

Annual Audit of the WRT Radiation Protection Program

February 2013



Water Remediation Technology LLC

A handwritten signature in black ink, appearing to read "T G Adams". The signature is written over a solid black horizontal line.

Theodore G. Adams, PMP
Corporate RSO

2/6/13
Date

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1.0 Overview

An annual audit of the Water Remediation Technology, Inc., (WRT) Radiation Protection Program was performed by Mr. Ted Adams, WRT Corporate Radiation Safety Officer (CRSO). The audit consisted of an ongoing review of various WRT activities that were supported by the Radiological Protection Group throughout the calendar year 2012. The audit included an evaluation of various WRT drinking water treatment facilities and WRT onsite activities (media exchanges, packaging/shipping, internal/external inspections, postings, placement of dosimetry, radiological controls, house keeping, waste storage), as well as, an evaluation of the status of training, dosimetry, survey, instrument calibration, and related documentation. The audit also included interviews with various WRT personnel and reviews of records/documentation supporting the WRT Radiation Protection Program. The audit also evaluated the effectiveness of the WRT Radiation Protection Program.

2.0 Surveys

Surveys performed by WRT during 2012 included baseline surveys, media exchange surveys, inspection surveys, packaging/shipping surveys, operational surveys, and miscellaneous surveys for other needs.

A review of selected surveys that were performed by Mr. Kent Stovall, WRT Radiation Safety Officer (RSO) during media exchanges or facility inspections/visits was performed as part of the audit. The following surveys were reviewed:

1. Canonicito, NM-June 25, 2012 - (Routine Site Visit/Inspection)
2. New Underwood, SD- September 19, 2012 - (Routine Site Survey/Inspection)
3. Vineland 10, NJ- April 30- May 2, 2012 - (Media for Resin Exchange)
4. Canonicito, NM- May 10, 2012 - (Routine Site Visit/Inspection)
5. Brookfield, WI- June 29, 2012 - (Semi-Annual Survey)
6. Pewaukee 2, WI- June 29, 2012 - (Semi-Annual Survey)
7. Arbors Trust 1, WI- June 29, 2012 - (Semi-Annual Survey)
8. Ethan Allen 3, WI- June 29, 2012 - (Semi-Annual Survey)
9. Schwartzwalder Mine, CO - August 10 and 14, 2012- (Resin Exchange)
10. Schwartzwalder Mine, CO - August 3, 2012 - (Resin Exchange)
11. Schwartzwalder Mine, CO - November 11, 2012 - (Site Visit/Inspection)
12. Brookfield, WI- August 28, 2012 - (Semi-Annual Survey)
13. Pewaukee 2, WI- August 28, 2012 - (Semi-Annual Survey)
14. Ethan Allen 3, WI- August 28, 2012 - Semi-Annual Survey)
15. Arbors Trust 1, WI- August 28, 2012 - (Semi-Annual Survey)
16. Schwartzwalder Mine, CO- March 13 -14, 2012 - (Resin Exchange)
17. Schwartzwalder Mine, CO - November 19 and 21, 2012 - (Resin Exchange)
18. Washington Township 10 and 11, NJ - March 26 - April 6, 2012 (Media Exchange)
19. Midnight Mine, Pilot Trailer, WA - July 26, 2012 - (Unrestricted Release)
20. Schwartzwalder Mine, CO - April 23, 2012 - (Routine Survey/Inspection)

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21. Schwartzwald Mine, CO - May 17, 2012 - (Routine Survey/Inspection)
22. Schwartzwald Mine, CO - June 14, 2012 - (Routine Survey/Inspection)
23. Point Pleasant 8, NJ - March 19-21, 2012 - (Media Exchange)
24. Skyborne, CA - October 17, 2012 - (Resin Exchange)

These surveys were reviewed/signed off by the CRSO. The review of the all of the surveys listed above found the related survey documentation complete, legible, and appropriately reviewed.

3.0 Inspections

Both internal (WRT performed) and external (responsible regulatory agency performed) inspections were reviewed.

