludlum	78 (tele-detector)	267949	08/10/16
Ludlum (REM Ball)	2241-2 with Eberline NRDH (RN 014279)	232688	03/28/16
MGP Instruments	DRM-1	11006-089	05/12/14
Radiation Alert	Inspector	5588	05/06/13
Dosimeter Corp.	611	9124781	04/20/15



Dosimeter Corp.	611	9124787	04/20/15
Dosimeter Corp.	611	9124795	04/20/15
Dosimeter Corp.	611	9124754	12/02/15
Dosimeter Corp.	611	9124767	04/20/15
Dosimeter Corp.	611	9124783	12/02/15
FEMA	725	6272	04/20/15
FEMA	725	6350	04/20/15
FEMA	725	6399	04/20/15
FEMA	725	6481	04/20/15
FEMA	725	6496	04/20/15
FEMA	725	6508	04/20/15
FEMA	725	6331	04/20/15
Dosimeter Corp.	862	4010818	12/02/15
Dosimeter Corp.	862	4010820	12/02/15
Dosimeter Corp.	862	4010831	12/02/15
Dosimeter Corp.	862	4010832	12/02/15
Dosimeter Corp.	862	4010833	12/02/15
Dosimeter Corp.	862	4010835	12/02/15
Dosimeter Corp.	862	4010838	12/02/15
Dosimeter Corp.	862	8101121	04/20/15
Dosimeter Corp.	862	8101122	04/20/15
Dosimeter Corp.	862	8101123	04/20/15
Dosimeter Corp.	862	8101124	04/20/15
Dosimeter Corp.	862	8101125	04/20/15
Dosimeter Corp.	862	8101126	04/20/15
Dosimeter Corp.	862	8101127	04/20/15
Dosimeter Corp.	862	8101128	04/20/15
Dosimeter Corp.	862	8101130	04/20/15
Dosimeter Corp.	862	8101131	04/20/15
Dosimeter Corp.	862	8101132	04/20/15
Dosimeter Corp.	862	8101133	04/20/15
Dosimeter Corp.	862	8101134	04/20/15
Dosimeter Corp.	862	8101135	04/20/15
Dosimeter Corp.	862	8101136	04/20/15
Dosimeter Corp.	862	8101137	04/20/15
Dosimeter Corp.	862	8101138	04/20/15
Dosimeter Corp.	862	8101139	04/20/15
Dosimeter Corp.	862	8101140	04/20/15
Dosimeter Corp.	862	9101882	04/20/15

Radiation Alert	Monitor 4/4EC	31663	08/13/07
Radiation Alert	Monitor 4/4EC	31784	08/13/07
Radiation Alert	Monitor 4/4EC	31896	10/11/07
Radiation Alert	Monitor 4/4EC	38564	10/11/07

Radiation Alert	Monitor 5	2561	01/09/08
Canberra	InSpector 1000	11063990	11/01/06
Reuter-Stokes	100 mR/hr HPIC	N-4510	11/10/00
Reuter-Stokes	100 mR/hr HPIC	N-4518	02/01/99
FLIR	indentiFINDER2	910383- 1481	05/01/15
Radiation Alert	Inspector	5588	07/19/12

Instrument calibrations are being done at the following locations.

Cardinal Health Nuclear Pharmacy Services
Ludlum 2241-2
Ludlum 2241-3
Ludlum Measurements, Inc.
Ludlum 2241-2 w/ Sodium Iodide
Ludlum 78 Teledetector
Ludlum REM Ball
FLUKE BIOMEDICAL, RMS
Victoreen 190
Iowa Emergency Management
Victoreen 450P
NDS Products ND-2200
NDS Products RA-500
Exploranium GR-130
Exploranium GR-135
Global Dosimetry DMC2000-X
Radiation Alert Inspector
Dosimeter Corps 611
Dosimeter Corps 862
FEMA 725
RADeCO, Inc.
RADCAL Air Samplers
Radiation Safety & Control Services, Inc. RSCS
MGP Instruments DRM-1

#### IV. Technical Quality of Licensing Actions

18. At the present time, the Radiation Control Unit has 160 active specific licenses.
19. During the review period, MDH has issued approximately 15 new licenses. One new license was issued to a well logging company, DGI Geoscience (1221); two were separating cyclotron licenses from specific licenses Mayo Clinic (1229) and PETNET (1228); two were industrial radiography companies, Applus RTD USA (1230) and Element Materials Technology (1231). Twin Ports Testing (1211-100-89). The remaining ten new licenses issued during the review period were priority 5 category.

Approximately 24 licenses have been terminated during the review period; three were the result of combining medical licenses. Again, the majority of terminated licenses were priority 5 licenses.

During the review period one cyclotron with PETNET (1017) was decommissioned in 2012. MDH staff reviewed the decommissioning plan and were present during the excavation.

20. MDH has issued six variances since November 19, 2011. Two variances were issued to permit the use of a new source model for breast seed localization treatment. The variance allowed for patient treatment to occur until the licensees were able to receive an amendment to include the new source model.

