



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

MARY FALLIN
Governor

October 23, 2018

Paul Michalak, Chief
Agreement State Programs Branch
Division of Materials Safety, Security, State, and Tribal Programs
Office of Nuclear Material Safety and Safeguards
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Michalak:

Thank you for the opportunity to review the Draft IMPEP report for the recent Oklahoma IMPEP. Please convey our appreciation to the IMPEP team for their thorough and professional work. The team's expertise and suggestions helped us make many small but valuable program enhancements and improvements beyond the report findings. We are in broad agreement with the report, but do have some updates we request that you consider before sending the report to the MRB.

Regarding the discussion on page 5 of inspection results being issued later than 30 days, be advised that I am working with staff and reviewers to speed the progress of inspection reports and NOVs through our review. We have issued an SOP for using the Form 591 which will help the situation. We also have changed our definition of the date the inspection closes as described in the report. We believe that these actions combined with further enhancements we develop will solve the problem.

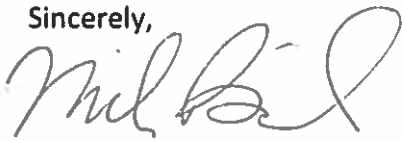
Regarding the discussion on page 9 of review of inspection and enforcement history during renewal issuance, we have a form to be used in the review of each renewal documenting four performance indicators to be considered. Reviewers have been instructed to use this checklist, and peer reviewers will verify that it is used. Verifying use of the form is being added to our checklist for peer reviewers.



Regarding the discussion on page 14 of state regulations, be advised that during a meeting on October 4th, we briefed our Radiation Management Advisory Council of the need to fix the oversight in our regulations, and advised them that language correcting our adoption by reference would be presented for their approval at the next Council meeting on March 29, 2019. The changes will then proceed through our administrative procedures. We will give NRC the opportunity to review and comment on these changes before they go to the Council.

Again, thanks for the fine work by the IMPEP team, and I look forward to finalizing this IMPEP at the MRB.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Broderick". The signature is fluid and cursive, with a large initial "M" and "B".

Mike Broderick
Environmental Programs Manager
Radiation Management Section