

UNITED STATES

NUCLEAR REGULATORY COMMISSION

REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

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November 17, 1992

MEMORANDUM FOR: A. B. Davis, Regional Administrator

FROM:

James L. Lynch, Regional State Agreements

Officer

SUBJECT:

TRIP REPORT - DES MOINES, IOWA

I visited the Iowa Department of Public Health (IDPH) in Des Moines, Iowa on November 12-13, 1992. The visit was designed to review progress since the last program review, monitor the ongoing DRSS licensing training and to provide technical assistance to the staff. At the conclusion of the visit, I met separately with Don Flater, Chief, Bureau of Environmental Health, and with Jack Kelly, Director, Division of Health Protection, to summarize my comments.

My observations indicate continuing improvements in most areas of the program with only a few reservations at this time. Specific comments are detailed below:

- An action plan is being developed by IDPH but has not been submitted yet. Expected: November 30, 1992.
- * The licensing training provided by the Region III licensing staff is excellent and is well received by Iowa staff. Loren Hueter was providing Nuclear Pharmacy licensing training during my visit and was observed to be very effective.
- Dan McGhee of the Iowa staff continues to show significant improvement regarding knowledge of regulations and overall program issues.
- The licensing backlog has been significantly reduced due, in large part, to NRC assistance.
- * The IDPH consultant's contract was approved on November 2, 1992. He has drafted program procedures, similar to Manual Chapter 2800, for the Iowa program. Training in those procedures, communications and enforcement are scheduled in the near future. He is also planning inspection accompaniments in the next few months. NOTE: Since the consultant is qualified to perform these inspection accompaniments, and I am also

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November 17, 1992 Iowa Trip Report providing this service, I do not see a need for DRSS inspector support as was proposed to the Commission. The DRSS licensing support is still needed and is very helpful. The new nuclear medicine/radiation therapy rules (similar to 10 CFR 35) which were effective on September 9, 1992, have been printed and are being distributed to licensees. An inspection/licensing tracking system is being developed by State computer experts. The shell has been completed and looks very promising. Full implementation of the system is expected by January 1993. Inspection letters and Notices of Violation currently produced are not timely, are not of very good quality and in some cases are not legally defensible.

- Inspection letters and Notices of Violation currently produced are not timely, are not of very good quality and in some cases are not legally defensible. I discussed this issue with staff and management and offered that, for a time, draft letters and Notices be sent to me for review prior to issuance. They agreed to do this, effective immediately. This matter was also discussed with Iowa's consultant who will include enforcement training (using NRC examples) in the short term.
- There has been no change with respect to the hiring of staff to fill the two positions released by the Iowa Governor. One promising outside candidate turned down an offer due to personal reasons.
- * There also has been no change in the previously proposed and then delayed restructuring of the Department to decrease other responsibilities of the Program Director (Don Flater).
- My previous visit, which included an inspection of a nuclear pharmacy, identified inappropriate distribution of nuclear medicine doses by the pharmacy to unlicensed hospitals and, also, questionable practices in the administration of those doses by a nuclear van licensee. As recommended, IDPH issued a confirmatory action letter to the pharmacy stopping the distribution of doses to unlicensed hospitals. They also met with the principals of the nuclear van company and received assurances that only approved administration procedures would be followed in the future. An investigation of the nuclear van company is planned for the near future.

4 . B November 17, 1992

Iowa Trip Report

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I am planning to address the IDPH restructuring issue by letter to Mr. Kelly in an effort to reiterate the NRC's concern over the many responsibilities of Mr. Flater outside the radiation program. This is a very important issue and needs to be addressed further.

I am planning an inspection accompaniment trip with Tom Wuehr of the IDPH staff November 23-25, 1992. He will perform inspections of nuclear medicine and gauge programs.