The other four variances were granted to allow the licensees to use personnel not meeting the qualifications outlined in Chapter 4731.4605, *Minimum Standards for a Nuclear Medicine Technologist*, and 4731.4612, *Training for Individuals Functioning as a Nuclear Medicine Technologist Before January 1, 2011, Who are Not Accredited*. These individuals were subject to meeting a specific set of qualifications for specific patient care tasks.

21. During the review period MDH made no changes to the written licensing procedures.
22. MDH has three renewal applications that have been pending for more than one year.
  - Carleton College (1152)
    - Received 9/24/14
    - Currently in peer review – due to be issued approximately 9/15/16
    - Delayed due to slow start by new license reviewer, slow licensee response, and changes in program mid-review
    -
  - Carleton College (1172)
    - Received 9/24/14

- This license will be terminated. Material authorized under this license will be added to the renewal for Carleton College 1152
  - Currently in peer review – due to be issued approximately 9/15/16
  - Delayed due to slow start by new license reviewer, slow licensee response, and changes in program mid-review
- St. Cloud State University (1167)
  - Received 4/26/15
  - Currently waiting for response to deficiency letter
  - Anticipate issue date approximately October 2016
  - Delayed due to RSO on sabbatical and slow licensee response

23. All events reportable under SA-300 occurring during the review period have been submitted to NRC.
24. During the review period the Radioactive Materials Unit has changed procedures for allegations received to make it more uniform with the Indoor Environments and Radiation (IER) Section. Allegation calls are processed using the IER Complaint form (see attachment). Allegation follow up is performed using the procedures in the MDH Allegations manual; these procedures remain the same as during the previous review period.

25. Below is a list of statutes that affect the radiation control program. Authority for Minnesota's Agreement State activities is primarily found in Minnesota Statutes, Sections 144.12-144.1205, and in the Minnesota Rules Chapter 4731. Minnesota's statutes and rules are accessible on the Internet at:  
<http://www.revisor.leg.state.mn.us/stats/>

Statute	Subject
13.02	Collection, security and dissemination of records; definitions.
13.39	Civil investigation. Covers the requirements the Commissioner follows in a pending civil legal action.
13.41	Licensing data. Covers the requirements that the Commissioner must follow to ensure that data collected for licenses is kept within the statutory guidelines of data privacy.
144.05	General duties of Commissioner; reports.
144.12	Regulations, enforcement, licenses, fees. Overall commissioner authority to regulate, adopt rules, enforce, license and collect fees.
144.1201	Definitions. For agreement state program. Provides clarification for 144.1202.
144.1202	U.S. NRC agreement. Gives the responsibility and authority for an agreement state program to the Department of Health.
144.1203	Training; rulemaking. Authority given to the Commissioner to adopt rules to ensure that individuals handling or utilizing radioactive materials are properly trained and have the qualifications to do so.
144.1204	Surety requirement. Gives the Commissioner authority to require financial assurance for radioactive materials licensees.
144.1205	Radioactive material; source and special nuclear material; fees; inspection. Gives the Commissioner authority to collect fees and penalties, and to conduct inspections.
144.121	X-ray machine and facilities using other sources of ionizing radiation. Indicates that machines and materials must be registered and that the Commissioner can collect fees and perform inspections.
144.989	Title; citation. This legislation is the title for the enforcement. Parts 144.989 to 144.993 are referred to as the Health Enforcement Consolidation Act of 1993.

- 144.99 Enforcement. Outlines the authority that the Commissioner has to access information and issue correction orders, administrative penalty orders, injunctive relief, cease and desist orders, suspension or revocation of permits, licenses, registration or certificates. Allows for hearing, misdemeanor penalties, and the authority to impound radioactive materials and associate shielding.
- 144.991 Administrative penalty order procedure. Outlines the administrative penalty order procedure that must be followed.
- 144.992 False information. Asserts that a person cannot make false material statements, representation or certification in any of the commissioner's areas or they are subject to actions listed in section 144.99, subdivision 1.
- 144.993 Recovery of litigation costs and expenses. Allows the Commissioner to recover any costs brought on my any litigation.
- 181.931 Definitions. Definitions used in the sections 181.931 to 181.935. This section covers employee rights.
- 181.932 Disclosure of information by employees. Actions prohibited by an employer whose employee files a complaint against the employer.
- 181.933 Notice of termination. Addresses employee who has been involuntarily terminated, and that any defamation action is prohibited.
- 181.934 Employee notice. The Department of Labor and Industry will have rules for the notification of employees by employers of an employee's rights.
- 181.935 Individual remedies; penalty. Refers to the ability of the employee to bring civil action to recover costs and damages caused by violation of 181.932.