3.1 Internal Inspections

The following WRT internal inspections were reviewed:

1. Semi-annual inspections of the Wisconsin treatment systems performed on June 29 and August 28, 2012 by Mr. K. Stovall, RSO, Mr. J. Joyner and Mr. J Etheridge.
2. Quarterly inspections of the treatment systems performed by the responsible WRT field service representative (Mr. Mike Hubler, NJ/NY: Mr. Sam Parrot NC/SC/VA/GA: and Mr. Josh Joiner and Mr. Jim Etheridge, IL/WI/MO).
3. Periodic inspections conducted by Mr. Ted Adams, WRT Corporate RSO and other WRT personnel.

Semi-Annual Inspections

The review of the semi-annual inspections of the Wisconsin treatment systems found the inspection/survey documentation in order, complete, legible, and prepared in a timely manner.

Quarterly Inspections

During the last audit, the review of the quarterly inspections performed by the WRT field representatives during the last audit of this area, found the inspection documentation status somewhat lacking in both content and timeliness of reporting. During this audit, significant improvement in this area was identified. Awareness training regarding the importance of these inspections and related inspection documentation has been provided to the WRT field representatives. In addition, the overall responsibility of ensuring that the quarterly inspections and related inspection documentation are performed has been assigned to the Operations Supervisor. Field representatives have been performing the quarterly inspections and providing required documentation.

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Periodic Inspections

The following internal inspections were performed by the CRSO and other WRT personnel during 2012:

1. Fox Run, VA - October 24, 2012- Inspector - T. Adams
2. Bass Lake, CA - July 24, 2012- Inspector - T. Adams
3. Canonicito, NM - January 16, May 10, June 25, 2012 - Inspectors - K. Stovall and J. Mestas
4. New Underwood, SD - February 21, 2012 - Inspector - R. Blaes
5. New Underwood, SD - September 19, 2012 - Inspector - J. Nemecek

During the inspections, attention was placed on postings, housekeeping, surveys/survey documentation, instrumentation and related daily checks/ calibration, radiological control practices, and personnel awareness of radiological safety.

The inspection of the Fox Run, VA found the postings, labeling of containers and dosimetry acceptable. This is an improvement over the last inspection, which was conducted on August 22, 2011. The inspections of the Bass Lake, CA, Canonicito, NM and New Underwood, SD facilities resulted in no deficiencies being identified.

3.2 External Inspections

There were a number of external inspections at the WRT drinking water treatment sites that were performed by state regulators during the 2012 period. These included, but are not limited to:

1. Illinois Emergency Management Agency (IEMA):

Illinois Prairie Estates, IL – August 20, 2012 - Mr. Mike Klebe

Oswego 3 6, and 9, IL November 9, 2012 – Inspector - Mr. Mike Klebe

Sycamore 6 and 8, IL-December 4, 2012 – Inspector - Mr. Mike Klebe

Elburn 3 and 5, IL – December 4, 2012 – Inspector - Mr. Mike Klebe

No findings were identified by the inspector as a result of these inspections. It was suggested however, by the IEMA inspector that the training records show the date, the local CWS personnel sign the training log.

2. New Jersey Department of Environmental Protection, Bureau of Environmental Radiation

New Jersey Department of Environmental Protection, Bureau of Environmental Radiation

Aqua NJ Southern/Erial- June 30, 2012- Inspector- Ms. Karen Flanigan

Aqua NJ Central/Hamilton – October 23, 2012 – Inspector – Ms. K. Flanigan

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No findings or recommendations were identified by the inspector.

3. Nebraska Department Human Health Services, Office of Radiological Health

Platt River Well Field Treatment Facility, Grand Island, NE – October 25, 2012 – Inspector -Mr. Bryan Miller

A notice of noncompliance was issued regarding License Condition 14, which requires that “the licensee shall obtain a written agreement with the Client to have unrestricted access to the license radioactive material at all times”. WRT provided a response on November 8, 2012, which was accepted.

4. North Carolina Department of Natural Resources

Lawrenceville, Ezzard Road, GA – August 9, 2012 – Inspector- Mr. E. Jameson

No items of non-compliance with the DNR requirements were identified.

5. New Mexico Environmental Department

Canonicito, NM – June 26, 2012 – Inspector – Mr. W. Medina

No findings or recommendations were identified by the inspector.

6. California Department of Public Health

Mission Springs Well No. 28, CA – April 26 and May 3, 2012 – Inspector- Mr. A. Taylor

No findings or recommendations were identified by the inspector.