> tem James L. Lynch

Regional State Agreements Officer

cc: C. J. Paperiello, RIII

C. Norelius, RIII

C. Kammerer, SP

V. Miller, SP

K. Schneider, SP

YOUR FILL



UNITED STATES NUCLEAR REGULATORY COMMISSION REGION III 799 ROOSEVELT ROAD

GLEN ELLYN, ILLINOIS 60137

November 20, 1992

MEMORANDUM FOR: James M. Taylor, Executive Director for

Operations

FROM: A. Bert Davis, Regional Administrator, RIII

Carlton Kammerer, Director, Office of State

Programs

SUBJECT: 10WA AGREEMENT PROGRAM PROGRESS REPORT

As stipulated in SECY-92-360, this is the first monthly progress report regarding the Iowa Agreement State program. Since the August 31-September 4, 1992, follow-up review, NRC staff has provided significant assistance to the Iowa Department of Public Health (IDPH). The goal of this assistance is to help Iowa return its radioactive materials program to an adequate and compatible condition. Another follow-up review is scheduled for February 1993 to assess the State's progress.

Overall, the Iowa program has made acceptable progress in the past month. Some of the progress can be attributed to the NRC assistance, but much has been self-initiated. The positive and negative indicators are described below:

POSITIVE INDICATORS

- NRC training in licensing and inspection is well received by IDPH management and staff. Noticeable improvements in staff licensing and inspection technique have been observed. Most of the training to date has been in the medical and nuclear gauge areas which constitute the bulk of State-licensed programs.
- The IDPH approved a contract for a consultant on November 2, 1992, to assist in the improvement of their radioactive materials regulatory program. The consultant is highly qualified in NRC materials program policies and practices. He has drafted program procedures, similar to NRC Manual Chapter 2800, for the IDPH program. Training in those procedures, and in communications and enforcement is scheduled for November and December 1992. The consultant has also scheduled inspection accompaniments in January 1993.
- The Region III Regional State Agreements Officer (RSAO), a qualified materials inspector, has been providing technical assistance and has been

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November 20, 1992 James M. Taylor accompanying IDPH inspectors in the field. Due to IDPH's procurement of competent consulting services and the RSAO's support, the need for DRSS inspector support will be limited to several IDPH staff accompaniments on scheduled NRC inspections in Iowa and in neighboring states. The first such accompaniment is scheduled for January 1993 in Iowa and Wisconsin. The licensing backlog has been significantly reduced due, in large part, to NRC assistance. Only nine license renewal requests and six amendment requests are currently awaiting action. 'ne of the two IDPH inspector/reviewers continues to how significant improvement regarding knowledge of regulations and overall program issues. An inspection/licensing tracking system is being

- developed by State computer experts. The shell has been completed and looks promising. Full implementation of the system is expected by January 1993.
- All regulations which require compatibility have been adopted into the IDPH regulations.
- * IDPH management has taken a more active role in the day-to-day operations of the radiation safety program. One example is the Bureau Chief's tracking of inspection reports which are due to be issued within 20 days of an inspection.
- Specific NRC Information Notices are now promptly sent to licensees after receipt.
- Another State organization has been contracted to calibrate the Bureau's radiation survey instruments.

NEGATIVE INDICATORS

- * There has been no success with respect to the hiring of staff to fill the two positions released by the Iowa Governor. One promising outside candidate turned down an offer.
- * There has been no change in the previously proposed and then delayed restructuring of the Department to decrease other responsibilities of the Program Director. Region III sent a letter on November 19, 1992, to Jack Kelly, Director, Division of Health Protection addressing this concern (Enclosure 1).