26. No, our regulations are not subject to a "Sunset" or equivalent law.

27. The information in the State Regulation Status (SRS) sheet is correct.

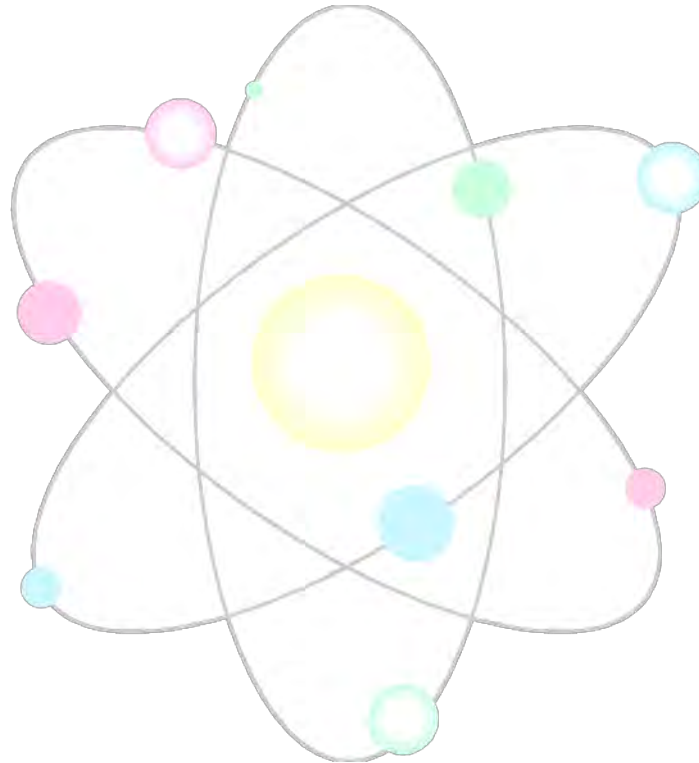
28. All amendments, except the ones listed below, have been adopted within three years from the date of NRC rule promulgation.

The following rules went into effect on August 17, 2015:

- RATS ID 2011-2 – Due for state adoption 11/14/2014
- RATS ID 2012-1 – Due for state adoption 1/25/2015
- RATS ID 2012-2 – Due for state adoption 8/10/2015
- RATS ID 2012-3 – Due for state adoption 8/6/2015

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# MINNESOTA DEPARTMENT OF HEALTH



## LICENSING AND INSPECTION QUALIFICATION JOURNAL DOCUMENT

The logo is circular with a black border. Inside the circle, there is a stylized black and white illustration of a ram's head facing right. The text "Radioactive Materials Unit" is written along the top inner edge, and "Minnesota Department of Health" is written along the bottom inner edge. The acronym "RAM" is positioned below the ram's head.	<p>Minnesota Department of Health Radioactive Materials Unit PO Box 64975 St. Paul, MN 55164-0975 651-201-4400</p>
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# MINNESOTA DEPARTMENT OF HEALTH LICENSING AND INSPECTION QUALIFICATION JOURNAL

## INTRODUCTION

The combination of the Licensing Procedures Manual, Inspection Procedures Manual, Enforcement Applications Manual, and the Qualification Journal form the nucleus of the Unit's Licensing and Inspection program. They provide the basic information necessary to review applications, issue licenses, conduct inspections, and implement any enforcement actions.

## POLICY STATEMENT

The Qualification Journal is the tool that documents the license reviewer's and the inspector's qualification progress as well as the steps taken to qualify that individual. This Journal contains an outline of the *minimum* activities expected by the Radioactive Materials Unit Supervisor and the Indoor Environments and Radiation Section Manager. These activities are classified as the following:

1. Formal training
2. Self-study
3. Accompanied inspections
4. Licensing audits

Additional activities may be assigned to augment an employee's professional development.

With the concurrence of the Indoor Environments and Radiation Section Manager, the Radioactive Materials Unit Supervisor will schedule attendance at the job related US Nuclear Regulatory Commission (NRC) sponsored training courses. No person will be expected to attend all the courses in a twelve-month period. However, each employee will have the opportunity to attend all courses. The Section Manager reserves the right to waive the requirement for attendance at any course based on availability and program workload.

US Nuclear Regulatory Commission establishes the content of Minnesota Department of Health (MDH) staff training. The current policy states: "although Agreement States need not follow NRC Inspection Manual, Chapter 1246, they should have an equivalent program for training and qualification of personnel, and it should be present and adhered to in Agreement State programs.<sup>1</sup>" Formal training consists of the "core courses" indicated in Sections I and II of the NRC Inspection Manual. These courses represent the minimum formal training requirements established for staff personnel who license and inspect radioactive materials programs.

In addition to the core courses, several "specialized training" courses may be scheduled to expand the staff's technical knowledge. Attendance, which is normally scheduled after employees have completed the core courses and functioned in the job position for a significant period, will be based on the availability of funds; the previous experience of personnel; and on the anticipated requirements of assigned work. The Section Manager will make the determination on an individual basis. For example, a staff member should attend the training if assigned activities in one of the areas for which a formal training course is available. As an alternative, management should ensure that the individual has had equivalent experience.

The self-study portion of this journal consists of a series of questions on each section of the Minnesota Department of Health's rules pertaining to the use of licensed material. These questions test the employee's knowledge of the rules and the thought process needed to effectively review licensing action requests and conduct inspections.

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<sup>1</sup> *Integrated Materials Performance Evaluation Program (IMPEP) Directive 5.6, Common Performance Indicator 3 – Technical Staff and Training*

After completing a self-study quiz, the supervisor will review the answers and assign a grade. If the grade is less than a passing grade (80%), the supervisor should assign remedial actions. Once this program is satisfactorily completed, the supervisor will sign the appropriate block in the journal. The original quiz and any relevant documentation will become a part of the Qualification Journal.

