REPORT AND STAFF EVALUATIONS

OF THE

IDAHO RADIATION CONTROL PROGRAM

FOR THE PERIODS

DECEMBER 6, 1979 TO NOVEMBER 17, 1980

AND

NOVEMBER 17, 1980 TO FEBRUARY 16, 1982

13th And 14th Regulatory Program Reviews

REPORT AND STAFF EVALUATIONS OF THE IDAHO RADIATION CONTROL PROGRAM FOR THE PERIOD DECEMBER 6, 1979 TO NOVEMBER 17, 1980 AND NOVEMBER 17, 1980 TO FEBRUARY 16, 1982

The 13th Regulatory Program Review meeting with Idaho representatives was held during the period November 17-20, 1980, in Boise, Idaho. In 1980, the State was represented by Mr. Robert Funderburg, Program Manager, Radiation Control Section and Mr. Alan Justus of his staff. The NRC was represented by Lloyd A. Bolling. An accompaniment of a State inspector was conducted on November 11, 1980. The review of selected license and compliance files was conducted by Mr. Bolling on November 12-17, 1980. A summary meeting regarding the results of the regulatory program review and inspection accompaniment was held with Mr. Murray Michael, Chief, Bureau of Air Quality & Hazardous Materials, on November 20, 1980.

The 14th Regulatory Program Review meeting with Idaho representatives was held during the period February 16-19, 1982, in Boise, Idaho.

In 1982 the State was represented by Mr. Robert Funderburg, Program Manager, Radiation Control Section and Mr. Larry Boschult, of his staff. The NRC was represented by Messrs. Lloyd Bolling and Ralph Heyer. An accompaniment of a State inspector was conducted by Mr. Heyer on February 17, 1982. The review of selected license and compliance files was conducted by Messrs. Bolling and Heyer on February 16-19, 1982. A summary meeting regarding the results of the regulatory program review and inspection accompaniment was held with Dr. Thomas L. Purce, Idaho Department of Health and Welfare, Dr. Lee Stokes, Administrator, Division of Environment, Mr. Robert Olson, Chief, Hazardous Materials Bureau and Mr. Robert Funderburg.

Conclusions

In 1980 the Idaho program for control of agreement materials, in the opinion of the staff, was adequate to protect the public health and safety and is compatible with the regulatory programs of the NRC and the NRC and the Agreement States.

In 1982, no findings were offered regarding adequacy and compatibility for the Idaho program pending NRC review of the revised Idaho regulations.

These conclusions are based on reviews of the technical and administrative aspects of the State's regulatory program for controlling agreement material. Included in the reviews were examinations of selected license and compliance files, information related to program indicators specified in NRC's "Guide for Evaluation of Agencies and State Radiation Control Programs, Revision 3", dated February, 1980," for the 1980 review and 46 FR 59341 for the 1982 review, the results of the accompaniments of State inspectors, the continuing exchange of information program between the State and the NRC, and the review of all licenses issued by Idaho from December 6, 1979 to February 16, 1982.

Summary of Discussion with Mr. Murray Michael

On November 20, 1980, a summary meeting was held to present the results of the regulatory program review. The meeting was held in Boise, Idaho with Messrs. Murray Michael and Robert Funderburg.

The following comments and recommendations were made at the summary meetings:

A. We recommended that every effort be made to reduce the inspection backlog was now stands a 18. Two of these inspections were from priority I and were overdue by 16 and 27 months respectively. We further recommended that special emphasis be placed on inspecting the priority I and II licensees.

B. We commended Mr. Funderburg and his staff for their prompt and correct handling of an investigation of an industrial radiation incident. Prompt enforcement action helped to avert a serious contamination problem.

C. We also commented that we were pleased to note that a new professional had been added to the radiation control program.

Program Changes Related to Previous NRC Comments And Recommendations (from January 8, 1980 Letter)

1. Comment

Staff turnover and special problems, such as current INEL environmental questions, have placed a tremendous burden on the staff's ability to keep up with routine licensing and compliance activities. We urge every effort be made to fill the current vacancy in the radiation control program.

State Response

Mr. Justus, who is in the licensing and inspection program, has not been able to be committed full time to his duties because of training needs and other demanding duties from the environmental vacancy.

Current Status

Mr. Justus has completed the core courses and is conducting most of the materials licensing and inspection functions. The program has made an offer to a new professional who will join the staff soon.

2. Comment

We were pleased to note improvement in the quality of inspections, however, more thorough coverage of the requirements of 10 CFR Part 19 is still needed during inspections.

State Response

Concerning 10 CFR Part 19, we will be able to better enforce these requirements when our regulations have been approved by the Board of Health and Welfare. Mr. Ashley was very helpful in explaining some of the finer points which we were overlooking.

Current Status

A review of selected compliance files indicates that Part 19 requirements are being addressed by inspectors especially during the later half of the review period.

3. Comment

The process of revising the Idaho radiation control regulations has been proceeding at an extremely slow pace. We believe the effort needed to prepare the required synopsis should be given high priority.

State Response

The Radiation Control Regulations will go before the Board of Health and Welfare and should be approved and finalized by August of this year (1980).

Current Status

Work is proceeding slowly on revision of the regulations. At this time we do not have a copy of the Idaho regulations to review. It is expected that a draft copy will be available for review in early 1981.

4. Comment

The number of priority I licenses overdue for inspection increased from 4 to 7 during the past year. The total inspection backlog increased from 16 to 19 during the same period. Every effort should be made to reduce this backlog of inspections.

State Response

I am afraid that our backlog of inspections will continue to increase until we have adequate staff. The environmental position has been open for eight months.

Current Status

A new health physicist has been hired and, after some orientation and training, will be phased into the materials program. This would allow for the physicist currently in the materials program to move to the environmental program.

5. Comment

Comments to applicants regarding deficiencies in applications need to be better documented and recorded in the file of the licensee.

State Response

Documentation of actions regarding deficiencies, etc., is always a constant battle; we will continue with our best effort in providing better documentation.

Current Status

A review of selected license files indicates that application deficiencies are better documented.

Summary Discussion with Dr. Thomas L. Purce

On February 19, 1982, a summary meeting was held to present the results of the regulatory program review. The meeting was held in Boise, Idaho with Drs. Thomas L. Purce, Lee Stokes and Messrs. Robert Olson and Robert Funderburg.

The following comments and recommendations were made at the summary meeting:

1. We noted that the State's radiation control regulations were revised effective May 1981. We have requested a copy from Mr. Funderburg for our review and comment. After completion of this task, we will be prepared to offer a finding on adequacy and compatibility of the program.

2. We noted that the State had received an application for a thorium pilot processing plant and that as a result of the "Stratton-Smith amendment," Idaho would have the authority to regulate this operation as defined in UMTRCA, until September 30, 1982. We suggested two courses of action: 1. Regulate the facility under existing State law or; 2. Send a letter from the Governor requesting a transfer of regulatory authority for UMTRCA materials back to the NRC. We recommended that, due to the significant financial and personnel resources needed to regulate uranium and thorium operations, the State elect the second option.

3. We mentioned that there were a number technical items that needed to be addressed and that specific comments would be directed to Mr. Funderburg for a response.

Program Changes Related to Previous NRC Comments And Recommendations (from December 22, 1980 Letter)

1. Comment

A review of selected license files indicated that in two cases written information was received from licensees following undocumented telephone conversations with program staff members. This is a category II comment (minor).

Recommendation

We recommend that telephone conversations that are substantive in nature be documented in the license files. This would help to assure that all responses from the licensees are adequate and that all questions are answered.

State Response

Documented telephone cases. Two undocumented cases out of approximately 90 is not a bad batting average. We are continuing to document as much as possible all telephone conversations pertaining to licensing actions.

Current Status

A review of selected license files indicates that there is better documentation of telephone calls.

2. Comment

A review of selected license files indicated in two instances license applications were filed and signed by the radiation safety officer. This is a category II Comment (minor).

Recommendation

We believe that all applications should be signed by a member of corporate management above the level of radiation safety officer. This would affirm corporate managements' commitment to safety.

State Response

Applications signed by RSO. It is our policy to have applications signed by management. In some cases the RSO represents management and has authority to sign the application.

Current Status

A review of selected license files indicated some improvement in obtaining management signatures on applications and identifying the corporate structure with respect to the RSO.

3. Comment

A review of selected compliance files indicates that enforcement letters do not routinely require a time frame for the correction of non-compliance items. This is a Category II comment (minor).

Recommendation

We recommend that enforcement letters require the licensee to state when non-compliance items will be corrected.

State Response

Time frame for correction of noncompliance. Our policy is to have a response from licensees within 30 days of corrective actions. We will now request a response within 30 days and a time frame for corrective actions.

Current Status

A review of selected compliance files indicated that enforcement letters are routinely requiring a 30-day time frame for the correction of noncompliance items.

4. Comment

A review of selected compliance files indicates that two priority I licenses were overdue by 16 and 27 months respectively. The number of priority I licenses overdue for inspection decreased from 7 to 3 during the past year. It was also noted that the total number of the overdue inspections decreased from 19 to 18 during the same period. This is a category I comment (minor).

Recommendation

We believe that every effort should be made to reduce the inspection backlog. We recommend that special emphasis be placed on priority I and II licenses.

State Response

Overdue inspection. As you are aware, the licensing and inspection program has been short one man year (out of 1.5 man years) during FY 1980. We have filled the position and will conduct inspections of the two overdue inspections.

Current Status

A review of selected compliance files and discussions with the staff indicated that there were no overdue inspections. This compared favorably to the 18 overdue inspections noted in December, 1980.

5. Comment

A review of selected compliance files indicates that independent measurements are not routinely performed during compliance inspections. This is a Category II comment (minor).

Recommendation

We recommend that independent measurements be obtained during each inspection and that the results be documented in the inspection reports.

State Response

Independent surveys. We have left the decision of making independent surveys up to the inspector. Sometimes these measurements are conducted and if there is no problem, nothing is recorded. We will strive to do and record independent measurements when necessary.

Current Status

A review of selected compliance files indicated that independent measurements were not always documented in inspection reports. We noted that this is the second consecutive review that comment was made.

6. Comment

A review of selected compliance files indicates that in at least two inspection reports recommendations were made that the licensee document receipt and transfer records as well as records of receipt surveys. This is a Category II comment (minor).

Recommendation

We believe that recommendations for documentation of receipts, transfers and surveys should have been citations for items of noncompliance.

State Response

Citation for items of noncompliance. The basic reason for citation is for correction of items of noncompliance and/or establishing records of continuous violations. We will cite licensees when necessary to assure uniform and proper regulatory authority.

Current Status

A review of selected compliance files indicated that in most cases noncompliance items were clearly distinguished from recommendations and citations were adequately identified.

Organization

Legal Authority

There has been no change in statutory authority designated to the Radiation Control Section. The Idaho legislature has granted to the Department of Health and Welfare the authority to adopt and enforce rules governing the control of radiation and nuclear material in Idaho, pursuant to Sections 39-3005 and 39-3006, Idaho Code. A copy of these Sections of the Idaho Code is on file in the State Agreements Program. State regulation of source material, byproduct materials, and special nuclear material in quantities not sufficient to form a critical mass is subject to the provisions of the agreement between the State of Idaho

and the U.S. Atomic Energy Commission (now NRC), effective October 1, 1968, and to the regulations of the Commission as contained in 10 CFR 150.