November 20, 1992 James M. Taylor The second full-time IDPH inspector/reviewer has not shown expected progress to date. He apparently is overwhelmed by the aggressive efforts being made to turn the program around. Additional one-to-one training will be provided by the RSAO. An assessment of his inspection abilities will be performed by the RSAO during an inspection trip on November 23-25, 1992. Inspection letters and Notices of Violation currently produced are not timely, are not of good quality and in some cases are not legally defensible. This issue was discussed with staff and management and the RSAO offered to review draft letters and Notices for a reasonable period prior to issuance. IDPH staff accepted this offer. This matter was also discussed with IDPH's consultant who will provide enforcement training (using NRC examples) in December 1992. A project plan dated November 3, 1992, for assistance to the State of Iowa was developed with input from Region III DRSS (Enclosure 2). An updated training schedule, dated November 18, 1992, was submitted by the State including extensive training by their consultant (Enclosure 3). The State is currently in the process of preparing an action plan as requested by the NRC. a Bert Lano A. Bert Davis Regional Administrator, RIII sa Kammeur Carlton Kammerer, Director, Office of State Programs Enclosures: Letter to J. Kelly dated November 19, 1992 Project plan dated November 3, 1992 3. Training schedule dated November 18, 1992 cc w/enclosure: H. Thompson, EDO V. Miller, OSP R. Cunningham, NMSS R. Bernero, NMSS K. Schneider, OSP C. Maupin, OSP W. Axelson, RIII

- The second full-time IDPH inspector/reviewer has not shown expected progress to date. He apparently is overwhelmed by the aggressive efforts being made to turn the program around. Additional one-to-one training will be provided by the RSAO. An assessment of his inspection abilities will be performed by the RSAO during an inspection trip on November 23-25, 1992.
- Inspection letters and Notices of Violation currently produced are not timely, are not of good quality and in some cases are not legally defensible. This issue was discussed with staff and management and the RSAO offered to review draft letters and Notices for a reasonable period prior to issuance. IDPH staff accepted this offer. This matter was also discussed with IDPH's consultant who will provide enforcement training (using NRC examples) in December 1992.

A project plan dated November 3, 1992, for assistance to the State of Iowa was developed with input from Region III DRSS (Enclosure 2). An updated training schedule, dated November 18, 1992, was submitted by the State including extensive training by their consultant (Enclosure 3). The State is currently in the process of preparing an action plan as requested by the NRC.

> A. Bert Davis Regional Administrator, RIII

original signed by Carlton Kammerer Carlton Kammerer, Director, Office of State Programs

Enclosures:

1. Letter to J. Kelly dated November 19, 1992

Project plan dated November 3, 1992

Training schedule dated November 18, 1992

cc w/enclosure:

H. Thompson, EDO

V. Miller, OSP

R. Cunningham, MSS

R. Bernero, NMSS .

K. Schneider, OSP

C. Maupin, OSP

W. Axelson, RIII

Lynch/pas

RIII Paperiello

RIII Davis

S. Schwattz OSP by telephone Kammerer 11/20/92



UNITED STATES

NUCLEAR REGULATORY COMMISSION

REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

November 19, 1992

John R. Kelly, Director Division of Health Protection Iowa Department of Public Health 321 East 12th Street Lucas State Office Building Des Moines, IA 50319-0075

Dear Mr. Kelly:

This letter refers to our conversation on November 13, 1992, regarding the proposed restructuring of the Division which would allow the Chief of the Bureau of Environmental Health to concentrate more time on the radiation protection program. As you recall, in our September 4, 1992, review meeting, IDPH proposed that the Bureau Chief's responsibilities be limited to the radiation protection program. This idea was viewed positively by the NRC as the lack of management supervision was identified as a program weakness during the past three reviews.

Subsequent conversations with you have indicated that the proposed reorganization has been delayed. Please provide us with your plans regarding this important matter.

Thank you for the assistance and courtesy extended to me and to Loren Hueter of the Region III staff this past week.

Sincerely,

James L. Lynch

Regional State Agreements Officer

cc: C. Atchison, IDPH

D. Flater, IDPH

A. B. Davis, RIII

C. Kammerer, OSP

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November 3, 1992

PROJECT PLAN

ASSISTANCE TO IOWA DEPARTMENT OF PUBLIC HEALTH

Objective:

Over a six-month period, assist the Iowa Department of Public Health in the reestablishment of an adequate and compatible radioactive materials program.