4.0 Notices of Violations

There was one (1) Notice of Violations (NOVs)/Notice of Noncompliance issued in 2012. This was issued by the Nebraska Department Human Health Services Office of Radiation Health. See Item 3 above.

5.0 Postings, Signs and Notices

During the various internal/external, inspections/audits performed during 2012 there were no issues identified related to postings, signs, or notices (Notice to Workers).

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6.0 Radiological Instrumentation

Condition

Radiological instrumentation used by WRT to support media exchanges and other related work was evaluated both during onsite use and offsite storage (WRT Corporate Offices). All instrumentation was found to be in good working condition and in calibration. Daily instrument source and background checks were performed by the WRT RSO prior to use and appropriately documented. A review of the daily instrument source and background forms found the documentation to be complete.

Calibration

A review of the instrumentation (listed in Attachment 1) currently being stored at the WRT Corporate Offices in Arvada Ridge, Colorado was performed on February 6, 2013 and found to be in good working order and in current calibration. A review of the calibration certificates for all of the instruments in use by WRT (either by WRT field service representatives or the WRT RSO were found to be complete, appropriately filed, and available to the auditor for inspection. The status of the instrumentation is managed and maintained by the RSO via a database/matrix (Survey Meter and Detector Head Inventory) which presents all of the instrumentation, model and serial numbers, status of calibration, and copies of calibration certifications.

WRT currently uses Ludlum Instruments, Sweetwater, Texas and Griffin Instruments, Kingston, Tennessee as their calibration vendors. As part of their service, Griffin Instrument provides the RSO with a notice of calibrations due which serves as an independent check on the status of the calibration of the instrument(s).

Instrument Check Sources

Check sources used to perform daily instrument performance checks are maintained by the RSO in a locked box which is located in lockable file cabinet located in the RSO's office. The main WRT building is also locked after hours.

7.0 Media Exchanges

Media exchanges performed during 2012 are presented in Attachment 2.

8.0 Training

The audit reviewed documentation in support of WRT personnel and CWS/HOA personnel radiation safety training. See Attachment 3.

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WRT Personnel Training

Training documentation of WRT personnel was reviewed during the audit. In general, there appears to be a relatively clear paper trail to confirm that appropriate WRT individuals have received the required training (Radiation Worker, DOT HazMat, etc).

CWS/HOA Personnel Training

The audit found that a strong effort was made to ensure that appropriate initial and refresher Radiation Safety Awareness Training was provided to a number of CWS Utility Operators and Managers and HOA personnel. However, there are still a small number of CWS personnel that haven't received the subject initial or refresher training. These include, but are not limited to: Stillwater, NJ; Upper Deerfield Township, NJ and the various CWS personnel in North Carolina. This is a carryover from previous audit.

While WRT System Specialists are responsible for the handling of any of the radioactive material and CWS personnel are not involved in any radioactive material handling activities, such voluntary training is more for "awareness/peace of mind" rather than health and safety. However, not providing this training to the CWS operators/managers as part of the WRT Radiation Protection Program volunteer effort may be interpreted by certain regulatory agency as a violation of the license (i.e., IEMA). Attachment 3 lists the Radiation Safety Awareness Training that was provided to CWS/HOA personnel in 2012. Based on the above, continued priority attention needs to be given to providing initial and refresher Radiation Safety Awareness Training to CWS personnel and to ensure the implementation and maintenance of this training. During the audit, it was discussed to prepare a simplified required reading for the refresher training of the CWS/HOA personnel that would be included as part of the annual dosimetry reports issued to the CWA/HOA personnel.

9.0 Dosimetry

The WRT Dosimetry Program consists of dosimeters issued for WRT personnel, CWS personnel, and for System (Primary and Secondary stages vessels) and Areas (a distance away from vessel), and specifically for NJ, the placement of a dosimeter on all vessels, area, and fence line.

WRT Dosimetry

The Dosimetry Program which involves WRT personnel appeared to be well executed and maintained. Results of doses are provided to WRT personnel on an annual basis.

CWS/HOA Dosimetry

A review of the CWS/HOA portion of the WRT Dosimetry program revealed continued progress in execution and maintenance since the last audit, but still room for some continued improvement. Delayed installation/return, lost badges, area badges being placed on vessels and visa versa, and lack of timely notification of changes in CWS personnel are some of the issues that occurred during 2012. Continued attention needs to be placed on this item to minimize the identified issues. This is especially

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important since WRT's long term goal is to reduce the number of dosimeters that will be required to be issued. This is a continued item that warrants continued attention.

