

**Vermont Department of Health Radioactive Materials Program**

**ATTACHMENT 1.1-6 to RMPP 1.1**

**Inspection Priority Codes Assigned to Program Codes**



**From US NRC Inspection Manual 2800 Enclosure 1**

Enclosure 1 - Inspection Priority Codes Assigned To Program Codes

Program Code	Priority Code	Category Title	Remarks (from NUREG-1556, Vol. 20, Appendix G)
01000	Vary <sup>2</sup>	RSRM Licensee	Licensee subject to ICs or Security Order requirements
01100	3	Academic Type A Broad	Radiation Safety Committee (RSC)-approved users;33.13
01110	5	Academic Type B Broad	Radiation Safety Officer (RSO)-approved users; 33.14
01120	5	Academic Type C Broad	Authorized Users specifically named in the license; 33.15
02110	2	Medical Institution Broad	RSC-approved users for possession and use of a wide range of radionuclides in medical research, diagnosis, and therapy and research and development.
02120	3	Medical Institution Written Directive (WD) Required	Used as primary code and may be used with the secondary codes for research and development, as appropriate. Used as secondary code when the license also authorizes certain medical therapy modalities.
02121	5	Medical Institution WD Not Required	Used as primary code <i>only</i> for diagnostic nuclear medicine and diagnostic types of use under 35.1000.
02200	3	Medical Private Practice WD Required	[Same remark as 02120]
02201	5	Medical Private Practice WD Not Required	[Same remark as 02121]
02210	3	Eye Applicators Strontium-90 (Sr-90)	Institution or Private Practice
02220	3	Mobile Medical Service WD Not Required	Use as a primary code if the license authorizes the mobile service <i>only</i> . Use as a secondary code if the license authorizes medical use at a central facility (i.e., institution or private practice facility) in addition to the mobile service.
02230	2	High-Dose Rate Remote After loader (HDR)	Use as a primary code.

<sup>2</sup> The Priority Code for the Security-Related Inspection varies depending on the Priority Code of the associated Program Code for health and safety inspections. The security-related inspection interval shall be the same as the health and safety interval for the related materials program category.

Program Code	Priority Code	Category Title	Remarks (from NUREG-1556, Vol. 20, Appendix G)
02231	2	Mobile Medical Service⊖WD Required	Use as a primary code. Includes mobile HDR and non-HDR modalities under 10 CFR Part 35
02240	2	Medical Therapy⊖Other Emerging Technology	Medical therapy modalities used under 10 CFR 35.1000, i.e., liquid sources, microspheres, and intravascular brachytherapy devices.
02300	5	Teletherapy	Treatment of human subjects only
02310	2	Gamma Stereotactic Radiosurgery (GSR)	Treatment of human subjects <i>only</i>
02400	5	Veterinary⊖Nonhuman Subjects	Routine diagnosis or therapy on animals. No animal research.
02410	5	<i>In-Vitro</i> Testing Laboratories	Licenses are issued to individuals or facilities which are not included in larger programs described by Program Codes 02110 or 02120.
02500	2	Nuclear Pharmacies	Receive bulk material used to prepare single use dosages or multi-dose products which are distributed to authorized medical licensees. Sealed sources are re-distributed in the original packaging to authorized clients.
02511	5	Medical Product Distribution – 32.72 Prepared Radiopharmaceuticals	Distribution of prepared radiopharmaceuticals to authorized medical licensees.
02513	5	Medical Product Distribution – 32.74 Sources and Devices	Therapy sources, calibration and reference sources
02600	<sup>3</sup>	Production of PET Radioactive Drugs – 30.32(j) (Secondary Code)	Used as secondary code to identify those entities that meet the criteria in 10 CFR 30.32(j). See primary code for inspection priority
02700	5	Radium-226 Luminous Products & Sources up to 10 Times 31.12(a)(4) & (5)	For luminous products containing Ra-226 authorized under 10 CFR 31.12
02710	3	Radium-226 Luminous Products & Sources Greater Than 10 Times 31.12(a)(4) & (5)	For luminous products containing Ra-226 authorized under 10 CFR 31.12
03110	3	Well Logging Byproduct and/or Special Nuclear Material (SNM) Tracer and Sealed Sources	Use of sealed or unsealed sources for exploration of oil, gas, or minerals in wells.