Location of the Control Program Within the State Organization

The location of the Idaho Radiation Control Section within State Government can be found on the organization chart attached to this report as appendix A.

It is the opinion of the sections' manager and the reviewer based on discussions with the staff and a review of the organization chart, that the Radiation Control Section is located comparably with other State health and safety programs and can compete effectively for funds and staff.

Internal Organization

The internal organization chart is attached to this report as appendix B. There is a clear division of job assignments within the Radiation Control Section. Of the three Senior Health Physicist positions noted during the December 1980 review, one was assigned to X-Ray, one to radioactive materials and one to environmental surveillance. During the February 1982 review meeting it was noted that the environmental surveillance program was terminated.

Legal Assistance

Legal assistance is available to the Radiation Control Section from two attorneys permanently assigned to the Department of Health and Welfare from the State Attorney General's Office. Their services are furnished to the Radiation Control Section without charge to the Section. Although their knowledge of radiation may be limited, there is a good working relationship and a fast response to requests for legal assistance.

Technical Advisory Committees, and Consultants

The State does not have an official radiation advisory committee or medical advisory subcommittee. The staff stated that technical advice as needed is obtained from the Nuclear Regulatory Commission, the Environmental Protection Agency, the Food and Drug Administration and the Department of Energy. Information is also obtained from professional societies. The staff stated that although there is no official medical advisory subcommittee, several physicians can be queried on new drugs, new medical procedures and physician training. It should be noted that the Radiation Control Section is not obligated to act on advice obtained from the above mentioned sources except where formal regulations or written agreements are in effect.

Management and Administration

Plans For Response To Local Emergencies Involving Agreement Materials

The State of Idaho has a Radiation Emergency Response Plan, dated November 1980. A copy this plan has been placed in the State Agreements Program Office. This plan contains a copy of a memorandum of understanding (MOU) between the Idaho Department of Law Enforcement and the Idaho Department of Health and Welfare. The MOU clearly details those areas of responsibility assigned to both Departments in the event of an accident involving radioactive materials. Copies of this plan have been distributed to the State and local Police, Fire and Rescue Squads, hospitals and other State and Federal Agencies. The plan provides for 24-hour notification of the Radiation Control Section and each of the six State Police regions in the event of a radiation incident. The plan also contains instructions on the handling of accident victims, survey meters, avoiding the spread of contamination and the identification of radiation warning labels. The Idaho Radiation Emergency Response Plan was reviewed during the 1979 Agreement State review meeting and was found to be adequate at that time.

Budget

The Radiation Control Section's budget is derived from general tax revenues. The FY 1981 (7/1/80 - 6/30/81) budget was reported to be $149,000. The radioactive materials program budget was reported to be approximately $50,000, of this 66% or $33,000 was allotted for licensing and 33% or $17,000 was allotted for inspections. The total number of licenses in effect as of 11/1/80 was 126. This converts to $396/license, which is equivalent to $397/license noted during the 1979 review.

The FY 1982 (7/1/81 - 6/30/82) budget was reported to be $132,000 for the entire Radiation Control Section. This represents a 14% decrease when compared to the FY 1981 budget and is directly related to the termination of employment of one senior health physicist and the cancellation of the environmental surveillance program. The section manager reported that the radioactive material program had a budget of approximately $50,000, with 66% or $33,000 allotted to licensing and 33% or $17,000 allotted for inspections.

Administrative Procedures

The staff is quite small (4) and so good communication exists between all staff members. Informal discussions are held as needed to discuss licensing and compliance matters. License guides and checklists are available for use as are inspection guides. Press releases and public relations matters are referred to the Department of Health and Welfare's public information officer. Information on licensing and inspection statistics is obtained from a manual filing system and is sent to NRC semi-annually.

Planning

Workload trends are derived as needed based on information maintained by the program. Long range planning centers around matching expected funding with program responsibilities.

Laboratory Support And Survey Instruments

The State staff reported that during the review periods they acquired two Ludlum beta-gamma survey meters and one M.D.H unit for X-ray surveys. Beta- Gamma sample analyses is performed by the radiation control program staff. Gross alpha and beta samples are analyzed.

Public Information

License and inspection files are available for public review, however proprietary information and the names of exposed persons are withheld routinely in correspondence.

Personnel

Qualification

Minimum qualifications for entrance level health physicists in the radiation control program include a Bachelor's degree in engineering or science. As noted in past reports, an Associate's degree with two years of acceptable work experience may be substituted for a Bachelor's degree. All professional staff members currently in the radiation control section have at least a Bachelor's degree in physical or biological science. Position description for the staff are attached to this report as appendix C .

Number of Personnel

As of 12/80	Radioactive Materials	Environmental Surveillance	X-Ray	Mgt.
R. Funderburg	0.45	0.20	0	0.35
A. Justus	0.50	0.50	0	0
L. Boschult	0.90	0.05	0.05	0
E. Raineri	0.05	0	0.95	0
Total	1.90	0.75	1.00	0.35
As of 2/82				
R. Funderburg	0.65	0	0	0.35
L. Boschult	1.00	0	0	0
E. Raineri	0.05	0	0.95	0
Total	1.70	0	0.95	0.35

Alan Justus left the program in July 1981. Larry Boschult joined the program in October 1980.

As of December 1980, there were 124 licenses in effect in the State of Idaho, with a staffing level of 1.9 person-years in the radioactive materials area. This converts to 1.53 person-years per 100 licenses.

As of February 1982, there were 130 licenses in effect with a staffing level of 1.7 person-years in the radioactive materials area. This converts to 1.31 person-years per 100 licenses.

The staffing-level for both review periods was acceptable when compared to our recommended level of 1.0-1.5 person-years per 100 licenses.

Duties

Mr. Robert Funderburg is the Radiation Control Section's Manager. Mr. Funderburg does assist on licensing, inspections, environmental surveillance and the training of new staff. In his management capacity, he also reviews the work of the professional and clerical staff.

December 1980 - Mr. Alan Justus issued licenses, conducting inspections and ran the Section's environmental surveillance program. Mr. Larry Boschult was receiving training on inspections and licensing and some orientation in the X-Ray and environmental surveillance programs. Mr. Ernest Raineri provides occasional assistance to the radioactive materials inspection effort.

Training

Although there is no specific formal training program, new personnel receive extensive on-the-job training and are expected to attend the NRC sponsored courses.

As of December 1980 the following staff attended NRC sponsored courses:

1. Medical Course - New York City, Sept. 8-12, 1980 - Alan Justus, 5 days

2. Emergency Response - Nevada Test Site, Nov. 1980 - Alan Justus, 10 days

3. Inspection Procedures - Region III, Aug. 25-29, 1980 - Alan Justus, 5 days

4. Bioassays in Uranium Mills - San Antonio, Tx., Jan. 22-23, 1980 - Alan Justus - 2 days

Between December 6, 1979 and November 17, 1980 the staff attended a total of 22 days of NRC sponsored training. This represents a training effort of 3.2%. It should be noted that although the current training effort is low when compared to our recommended level of 5-10%, the staff is small in number (3) and has the support of State management in obtaining the required training.

Between November 17 and February 16, 1982 the following staff attended NRC sponsored courses:

1. Inspection Procedures - Glen Ellyn, Ill. - Nov. 30-Dec. 4, 1981 - Larry Boschult - 5 days

2. Radiochemistry - Idaho Falls, Ida. - Feb. 9-13, 1981 - Alan Justus - 5 days

3. Health Physics - Oak Ridge, Feb. 9-April 16, 1981 - Larry Boschult - 50 days

4. Industrial Radiography - Baton Rouge, La. - Larry Boschult - 5 days

5. Orientation in Licensing - Silver Spring, Md. - Sept. 14-19, 1981 - Larry Boschult - 10 days

During the reporting period, the staff attended a total of 75 days of NRC sponsored training. This represents a training effort of 12.1%, which compares favorably with our recommended level of 5-10%.

Salaries

The following are the salary ranges for the professional staff in the radiation control program:

As of November, 1980

Manager	$20,820 - 27,900
Senior Radiation Physicist	$18,888 - 25,308

As of February, 1982

Manager	$25,600 - 29,600
Senior Radiation Physicist	$19,100 - 23,100

Each position has 7 ingrade steps, the first step is 6-months and the remaining 6 steps are at 12-month intervals. There are also separate salary schedules for personnel with at least 5, 10, 15 or 20 years of service. The longevity bonuses are 2½%, 5%, 7½% and 10% respectively. Cost-of-living increases are granted by the State legislature.

The staff feels that salaries are comparable with other health programs in the State. Similar positions, in Idaho, in industry and federal service offer higher salaries.

Staff Turnover

In each of the 3 years preceeding the February 1982 review, the program lost 1 of its Senior Radiation Physicists. Two of them left for higher paying positions in private industry, the third one moved to higher paying position in another State. The staff reported that promotional opportunities exist only if the program manager's position were to become vacant.

Recruiting

Vacant positions are announced within the Department of Health and Welfare and are posted in the State register by the State Personnel Commission. A copy of the vacancy announcement is attached to this report as Appendix D. Vacant positions are also posted in the Health

Physics Society newsletter and with the Conference of Radiation Control Program Directors.

Regulations

Compatibility

The opportunity for NRC comment is built into the State's regular rulemaking process. The current regulations dated May 1981 were not reviewed by NRC and no compatibility determination has been made on them.

Updating of Regulations

The effective date of the last revision of the Idaho Radiation Control Regulations is May 1981. The regular rulemaking process takes a minimum of 120 days to complete. During this time ample opportunity is provided for written comments and statements before a public hearing. There is an emergency rulemaking process in which rules become effective immediately upon filing or within 20 days. Rules passed under this process expire at the end of 120 days. The schematic for tracking both rulemaking processes is attached to this report as Appendix E.

Licensing

Licensing Procedures

The Radiation Control Section staff utilizes NRC licensing guides, checklists and standard license conditions.

1980 Review:

At the time of this review, Alan Justus was performing most of the licensing with supervisory assistance from Robert Funderburg. Licensing actions are coordinated with inspection actions. Expiration notices are sent to each licensee 60 days before expiration of their license.

A timely renewal procedure may be enacted for applications that cannot be completed promptly. The program manager noted that most initial applications are reviewed within two weeks and licenses are usually issued within one month of receipt of applications. A review of selected licenses revealed that license file are maintained in an orderly manner. As part of our regular exchange of information program, newly issued licenses are sent to NRC promptly.

1982 Review:

Larry Boschult performs most of the licensing with supervisory review by Robert Funderburg. The other aspects of the program's licensing procedures remain as noted in the 1980 review.

Licensing Actions

1980 Review:

During the period since the last review (12/6/79 - 11/17/80), 7 new licenses and 93 amendments were issued. Prelicensing visits are conducted at the discretion of the reviewer and two such visits were conducted during this period. As of November 17, 1980 there were 125 licenses in effect.

1982 Review:

During this reporting period (11/17/80 - 2/16/82) 13 new licenses and 100 amendments were issued. There were no prelicensing visits conducted during this period.

A review of selected license files for the 1980 and 1982 reviews is attached to this report as Appendix F. Essential elements of applications sufficient to establish as basis for licensing are contained in the license files. There were however several minor comments presented to the staff and included in Appendix F.