Copies of dosimetry reports for the NJ CWSs (personnel, vessel, and area) are being sent to the NJDEP within the 15-day requirement specified in the CWS license conditions. Quarterly and annual dosimetry reports are being reviewed by the CRSO.

10.0 Radiological Field Procedures

The existing radiological field procedures were reviewed and found to be reflective of the current radiological control/protection practices/policies. However, there were still a number of draft procedures that should be finalized and implemented as part of the WRT Radiation Protection Program. The finalization and implementation of these procedures should be given a high priority.

A process has been established between the RSO and the CRSO to go through all of the draft procedures and set a timetable for completing this task. This is a continued item and one that needs to be addressed.

11.0 License(s) Status

The current WRT licenses and other CWS/HOA licenses were reviewed. The status of the licenses is provided in the following sections.

WRT Licenses

The following license/amendments/renewals were prepared and or obtained in 2012:

Mission Springs, Golden State Water, California – December 17, 2012 – License Amendment issued

Colorado – May 21, 2012 – License Amendment issued

Georgia – July 20, 2012 – License Renewal issued

North Carolina – October 30, 2012 – License Renewal issued

Wisconsin – March 28, 2012 – License Renewal issued

Nebraska – February 17, 2012 – License issued

New Jersey – July 13, 2012 – License Renewal issued

Falling Water, Texas – December 20, 2012 – License Amendment issued

Zavala, Texas – August 13, 2012 – License Amendment issued

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CWS/HOA Licenses

Winslow Township 3, 7, 9, New Jersey – June 1, 2012 – License Amendment issued

Washington Township, 10 and 11, New Jersey – March 9, 2012 – License Amendment issued

Point Pleasant, New Jersey – June 28, 2012 - License Renewal issued

12.0 Records

Records documenting surveys, training, dosimetry, instrument calibration, and shipping/manifest were evaluated during the audit. Documentation of such is maintained in both hard copy (Central File) and electronic version (P Drive).

Surveys

Documentation of all surveys reviewed was found to be complete, legible and well maintained. Daily instrument performance check logs were reviewed and found to be complete, legible, and well maintained.

Training

The audit found improvements in the documentation of training records, but additional attention to this area is warranted. A training database was established and updated for IL CWSs. However, this data base needs to be updated (or a new tracking program implemented) to include all CWS operators/managers for all of the WRT systems in the various states, as well as, WRT personnel.

Dosimetry

Documentation of dosimetry records was found to be complete and well maintained (with continued effort). Reports are being submitted to the NJDEP for NJ CWSs within the required 15 day period specified in the CWS license condition. Annual dose reports are sent to all CWS/HOA personnel.

Instrument Calibration

Documentation of instrument calibrations was found to be complete and well maintained. No issues were identified during the audit. See Attachment 2 for instrument which calibration certifications were reviewed.

Shipping Documentation

Documentation of shipping records/waste manifests in support of media/resin exchanges were found to be complete and well maintained. No issues were identified during the audit.

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13.0 Staffing

The current staffing of the radiation protection group is adequate but being strained. License applications/amendments are being prepared and submitted in timely manner, media exchanges are being supported, semi-annual inspections are being performed, baseline surveys and other surveys are being completed and reviewed, dosimetry records are being maintained and issues resolved, and training is being provided and records maintained. However, signs of weaknesses/deficiencies in the administrative function of maintaining the training, dosimetry, and quarterly inspection data bases were again identified during this audit. This is a carry over from previous audit.

The maintenance of the various data bases/records in support of the WRT Radiation Protection Program is currently being performed by the RSO. Because the RSO is also the primary individual responsible for the support of the media exchanges and since the number of media exchanges has continued to increase, the RSO has had to dedicate more of his time to support these media exchanges and has had less time to support the administrative effort required to maintain the data bases. As additional treatment systems become operational, and more training, dosimeters, surveys are required, the administrative needs to maintain these data bases will become even greater. WRT management should consider providing administrative support to the RSO to assist in the maintenance of the various databases.