<sup>3</sup> Program Code 02600 is used only as a secondary code

Program Code	Priority Code	Category Title	Remarks (from NUREG-1556, Vol. 20, Appendix G)
03111	3	Well Logging Byproduct and/or SNM Sealed Sources Only	Exploration of oil, gas, or minerals in wells; study of subsurface potable aquifers.
03112	3	Well Logging Byproduct Only – Tracers Only	Exploration of oil, gas, or minerals in wells
03113	3	Field Flooding Studies	Injection of unsealed byproduct materials for tracing oil and gas reservoirs
03120	5	Measuring Systems Fixed Gauges	Non-portable gauges for measurement or control of material density, flow, level, thickness, or weight, etc.
03121	5	Measuring Systems Portable Gauges	Moisture/density gauges contain gamma and neutron sources used for measurements in soils, compacted soils and road surfacing materials.
03122	T <sup>4</sup>	Measuring Systems Analytical Instruments	i.e., x-ray fluorescence analyzers
03123	T	Measuring Systems Gas Chromatographs	Quality control testing of samples from industrial process and environmental conditions.
03124	T	Measuring Systems Other	instrument calibrators, Krypton-85 (Kr-85) leak detectors
03130	5	Inspection Systems	Fixed or mobile non-intrusive inspection systems
03210	2	Radionuclide Production Using an Accelerator	Covers activities that take place once radioactive materials are produced by the accelerator. It does not include the operation of the accelerator.
03211	2	Manufacturing and Distribution Broad – Type A	RSC-approved users under 10 CFR 33.13
03212	5	Manufacturing and Distribution Broad – Type B	RSO-approved users under 10 CFR 33.14
03213	5	Manufacturing and Distribution Broad – Type C	Authorized Users specifically named in the license under 10 CFR 33.15
03214	5	Manufacturing and Distribution Other	Smaller firms that require a more restrictive license.
03215	3	Manufacture, Assembly, Disassembly, Repair of Products Containing Radium-226	For certain items and self-luminous products containing Ra-226 authorized under 10 CFR 31.12

<sup>4</sup> Priority T denotes a telephone contact made by an inspector to evaluate the radiation protection program for Program Codes 03122, 03123, 03124, 03220, 11210, 22130, 22160, and 22161. The telephone contact interval is 5 years.

Program Code	Priority Code	Category Title	Remarks (from NUREG-1556, Vol. 20, Appendix G)
03218	3	Nuclear Laundry	Cleaning of protective clothing contaminated with radioactive materials.
03219	3	Decontamination Services	Cleaning of scrap materials for authorized release for unrestricted use.
03220	T	Leak Test Service Only	Commercial service organizations provide leak test kits to clients, perform measurement of leak test samples from clients, and issue reports of leak test results.
03221	5	Instrument Calibration Services Only – Source Less Than Or Equal To 100 Curies	Commercial calibration service
03222	5	Instrument Calibration Services Only – Source Greater Than 100 Curies	Commercial calibration service
03225	5	Other Services – Source Less Than Or Equal To 100 Curies	Commercial servicing for industrial gauge, and HDR licensees
03226	2	Other Services – Source Greater Than 100 Curies	Commercial servicing for teletherapy, irradiators, and GSR units containing a total activity in the unit during servicing that is greater than 100 curies.
03231	2	Waste Disposal (Burial)	Commercial and non-commercial
03232	3	Waste Disposal Service Prepackaged Only	pick up, transfer, and storage; opening packages not authorized
03233	2	Waste Disposal Service Incineration	Commercial operation
03234	2	Waste Disposal Service Processing and/or Repackaging	receipt, open, compact, re-package, and transfer to authorized burial
03235	-. <sup>5</sup>	Incineration, Non-Commercial	(Secondary Code)
03236	2	Waste Treatment Service (Other Than Compaction)	Includes multiple, complex physical and chemical waste treatment processes
03240	5	General License Distribution – 32.51	For fixed gauges authorized under 10 CFR 31.5
03241	5	General License Distribution – 32.53	For luminous aircraft safety devices authorized under 10 CFR 31.7
03242	5	General License Distribution – 32.57	For calibration and reference sources authorized under 10 CFR 31.8
03243	5	General License Distribution – 32.61	For ice detection devices authorized under 10 CFR 31.10

<sup>5</sup> Program Code 03235 is used only as a secondary code for certain licensees authorized to operate a noncommercial incinerator to dispose of radioactive waste



Program Code	Priority Code	Category Title	Remarks (from NUREG-1556, Vol. 20, Appendix G)
03244	5	General License Distribution – 32.71	For certain <i>in-vitro</i> clinical testing kits authorized under 10 CFR 31.11
03250	5	Exempt Distribution – 32.11: Exempt Concentrations and Items	For residual material in a product authorized under 10 CFR 30.14
03251	5	Exempt Distribution – 32.14: Certain Items	For manufactured products authorized under 10 CFR 30.15
03252	5	Exempt Distribution – 32.17: Resins	For synthetic plastic resins authorized under 10 CFR 30.16
03253	5	Exempt Distribution – 32.18: Small Quantities	For individual quantities authorized under 10 CFR 30.18
03254	5	Exempt Distribution – 32.22: Self-Luminous Products	For devices authorized under 10 CFR 30.19
03255	5	Exempt Distribution – 32.26: Smoke Detectors	For devices authorized under 10 CFR 30.20
03256	5	Exempt Distribution – 32.21 Carbon-14 Urea Capsules	For <i>in vivo</i> diagnostic use authorized under 10 CFR 30.21
03310	2	Industrial Radiography Fixed Location	Permanent radiographic installation (PRI) or designated field station. Use as secondary code, except when the license authorizes the PRI <i>only</i> .
03311	2	Industrial Diagnostic Systems	A sealed source used for diagnostic scanning at industrial sites
03320	1	Industrial Radiography Temporary Job Sites	Use as primary code for multiple temporary customer locations
03510	5	Irradiators Self Shielded Less Than Or Equal To 10,000 Curies	Not external beam
03511	5	Irradiators Other Less Than Or Equal To 10,000 Curies	Panoramic (in air or under water) units; includes converted teletherapy units
03520	5	Irradiators Self Shielded Greater Than 10,000 Curies	Not external beam
03521	2	Irradiators – Other Greater than 10,000 curies	Panoramic (in air or under water) units; includes sterilization (mega-curie) units
03610	3	Research and Development Broad – Type A	RSC-approved users under 10 CFR 33.13
03611	5	Research and Development Broad – Type B	RSO-approved users under 10 CFR 33.14
03612	5	Research and Development Broad – Type C	Authorized users specifically named in the license under 10 CFR 33.15
03613	2	Research and Development Broad – Multisite Multiregional	Master Materials Licenses
03620	5	Research and Development Other	Non-human research subjects
03710	5	Civil Defense	Instrument calibration and training
03800	3	Byproduct Material Possession Only – Permanent Shutdown	Principle activities ceased, license termination request pending; packaging and shipping operations authorized; decontamination and decommissioning not authorized