The accompanied inspections have been divided into categories. At a minimum, the inspector candidate must complete three accompanied inspections. During the first accompaniment, the candidate will observe a qualified inspector in all phases of the inspection. In the second, the candidate will participate in all phases of the inspection with the supervision of a qualified inspector. The inspector candidate must conduct all phases of the inspection under the supervision of a qualified inspector during a subsequent inspection. At the discretion of the Unit supervisor, a candidate may be required to perform more than one of either type of accompaniment. Once a candidate has received a signature, he or she will be able to conduct that type of inspection independently in all but broadscope program areas.

## **RADIOACTIVE MATERIAL LICENSE REVIEWER AND INSPECTOR QUALIFICATION JOURNAL**

Webster's Collegiate Dictionary defines "journal" as, "A record of current transactions and an account of day-to-day events." Clearly, a journal should not be a massive reference manual. The Qualification Journal used by the State of Minnesota for its radioactive materials license reviewers and inspectors defines areas in which an individual must demonstrate competence. It also provides a record to show how and when this competence was measured or demonstrated. Although this Journal does not include reference material, in some cases it does describe various reference materials employees should study to satisfactorily complete the Journal.

The agreement between the State of Minnesota and the US Nuclear Regulatory Commission (NRC) in accordance with the provisions of subsection 274b of the Atomic Energy Act of 1954 (Act), as amended, determines the minimum training requirements for a radioactive materials inspector. Under the provisions of the Act, the Minnesota Legislature must certify that the State has a program for the control of radiation hazards adequate to protect the public health and safety. The legislature must also affirm the desire to assume regulatory responsibility for those hazards (i.e., become an Agreement State). The Act also requires that the State's program be compatible with the NRC's program for the regulation of such material and the State's program must be adequate to protect the public health and safety with respect to the materials covered by the Agreement. To implement the requirements of the Act, the NRC routinely interacts with each Agreement State; verifies that compatibility is being maintained; and evaluates the State's program to determine that it is adequate to protect the public health and safety.

One of the important criteria reviewed by the NRC is the level of technical competence of each Agreement State radioactive materials license reviewer and inspector. Since technology and the uses of radioactive material are not static, it is necessary to continually evaluate the skills of Agreement State personnel based on current perceived hazards that exist throughout the radioactive material industry. Hazards exist now that did not exist ten years ago. Both the license reviewer and the inspector should recognize that as industry practices and activities change, there will be additions and revisions to this journal. These changes will require a corresponding update of skills.

### **PURPOSE**

This Qualification Journal establishes the current minimum training requirements required to license and inspect radioactive material facilities in the State of Minnesota. The Journal also is a record that documents the training requirements of the individuals completing those tasks. It is important to note that subsequent training may be required to retain or update those skills.

### **FORMAT**

The Journal documents that various administrative and technical tasks required of the license reviewer and the inspector have been accomplished. It shows that:

- The license reviewer/inspector received an administrative orientation that explains administrative actions of the Department.
- The license reviewer/inspector demonstrated a basic understanding of Information Notices issued by the US Nuclear Regulatory Commission.
- The license reviewer/inspector completed required formal training courses.

- The license reviewer/inspector demonstrated by a series of self-study quizzes an understanding of State of Minnesota Rules.<sup>2</sup>

In addition to the above, the radioactive materials inspector completes the following actions:

- Accompanied a qualified inspector during inspections.
- The inspector independently performed radioactive materials inspections while being observed by a qualified inspector.
- Qualified in writing as having met all the specific training requirements.
- Approved by the Radioactive Materials Unit Supervisor.

### **EXPECTATIONS FOR A LICENSE REVIEWER AND/OR INSPECTOR:**

The primary role of a license reviewer or inspector is to gather information that can be used to determine a licensee's level of understanding of, and compliance with, applicable statutes, laws, rules, and license conditions. Beyond this responsibility, the personnel are expected to provide technical support for the regulated community. To successfully fulfill these roles, individuals will need to be aware of the proper procedures for the following:

- Safety practices
- Quality assurance tests and standards
- Documentation
- Sampling techniques (where required)
- Evidence collection

Explaining the rationale behind a rule helps the regulated party understand its importance. This also enables the inspector to effectively communicate the rules to regulated parties. Many of the radioactive materials rules coincide with federal regulations. The rationale behind the enactment of a federal regulation may be found in the Statements of Consideration prepared as part of the US Nuclear Regulatory Commission's rulemaking process.

### **SKILLS**

An effective radioactive materials license reviewer or inspector possesses many skills. Some can be learned but others seem to be innate and are difficult to quantify. In this training program, the developed skills will be measured or objectively verified. The following list sets forth the more important basic skills that should be possessed by competent and effective radioactive materials license reviewer or inspector:

- Qualified by academics and experience
- Effective Communicator
- Competent Technical Writer

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<sup>2</sup> *Some of the questions pertain to the enforcement policy that has been provided to each employee. In addition, answers to questions pertaining to transportation of radioactive material can be found in 49 CFR 172-184.*

## **TRAINING POLICY**

An individual can be qualified to perform license and inspection functions for certain types of licenses while working toward full qualification of all types of licenses issued by Minnesota Department of Health (MDH). When an individual has demonstrated competency in a particular training area, their training record will be updated to document that competency. An individual will not serve as lead inspector or senior license reviewer unless that individual has demonstrated competency in the program areas applicable to that type of license.