Adequacy of Product Evaluations

There were no sealed source or device evaluations performed during the reporting periods.

Quality Assurance

Mr. Funderburg conducts supervisory reviews of licenses and compliance correspondence for accuracy and completeness.

Compliance

Status of the Inspection Program

1980 Review:

During the review period (12/7/79 - 11/17/80) the following number of inspections were performed: Priority I - 12, Priority II - 3, Priority III - 18. A total of 33 inspections were conducted and it was determined that 33 inspections were overdue. Of those inspections that were overdue, 3 were in priority I, 13 were in priority II, and 17 were in priority III.

1982 Review:

During this review period (11/18/80 - 2/16/82) there were 18 overdue inspections. The following table lists the priority and length of time overdue:

Priority	License	Time Overdue
I	A.	1 year, 4 months
	B.	10 months
	C.	2 months
II	A.	1 year
	B.	5 years, 8 months
	C.	2 years, 1 month
	D.	3 years
	E.	8 months
	F.	1 year, 3 months
	G.	5 years, 4 months
III	A.	9 months
	B.	1 year
	C.	6 months
	D.	3 months
	E.	1 month
	F.	3 years, 2 months
	G.	4 years
	H.	4 years, 9 months

The program management assesses the status of the inspection program by the use of a manual card (tickler) file. Statistical data, regarding inspections, is derived from the tickler file.

Inspector's Performance and Capability

1980 Review:

During this review meeting Mr. Alan Justus was accompanied while inspecting the following facility:

Date	Licensee	License No.
11/17/80	Huico, Inc. Crestwood Industrial Park Box 208 Meridian, Idaho 83642	IDA-98

This accompaniment was conducted by Lloyd Bolling. In general, the inspector was found to be competent to evaluate health and safety problems and to determine compliance with State regulations. Comments regarding the inspection were made to the inspector and to the program manager.

1982 Review:

During this review meeting Mr. Larry Boschult was accompanied while inspecting the following facility:

Date	Licensee	License No.
2/17/82	Northern Testing Laboratories (NTL) 370 Benjamin Lane, P.O. Box 7867 Boise, Idaho 83707	IDA-53-1

This accompaniment was conducted by Mr. Ralph Heyer and Mr. Lloyd Bolling. This inspection was adequately conducted and two minor comments were discussed with the inspector and the program manager.

Response to Incidents and Alleged Incidents

1980 Review:

During the review period 12/7/79 - 11/17/80, the State staff conducted one major investigation. This involved a 60 curie Iridium 192 source, which could not be retracted following an industrial radiography operation. The incident occurred on June 25, 1980 and an inspector and the program manager were dispatched to the site the following morning. As a result of the special investigation, it was learned that the radiographer was using a "homemade" source tube; an oxyacetylene torch was used to cut the source tube around the source; source recovery was initiated without State knowledge or approval; no records were kept of the exposure times received by the recovery crews and the recovery crews lacked decontamination and recovery equipment. The State personnel onsite closely observed the recovery procedure and required that the crew explain and obtain approval for each step of the recovery effort.

An examination of this file by the NRC reviewer revealed that the prompt and decisive action by the State staff averted a rupture of the sealed source with accompanying human overexposures and environmental contamination. The reviewer noted that the investigation file contained adequate documentation of telephone calls, telegrams and other correspondence. The State staff pursued followup enforcement actions and obtained written commitments from licensee management to prevent a recurrence of the incident. Among these commitments were to: (1) revise operating and emergency procedures and (2) have all "homemade" source tubes reviewed and approved before resuming operations in Idaho.

1982 Review:

During the review period 11/18/80 - 2/16/82, the State staff conducted one major incident investigation.

On February 6, 1981 the State staff was notified of a possible overexposure which occurred on February 5, 1981 at approximately 8:30 pm. The incident occurred at a temporary jobsite in Nevada and involved a 22 Curie, iridium-192 source. The radiographer was working in limited light and failed to perform the required surveys. The radiographer noticed that the drive cable was still inside the source tube when the equipment was being disassembled. After noticing that his dosimeter was offscale, he closed down the operation and returned to Idaho. Based on blood tests, dose calculations and filmbadge results, the radiographer is believed to have received approximately 730 mr wholebody and less than 490 rem to the hand.

The incident file on this case was well documented and included dose estimates by the State staff. The appropriate enforcement action was taken including measures to be instituted to prevent a reoccurrence. The licensee was also informed that they must notify the agency in whose jurisdiction an accident has occurred.

Enforcement Procedures (I)

Enforcement letters are issued usually within 30 days after each inspections. Generally enforcement letters used appropriate regulatory language. The reviewer did however comment on the need to routinely require a time frame for the correction of non-compliance items. The State does not have civil penalty authority, but equipment can be impounded by the radiation control section to protect the public health and safety. Enforcement procedures are general in nature and apply to all programs in the department of health and welfare. A copy of the State's Administrative Procedures for Enforcement Actions is attached as Appendix A to review report Number 12.

Equipment Failure

Although there was a major investigation involving equipment failure, there is no evidence to suggest that a generic design deficiency was involved.

Inspection Procedures

The State staff utilizes inspection guides supplied by NRC. Except for field radiography, most inspections are announced. Inspection procedures require followup of previous noncompliance items, interviews with workers, examination for records (dosimetry, utilization and transfer) and close-out meeting with management. Inspectors are debriefed by the program manager upon return from inspections.

Inspection Reports

A review of selected compliance files is attached to this report as Appendix G.

1980 Review:

In general reports reviewed during this period (12/7/79 - 11/17/80) were adequately documented regarding inspection findings. Two minor comments were made however, regarding better documentation of independent measurements and two recommendations which should have been citations for noncompliance. These comments were discussed with the State staff.

1982 Review:

During the period covered in this review (11/17/80 - 2/16/82) half of the inspection reports lacked adequate documentation of inspection scope and findings. The reviewer noted that a number of the inspections appeared to be only partial in nature with no indication why a complete inspection was not performed. The reviewer recommended, in accordance with the State's inspection report form, that each inspector indicate whether the inspection was announced vs. unannounced and the rationale for conducting a partial vs. a complete inspection. In addition we commented on the need to perform and document independent measurements during each inspection.

Independent Measurements

It was noted during the review of selected compliance files, that the inspectors did not always perform and document independent measurements. During the inspector accompaniments however measurements were obtained and documented in each report.

Attached to this report as Appendix I, is a list of instruments available for evaluation samples obtained during inspections. Portable survey instruments are calibrated semi-annually by program staff.

Inspection Frequency

The State's inspection priority system is comparable to NRC's although in some cases inspection may be more frequent. The following table shows the inspection priority, type of license and inspection frequency:

Priority	Type	Inspection Frequency
I	Broad Academic Industrial Radiography Manufacturer/Distributor Uranium Mills	Annually
II	Medical Brachytherapy	2 years
III	Industrial Gage Invitro Medical Miscellaneous	10% per year
IV	Teletherapy	5 years

Other Areas Affecting the Adequacy of the State's Radiation Control Program

A. The State staff reported that NARM is regulated in the same manner as agreement materials.

B. The State Division of Laboratories has the responsibility for testing drinking water for gross alpha and beta contamination and air samples are split with EPA. Environmental monitoring program stopped in mid 1981 when the program's physicist resigned and was not replaced.

C. The X-Ray Program:

	1980 Review	1982 Review
Hospital	50	50
Dental	403	408
Chiropractors	61	84
Pvt. M.D. & O.D.	165	192
Veterinarians	98	98
Podiatrists	19	25
Other (Accelerators)	12(5)	20(5)
	813	822

During the period covered by the 1980 review, 158 inspections of 312 machines were conducted. Of the 5 registered accelerators, 3 medical and 2 academic, none were inspected.

During the period covered by the 1982 review, 142 inspections of 228 machines were conducted. No accelerators were inspected.