As identified previously, as more and more systems come on line, the frequency for media exchanges will increase. This increase required the RSO and/or other senior radiological support personnel to be out of the office several times a year. Furthermore, as was experienced in 2010, 2011, and 2012 (CRSO and VP Government Affairs), several exchanges were scheduled back to back or within a relatively short time frame between exchanges. With the increase in the number of systems, the future may require that two or more exchanges be performed simultaneously. As stated in the previous audit, WRT management should consider providing/acquiring additional radiological support (an additional RCT resource) and (administrative resource[s]) to address the need for the increase in radiological support for the increase in media exchanges and other needs.

14.0 ALARA

A review of the WRT and CWS personnel dosimetry records revealed that doses were maintained reasonably low. There were no unusual doses recorded. The program is being implemented effectively and thus, no modifications are necessary at this time to the WRT ALARA Program.

15.0 Changes in Agreement State/NRC Radiation Protection Standards and Requirements

A review of the various Agreement States (New Jersey, New York, North Carolina, Virginia, Colorado, Nevada, California, Texas, Nebraska, Illinois, Georgia, Wisconsin, New Mexico, South Carolina, South Dakota, Missouri) and NRC where WRT has a license or has a uranium/radium and/or uranium/radium removal system/pilot system operating in 2012, radiation protection standards and requirements were

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performed. Based on that review, no changes or modification to the WRT Radiation Protection Program is necessary.

16.0 Issues

As a result of the audit, the no specific issues were identified.

17.0 Personnel Interviewed

The list of WRT Personnel interviewed during this audit is presented in Attachment 4.

18.0 Conclusion and Recommendations

Conclusion

As a result of the audit, the WRT Radiation Protection Program including the ALARA Program was found to be effectively implemented. However, a number of items/areas have been identified that need attention/corrective action to ensure that the Program continues to be efficiently and effectively maintained and implemented, especially in light of WRT's goal to increase the number of treatment systems and to become more involved in groundwater/wastewater treatment opportunities.

Recommendations

Based on the results of the audit, the following recommendations are presented:

1. The remaining draft Radiation Field Procedures should be completed and implemented as part of the WRT Radiation Protection Program.
2. Initial/refresher Radiation Safety Awareness Training should be provided to all those CWSs/HOAs that have not yet received such training. In addition, the current training matrix/data base should be updated (or a new system [Conductor] implemented) to reflect all CWS/HOA initial/refresher training, ensure all CWS/HOA individuals are receiving the proper training/retraining at the required frequencies, that their training is current, enable adequate and timely tracking of all CWS/HOA training, and that the records are easily auditable. (Carry over recommendation)
3. While the current training tracking data base is working, the current database for tracking and maintaining training of WRT personnel should be reviewed and updated (or a new tracking program [Conductor] implemented) to reflect the status of each WRT individual required to be trained. This will ensure all appropriate WRT individuals are receiving the proper training/retraining at the required frequencies, that their training is current, enable adequate and timely tracking of all WRT training, and that the records are easily auditable. (Carry over recommendation)

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4. Continued attention should be implemented to address the current issues related to the WRT Dosimetry Program for the CWS/HOA sites (carry over recommendation).
5. WRT management should review the need for administrative assistance support to the radiological group to develop, maintain, and track the data in the various established databases (training, dosimetry, quarterly inspections, etc.) (Carry over recommendation).
6. WRT management should review the need for additional radiological resources (full-time/part-time contract RCT, etc.) to support current and future needs (Carry over recommendation).

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Attachment 1 Radiological Instrumentation

<u>Instrumentation</u>	<u>Serial Number</u>	<u>Calibration Date</u>	<u>Calibration Due Date</u>
Ludlum 19	238786	6/20/12	6/20/13
Ludlum 19	244979	3/21/12	3/21/13
Ludlum 19	238715	12/13/12	12/13/13
Ludlum 19	253077	4/6/12	4/6/13
Ludlum 19	282718	6/25/12	6/25/13
Ludlum 3030	247403	8/29/12	8/29/13
Ludlum 43-10-1	263693	2/17/12	2/17/13
Ludlum 2241-2	243225	12/4/12	12/4/13
Ludlum 44-9	262082	12/4/12	12/4/13
Ludlum 44-10	273154	1/16/12	1/16/13
Ludlum 43-5	262385	12/4/12	12/4/13
Ludlum 2401-P	188826	7/3/12	7/3/13
Ludlum 2401-P	190956	12/3/12	12/3/13
Ludlum 2241-2	254723	7/2/12	7/2/13
Ludlum 2241-2	243332	6/25/12	6/25/13
Ludlum 44-9	271879	7/2/12	7/2/13