NRC technical assistance over this six-month period shall consist of one half-time inspector and one half-time license reviewer from the Region III DRSS program (Total 0.5 FTE) and at least one-half of the Regional State Agreements Officer's time (0.25 FTE). The assistance will be in the form of training and direct observation of inspection activities so as to allow Iowa personnel the opportunity to learn how to properly manage and operate an effective radioactive materials program. The RSAO will act as Project Manager and will, with input from DRSS, issue a monthly progress report to the Regional Administrator, the Office of State Programs and the Executive Director for Operations.

A follow-up review will be performed by the RSAO in February 1993 to assess the efforts made by the IDPH and to determine whether continued assistance by the NRC is warranted. If appropriate State commitments have not been made by that time, NRC assistance will be terminated.

INSPECTION TRAINING

The goal of the NRC assistance project is to, over a six-month period, help IDPH establish a fully functioning inspection program capable of independently inspecting all materials licensees from a health and safety perspective. Inspection training will be conducted at the IDPH office in Des Moines and at Iowa licensee facilities. The training effort wall be designed to teach Iowa personnel inspection technique, inspection program administration and to increase inspectors' technical knowledge in the various program areas. A qualification journal will be maintained for each inspector which will require concurrence by the inspector's supervisor. The supervisory oversight of the program will be a focal point of this training effort. NOTE: This training plan may be modified to reflect the addition of other inspection personnel to fill the vacancies recently approved by the Iowa Governor.

Inspection Personnel: Dan McGhee

At the end of three months, in February 1993, we anticipate that Mr. McGhee will be qualified to perform inspections of the following types of licensees:

. Ba

Fixed gauges and devices * (* currently qualified)
Portable gauges and devices *
Diagnostic nuclear medicine *
Radiopharmaceutical therapy
Brachytherapy
Industrial radiography *
Research and development (non-broadscope)
Self-shielded irradiators
Nuclear pharmacies

At the end of six months, in May 1993, we expect that Mr. McGhee will be qualified to perform inspections of all categories of licenses, adding the following to the above list:

Broadscope research and development Teletherapy Well logging

Inspection personnel: Tom Wuehr

At the end of three months, we anticipate that Mr. Wuehr will be qualified to perform the following types of inspections:

Fixed gauges and devices *
Portable gauges and devices
Diagnostic nuclear medicine
Industrial radiography
Research and development (non-broadscope)
Self-shielded irradiators

At the end of six months, we expect that Mr. Wuehr will be qualified to perform the following types of inspections in addition to the above list:

Radiopharmaceutical therapy Brachytherapy

Technical assistance for all inspection matters will be handled by Jim Lynch, RSAO.

LICENSING TRAINING

The goal of the NRC assistance project is to, over a six-month period, help IDPH establish a fully functional licensing program capable of independently licensing all but the most complex licenses in their materials program. The training effort will be designed to teach Iowa personnel licensing technique, develop the licensing administration program and to increase knowledge of applicable health physics issues. Approximately one week-long trip per month will be made by Region III licensing staff to Des Moines.

IDPH personnel will also be trained at the Region III office several days each month, as needed. Additional training will be performed through the use of telephone, mail and facsimile critiquing of licensing actions. A qualification journal will be maintained for each reviewer and signed off by the reviewers' supervisor.

Licensing Personnel: Dan McGhee

At the end of three months, in February 1993, we anticipate that Mr. McGhee will be qualified to perform new, renewal and amendment actions for the following license categories:

Fixed gauges and devices *
Portable gauges and devices *
Diagnostic nuclear medicine
Radiopharmaceutical therapy
Brachytherapy
Teletherapy
Industrial radiography
Self-shielded irradiators

(* currently qualified)

... Da

After six months, in May 1993, Mr. McGhee should be able to complete licensing actions for the following types of licenses in addition to those above:

Well logging Nuclear pharmacies Research and development (non-broadscope)

Licensing Personnel: Tom Wuehr

After three months, Mr. Wuehr is expected to be qualified to complete licensing actions for the following categories of licenses:

Fixed gauges and devices Portable gauges and devices Diagnostic nuclear medicine Self-shielded irradiators

In six months, Mr. Wuehr should be able to license the following additional categories:

Radiopharmaceutical therapy Brachytherapy Industrial radiography

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Licensing Personnel: Charlene Rogers

Ms. Rogers will be trained to license gauge programs and to assist the other reviewers by independently completing minor amendments such as name changes, addition of users and possession limit increases.