List of Appendices

A. State Organization Chart

B. Internal Organization Chart

C. Position Descriptions

D. Vacancy Announcement

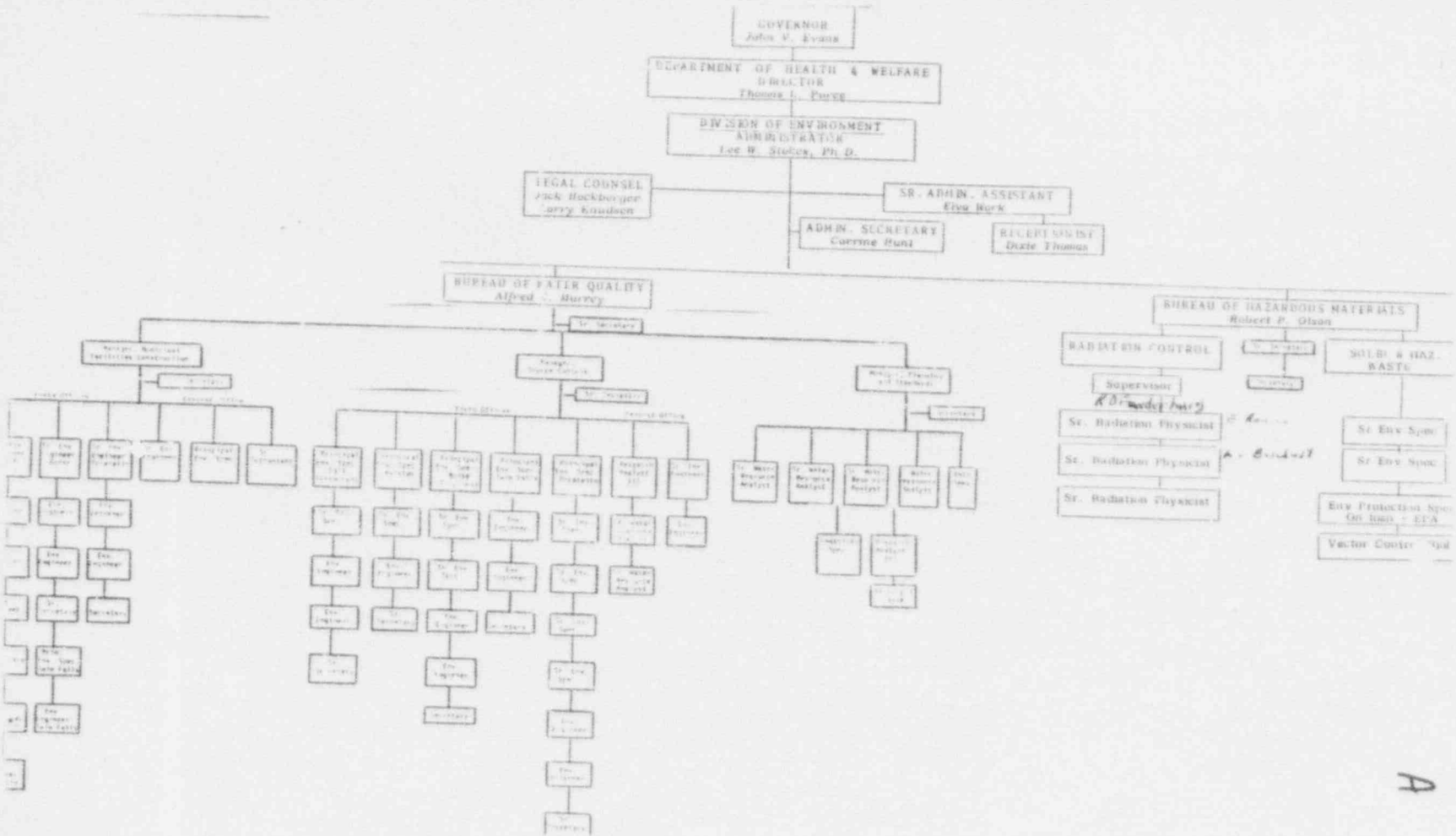
E. Rulemaking Schedule

F. Review of Selected License Files

G. Review of Selected Compliance Files

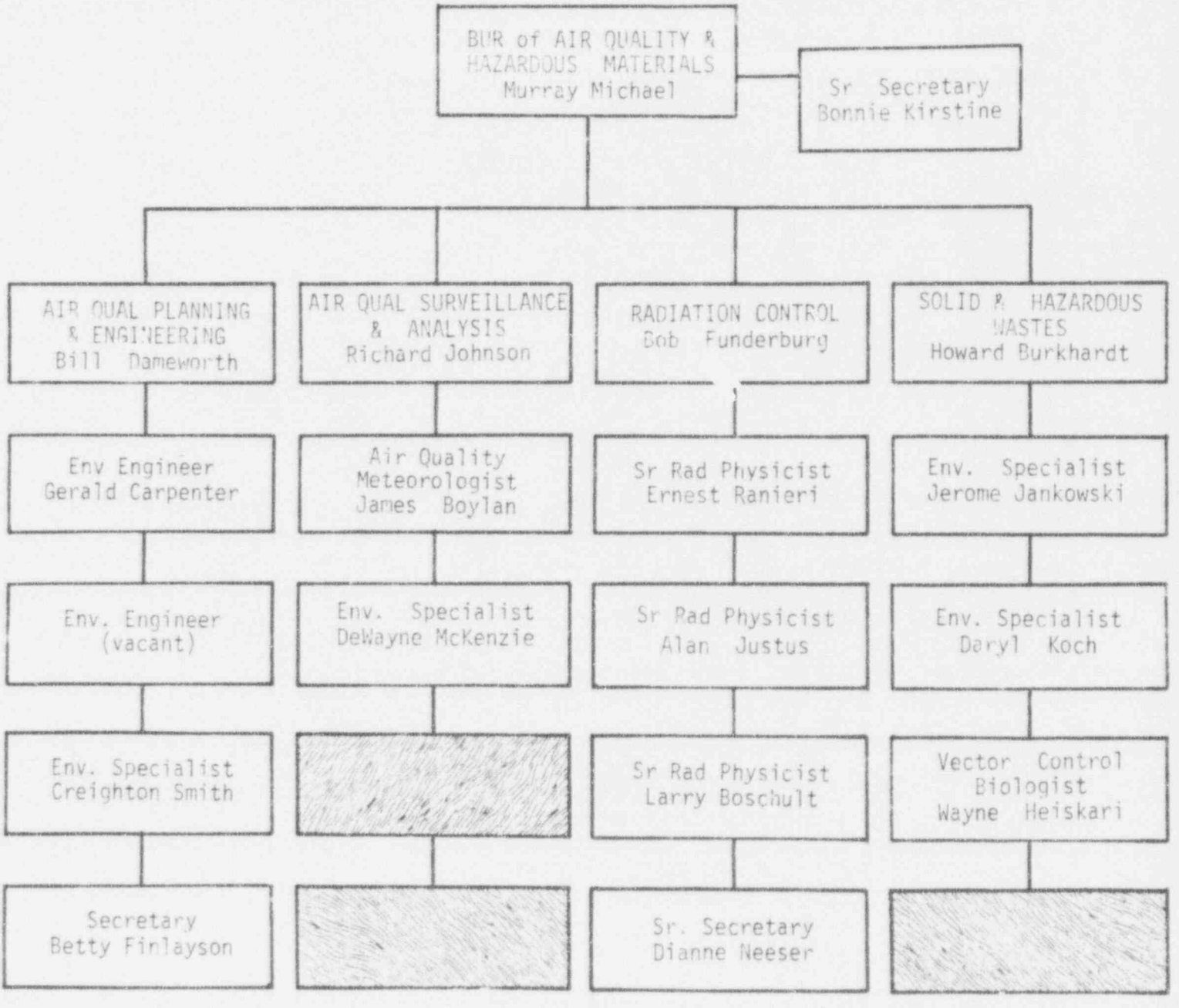
H. Resume of New Staff

I. Instrumentation


GOVERNOR
John V. Evans
DEPARTMENT OF HEALTH & WELFARE
DIRECTOR
Thomas L. Purse
DIVISION OF ENVIRONMENT
ADMINISTRATOR
Lee W. Stokes, Ph.D.
LEGAL COUNSEL
Jack Hackberger
Larry Knudson
SR. ADMIN. ASSISTANT
Elva Rork
ADMIN. SECRETARY
Corrine Hunt
RECEPTIONIST
Dixie Thomas
BUREAU OF WATER QUALITY
Alfred C. Murray
BUREAU OF HAZARDOUS MATERIALS
Robert P. Olson
RADIATION CONTROL
SOLID & HAZ. WASTE
Supervisor
Sr. Radiation Physicist
Sr. Radiation Physicist
Sr. Radiation Physicist
Sr Env Spec
Sr Env Spec

B

BUREAU of AIR QUALITY & HAZARDOUS MATERIALS



DHW-DOE

7 OCT 80

RADIATION CONTROL SECTION MANAGER

Class code: 03550
Pay Grade: 31

CLASS PURPOSE

Under general direction, plans, organizes, implements, monitors, and evaluates a statewide radiation control program; performs related work as required.

PRINCIPAL ACCOUNTABILITIES

1. Program Management. Typical tasks include: plans, organizes, implements, monitors, and evaluates a statewide program involving the inspection, surveillance, regulation and licensing of radiation sources; determines program needs with regard to the use of radiation sources in the state and its effect on the environment; establishes priorities for program direction, and develops program goals and objectives; directs staff members in planning, implementing, and maintaining effective radiation reduction programs, such as Materials Licensing, X-ray Registration and Inspection, and Environmental Surveillance; evaluates program policy, procedures, rules and regulations for compliance with Federal laws, rules and regulations and revises as necessary; submits drafts of new and revised rules and regulations for promulgation according to department policy and Administrative Procedures Act; monitors promulgation process, and acts as chief witness in hearings; reviews and comments on regulations proposed by the Nuclear Regulatory Commission, the Environmental Protection Agency, or other federal agencies that have an impact on radiation control; coordinates program activities with other department and state activities, such as water and air quality, dental health, medical and hospital licensing, District Health Departments, and regional environmental offices; reviews, receives input from staff, and prepares comments on environmental impact statements; reviews and approves all licensing applications and enforcement actions for legal content prior to issuance; develops and controls section budget; may monitor federal grant funds.

2. Technical Support. Typical task include: provides technical support at the departmental, state, and federal level in all matters involving radiation control; interprets Idaho Radiation Control Law for concerned parties, and makes decisions on interpretation of State Radiation Control Regulations as they apply to users; prepares legislative documents in support of radiation control laws, and acts as technical representative in legislative hearings; provides technical assistance to the Governor's office upon request and to the Attorney General's office during enforcement process; provides assistance to other governmental agencies whose programs may impact radiation control; participates at national conferences and meetings, such as the Annual Agreement States Meeting and the National Conference on Radiation Control, in deciding national policies on radiation control matters; interacts with Department of Energy personnel at the Idaho National Engineering Lab to review and offer comments on disposal practices and environmental activities at the site; prepares lectures for the public and radiation users on radiation protection.

3. Staff Supervision. Typical tasks include: establishes acceptable performance standards and evaluates employee performance; conducts interviews for hiring new staff; makes selection and arranges for hiring of personnel; documents and recommends appropriate disciplinary actions; makes work assignments and reviews work; provides training, consultation, interpretation, and direction to staff regarding the Idaho Radiation Control Law and other federal and state regulations, policies, and procedures.

4. Emergency Response Team. Typical tasks include: serves as leader of the state's emergency response radiation control team; drafts and maintains an emergency response plan for radiation emergencies; responds to accidents involving radioactive materials; determines action necessary to maintain public health and safety; recommends clean-up action; directs maintenance of emergency response equipment; writes/reviews technical reports on accidents and recommends/ approves recommendations on procedures necessary to prevent recurrence.

GENERAL INFORMATION

This position operates independently in serving as the state's expert on health physics and radiation control. Unless special arrangements are made, incumbent must be on 24-hour call to respond to emergency situations anywhere in the state. Travel is required in performance of regular duties of position.

MINIMUM QUALIFICATIONS

Any combination of education, training and experience that demonstrates competence in each of the following:

Knowledge of: advanced theory and practice of health physics including nuclear medicine, x-ray technology and radiography, reactor physics, uranium milling, medical therapy, environmental hazards, laser principles and radiation waste management; principles and practices of management including needs assessment, development of goals and objectives, the budget process; personnel practices and procedures; techniques of supervision and training; state and federal laws governing radiation control including licensing, monitoring and enforcement.

Ability to communicate clearly and effectively both orally and in writing; read, write and interpret complex technical and scientific material; establish performance standards and evaluate employee performance; assess program needs and develop goals and objectives; plan, conduct, and correlate investigations of radiation hazards; develop and maintain effective working relationships.

PROBATIONARY PERIOD

Entrance: 12 months
Promotion: 6 months

Revised: 3/73
8/75
12/79 D. Tweedy (Retitled from Radiation Control Section Supervisor)

JOB CONTENT EVALUATION: FI 2 264/E3(33)87/EIP 152 = 503
FI 3 304/E4(43)132/EIP 132 = 568 (Proposed July 1, 1980)

RADIATION PHYSICIST, SENIOR

Class code: 03552
Pay Grade: 29

CLASS PURPOSE

Under direction, plans and performs complex radiation control work dealing with the investigation, surveillance, and inspection of sources of radiation; performs related work as required.