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Attachment 2 Media Exchanged 2012

Media Exchanged 2012

	<u>Date</u>	<u>Location</u>	<u>Media</u>	<u>Weight lb</u>	<u>Volume ft3</u>	<u>Disposal Location</u>
1	1/26/2012	Bartlett 7	Z-88	8,200	170	USE Grand View
2	3/8/2012	Sycamore 6	Z-88	41,800	720	USE Grand View
3	3/14/2012	Schwartzwalder	Z-92	5,700	130	N/A
4	3/23/2012	Point Pleasant	Z-88	25,600	440	USE Grand View
5	3/30/2012	Washington TWP	RSC	75,100	1500	USE Grand View
6	5/13/2012	Vineland 10	RSC	40,000	670	N/A
7	8/2/2012	Schwartzwalder	Z-92	5,700	130	N/A
8	8/10/2012	Schwartzwalder	Z-92	5,700	130	N/A
9	8/27/2012	Farmington 16	Z-88	37,600	650	USE Grand View
10	9/10/2012	Vineland 9	RSC	23,900	435	N/A
11	10/3/2012	Sycamore 9	Z-88	65,700	1135	USE Grand View
12	10/13/2012	Skyborne 34	Z-92	8,800	200	Cameco Resources
13	10/24/2012	Fox Run	Z-92	880	20	Cameco Resources
14	10/26/2012	Arbors	Z-88	5,700	100	USE Grand View
15	10/31/2012	Mtn. Water PES	Z-92	660	15	Cameco Resources
16	11/9/2012	Central 14 clean up	Z-88	45,600	790	USE Grand View
17	11/16/2012	Monroe 22 Temp	Z-88	12,900	220	USE Grand View
18	11/21/2012	Schwartzwalder	Z-92	5,700	130	N/A
19	12/11/2012	Farmington 5	Z-88	6,380	110	USE Grand View
20	12/12/2012	Farmington 15	Z-88	6,380	110	USE Grand View
21	12/13/2012	Farmington 19	Z-88	6,380	110	USE Grand View

Weight/Volume taken from BOL or estimated based on previous exchange.
Vineland/Schwartzwalder media stored onsite.

2/31/2013	Central 11
2/11/2013	Winslow 8 RSC
2/15/2013	Central 14

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Attachment 3 Training/Refresher Training

The following training was reviewed:

<u>CWS</u>	<u>Type of Training</u>	<u>Trainer</u>	<u>Date</u>
Aqua NJ- Central, NJ	Refresher	Required Reading	9/20/12
Aqua NJ- Southern, NJ	Refresher	Required Reading	9/21/12
Brookfield, WI	Refresher	T. Kaiser	8/29/12
Brookfield, Pewaukee, Arbors, WI	Initial	T. Adams	8/29/12
Cortland, IL	*Refresher	Required Reading	8/22/12
Oswego, IL	*Refresher	Required Reading	8/23/12
Bartlett, IL	*Refresher	Required Reading	8/31/12
Antioch, IL	*Refresher	Required Reading	9/17/12
Elburn, IL	*Refresher	Required Reading	8/16/12
Sycamore, IL	*Refresher	Required Reading	8/31/12
IL Prairie Estates, IL	*Refresher	Required Reading	8/10/12
Pewaukee, WI	*Refresher	T. Kaiser	10/3/12
Grand Island, NE	Initial	D. Bollig	6/28/12

*included Initial training, as appropriate/needed

WRT

Certification of Radiation Safety Training for System Specific – K. Stovall May 15 and 16, 2012

Radiological Instrument	Refresher	K. Stovall	2/7/12
Radiological Instrument	Refresher	K. Stovall	2/8/12

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Attachment 4: Personnel Interviewed

1. Duane Bollig- VP of Regulatory and Government Affairs and Business Development
2. Kent Stovall- RSO
3. David Jones- VP Operations
4. Mike Dimitriou – President
5. Dan Debello - Operations