It is expected, after the six-month assistance period, that IDPH personnel will be capable of licensing most of the programs in Iowa. Future assistance for a few complex programs such as broadscope research and development licenses and nuclear laundries will be coordinated by the RSAO. If licensing casework involving complex programs is due to be completed in the next six months, and Iowa staff is not yet qualified, Region III staff will perform the necessary reviews involving the IDPH staff as appropriate. These actions will be signed by the program supervisor.

Technical assistance (licensing) contacts for IDPH are as follows:

Gauges- Debbie Piskura
Medical- Bob Gattone
Radiography- John Madera
Pharmacies- Loren Hueter
R & D- Sandy Frazier

SCHEDULE

The following is a proposed training schedule through February 1993. Additional assistance with regard to program management will be provided as needed. Additional consultant training will also be scheduled by the IDPH.

October 28-30, 1992
Licensing training by Mike McCann and Kevin Null for nuclear medicine, radiation therapy, fixed gauges and devices and portable gauges.

November 9-13, 1992 Licensing training by Loren Hueter for nuclear pharmacies including a renewal review with site visit.

November 12-13, 1992
Inspection training by Jim Lynch including a review of inspections performed since the last program assessment.
Review of consultant procedure development. Review of program management.

- November 23-25, 1992
 - Inspection training for gauges and diagnostic nuclear medicine programs by Jim Lynch at licensee facilities.
- November 1992

Licensing training for portable and fixed gauges via mail by Debbie Piskura.

December 9-11, 1992

Licensing training for nuclear medicine, brachytherapy and mobile nuclear services by Bob Gattone.

December 16-18, 1992

Inspection training for nuclear medicine, radiopharmaceutical therapy, brachytherapy, research and development, self-shielded irradiators by Jim Lynch.

January 6-8, 1993

Inspection training for industrial radiography, research and development and teletherapy by Jim Lynch.

January 11-15, 1993

Licensing training for industrial radiography and teletherapy by Debbie Piskura.

January 20-22, 1993

Inspection training for nuclear pharmacies by DRSS inspector.

February 8-12, 1993

Licensing training for research and development by Peter Lee and Sandy Frazier.

February 22-26, 1993

Follow-up review of Iowa program by Jim Lynch.

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November 18, 1992 - Schultz

- NRC License Training
- NRC Inspection Training

Month of	October		Year	1992		T
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	5 Accompanied Inspe Jim Lynch - Wuehr,	6 tions McGhee	7	8	9	
	12 Independent Inspect	13 lons	14	15 DAEC Drist and Eme Response Training	16 rgency	
	19 Independent Inspec	20 ions	21	22 DAEC Drill and Eme Response Training	23 gency	
	26	27	28 NRC License Train	29 ning (McCanr/Nall) Fited Gauge, Portable C	30	

Month of	November		Year	1992		
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	2 Schultz Contract In Effect	3	4	5	6	
	9 NRC License Trainin Nuc. Pharmacies	10 g (Hueter - McGhee/M	11 uehr)	12	13	
	Transfer Francisco			NRC Informal Progre Jim Lynch	55	
	16 License Training Via (Piskura - Portable of a Fixed Gauge by 1)	auge	18 Draft Inspection Manual from Schultz to Flater for Review & Final by 1/1/93	19 DAEC Drill	20	
	23 Schultz to Review Paperwork System NRC Inspections (Ly	24	25	26 HOLDAY	27 ROLIDAY	
	30 Schuttz Training For Inspections					

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Enclosure 3

Month of _	December		Year	1992		
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturda
		Schultz Training for All Staff	Inspections	3	4	
	7	8 DAEC Driff Dress Rehearsal	9 NRC License Trainin Medicals	10 g (Gatone-NcGheek	11 Yuehr)	
	14	15 Oraft Staff Qualification Journal Due (Schultz) DAEC Exercise	Safaulta Tuninda a for	17 Enforcement	18	
	21	22	23	24	25 HOLIDAY	
	28	29	30	31		