PRINCIPAL ACCOUNTABILITIES

1. Program Maintenance and Operation. Typical tasks include: assesses state radiation control needs within assigned program function; develops goals and objectives, identifies personnel and equipment needs and implements long- and short-range projects; coordinates activities with regional environmental offices, Nuclear Regulatory Commission, Environmental Protection Agency, and other Federal and state agencies; reviews current and proposed state and federal rules, regulations, and procedure manuals and proposes revisions as necessary; assists in formulatings health and safety criteria for licensure of radioactive material users and/or registration of x-ray users; plans project budgets and assists in planning section budget; assists in planning activities within other radiation control subsections.
2. Source Inspection and Evaluation. Typical tasks include: inspects x-ray facilities of medical, dental, industrial and other users of radioactive material to determine compliance with radiation control regulations; receives, reviews, and evaluates licensure or registration applications for use of radioactive materials; may conduct pre-licensing inspection to assess facility, including equipment, staff and procedures; denies or authorizes licensure; performs follow-up inspections of licensed facilities; meets with management of facilities to discuss inspection results, items of non-compliance, corrective actions and possible legal implications; collects appropriate samples for environmental surveillance and performs analysis with various laboratory equipment to determine level of radiation from sources such as the Idaho Nuclear Engineering Lab, construction slag or nuclear detonation fallout; inspects items such as microwave ovens, color television sets and laser units for excess radiation leakage; writes technical reports; maintains calibration equipment.
3. Technical Assistance/Training. Typical tasks include: trains medical professionals in radiation protection methods designed to maximize diagnostic and treatment quality while minimizing radiation exposure to patients and personnel; conducts courses in radiation protection for industrial users, educational institutions, and the general public; advises architects, builders, doctors and other professionals in planning radiation facilities, including necessary shielding; trains law enforcement agencies, fire departments, county employees and general public in emergency response procedures for radiation accidents; interprets Idaho Radiation Control Law for concerned parties; reviews environmental impact statements; may provide technical assistance to Attorney General's office during enforcement process; may train and review work of Health Physicists.
4. Enforcement. Typical tasks include: enforces Idaho radiation control regulations; issues notices of violation to radiation users who are in non-compliance with regulations; institutes such field enforcement procedures as close down of a facility due to contamination if necessary for public health and safety.
5. Emergency Response Team. Typical tasks include: serves as a member of the state's emergency response radiation control team; responds to accidents involving radioactive materials; determines action necessary to maintain public health and safety; recommends clean-up action; maintains emergency response equipment; writes technical reports on accidents and recommends procedures necessary to prevent recurrence; assists in keeping emergency response plan active and current with new developments in the field.

GENERAL INFORMATION

This class is distinguished from the Radiation Physicist class by the complex nature of the studies and the independence required in performance of the work. Incumbents will be assigned a specific program within the radiation control section such as x-ray registration and inspection, radioactive materials licensing and control, or environmental surveillance. Periodically, incumbents will be on 24-hour call to respond to emergency situations anywhere in the state. Some travel is required in performance of regular duties of the position.

MINIMUM QUALIFICATIONS

Any combination of education, training and experience that has demonstrated competence in each of the following:

Knowledge of: advanced theory and practice of health physics including nuclear medicine, x-ray technology and radiography, reactor physics, uranium milling, medical therapy, environmental hazards, laser principles and radiation waste management; mathematics, chemistry, physiology and medical terminology as applied to health physics; common uses of radioation including the hazards involved and preventive measures available; radiation detection equipment; standard decontamination procedures; sampling methods and techniques; general radiation control regulatory practices.

Ability to: establish and maintain good working relationships; communicate clearly and effectively both orally and in writing; write and interpret complex technical and scientific material; assess program needs and develop goals and objectives; plan, organize and implement long- and short-range projects; plan, conduct and correlate investigation of radiation hazards; work independently.

PROBATIONARY PERIOD

Entrance: 12 months
Promotion: 6 months

Revised: 3/73
3/77
12/79 D. Tweedy (retitled from Health Physicist Senior)

JOB CONTENT EVALUATION: EI 3 230/E4(43)100/DIP 100 = 430
FI 2 264/E3(38)100/EIC 100 = 464 (Proposed July 1, 1980)

25

RELEASED: May 12, 1980

PLEASE POST
AN# 80-03552-223

Idaho Personnel Commission

Announces

OPEN-COMPETITIVE, CONTINUOUS RECRUITMENT, PERIODIC EXAMINATIONS FOR

RADIATION PHYSICIST, SENIOR

DEPARTMENT OF HEALTH & WELFARE

SALARY RANGE: $1360 - $1822 (Effective July 1, 1980: $1574 - $2109)
(Longevity increments not included in Salary Range)
(Appointments are normally made at the first step of the Salary Range)

ONE OPENING - DIVISION OF ENVIRONMENT - BOISE

DUTIES:

Under direction, plans and performs complex radiation control work dealing with the investigation, surveillance, and inspection of sources of radiation; performs related work as required.

MINIMUM QUALIFICATIONS:

Any combination of education, training and experience that has demonstrated competence in each of the following:

Knowledges and Abilities: Knowledge of advanced theory and practice of health physics including nuclear medicine, x-ray technology and radiography, reactor physics, uranium milling, medical therapy, environmental hazards, laser principles and radiation waste management; mathematics, chemistry, physiology and medical terminology as applied to health physics; common uses of radioation including the hazards involved and preventive measures available; radiation detection equipment; standard decontamination procedures; sampling methods and techniques; general radiation control regulatory practices. Ability to establish and maintain good working relationships; communicate clearly and effectively both orally and in writing; write and interpret complex technical and scientific material; assess program needs and develop goals and objectives; plan, organize and implement long- and short-range projects; plan, conduct and correlate investigation of radiation hazards; work independently.

EXAMINATIONS:

100% Rating of Education and Experience. The score you receive is based upon information obtained from your application form. It is important that these applications be filled out accurately and completely and all pertinent experience included.

APPLICATIONS:

Application form PC-1 may be obtained from the Idaho Departments of Employment and the IDAHO PERSONNEL COMMISSION, 700 West State Street, Boise, Idaho 83720. Telephone: (208) 334-2263.

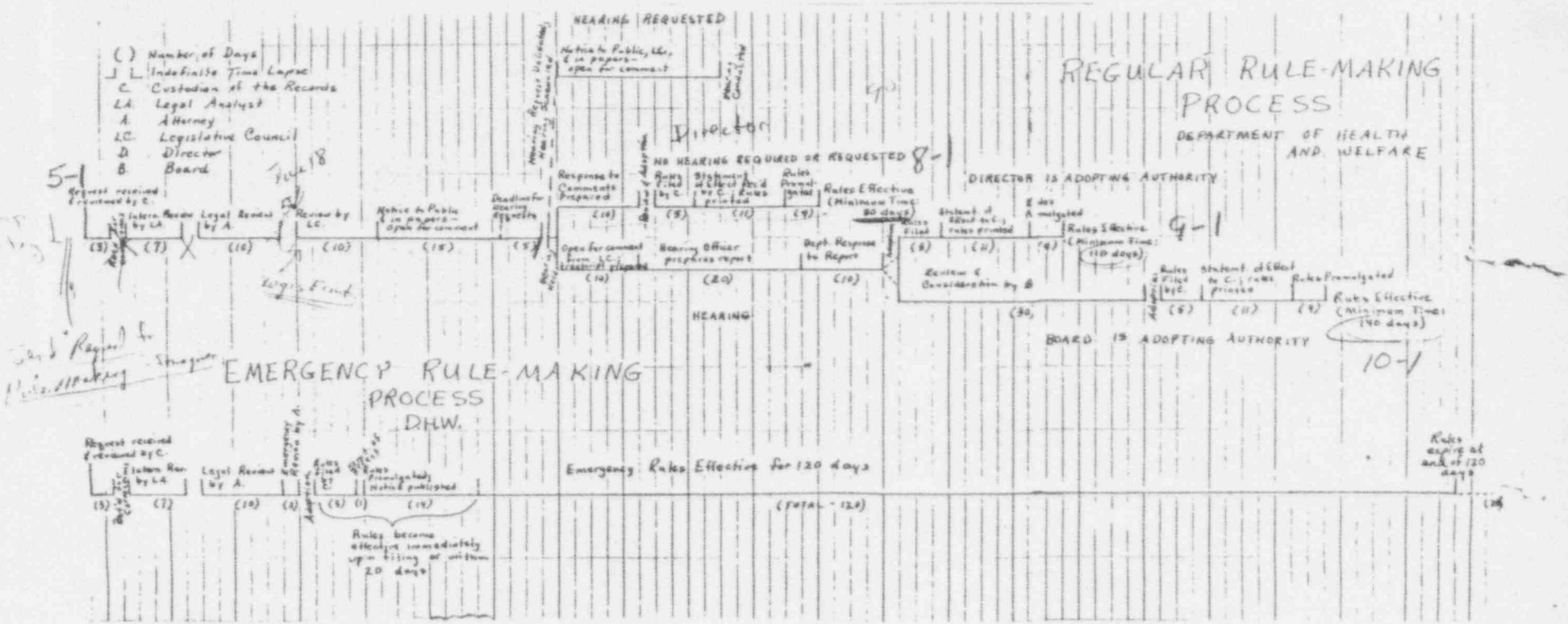
GENERAL INFORMATION:

Only applicants meeting the minimum qualifications will be admitted to the examination. A minimum score of 70 is required to place on the register. Veterans' preference points added to final score in accordance with Idaho Law. Career state employees receive earned vacation, sick leave, state-paid life insurance, Federal Social Security, retirement, and group health and accident insurance. Group health and accident insurance for dependents available.

CLOSING DATE: June 30, 1980. Applications will be received continuously and examinations conducted periodically until the closing date.

NOTE: NO ILLEGAL DISCRIMINATION AGAINST ANY PERSON IS PERMITTED ON THE BASIS OF RACE, COLOR, NATIONAL ORIGIN, RELIGION, SEX, AGE, HANDICAP, OR VETERAN'S STATUS. REASONABLE ACCOMMODATIONS WILL BE MADE FOR HANDICAPPED PERSONS IN TESTING AND EMPLOYMENT. IF YOU REQUIRE SPECIAL ACCOMMODATIONS FOR TESTING, PLEASE CONTACT THE EXAM ANALYST RESPONSIBLE FOR SCHEDULING THAT PARTICULAR TEST, (208) 334-2263, OR ATTACH A NOTE TO YOUR APPLICATION.

RADIATION PHYSICIST, SENIOR


( ) Number of Days
Indefinite Time Lapse
C. Custodian of the Records
LA. Legal Analyst
A. Attorney
LC. Legislative Council
D. Director
B. Board
REGULAR RULE-MAKING PROCESS
DEPARTMENT OF HEALTH AND WELFARE
HEARING REQUESTED
NO HEARING REQUIRED OR REQUESTED
DIRECTOR IS ADOPTING AUTHORITY
BOARD IS ADOPTING AUTHORITY
HEARING
EMERGENCY RULE-MAKING PROCESS
DHW.
Emergency Rules Effective for 120 days
(TOTAL - 120)
Rules become effective immediately upon filing or within 20 days
Rules expire at end of 120 days

Appendix F

REVIEW OF SELECTED LICENSE FILES

The following licenses were reviewed to determine whether the application had been properly completed and signed by an official authorized to sign such a document. The reviewer noted where appropriate all significant errors, omissions and deficiencies in the licensing actions. License files were reviewed for adequate support information and unusual time lapses between receipt of applications and the issuance of licenses. Missing information, i.e., letters, documents, file notes and telephone conversations were noted where appropriate. The files were also reviewed for illegal and/or improper license authorizations and the lack of appropriate cover letters.

Nov. 1980

1. Met-Chem Engineering Laboratories, Inc.
   4990 Valenty Road, Unit G
   Chubbuck, Idaho 83201
   License No. IDA-182
   Issued: October 30, 1980
   Expires: October 31, 1981
   Industrial Radiography (Temporary sites only)

2. Idaho Testing Laboratories
   1563 Sunnyside Road
   Idaho Falls, Idaho 83401
   License No. IDA-177
   Issued: April 24, 1980 & Amendment #1 November 12, 1980
   Expires: April 30, 1982
   Density Gauges (Temporary sites only)

3. Morrison-Knudsen Company
   One Morrison-Knudsen Plaza
   Boise, Idaho 83729
   License No. IDA-95-1 Amended in entirety
   Issued: April 8, 1980
   Expires: March 31, 1982
   Density Gauges, Commercial Instrument Calibration and Leak Testing.