Normally, staff is expected to complete the Core Courses within the two years. Specialized training courses will be scheduled based on employee's schedules, program requirements, and availability of funds.

## **REFRESHER TRAINING**

Qualified individuals will complete 24 hours of refresher training every 24 months following their initial qualification.

Refresher training may consist of health and safety or security topics. The Radioactive Materials Supervisor will determine the training courses that are eligible for refresher training.

Refresher training will be tracked in the individual's Qualification Journal.

## **ACADEMIC QUALIFICATIONS**

The usual criteria for evaluating technical personnel are academic qualifications. Most assume that more degrees equal greater ability to perform complex technical tasks. Unfortunately, most resumes and job interviewers focus almost entirely on academic qualifications. Little effort is made to evaluate the other areas listed above. This does not imply academic excellence is not important, it obviously is. However, academic excellence or experience without collateral skills (those listed above) will not result in a competent and effective radioactive materials license reviewer or inspector. The qualification objectives<sup>3</sup> for entry-level license reviewers and inspectors are:

- Graduation from an accredited college or university with major coursework in a natural science; or
- An equivalent combination of the required education and experience, substituting one year of full-time professional experience in a radiation or environmental control program for thirty semester hours of education; or
- An equivalent combination of education and full-time experience in radiological technology, nuclear medicine technology or radiation therapy, substituting thirty semester hours or equivalent or one year of full-time experience for one year or thirty semester hours of the required education or experience.

## **COMMUNICATION SKILLS**

Communication is an essential element in the licensing and inspection processes. It is imperative that employees understand the licensee's policies and procedures. However, it is just as important that employees effectively communicate any issues identified during a review or inspection. The license reviewer and the inspector must be able to adequately converse with licensees and transfer information. Good communication skills are essential in the evaluation and assurance of radiological safety programs licensed by MDH.

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<sup>3</sup> *The specific education and experience requirements for employees are included in the position descriptions.*

## TECHNICAL WRITING SKILLS

The ability to accurately document licensing issues and inspection findings cannot be emphasized too strongly. Each licensing action or inspection report provides the legal basis for enforcement sanctions. That documentation also helps the license reviewer during the next license review as well as the inspector on the next inspection.

## ADDITIONAL CONSIDERATIONS

*Persistence.* Persistence means that the license is not issued or the inspection is not finished until all the facts and information needed have been obtained. Sometimes, it may be more important to delay issuing a license or to reschedule other inspections until all necessary information is obtained.

*Treating Others Fairly.* It is essential that reviewers and inspectors assist the licensees in understanding all the identified problems. In some cases, a licensee might need to contemplate the various options and issues. The license reviewer and the inspector must ensure that the licensee has the appropriate time to identify and implement actions. Finally, if licensee's management does not agree that there is a problem, the reviewer or inspector should take another look at the conclusions.

*Awareness of the Inspector's Own Emotions.* Employees experience a range of emotions. Sometimes interaction with the licensee can be intense. Inspectors should recognize that they might experience strong emotions while doing their job. Licensees may respond in a defensive, argumentative way, or even be verbally abusive. In these situations, the personnel should not let inappropriate behavior trigger a similar response.

*Ethics for a State Employee.* Employees will be faced with decisions that concern ethics throughout their career. The ethical behavior expected of state employees ranges from areas of conflict of interest, acceptance of advantages, use of state equipment, use of confidential information, and acceptance of gifts, meals and other items of financial value. Beyond these, management expects employees to use common sense, conduct themselves professionally, and to seek guidance from a supervisor if a situation arises where the ethical choice is unclear.

*Personal Gain.* Personnel must not act or fail to act for reasons of personal gain. In fact, any actions that may be construed as such must be avoided. Employees cannot accept favors under circumstances that may be construed as having an influence on the performance of their duties. For example, if an inspector and the regulated party have lunch together during the course of the inspection, the inspector must pay for his or her own lunch.

*Other Inspection Guidelines.* A positive, supportive demeanor promotes good will. A positive rapport with the regulated party will more likely result in a cooperative, productive inspection than will an arrogant, heavy-handed approach. It is important to be courteous and respectful. To do so, creates an atmosphere of cooperation, reduces the responsible party's anxiety level, and encourages an exchange of information.

*Personal Appearance.* Proper personal appearance is also important and contributes significantly to the professional image. Under no circumstances should the employees wear clothing that bears emblems advertising a business or business-related product. Inspectors should wear attire appropriate for the type of inspection being conducted, including proper safety equipment.

## INFORMATION NOTICES

In order to keep licensees, as well as NRC and Agreement State inspectors, informed about various concerns involving radioactive material that were identified throughout the country, the NRC began issuing Information Notices. Each Notice describes a problem or concern that relates to equipment failure, design problems, loss of control over radioactive material, etc. More importantly, the Notices

describe various solutions and corrective actions that were taken or can be taken to resolve identified problems.

During training, the license reviewers and inspectors may need to refer to some of these Notices. Employees are not expected to review every Notice. However, as a minimum, they should know where to look if a question or concern arises.