Enclosure 3

Month of _	January		Year	1993		
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1 HOLIDAY	
	4 McGhee to Accomp- on lows & Wisconsi	5 ny NRC Region III 3t Inspection	6 ff (Canteron)	7	8	
	11 NRC License Trainin Industrial Radiograp	12 g (Piskura) hy & Teletherapy	13	14	15	
	18 HOLIDAY	19	20	21	22	
	25 Schultz Inspection Fi		27	28	29	

Month of	February		Year	1993		
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		2	Inspection Training	3 through the state of the stat	w (6)	
	B License Training (Frizzier:Lee) Research & Development	g tzler/Lee) ment	10	11	12	
	6m (C)	9	47	18	9	
	22 NRC Follow-Up Review (Lynch)	23 bw (Lynch)	24	25	26	

		Year	1993	-	
Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1	2	3	4	5	
8 Inspection Training NP, Radiophar. The	3 [Lynch] epy	10	11	12	
15	16	17	18	19	
22	23	24	25	26	
29	30	31			
	8 Inspection Training NP, Radiophar. The	8 Inspection Training Lynch) NP, Radiophar. Therepy 15 16	1 2 3 8 Inspection Training Lynch) NP, Radiophar. Therepy 15 16 17	1 2 3 4 8 Inspection Training Lynch) NP, Radiophar. Therepy 15 16 17 18 22 23 24 25	1 2 3 4 5 8 Inspection Training Lynch) NP, Radiopher. Therapy 15 16 17 18 19 22 23 24 25 26



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TERRY E. BRANSTAD, GOVERNOR

DEPARTMENT OF PUBLIC HEALTH CHRISTOPHER G. ATCHISON, DIRECTOR

November 25, 1992

James M. Taylor Executive Director of Regional Operation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Taylor:

Reference is made to your letter to Governor Terry E. Branstad dated October 22, 1992 regarding your agency's review of Iowa's Radioactive Materials Program. Your letter has been referred to this office for reply.

First, I would like to take this opportunity to express our appreciation to Ms. B.J. Holt for her efforts in assisting us to maintain a quality radiation program. I understand that she has taken another position with the NRC. We also look forward to working with her replacement Mr. James Lynch.

Numerous issues were raised and recommendations were in your correspondence. Our comments and proposed action is based on the order in which the issues/recommendations appear in your correspondence.

 Inspection Performance and Capability is a Category I Indicator.

The attached time table, Exhibit A, is a schedule of additional licensing and inspection training for our current Radio ctive Materials (RAM) Program staff. As of the date of this letter, all goals have been accomplished. Inspection trips with other Agreement State personnel are not included in the schedule. Specific dates have not been established because we will consider the need after we complete the training with our contractor and NRC Region III staff. We have, however, contacted Illinois and Nebraska and have received commitments from them to provide training upon request. Also included as Exhibit B is a copy of a portion of the contract with, Mr. William Schultz. It outlines the services he will provide during the contract period of November 1992 - January 1993. Please note that one of Mr. Schultz's products will be a Qualification Journal. This document will be used by

supervisory personnel to document the level of staff qualification in performing inspections and licensing activities.

Recommendation was made to hire staff with a greater level of experience than our current staff. We have received only one positive inquiry and we are currently negotiating with him.

2. Status of Inspection Program is a Category I Indicator

Please refer to Exhibit A. This outlines the steps necessary to upgrade staff with respect to inspection abilities/competency.

The original activity tracking system is functioning. and is updated. However, a new electronic license/inspection data tracking system, which is designed to be more functional and user friendly, is under development.

The license tracking portion of the system will be operational by December 15, 1992. In preparation for loading the data in the new system, staff has done an audit of the RAM licensing files and to the best of our knowledge, they are all up to date. Phase II, the inspection tracking portion of the system, will be operational by February 1, 1993.