4. Eastern Idaho Vocational-Technical School
2299 East 17th Street
P.O. Box 2829
Idaho Falls, Idaho 83401
License No. IDA-117, Amended in entirety
Issued: March 10, 1980
Expires: June 30, 1981
Training and Instrument Calibration

5. University of Idaho
Moscow, Idaho 83843
License No. IDA-04-16, Amended in entirety
Issued: November 18, 1979
Expires: November 30, 1981
Academic Broad License

6. FMC Corporation
Mineral Development Department
717 17th Street, Suite 1620
Denver, Colorado 80202 (Pocatello Office has records)
License No. IDA-01-2
Issued: June 30, 1980
Expires: May 31, 1982
Well-logging

7. Del Monte Corporation
1325 Washington Boulevard
P.O. Box 9260
Ogden, Utah 84409
Also Burley Plant #134
305 West Highway 30
Burley, Idaho 83318
License No. IDA-172-2
Issued: July 7, 1980
Expires: July 31, 1982
Level Gauge

Comment	License File Number						
	1	2	3	4	5	6	7
A. Undocumented telephone call	X						X
B. Application lacks signature of licensee's higher manager			X			X	
C. Lacks leak test license condition				X			

Comment	License File Number						
	1	2	3	4	5	6	7
D. Application lacks copy of written exam and answers				X			
E. Lacks review by Program manager						X	

February 1982

1. Peter J. Hanges
   Blackfoot, Idaho
   License No. IDA-191
   Issued: June 6, 1981
   Expires: June 30, 1982
   Industrial Radiography

2. University of Idaho
   Moscow, Idaho
   License No. IDA-04-16
   Issued: October 5, 1981
   Expires: September 30, 1983
   Academic Broad License

3. Inspection and Testing, Inc.
   Chubbock, Idaho
   License No. IDA-193
   Issued: August 20, 1981
   Expires: August 31, 1983
   Industrial Radiography

4. Industrial Testing International
   Pocatello, Idaho
   License No. IDA-192
   Issued: June 12, 1981
   Expires: Terminated
   Industrial Radiography

5. Morrison-Knudsen Company, Inc.
   Boise, Idaho
   License No. IDA-95-3
   Issued: March 19, 1981
   Expires: March 31, 1983
   Instrument Calibration (Commercial)

6. ASARCO
Wallace, Idaho
License No. IDA-124
Issued: September 11, 1981
Expires: October 31, 1983
Industrial Gauge

7. Amalgamated Sugar Company
Rupert, Idaho
License No. IDA-21
Issued: December 22, 1981
Expires: November 30, 1983
Industrial Gauge

8. Huico, Inc.
Meridian, Idaho 83642
License No. IDA-98
Issued: December 7, 1981
Expires: December 31, 1983
Industrial Radiography (In-plant & field sites)

9. Measurements, Inc.
Idaho Falls, Idaho
License No. IDA-103-2
Issued: December 14, 1981
Expires: May 31, 1982
Gauge Manufacturer

10. Pathology Associates, P.S.
Spokane, Washington and Coeur d'Alene, Idaho
License No. IDA-70, Renewed in entirety
Issued: October 5, 1981
Expires: September 30, 1983
Nuclear Medicine

11. Industrial Testing Laboratories, Inc.
Idaho Falls, Idaho
License No. IDA-24
Issued: December 30, 1981
Expires: December 31, 1983
Industrial Radiography

12. Twin Falls Clinic Hospital
Twin Falls, Idaho 83301
License No. IDA-123, Renewed in entirety
Issued: October 7, 1981
Expires: October 31, 1983
Nuclear Medicine

13. Engineers Testing Laboratories, Inc.
Phoenix, Arizona and
License No. IDA-188
Issued: February 27, 1981
Expires: February 28, 1983
Density Gauge (field sites)

14. Idaho Power Company
Construction Department
Boise, Idaho
License No. IDA-187
Issued: February 27, 1981
Expires: February 28, 1983
Density Gauge (field sites)

15. Idaho Falls Consolidated Hospitals, Inc.
Idaho Falls, Idaho
License No. IDA-12-2, Renewed in entirety
Issued: February 8, 1982
Expires: January 31, 1984
Nuclear Medicine

Comment	License File Number														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
A. Application does not identify who will perform leak tests or leak test procedure								X					X		
B. Application lacks signature of higher corporate manager								X							
C. Undocumented telephone call								X							
D. Lacks training or refresher course in application	X			X											
E. No named Radiation Safety Officer		X													
F. Application lacks procedure manual or Operating and Emergency procedures		X							X			X	X		
G. File lacks facility diagram/storage area diagram									X	X			X		
H. File lacks transportation QA program									X						
I. File lacks assessment of room design and air flow for Xenon-133 use.															X

Appendix G

REVIEW OF SELECTED COMPLIANCE FILES

The following files were reviewed to determine if the reports adequately document the scope of the inspections and the licensed program, the licensees' organization and the persons contacted, the licensee's administrative controls and procedures, facilities and equipment; radiation safety procedures for procurement, use, transfer and disposal; posting and labeling; personnel monitoring; gaseous and liquid effluents; surveys and bioassays; incidents and overexposures; radwaste packaging and shipping. The reviewer also determined that reports adequately documented operations observed; worker interviews, independent measurements, status of previous noncompliance items, new items of noncompliance noted, and exit interview with management.

The reports were reviewed in sufficient detail to show that the inspections were complete and to substantiate all items of noncompliance and safety recommendations.

The reviewer also determined that appropriate enforcement action was taken; that the enforcement letters were written in the appropriate regulatory language; that the enforcement letters were dispatched in a timely manner; that the licensees' responses were received in the required period of time; that they were acknowledged promptly using proper regulatory language, and that any unresolved items or misunderstandings by the licensees were pursued to satisfactory conclusion.

The reviewer determined if the reports were reviewed by compliance supervisors or peers prior to dispatch of the enforcement letters. The reviewer determined if compliance supervisors noted report deficiencies, such as unsupported conclusions and opinions in the report, noncompliance items not properly substantiated, apparent noncompliance items not cited, etc., and whether these deficiencies were brought to the attention of each inspector. The reviewer determined if the licensees' responses were reviewed for adequacy and what subsequent action was taken by compliance supervision.

Nov. 1980

1. Northern Testing Laboratories, Inc.
370 Benjamin Lane
P.O. Box 7867
Boise, Idaho 83707
License No. IDA-53-1
Inspected: 10/6-7/80
Inspector: Alan Justus
Complete office reinspection

Report Reviewer: R. Funderburg
Date Reviewed: Not indicated
Type of Report: Narrative
Date of Enforcement Letter: 10/29/80
Signed by: Alan Justus
Date of licensees' Response: 11/13/80
State Acknowledged: 11/17/80

2. Morrison-Knudsen Company
One Morrison-Knudsen Plaza
P.O. Box 7808
Boise, Idaho 83729
License No. IDA-2
Inspected: 5/5/80
Inspector: Alan Justus
Announced complete reinspection

Report Reviewer: R. Funderburg
Date Reviewed: Not indicated
Type of Report: Narrative
Date of Enforcement letter: 5/15/80
Signed by: Alan Justus
Date of licensees' Response: 6/10/80
State Acknowledged: 6/18/80

3. Eastern Idaho Vocational-Technical School
2299 East 17th Street
P.O. Box 2829
Idaho Falls, Idaho 83401
License No. IDA-117
Inspected: 10/23/80
Inspector: A. Justus & E. Ranieri

Report Reviewer: R. Funderburg
Date Reviewed: Not indicated
Type of Report: Narrative
Date of Enforcement letter: 11/13/80
Signed by: A. Justus & E. Ranieri
Date of licensees' Response: N/A
State Acknowledged: N/A

4. Measurements Incorporated
P.O. Box 1742
1750 Foot Drive
Idaho Falls, Idaho 83401
License No. IDA-103-1 & 103-2
Inspected: 12/4/79
Inspector: R. Funderburg &
E. Ashley (NRC)
Complete announced reinspection

Report Reviewer: R. Funderburg
Date Reviewed: 2/4/80
Type of Report: Narrative
Date of Enforcement letter: 2/26/80
Signed by: R. Funderburg
Date of Licensees' Response: 3/18/80
State Acknowledged: 4/7/80

5. Energy Incorporated
P.O. Box 736
445 North Capitol
Idaho Falls, Idaho 83401
License No. IDA-168-1
Inspected: 7/23/80
Inspector: A. Justus & E. Ranieri
Complete initial inspection

Report Reviewer: not indicated
Date Reviewed: not indicated
Type of Report: Narrative
Date of Enforcement letter: 8/27/80
Signed by: A. Justus
Date of Licensees' Response: 9/23/80
State Acknowledged: not indicated

6. Idaho Testing Laboratories
1563 Sunnyside Road
Idaho Falls, Idaho 83401
License No. IDA-177
Inspected: 7/23/80
Inspectors: A. Justus & E. Ranieri
Complete office inspection

Report Reviewer: not indicated
Date Reviewed: not indicated
Type of Report: Narrative
Date of Enforcement letter: 8/13/80
Signed by: A. Justus
Date of Licensees' Response: N/A
State Acknowledged: N/A

Comment	Compliance File Number					
	1	2	3	4	5	6
A. Enforcement letter should require the licensee to state when corrective action will be completed	X	X		X		
B. Inspection overdue	X	X				
C. Recommendation re: receipt and shipping records should have been a citation for noncompliance	X				X	X
D. Report does not indicate whether inspection was announced vs. unannounced	X					
E. No indication whether previous noncomp. items were reviewed at this inspection	X					
F. Verbal authorization given for 3 workers to use a gauge during the inspection						X
G. No indication whether inspector spoke to radiation workers (Part 19)	X		X			
H. No independent measurements		X	X			
I. No Acknowledgement of Licensees letter					X	
J. Repeat items of noncompliance should be highlight in enforcement letters		X				

Comment	Compliance File Number					
	1	2	3	4	5	6
K. Report/enforcement letter overdue				X		
L. Recommend change in wording of enforcement letter from "licensee found in compliance" to "NO items of noncompliance found."			X			X
M. Report lacks supervisory review					X	

Feb. 1982

1. University of Idaho
   Moscow, Idaho
   License No. IDA-04-16
   Inspected: 12/9-11/80
   Inspectors: A. Justus & E. Ranieri
   Reinspection complete

   Report Reviewer: R. Funderburg
   Date Reviewed: not Indicated
   Type of Report: Narrative
   Date of Enforcement letter: 2/25/81
   Signed by: A. Justus
   Licensees' Response: 3/7/81
   State Acknowledged: 4/6/81

2. Inspection & Testing, Inc.
   Chubbuck, Idaho
   License No. IDA-193
   Inspected: 11/20/81
   Inspectors: L. Boschult
   Reinspection Complete

   Report Reviewer: R. Funderburg
   Date Reviewed: not indicated
   Type of Report: Narrative
   Date of Enforcement Letter: 12/8/81
   Signed by: L. Boschult
   Licensees' Response: N/A
   State Acknowledged: N/A

3. St. Lukes Regional Medical Center
   Boise, Idaho
   License No. IDA-13-2
   Inspected: 6/28/81
   Inspector: R. Funderburg
   Reinspection complete