## LICENSING AND INSPECTION QUALIFICATION JOURNAL MASTER LOG SHEET

Employee:

The following log verifies you have received various documents and have completed required learning objectives in a satisfactory manner.

	<b>Supervisor's Signature When Issued/Completed</b>	<b>Date</b>
1. Administrative orientation and Department Policies Explained		
2. Inspection Manual		
3. Enforcement Manual		
4. Information Notices		
5. Required Formal Training Courses		
6. Self-study Quizzes		
7. Accompanied a Qualified Senior Inspector		

**LICENSING AND INSPECTION QUALIFICATION JOURNAL  
CORE COURSE TRAINING LOG**

Course	Date
1. Inspection Procedures (G-108)	
2. Licensing Practicing and Procedures (G-109)	
3. Fundamentals Health Physics I and II (Basic Health Physics) (H-122)	
4. Nuclear Medicine (H-304)	
5. Industrial Radiography (H-305)	
6. Transportation of Radioactive Material (H-308)	
7. Brachytherapy and Gamma Knife (H-313)	
8. Radiological Emergency Response Operations (RERO)	
9. NRC Materials Control & Security Systems & Principles (S-201)	

By signature, the Radioactive Materials Unit Supervisor certifies that the requirements for Core Course Training have been satisfied.

\_\_\_\_\_  
Supervisor's Signature

\_\_\_\_\_  
Date

**LICENSING AND INSPECTION QUALIFICATION JOURNAL  
SPECIALIZED TRAINING COURSES LOG**

Course	Date
1. Environmental Monitoring (H-111)	
2. Air Sampling (H-119)	
3. Root Cause Workshop (G-205)	
4. Fundamental Health Physics III (H-123)	
5. Internal Dosimetry (H-312)	
6. Advanced Radiological Incident Operations (ARIO)	
7. Health Physics in Radiation Accidents (REAC/TS)	
8. Advanced Health Physics (Health Physics Technology) (H-201)	
9. Multi-Department Radiation Survey and Site Investigation Manual (MARSSIM) (H-121)	
10. RESRAD (H-410)	
11. Well Logging (H-314)	

By signature, the Radioactive Materials Unit Supervisor certifies that the requirements for Specialized Training have been satisfied.

\_\_\_\_\_  
Supervisor's Signature

\_\_\_\_\_  
Date

## **LICENSING AND INSPECTION QUALIFICATION JOURNAL RADIOLOGICAL SAFETY INSPECTION ACCOMPANIMENTS**

As part of your on-the-job training, you will accompany other inspectors and observe how they conduct inspections. You will probably have an opportunity to accompany more than one inspector. In this way, you will be able to learn those techniques and methods that best suit your personality and technical skills.

After you have participated in inspections, principally as an observer, you will have an opportunity to prepare for, perform, and document the results of actual inspections while being observed by the Radioactive Materials Unit Supervisor or a qualified inspector. If it is determined that you are capable of performing a quality inspection for a particular type of licensed program, you will be granted approval for performing that type of inspection without accompaniment. The Inspector Fieldwork Evaluation Report (Appendix A) must be completed and a copy included in this Journal.

As you demonstrate the ability to perform additional types of inspections, these will be added to the types of inspections you can perform without accompaniment. The following types of license inspections are included in this qualification program:

- Measuring Systems - Fixed and Portable Gauges, and Self-Shielded Irradiators less than 10,000 Curies
- Medical Institution - Diagnostic Only
- Medical Institution - Diagnostic & Therapy
- Industrial Radiography
- Research and Development
- Broadscope

In addition to the accompaniments indicated above, the Radioactive Materials Unit Supervisor or another qualified inspector will make periodic evaluations. These evaluations are to assure consistency within the program. The Inspector Fieldwork Evaluation Report must be completed and a copy incorporated into this Journal.

## LICENSING AND INSPECTION QUALIFICATION JOURNAL RADIOLOGICAL SAFETY INSPECTION ACCOMPANIMENTS

This log verifies that you have accompanied a qualified inspector on a series of inspections principally as an observer with some participation. This accompaniment included at least one of each type of licensed program described on the previous page.

Licensee	License or Registration No.	Inspection Date	Qualified Inspector's Signature
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			

**LICENSING AND INSPECTION QUALIFICATION JOURNAL  
RADIOLOGICAL SAFETY INSPECTION ACCOMPANIMENTS WITH  
PARTICIPATION**

This log verifies that you have accompanied a qualified inspector on a series of inspections principally as an observer with some participation. This accompaniment included at least one of each type of licensed program described on the previous page.

<b>Licensee</b>	<b>License or Registration No.</b>	<b>Inspection Date</b>	<b>Qualified Inspector's Signature</b>
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			

**LICENSING AND INSPECTION QUALIFICATION JOURNAL  
EVALUATED RADIOLOGICAL SAFETY INSPECTION ACCOMPANIMENTS**

This log verifies that you have performed a series of inspections while being observed and evaluated by a qualified inspector. Your effort included a review of the license files while preparing for the inspection, the conduct of the inspection (while being observed by a qualified inspector), written documentation of the inspection findings, and any enforcement correspondence of findings that resulted from your inspection. This accompaniment included at least one of each type of licensed program described in the Radiological Safety Inspection Accompaniments.