3. Technical Quality of Licensing Actions is a Category I Indicator

At the writing of this letter, 50% of the licensing errors have been corrected. We intend to have the remaining errors corrected by February 1, 1993. Currently we are using the NRC audit check lists for license review and preparation. As time permits we will develop check lists for Iowa.

Training on licensing received and plan is documented on Exhibit A.

We have expended considerable effort in trying to find the missing University of Iowa file. We have found the disk which had letters that are part of the file. Hard copies of the appropriate letters will be produced if the file is not found in the very near future and used to get appropriate supporting correspondence from the University to reconstruct the file. Please be advised that discussion with Mr. Lynch indicates that Mr. Fobair had advised him that he had no knowledge as to where the University of Iowa file is. Also, we have contacted Mr. Hokel and he indicated that the file was in the file cabinet when he left state employment. As suggested, if after the file is found or reconstructed, we will amend the license as necessary.

4. Staffing Level is a Category II Indicator

Until the radioactive material is adequate and compatible we intend to staff it at a 3.4 FTE level of technical staff. When we reach the status of adequacy and compatibility we intend to return to a 2.25 to 2.5 FTE staffing level. We also intend to continue training staff in the X-ray and Radon program areas using NRC courses so that we have staff trained should RAM staff leave in the future.

5. Staffing Level is a Category II Indicator

As soon as we are at full staff, we will designate a person to be responsible for the RAM program operations. As to the responsibilities of the program director, the State is in the process of "right sizing" state government. Indications are that this process may be complete sometime on or before January 1, 1993 as it relates to Mr. Flater. The program director's overall management responsibilities will then be decreased. Until the plan is fully approved, and operational we are unable to specifically state the level of decrease but it should be consistent with our previous discussions.

6. Office Equipment and Support Services is a Category II Indicator

At the time of the review, the Bureau of Environmental Health secretary had just been hospitalized for major surgery. Therefore, it was necessary to assign additional duties to the RAM/Radon program secretary. It is anticipated that the Bureau secretary will return December 15, 1992. When this occurs the RAM/Radon secretary will resume her original duties. Secretarial support for the RAM program will be at a .6 to .75 FTE level.

7. Licensing Procedures is a Category II Indicator

By virtue of the training received by Region III licensing staff, our backlog of licensing actions is less than 10%. It is our goal to maintain the backlog at or below this level. To accomplish this, we have set the policy of taking initial action on any licensing action within sixty days of receipt.

Licensing notebooks for the different program areas are under development. As training is given in each area, the appropriate items are assembled, e.g., Regulatory Guides, review plans, etc. and typed. When the references are changed, IDPH to NRC, the items are placed in a binder. This process will continue until all program areas are covered.

In October, a staff member went through the RAM files and put each file in numerical order. When the RAM secretary is reassigned to her full time position, that individual will audit the files every thirty days to insure they remain in order.

Regarding the inspection reports, a system has been established and documented in the secretary notebook. This will allow us to assure that reports are properly filed.

8. Inspection Procedures is a Category II Indicator

An inspection procedure has been drafted by our contractor and is in review at NRC Region III and by RAM program staff. We expect this procedure to be finalized and in full use by January 15, 1993.

9. Administrative Procedures is a Category II Indicator

An administrative procedure has been drafted and is in the review process. We expect the document to be final and in use by January 15, 1993.

10. Confirmatory Maintenance is a Category II Indicator

Arrangements have been made with the Emergency Management Division of the Iowa Department of Public Defense to have our instruments calibrated on a quarterly basis. The new service is scheduled to start in early January 1993. A procedure is being

established to assure that the quarterly basis check is followed.

11. Management is a Category II Indicator

Because of the current staffing problem, the program director is signing off on all license and inspection reports. When a person is put in the Environmental Specialist III position, reconsideration of this policy will be examined. It is assumed that, in time, the program director will spot check the inspection reports and will sign off on licensing actions as we have done in the past.