   Report Reviewer: R. Funderburg
   Date Reviewed: not indicated
   Type of Report: Narrative
   Date of Enforcement letter: N/A
   Signed by: N/A
   Licensees' Response: N/A
   State Acknowledged: N/A

4. Energy Incorporated
   Idaho Falls, Idaho
   License No. IDA-168
   Inspected: 11/17/82
   Inspector: R. Funderburg
   Reinspection Complete

   Report Reviewer: R. Funderburg
   Date Reviewed: Not indicated
   Type of Report: Narrative
   Date of Enforcement letter: 1/11/82
   Signed by: R. Funderburg
   Licensees' Response: no response
   State Acknowledged: N/A

5. Industrial Testing Labs., Inc.
133 West Broadway
Idaho Falls, Idaho
License No. IDA-24
Inspected: 11/18/81
Inspectors: R. Funderburg &
L. Boschult
Unannounced Reinspection

Report Reviewer: R. Funderburg
Date Reviewed: not indicated
Type of Report: Narrative
Date of Enforcement letter: 12/2/81
Signed by: R. Funderburg
Licensees' Response: 12/9/81
State Acknowledged: 12/30/81

6. Twin Falls Clinic & Hospital
666 Sheshone Street East
Twin Falls, Idaho 83301
License No. IDA-123
Inspected: 1/23/81
Inspectors: R. Funderburg &
L. Boschult
Reinspection Complete

Report Reviewer: R. Funderburg
Date Reviewed: not indicated
Type of Report: Narrative
Date of Enforcement letter: 2/17/81
Signed by: R. Funderburg
Licensees' Response: N/A
State Acknowledged: N/A

7. Measurements, Inc.
P.O. Box 1742
Idaho Falls, Idaho 83401
License No. IDA-103-1 & 103-2
Inspected: 11/19/81
Inspector: R. Funderburg
Partial Reinspection

Report Reviewed by: R. Funderburg
Date Reviewed: 12/21/81
Type of Report: Narrative
Date of Enforcement letter: 12/10/81
Signed by: R. Funderburg
Licensees' Response: not in file
State Acknowledged: 1/27/82

8. Magic Valley Memorial Hospital
650 Addison Avenue, West
P.O. Box 409
Idaho Falls, Idaho 83301
License No. IDA-11
Inspected: 1/22/81
Inspectors: R. Funderburg/L. Boschult
Complete Reinspection:

Report Reviewed by: R. Funderburg
Date Reviewed: not indicated
Type of Report: Narrative
Date of Enforcement letter: 2/17/81
Signed by: R. Funderburg
Licensees' Response: N/A
State Acknowledge: N/A

9. St. Anthony Hospital
650 Seventh North
Pocatello, Idaho 83201
License No. IDA-18
Inspected: 1/14/81
Inspectors: R. Funderburg &
L. Boschult
Complete Reinspection

Report Reviewer: R. Funderburg
Date Reviewed: not indicated
Type of Report: Narrative
Date of Enforcement: 2/4/81
Signed by: R. Funderburg
Date of Licensees' Response: N/A
State Acknowledged: N/A

10. Idaho Falls Consolidated Hospitals
Riverview Facility
900 Memorial Drive
Idaho Falls, Idaho 83401
License No. IDA-47
Inspected: 1/15/81
Inspectors: R. Funderburg &
L. Boschult

Report Reviewer: R. Funderburg
Date Reviewed: no indicated
Type of Report: Narrative
Date of Enforcement letter: 2/4/81
Signed by: R. Funderburg
Date of licensee response: 2/24/81
State Acknowledged: 3/9/81

Comment		Compliance File Number									
		1	2	3	4	5	6	7	8	9	10
A.	Report does not indicate whether inspection was announced vs. unannounced	X	X	X							
B.	Previous items of noncompliance not mentioned in Current report		X	X	X		X				
C.	No independent measurements by inspector			X	X	X	X			X	
D.	No indication of previous inspection date in this report		X	X							
E.	Incomplete inspection report and no mention of complete vs. partial inspection		X	X	X						
F.	Undocumented telephone call					X					
G.	Report lacks close-out survey for termination of licensed operation							X			
H.	Enforcement letter did not require correction of noncompliance item								X		
I.	Noncompliance items were not clearly distinguished from recommendations								X		
J.	No indication that molybdenum breakthrough test results were checked								X		
K.	No indication that dosimeter calibrator test results were checked								X	X	

Comment	Compliance File Number									
	1	2	3	4	5	6	7	8	9	10
L. No indication that survey instrument calibration results were checked								X	X	
M. Overdue inspection									X	
N. Overdue leaktest and no citation for noncompliance									X	X

PC-1
R 8/78

STATE OF IDAHO

APPLICATION FOR EMPLOYMENT

TO:
IDAHO PERSONNEL COMMISSION
700 WEST STATE STREET
BOISE, IDAHO 83720

IMPORTANT

READ CAREFULLY BEFORE FILLING OUT YOUR APPLICATION

This Application may be used for ONE POSITION ONLY. If you wish to apply for other positions with the State of Idaho, please submit an original application for EACH position. Reproduced applications cannot be accepted. Study the minimum qualifications listed in the examination announcement. If you believe that you meet these qualifications, complete this application using typewriter or ink. Answer all questions applicable to the position for which you are applying. Be thorough. Your answers determine whether you will be admitted to the examination. Incomplete, undated, or unsigned applications cannot be processed.

There will be no illegal discrimination in hiring due to race, color, sex, religion, national origin, age, handicap or veterans status. Reasonable accommodations will be made for the handicapped in testing and employment.

Please do not fill in shaded portions of the application.

RECEIVED
JUL 21 1980
DEPT. OF ENVIRONMENT
RADIATION CONTROL SEC

DO NOT DETACH

IDENTIFYING INFORMATION

Position Applied For (One Position Only)	Announcement No.
Radiation Physicist	80-03552-48

Last Name / First Name / Middle Initial

(Mr.) Ms. Boschult, Larry C.

Mailing Street Address: 1408 Amity

City	State	Zip Code
Nampa,	Idaho	83651

Maiden or other names if used on other State of Idaho applications: N/A

Home Phone	Other Phone	Social Security Number
467-1876		506-70-9401

OFFICE USE ONLY

R: A Ext, B Exp, C Other; D Late, E Inc.

F: F Wr, G Or, H DPR, I T&E; J Pw, K Typ, L Dic

DNA: M Wr, N Or, O Pw

TEST	RAW SCORE	CONVERTED	W	WEIGHTED	
WR					
ORAL					
DPR					
T & E					
		Total Earned			
Eligibility Date		Veteran Status			
		Final Score			

VETERAN PREFERENCE CLAIM

ELIGIBILITY FOR VETERAN PREFERENCE POINTS IS LIMITED TO ORIGINAL APPOINTMENT

Persons Applying For Veteran Preference Points Must Have Idaho Residence

Five (5) Points. Must have served more than 180 days, unless disabled in the line of duty, in active service of the armed forces of the United States during recognized war periods, and must have been discharged or separated under honorable conditions. The widow of any war veteran may claim five (5) points war veteran preference as long as she remains unmarried.

Ten (10) Points. Must meet the above basic eligibility requirements, and be recognized by the U.S. Veterans Administration as having a disability incurred in service of a degree of 10% or more or be receiving pension or compensation for non-service connected disabilities in accordance with the laws and regulations administered by the U.S. Veterans Administration. (Ten points disabled veteran preference may be claimed by the widow of a disabled war veteran as long as she remains unmarried, or the wife of a disabled war veteran who is himself physically unable to perform the work of the position to which the wife seeks to apply the preference.) V.A. CERTIFICATION REQUIRED.

PART 1 – TO BE ANSWERED BY ALL PERSONS CLAIMING VETERAN PREFERENCE

Service Branch	Service Number	Date Entered Into Service	Date of Separation

Type of Discharge or Separation From Service	Do You Claim Idaho Residence	Percent of Disability Certified by V.A. or Service	Do You Receive Compensation Pension or Disability Retirement From V.A. or Service
	☐ YES ☐ NO		☐ YES ☐ NO

PART 2 – TO BE ANSWERED BY WIVES AND WIDOWS OF DISABLED VETERANS OR WIDOWS OF VETERANS

Veteran's Name on Whose Service Preference is Claimed (Last / First / Middle Initial)	Date You Married Veteran	Is the Veteran Deceased
		☐ YES ☐ NO

Are You Divorced From the Veteran	If Widowed or Divorced From the Veteran, Have You Remarried	– IMPORTANT –
☐ YES ☐ NO	☐ YES ☐ NO	PART I INFORMATION MUST BE COMPLETED IN ORDER TO ESTABLISH YOUR ELIGIBILITY FOR VETERANS PREFERENCE POINTS

Employer's Name and Address (Firm, Organization, etc.)	Exact Title of Position	FROM	TO
St Lukes Hospital Twin Falls, Idaho	Chief Nuclear Medicine Technologist	Mo/Yr 3/77	Mo/Yr 6/79

Duties (Be Specific)

Performed diagnostic tests with radioactive materials, QC quality control tests on radioactive detection equipment, inventory of receipt, storage, disposal of radioactive materials, prepare radioactive reagents and administer them to patients

TOTAL TIME	HOURS/WEEK
Yrs/Mos 2/3	40

SALARY	
Starting $ [illegible]	Ending $ [illegible]

Reason for Leaving: Not ready for [illegible]

Supervisor's Name: [illegible]

Employer's Name and Address (Firm, Organization, etc.)	Exact Title of Position	FROM	TO
[illegible]	[illegible]	Mo/Yr 7/74	Mo/Yr 2/77

Duties (Be Specific)

[illegible]

TOTAL TIME	HOURS/WEEK
Yrs/Mos 2/7	40

SALARY	
Starting $ [illegible]	Ending $ [illegible]

Reason for Leaving: Move to Idaho

Supervisor's Name: [illegible]

Summary of Other Pertinent Work Experience

United Parcel Service — computer operator (part time) — 2/77 - 7/77 — 34 hrs a week at $3.25/hr Fri $3.75/hr

Operate computer peripheral equipment - card reader, line printer, tape drive, disk [illegible] terminal

Left to Move to Idaho

Maynard Klotzbucher

Have you been convicted of any criminal offense, including military court convictions, since your 18th birthday? If YES, please explain. ☐ YES ☒ NO

Full Name (Print or Type Please) Harry Charles Beckwith Social Security No. 525-72-9461

→ SIGNATURE Harry Beckwith Date 6/12/79

By my signature above, I certify that all answers and statements on this application are true and complete to the best of my knowledge. I understand that should an investigation disclose untruthful or misleading answers, my application may be rejected, my name removed from consideration, or my employment with the state terminated.

DO NOT DETACH

EQUAL EMPLOYMENT OPPORTUNITY INFORMATION

The Idaho Personnel Commission is attempting to monitor recruitment and selection programs in order to assure equal opportunity. We would appreciate your cooperation by voluntarily furnishing us with the information requested below. This information will be kept confidential and used only for affirmative action purposes as specified by law.

This information is for statistical use only and will be separated from the form before processing your application.

☒ Male ☐ Female

☐ Black ☐ American Indian

☐ Asian American ☐ Hispanic American

☒ White

☐ Vietnam Era Veteran

☐ Disabled Veteran

☐ Handicapped

☐ Over 40 Yrs. of Age

HOW DID YOU FIRST LEARN ABOUT THIS JOB?