Licensee	License or Registration No.	Inspection Date	Qualified Inspector's Signature
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			

**LICENSING AND INSPECTION QUALIFICATION JOURNAL  
EVALUATED RADIOLOGICAL SAFETY INSPECTIONS - ANNUAL  
ACCOMPANIMENTS**

This log documents accompaniments and subsequent evaluation by the Radioactive Materials Unit Supervisor. Your effort included a review of the license files while preparing for the inspection, the conduct of the inspection, written documentation of the inspection findings, and any enforcement correspondence of findings that resulted from your inspection. A copy of the Inspector Evaluation Form (included in Appendix A) has been completed and placed in this manual.

Licensee	License or Registration No.	Inspection Date	Qualified Inspector's Signature
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			



### REFRESHER TRAINING TRACKING

This log verifies that you have completed refresher training as required. Every 24 months qualified individuals must complete 24 hours of refresher training.

**Initial Qualification / Requalification Date:** \_\_\_\_\_

**Refresher Training to be completed by:** \_\_\_\_\_

TRAINING COURSE	HOURS	DATE	SUPERVISOR SIGNATURE

**TOTAL HOURS:** \_\_\_\_\_

**LICENSING AND INSPECTION QUALIFICATION JOURNAL  
SELF-STUDY QUIZZES – FINAL SCORES**

This log verifies that you have satisfactorily completed the following self-study quizzes. A grade of 80% is required to pass each quiz. In some instances, you are required to explain how you arrived at your answer. This requires that you analyze a situation that might be identified during an inspection before you are able to determine what, if any, regulatory requirement has been violated.

	<b>Final Score</b>	<b>Date</b>
Regulatory Requirements, Administrative	_____	_____
Regulatory Requirements, Licensing Procedures	_____	_____
Regulatory Requirements, Radiation Protection Standards	_____	_____
Regulatory Requirements, Medical Uses	_____	_____
Regulatory Requirements, Industrial Radiography	_____	_____

APPENDIX A  
**INSPECTOR FIELDWORK EVALUATION REPORT**

**Minnesota Department of Health Radioactive Materials Unit  
Inspector Fieldwork Evaluation Report**

DATE:

INSPECTOR:

EVALUATOR:

LICENSEE:

LICENSE NUMBER:

LOCATION:

ANNOUNCED

UNANNOUNCED

DATE OF INSPECTION:

INSPECTION TYPE:

I. PRELIMINARY DISCUSSION WITH INSPECTOR

Done

1. Explain the extent of the reviewer's participation in the inspection.
2. Discuss the procedure for introducing the reviewer to the licensee and explaining his/her presence during the inspection.
3. Explain the method that will be used for evaluating the inspector's performance.

II. SUMMARY OF EVALUATION

1. Inspector's performance rating:       Meets the Guidelines       Needs Improvement
2. Comments:
3. The inspector would benefit from additional training in:
4. The evaluation was discussed with me.

\_\_\_\_\_  
Inspector's Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Qualified Inspector's Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Supervisor's Signature

\_\_\_\_\_  
Date

III. INSPECTOR'S PREPARATION

- 1. Has the inspector reviewed the license and prior compliance history?  Yes  No  N/A
- 2. Has the inspector planned the inspection?  Yes  No  N/A
- 3. Does the inspector have the appropriate instruments?  Yes  No  N/A
- 4. Are the instruments in calibration?  Yes  No  N/A
- 5. Does the inspector have the necessary supplemental materials? (Regulations, inspection forms, personal dosimetry, ID, wipe materials, smoke tubes and bombs, thermal anemometer, dose calibrator sources, instrument check sources, etc.)  Yes  No  N/A

Comments:

IV. OPENING

- 1. Was the opening interview conducted with management?  Yes  No  N/A
- 2. Were incidents or overexposures discussed?  Yes  No  N/A
- 3. Did licensee understand the purpose, scope and techniques?  Yes  No  N/A

Comments:

V. INSPECTION

- 1. Did the inspector use appropriate form or checklist?  Yes  No  N/A
- 2. Did the inspector perform a "walk through" at the beginning of the inspection?  Yes  No  N/A
- 3. Were licensee operations and use and handling of materials observed?  Yes  No  N/A
- 4. Were the facilities checked for proper posting?  Yes  No  N/A
- 5. Was security verified?  Yes  No  N/A
- 6. Were workers checked for personal dosimetry?  Yes  No  N/A
- 7. Were workers interviewed to verify their understanding of safety procedures?  Yes  No  N/A
- 8. Were ancillary workers also interviewed?  Yes  No  N/A
- 9. Were adequate wipes, surveys, and measurements taken?  Yes  No  N/A
- 10. Did inspector check for adherence to ALARA?  Yes  No  N/A
- 11. Were records verified against oral statements for:
  - a. procurement and inventory  Yes  No  N/A
  - b. receipt and transfer of materials  Yes  No  N/A
  - c. internal audits  Yes  No  N/A
  - d. qualification and training of users  Yes  No  N/A
  - e. emergency plan and procedures  Yes  No  N/A
  - f. committee meetings and minutes  Yes  No  N/A
  - g. authorized users  Yes  No  N/A
  - h. instrument calibration  Yes  No  N/A
  - i. dose calibrator tests  Yes  No  N/A
  - j. surveys and monitoring  Yes  No  N/A
  - k. personnel dosimetry and bioassay  Yes  No  N/A
  - l. leak tests  Yes  No  N/A
  - m. generator-assay, moly breakthrough and logs  Yes  No  N/A
  - n. release of effluents, sewer and air  Yes  No  N/A
  - o. management and disposal  Yes  No  N/A

