

ARKANSAS DEPARTMENT OF HEALTH
4815 West Markham Street
Little Rock, Ark. 72201

Robert W. Young, M. D., M.P.H.
Director

Bill Clinton
Governor

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PDR
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April 8, 1980

Mr. Wayne Kerr, Acting Director
Office of State Programs
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

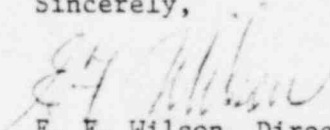
Dear Mr. Kerr:

Thank you for your letter dated February 8, 1980, regarding the Arkansas Radiation Control Program review conducted by Mr. Lloyd Bolling during the week of January 21 - 25, 1980.

We appreciated Mr. Bolling's comprehensive review of Arkansas' regulatory program and believe that his recommendations were constructive to the program. Specific comments addressing each of the recommendations are enclosed.

If you have any questions regarding these matters, please contact us.

Sincerely,


E. F. Wilson, Director

Division of Environmental Health Protection

EFW:RMcB:tlm

Enclosures: 3

*Stat. Programs
ack. file*

COMMENTS ON NRC RECOMMENDATIONS

I. Licensing

- A. Recommendation: That applicants submit step-by-step procedures for dose calibrators and survey meters.

Comment: We now require that these procedures be submitted, where applicable, for all new licensees and complete renewal of licenses. ✓
If the applicant plans to use a consultant, we now require his procedures if we do not currently have them in file.

- B. Recommendation: That new NRC requirements for teletherapy licensees be added by conditioning the licenses.

Comment: We will now require teletherapy licensees to meet the new NRC requirements by license conditions until those requirements can be added to our State regulations. ✓

- C. Recommendation: That Timex Corporation be required to submit procedures, equipment used, and calibration procedures involved with bioassays. ✓

Comment: We are requiring that this information be furnished by the licensee. ✓

- D. Recommendation: That Timex Corporation be required to have an adequate sampling program for tritium to demonstrate compliance with MPC values.

Comment: We are working with Mr. Lloyd Bolling, who is reviewing the current Timex license. Timex will be required to modify its license concerning release of tritium to the atmosphere. They will also be required to ascertain that levels released will not exceed MPC by the use of calibrated monitors and environmental sampling. ✓

II. Compliance

- A. Recommendation: That a standard format for enforcement letters be composed to include a time requirement for licensees' response, what and when steps for correction would be taken, and procedures to prevent non-compliance. ✓

Comment: A standard enforcement letter format has been developed to include all of the above. Enclosed is a copy of our latest standard enforcement letter.

B. Recommendation: That a written plan be developed to cover procedures for escalated enforcement actions.

Comment: We are in the process of developing and updating escalated enforcement procedures. Enclosed is a copy of a memorandum from our legal counsels concerning emergency off-duty hours enforcement actions. ✓

As soon as the plan and proposed changes have been developed, a copy of the procedures will be forwarded to your office.

RML INSPECTION LETTER NO. 1

Dear _____:

from the Division of Radiological Health, Arkansas Department of Health,
inspected the radioactive material licensed activities under license number
ARK- _____
on _____.

During this inspection, _____

_____ (were) (was) interviewed and _____

_____ were informed of our findings at the conclusion of the inspection.

There (were) (was) _____ item(s) of non-compliance noted during this
inspection and (they are) (it is) as follows:

You are requested to reply to the Department within 30 days after the receipt of
this letter as to the action taken by you concerning the (item(s) of non-compliance)
(above noted matters) (above noted deficiency (deficiencies)) and to prevent future
recurrence.

Thank you for the time and assistance given _____

If we can be of further assistance to you concerning your radiation safety program,
please feel free to call on us.

Sincerely yours,

David D. Snellings, Jr.
Division of Radiological Health
Bureau of Environmental Health Services

cc:

DDSjr:JDW:ef

ARKANSAS DEPARTMENT OF HEALTH
4815 West Markham Street
Little Rock, Ark. 72201

MEMORANDUM

TO: Frank Wilson
Director
Division of Environmental Health Protection

FROM: Joyce Williams Warren *JWW*
George Harper *GH*
Legal Counsel

DATE: March 26, 1980

SUBJ: Procedure for Emergency Action Involving Sources of Ionizing
Radiation During Non-Duty Hours.

In the event of an emergency during non-duty hours, the following steps should be taken by the person who is on duty for the emergency response program:

1. Upon notification of an emergency involving sources of ionizing radiation, the emergency response person shall, after assessing the situation, take appropriate action to eliminate the hazard. Such steps may include, but not be limited to, impoundment, removal, storage.
2. Notify the Director or his/her designated agent, who shall, within two (2) working days, issue a written order reciting the existence of such emergency, the nature and location of the materials subject to impoundment, and that such action was necessary to meet the emergency.
3. In situations requiring emergency legal assistance, the emergency response person should contact the Prosecuting Attorney in the County where the hazard exists. In the event the Prosecuting Attorney cannot be contacted, the emergency response person should then contact the Health Department's Legal Counsel.
4. As soon as practicable after the emergency situation, the emergency response person shall make a written report to the Director or his/her designated agent summarizing the incident.

JWW/GH/tjw