Program Code	Priority Code	Category Title	Remarks (from NUREG-1556, Vol. 20, Appendix G)
03810	3	Byproduct Material Standby – No Operations	Principle activities ceased, licensee undecided about terminating the license, packaging and shipping operations authorized, D&D not authorized
03900	D <sup>6</sup>	Decommissioning of Byproduct Material Facilities	(See IMC 2602) D&D may have been authorized according to an approved plan under 10 CFR 30.36
11200	5	Source Material Other Less than 150 Kilograms	Research or manufacturing of consumer products
11210	T	Source Material Shielding	Possession and use
11220	5	Source Material Military Munitions Indoor Testing	Depleted Uranium (DU); results in fragmentation of DU
11221	5	Source Material Military Munitions Outdoor Testing	DU
11230	5	Source Material General License Distribution – 40.34	DU products and devices authorized under 10 CFR 40.25
11300	5	Source Material Other Greater than 150 Kilograms	Research or manufacturing of consumer products
11700	5	Rare Earth Extraction and Processing	Generates waste products containing source material not related to the nuclear fuel cycle
11800	2	Source Material Possession Only – Permanent Shutdown	Principle activities ceased, license termination request pending; packaging and shipping operations authorized; decontamination and decommissioning (D&D) not authorized
11810	2	Source Material Standby – No Operations	Principle activities ceased, licensee undecided about terminating the license, packaging and shipping operations authorized, D&D not authorized
11900	D	Decommissioning of Source Material Facilities	(See IMC 2602) D&D may have been authorized according to an approved plan under 10 CFR 40.42
21310	5	Critical Mass Material – University	Greater than 350 grams of enriched Uranium-235 (U-235), greater than 300 grams of Uranium-233 (U-233), greater than 200 grams of Plutonium, or any combination thereof

<sup>6</sup> The Priority D denotes a decommissioning inspection as determined under IMC 2602, Decommissioning Inspection Program, for Program Codes 03900, 11900, 21325, and 22200. These inspections are scheduled at times when the licensee is performing decommissioning activities at the site.

Program Code	Priority Code	Category Title	Remarks (from NUREG-1556, Vol. 20, Appendix G)
21320	5	Critical Mass Material – Other Than Universities	Greater than 350 grams of enriched U-235, greater than 300 grams of U-233, greater than 200 grams of Plutonium, or any combination thereof
21325	D	Decommissioning of Critical Mass – Other Than Fuel Fabrication	(See IMC 2602) D&D may have been authorized according to an approved plan under 10 CFR 70.38
22110	3	Special Nuclear Material Plutonium – Unsealed, Less than Critical Mass	Less than 200 grams, total, for biological and chemical testing and instrument calibration
22111	3	Special Nuclear Material, U-235 and/or U-233 – Unsealed, Less than a Critical Mass	Less than 350 grams U-235 and/or less than 300 grams U-233 for biological and chemical testing and instrument calibration
22120	5	SNM Plutonium – Sealed Neutron Sources, Less than 200 Grams	Plutonium-beryllium howitzer for instrument calibration, teaching and demonstration purposes, and industrial applications
22130	T	Power Sources with Byproduct and/or Special Nuclear Material	Heat or power generators for remote locations
22140	5	Special Nuclear Material Plutonium – Sealed Sources in Devices	Gauges
22150	5	Special Nuclear Material Plutonium – Sealed Sources Less than a Critical Mass	Less than 200 grams, total, for biological and chemical testing and instrument calibration
22151	5	Special Nuclear Material, U-235 and/or U-233 Sealed Sources, Less than a Critical Mass	Less than 350 grams U-235 and/or less than 300 grams U-233 for biological and chemical testing and instrument calibration
22160	T	Pacemaker – Byproduct, and/or Special Nuclear Material – Medical Institution	Surgical implantation, follow up, recovery, and disposal of devices
22161	T	Pacemaker – Byproduct, and/or Special Nuclear Material – Individual	Possession of a surgically implanted device by the recipient while in the United States