12. Did the inspector safely handle radioactive material?  Yes  No  N/A
13. Did the inspector address all necessary elements of the licensee's program?  Yes  No  N/A  
If not, explain:
14. Were hazards or potential problems discovered and given follow-up?  Yes  No  N/A  
If not, explain:

Comments:

VI. CLOSING

1. Was there careful assembly of supporting information prior to the exit interview?  Yes  No  N/A
2. Did the inspector close with appropriate level of management or make every effort to do so?  Yes  No  N/A
3. Were suggestions clearly distinguished from items of noncompliance?  Yes  No  N/A
4. Were items of noncompliance fully explained with regulation or license condition cited?  Yes  No  N/A
5. Did the inspector explain what follow-up actions would occur? (enforcement letter, etc.)  Yes  No  N/A
6. Was the licensee advised of any requirements?  Yes  No  N/A
7. Did the inspector properly decide if certain practices or operations should cease immediately?  Yes  No  N/A
8. Were previous items of noncompliance discussed?  Yes  No  N/A

Comments:

VII. PROFESSIONALISM

1. Did the inspector use proper judgment in evaluating radiation safety?  Yes  No  N/A
2. Did the inspector demonstrate an adequate knowledge of health physics and regulations?  Yes  No  N/A
3. Was the inspector's appearance appropriate for the type of licensee?  Yes  No  N/A
4. Was rapport with management and workers sufficient for free exchange of information?  Yes  No  N/A
5. Were the inspector's questions phrased appropriately?  Yes  No  N/A

Comments:

VIII. INSPECTION REPORT

1. Did the inspector document all items in the Inspection Report?  Yes  No  N/A
2. Were all deficiencies addressed?  Yes  No  N/A
3. Was the inspection report generated in a timely manner?  Yes  No  N/A

Comments:

IX. Follow-up review

1. Were all deficiencies addressed?
2. Were the corrective actions adequate?
3. Was the inspection closed out in a timely manner?

- |                              |                             |                              |
|------------------------------|-----------------------------|------------------------------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |

Comments:

## REVISIONS

<b>Revision</b>	<b>Section</b>	<b>Description</b>
06/02/05	Advanced Courses	Deleted Internal Dosimetry because it is no longer offered. Made an editorial correction in numbering.
07/20/07	Accompaniments	Revised signature blocks
07/30/07	Core Courses	Added Increased Controls Training
7/11/14	Core Courses & Advanced Course	Updated course names and numbers. Added Internal Dosimetry and HP III to Advanced Courses
7/21/15	Refresher Training	Add requirements for refresher training - 24 hours every 24 months





# Minnesota Department of Health

## Indoor Environments and Radiation Complaint Form

Complaint ID

Date complaint received

STEP 1: Triage – listen to the caller or read the email/letter to determine if it meets the following conditions:

Is the activity/material within the state of Minnesota?

Is the complaint an allegation/concern about a material/activity that MDH regulates?

IMPORTANT: If both boxes are not checked, the call/email is NOT a complaint. To address the concerns of the caller/emailer provide them the appropriate MDH educational information, either verbal or written. If their concern is handled by a different unit, section or agency, use this phone list to direct the caller or forward their email.

### [Frequently Called Phone Numbers by Subject](#)

STEP 2: Read/issue Tennessee Warning (not necessary for referrals from other government agencies)

- A. Telephone complaint                      Read to complainant on
- B. Email/Written complaint              Sent to complainant on

Thank you for contacting MDH. Here's what we can do about what you told us. We will investigate your complaint. But we need some more information. You are not required to provide this information to us. However, if you don't provide us with this information, we may not be able to investigate your complaint or contact you to get additional information. During our investigation, the person you are complaining about might figure out you contacted us. If you choose to withhold information, we may not be able to investigate your complaint. If you ask to withdraw your complaint, we may still investigate if there is a danger to public health. If our investigation leads to enforcement against the person you complained about, we may share your information with state or local public health department employees, the Office of the Attorney General, the Office of Administrative Hearings and anyone who has a court order to get it.

- C. Does complainant want to continue with complaint?                      Yes                      No
- D. If "No", will MDH investigate the complaint anyway?                      Yes                      No
- E. Reasons for investigating/not investigating complaint.

STEP 3: Collect Information from complainant/referring government agency

A. Who is contacting MDH? Complainant Referral

i. Name

ii. Telephone number

iii. Address

iv. Email address

v. Government agency

B. What is the complaint?

C. When did the incident happen?

D. Where did the complaint occur?

i. Complaint site name

ii. Complaint site address

iii. Complaint site mailing address

iv. Complaint site telephone number

v. Exact location of complaint

E. Does complainant want follow-up? Yes No

F. Additional Information