



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76011

July 19, 1983

MEMORANDUM FOR: Donald A. Nussbaumer, Assistant Director for State  
Agreements Program, Office of State Programs *Del 8/23* *ok dr 8/19/83*  
FROM: Ralph S. Heyer, State Agreements Program, Region IV  
SUBJECT: REPORT AND STAFF EVALUATION OF THE IDAHO RADIATION  
CONTROL PROGRAM (FEBRUARY 16, 1982 - APRIL 1, 1983)

Enclosed is the subject report and staff evaluation.

As noted in the report, the staff believes that the radiation control program for regulation of agreement materials is adequate to protect public health and safety and is compatible with the Commission's program for the regulation of similar materials.

Specific comments and recommendations were developed during the review regarding the radiation control section's administrative procedures, training, and inspection reports. During the next scheduled review, special attention should be directed toward the "Administrative Procedures" indicator. The reviewer should specifically identify if an internal procedures manual has been developed.

Based on the results of this review meeting, the staff recommends that the next program review meeting be conducted within 12 to 18 months.

*Ralph S. Heyer*  
Ralph S. Heyer  
State Agreements Program

Enclosure:  
As stated

cc: J. T. Collins  
G. Sanborn  
R. Doda  
R. S. Heyer

MAY 13 1983

Thomas L. Purce, Ph.D.  
Director  
Idaho Department of Health and Welfare  
Statehouse Mall  
Boise, Idaho 83720

Dear Dr. Purce:

This is to confirm the discussions Mr. Ralph S. Heyer held with you, Dr. Lee Stokes, Mr. Robert Olson, and Mr. Robert Funderburg of your staff following our 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. There was also a field accompaniment of a State inspector conducted during this review.

Our review used as a reference the NRC policy statement, "Evaluation of Agreement State Radiation Control Programs," published in the Federal Register on December 4, 1981. This policy statement provides 30 indicators for evaluating Agreement State program areas. Guidance as to their relative importance to an Agreement State program is provided by dividing the indicators into two categories. Category I indicators address program functions that directly relate to the State's ability to protect public health and safety. Category II indicators address functions which provide essential technical and administrative support. If a significant problem exists in a Category I indicator, the deficiency may seriously affect the State's ability to protect the public health and safety and needs to be addressed on a priority basis. If significant problems exist in more than one Category I indicator, then improvements are critically needed. In such cases, we will need a timely response from the State and the NRC staff will not make recommendations for adequacy and compatibility until after the responses are received and evaluated. A followup review within 6 months may also be scheduled.

As a result of our review of the State's program and the routine exchange of information between the NRC and the State, the NRC staff believes that the Idaho program for the regulation of agreement materials is adequate to protect the public health and safety and is compatible with the Commission's program for the regulation of similar materials.

Our review disclosed that most program indicators were within the NRC guidelines. We were pleased to find that the organization of the license and compliance files has improved since the last review.

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Thomas L. Purce, Ph.D.

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During the review last year, the NRC staff did not offer findings on adequacy and compatibility to the Idaho radiation control program pending clarification of the status of the program's radiation control regulations.

We were pleased to find during this review that the State's regulations have been revised in their entirety and NRC comments have been incorporated.

Enclosed with this letter are comments regarding technical aspects of the program. You may wish to have Mr. Funderburg respond directly to these comments. I am enclosing a copy of this letter for placement in the State Public Document Room or to otherwise be made available for public review.

I appreciate the courtesy and cooperation extended to R. S. Heyer during the review meeting.

Sincerely,

Original signed by

John T. Collins

John T. Collins

Regional Administrator

Enclosures:

As stated

cc w/enclosure:

Dr. Lee Stokes, Idaho

Mr. Robert Olson, Idaho

G. W. Kerr, OSP

NRC Public Document Room

State Public Document Room

bcc w/enclosure:

DMB for dist. (SP01)

J. T. Collins

P. S. Check

R. L. Bangart

G. Sanborn

R. J. Uoda

R. S. Heyer

Idaho File

TECHNICAL COMMENTS AND RECOMMENDATIONS  
FOR THE  
IDAHO RADIATION CONTROL PROGRAM

A. Management and Administration

Administrative Procedures (Category II Indicator)

Comment:

The indicator, "Administrative Procedures," includes a guideline which recommends that the radiation control program establish written internal procedures in order to assure that the staff perform its duties as required and provides a high degree of uniformity and continuity in regulatory practices. It was identified that this type of written procedures do not exist.

Recommendation:

It is recommended that the internal procedures be developed in order to maintain consistency in staff licensing and compliance activities. They should cover internal processing of license applications, scheduling and documenting inspections and enforcement guidelines, escalated enforcement action, and other functions required under the program. (Attached is a suggested outline for content of a procedures manual.)

B. Personnel

Training (Category II Indicator)

Comment:

The indicator, "Training," includes a guideline which recommends that senior personnel attend NRC core courses as well as utilize any specific short courses and workshops to maintain an appropriate level of staff technical competence in areas of changing technology. It was noted during this review that there has been a slight increase in radiography activities in the State.

Recommendation:

It is recommended that the Senior Radiation Physicist attend the NRC sponsored course in "Safety Aspects of Industrial Radiography for State Regulatory Personnel." NRC will cover the cost of travel and per diem as is our usual practice.

C. Compliance

Inspection Reports (Category II Indicator)

Comment:

The inspection reports did not always describe the scope of the inspection and indicate the substance of discussions with licensee management and the licensee's response. The reports did not always identify areas of the licensee's program which should receive special attention during the next inspection or give the results of any independent or confirmatory physical measurements made by the inspector. We noted deficiencies in inspection reports in the 1982 review as well as this year.

Recommendation:

It is recommended that specific guidelines be developed to assure inspection reports are consistent and complete.

ATTACHMENT 1

Suggested Outline for Content of an Internal Procedures Manual

- I. General Format for Radiation Control Program Procedures and Information Manual
- II. General Radiation Control Program Policy Statements\*
- III. Policy for Training and Qualifications of Radiation Control Program Staff Responsible for Issuing Licenses and Performing Inspections
- IV. Procedures for Transmitting License Guides and other information to Licensees and Applicants
- V. Procedures for Review, Retention, and/or Distribution of Materials Licenses
- VI. Procedures for Scheduling, Conducting, Reporting, and Supervisory Review of Materials Inspections
- VII. Procedure for Conducting Pre-Licensing Visits
- VIII. Procedures for Conducting, Documenting, and Supervisory Review of Incident Investigations
- IX. Procedures for Implementing Escalated Enforcement Actions
- X. Interpretations

\*The following may be part of this section or may be set out as separate parts of the Manual:

Responding to Public, State Legislature, and Media Inquiries  
Availability of Files to Public Inspection  
Organization  
Contacts with Federal, State and Local Agencies  
Supervisory Field Evaluations of Inspectors