☐ 1. Friend or Relative Working for the State
☐ 2. Newspaper
☐ 3. By contacting the Idaho Personnel Commission
☒ 4. By contacting the Idaho Department of Employment
☐ 5. By contacting other agencies of state government
☐ 6. School Placement Office or Guidance Counselor
☐ 7. Community Action Group (Please Specify) _____
☐ 8. Other (Please Specify) _____

OFFICE USE ONLY

- ☐ The examination for this position is a rating of education and experience. Your application has been reviewed and your name has been placed on a list of eligibles with a score of
- ☐ Your application has been reviewed and disapproved for examination. It does not indicate that you meet the education/experience requirements for the position.
- ☐ These positions are currently open only to (a) permanent employees of the State of Idaho, or (b) promotional applicants employed in the agency specified in the examination announcement.
- ☐ Application received after closing date.
- ☐ Other:

For reconsideration of your application you may submit additional information to:

DO NOT DETACH

EDUCATION

Do You Have a High School Diploma or GED Certificate	High School Name and Location	Number of the Last School Grade Completed →
☒ YES ☐ NO	North High School Grooms Nebraska	12

Schools Attended After High School or Special Training Received

NAME	LOCATION City, State	FROM Mo/Yr	TO Mo/Yr	Graduate	TYPE DEGREE OR DIPLOMA	MAJOR SUBJECT(S)	TOTAL CREDIT HRS. Semester	TOTAL CREDIT HRS. Quarter
Friends Bible(a))	Hartland Kans	9/68	5/72	☐ YES ☒ NO	None	Liberal Arts	35	
University Nebr Omaha	Omaha Nebraska	9/72	7/74	☐ YES ☒ NO	None	Biology	69	
[illegible]	Omaha Nebraska	9/74	5/76	☒ YES ☐ NO	A.S Biology	Nuclear Medicine Technology	74	

Special Qualifications, Skills, Languages	Kind of License or Certificate	State or Other Licensing Authority
	R-T (ART)	ARRT
	Year of First License/Cert. 1976	Year of Latest License/Cert. 1982

EXPERIENCE

EMPLOYMENT HISTORY: List below your work history beginning with your present or most recent job, emphasizing your specific tasks and supervisory, technical, or other responsibilities. Give special attention to experience relating to the job for which you are applying. INCOMPLETE DESCRIPTIONS MAY RESULT IN LOWER RATINGS. Attach additional sheets if necessary.

Employer's Name and Address (Firm, Organization, etc.)	May We Contact Your Present Employer	Exact Title of Position	FROM Mo/Yr	TO Mo/Yr
C+H Construction R+#2 Caldwell, Idaho	☒ YES ☐ NO	Roofer	8/79	12/79

Duties (Be Specific)	TOTAL TIME Yrs/Mos	HOURS/WEEK
Apply asphalt roofing	0/4	40
	SALARY Starting	SALARY Ending
	$ 4.50/hr	$ 4.50/hr
	Supervisor's Name Vern Hyde	

Reason for Leaving

Are you currently employed by the State of Idaho	If YES, What Department or Agency	(To be answered by present state employees only) Is this application for department promotion only? If YES, your name will not be certified to any other state agency.
☐ YES ☒ NO		☐ YES ☐ NO

Are you seeking permanent employment	Will You Accept		
☒ YES ☐ NO	Temporary Employment* ☒ YES ☐ NO	Part-Time Employment** ☒ YES ☐ NO	Temporary Part-time Employment ☐ YES ☒ NO
Date available to begin work: Immediately	Shift Work ☐ YES ☐ NO	Night Work ☒ YES ☐ NO	Summer Only ☐ YES ☒ NO

*Not to exceed 8 mos. in any 12 mo. period **Less than 8 hrs. per day

Please indicate only those areas in which you WOULD ACCEPT employment. Consider your answer carefully and be specific. Refusal of an offer of employment in area(s) indicated may be used as basis for removing your name from the register.

- ☐ 01 American Falls
- ☐ 02 Blackfoot
- ☒ 03 Boise
- ☐ 04 Bonners Ferry
- ☐ 05 Burley-Rupert
- ☐ 06 Coeur d'Alene
- ☐ 07 Gooding-Shoshone
- ☐ 08 Grangeville
- ☐ 09 Idaho Falls
- ☐ 10 Jerome
- ☐ 11 Kellogg-Wallace
- ☐ 12 Lewiston
- ☐ 13 McCall
- ☐ 14 Montpelier
- ☐ 15 Mountain Home-Glenns Ferry
- ☐ 16 Moscow
- ☒ 17 Nampa-Caldwell
- ☐ 18 Orofino
- ☐ 19 Payette-Weiser
- ☐ 20 Pocatello
- ☐ 21 Rexburg-Rigby
- ☐ 22 St. Anthony
- ☐ 23 St. Maries
- ☐ 24 Salmon
- ☐ 25 Sandpoint
- ☐ 26 Twin Falls
- ☐ 27 Other (specify)

Are you willing to commute to within 25 miles of your residence? ☒ YES ☐ NO

NOTE: If you change your mind, it is your responsibility to notify us. Phone (208) 384-2263.

Do you have any relative (spouse, parent, child, grandparent, grandchild, aunt, or uncle, etc.) who is presently employed by the State of Idaho?	☐ YES ☒ NO
Are you now receiving a pension or retirement allowance from the Idaho Public Employee Retirement System, Idaho State Teachers Retirement System, Idaho State Judges' Retirement System, Idaho State Department of Employment Retirement System or any other political subdivision in the State of Idaho?	☐ YES ☒ NO
Do you presently hold a political office in the State of Idaho to which you were elected in a partisan political election?	☐ YES ☒ NO

DO NOT DETACH

IDAHO PERSONNEL COMMISSION
700 WEST STATE STREET
BOISE, IDAHO 83720
Ph. (208) 384-2263

APPLICANT: PLEASE COMPLETE

Position Applied For	
	Radiation Physicist, Senior

Name	Larry Beschult
Mailing Address	1468 Amity
City, State Zip Code	Nampa, Idaho 83651

OFFICE USE ONLY

☐ 1. Your application has been reviewed but not scheduled for examination. Please see reverse.

☐ 2. Your application has been accepted and you are scheduled for (a/an) ☐ Oral ☐ Written ☐ Performance Exam as follows:

Date

Time

Place

If you are to take an ORAL exam and do not plan to appear, we would appreciate a note or call from you in advance. Phone (208) 384-2263.

RADIATION DETECTION EQUIPMENT

Quantity	Type of Equipment
2	Ludlum 5A
1	Ludlum 5S
1	Ludlum 14B
1	Ludlum 12
1	Ludlum 16
1	Eberline PAC-15A (Alpha)
1	Eberline PRM-7 (Micro-R)
1	Texas Nuclear Model 2592 (ion chamber)
1	Ludlum Model 2000 scaler
1	Ludlum 28L ratemeter
2	Keithly 35055 (digital dosimeter)
1	Eberline mini scaler Model MS-2
1	Eberline TLD Reader Model TLR-2
1	Victoreen Model 570 condenser R meter (0.25-100R chambers)
1	Tracor Northern Model TN-1705 (MCA) Detectors and probes
4	Side window GM probes
2	Pancake probes
1	NaI probe 3 x 3 cm
1	Thin crystal NaI probe
1	Alpha scintillator probe
1	Thin end window GM probe
1	Neutron probe
1	Eberline Model FC-2 gas flow prop. counter
1	5 x 5" NaI crystal
1	3 x 3" NaI crystal (center drilled)
1	Eberline SAC-R5 PMT (Lucas cell counting)

Apr 13 1982 REF: SA/LAB

Dr. Thomas L. Purce, Director
Idaho Department of Health and
Welfare
Statehouse
Boise, Idaho 83720

Dear Dr. Purce:

This is to confirm the discussion L. A. Bolling and R. S. Heyer held with you, Dr. L. Stokes, and Messrs. R. Olson and R. Funderburg on February 19, 1982, following the review and evaluation of the Idaho radiation control program. The review covered the principal administrative and technical aspects of the program. This included an examination of the program's legislation and regulations, organization, management and administration, personnel, and licensing and compliance activities.

We found that the state's radiation control regulations were revised in 1981. We have requested Mr. Funderburg to provide us a copy for review and comment. After we complete this task, the staff will be prepared to offer findings on the adequacy and compatibility of the program.

Enclosed are our comments on the technical aspects of the program which, if you wish, Mr. Robert Funderburg is welcome to respond to directly. Enclosed is an extra copy of this letter for placement in your State Public Document Room or otherwise be made available for public review.

I appreciate the courtesy and cooperation extended to Messrs. Bolling and Heyer during the meeting with your staff.

Sincerely,

John T. Collins
Regional Administrator

cc: Dr. L. Stokes
Mr. R. Olson
Mr. G. Wayne Kerr
NRC Public Document Room
State Public Document Room

Distribution:
LABolling, w/encl.
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SURNAME	LABolling/cd	RSHeyer	JOLubenau	DANussbaumer		GWKerr	WJDircks	JTCollins
DATE	3/22/82	3/22/82	3/12/82	3/22/82		3/ /82	3/ /82	3/ /82

for Heyer

NRC FORM 318 (10-80) NRCM 0240 OFFICIAL RECORD COPY USGPO: 1981—335-960

Technical Comments and Recommendations on the Idaho Radiation Control Program

I. Licensing

Licensing procedures is a Category II Indicator. The following deficiencies were noted.

A. Comment

A review of selected license files indicates that in at least two cases applicants for license renewal did not provide adequate procedures for the control of Xenon-133 gas.

Recommendation

We recommend that all medical applicants (new licenses and renewals) desiring to use Xenon-133 be required to submit detailed procedures for the control of this material, for example, the use of a collection trap, room diagrams and actual room-air measurements of Xenon-133. To assist in this effort we are enclosing some guidance for the evaluation of applications for Xenon-133 use.

B. Comment

A review of selected license files indicates that in at least four cases applicants for license renewal and new licenses were issued licenses without the submission of adequate operating and emergency procedures.

Recommendation

We recommend that applicants for new licenses and license renewals be required to submit operating and emergency procedures which reflect the scope of the applicant's activities. This is especially important in the case of Measurements, Inc., a firm which acquired the equipment, personnel and patents of Idaho Industrial Instruments, Inc.

II. Compliance

Inspection reports is a Category II Indicator. The following deficiencies were noted.

A. Comment

A review of selected compliance files indicates a lack of adequate documentation of inspection findings in the inspection reports. This deficiency was noted in half of the inspection reports reviewed.

Recommendations

We recommend that inspectors document all essential inspection findings, as outlined in the Radiation Control Section's inspection report form, for each compliance inspection. The inspector should also indicate whether the inspection was announced versus unannounced and the rationale for conducting a partial inspection as opposed to a complete inspection.

B. Comment

A review of selected compliance files indicates the confirmatory measurements obtained during compliance inspections were not always documented in the inspection reports.

Recommendations

We recommend that confirmatory measurements be performed during each compliance inspection and that the findings be documented in the inspection reports. Confirmatory measurements should include wipe tests, area surveys and air flow readings, where applicable.