12. Training is a Category II Indicator

As we have in the past, the department will continue to make every effort to send radiation control staff to NRC training. However, be aware of the fact that we can only do so within the policy and procedures of state government.

If you have any questions regarding the above, please do not hesitate to contact me or Donald A. Flater of my staff at 515-281-3478.

Sincerely,

John R. Kelly, Director

Division of Health Protection

515-281-7785

JRK/DAF/dp

cc: J. Lynch, NRC Region III

C. Kammerer, State Program NRC

D. Flater, IDPH

Att: Exhibit A - Time Table

Exhibit B - Contractor Products

- Schultz
- NRC License Training
- NRC Inspection Training

Exhibit A

Month of	October		Year	1992		,
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	5 Accompanied Inspe Jim Lynch - Wuehr,	6 ctions McGhee	7	8	9	
	12 Independent Inspect	13 ions	14	15 DAEC Drill and Eme Response Training	16 rgency	
	19 Independent Inspec	20 ions	21	22 DAEC Drill and Eme Response Training	23 gency	
	26	27	28 NRC License Train N. Med., Therapy, F	29 ing (McCann/Null) Fited Gauge, Portable G	30 auge	

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturda
	2 Schultz Contract In Effect	3	4	5	6	
	9 NRC License Trainin Nuc. Pharmacies	10 g (Hueter - McGhee/W	11 uehr)	12 NRC Informal Progre	13 ss	
				Jim Lynch		
	16 License Training Via (Piskura - Portable 0 & Fixed Gauge by 1	auge	18 Draft Inspection Manual from Schultz to Flater for Review & Final by 1/1/93	19 DAEC Drill	20	
	23 Schultz to Review Paperwork System CANCELED B NRC Inspections (Ly	ECANGE OF WO	25	26 HOLIDAY	27 HOLIDAY	
	30 Schultz Training For Inspections					

Month of	December	T	Year	1992	-	
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		1 Schultz Training for All Staff	2 Inspections	3	4	
	7	8 DAEC Drill Dress Rehearsal	9 NRC License Trainin Medicals	10 g (Gattone- McGhee/\	11 Vuehr)	
	14	15 Draft Staff Qualification Journal Due (Schultz) DAEC Exercise	16 Schultz Training for Policy - All Staff	17 Enforcement	18	
	21	22	23	24	25 HOLIDAY	
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Contract #5883N001

SPECIAL CONDITIONS

ARTICLE I - Identification of Parties:

This contract is entered into by and between the Iowa Department of Public Health (hereinafter referred to as the DEPARTMENT) and William H. Schultz

ARTICLE II - Statement of Contract Purpose:

To coordinate U.S. Nuclear Regulatory Commission guidelines and State of Iowa laws and rules to prepare manuals and train appropriate personnel in proper procedures.

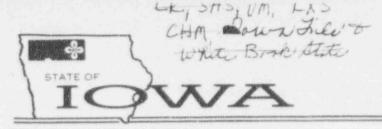
ARTICLE III - Description of Work and Services:

The CONTRACTOR will provide:

- A draft of a radioactive materials inspection manual by December 15, 1992.
- Training for inspection and support staff by December 15, 1992.
- 3. Methods for conducting enforcement conferences or management meetings with licensee personnel. This will include boilerplate letters that will address both routine enforcement activities and escalated enforcement actions and training in their appropriate use by January 1, 1993.
- Review of current paperwork system by December 15, 1992.
- 5. Review of each inspector as he/she conducts 2-3 various kinds of inspections to evaluate individual skills by January 15, 1993.
- A draft of a radioactive materials staff qualification journal by January 15, 1993.

ARTICLE IV - Designation of Contract Administrator:

William H. Schultz has been designated to act as Contract Administrator. This individual is responsible for financial and administrative matters of the contract. Negotiations concerning this project should be referred to: William H. Schultz, telephone: (708) 858-1205.



Ref. EDO 8359 Kammerer, SP cys: Taylor Blaha Sniezek Knubel

Sniezek Knubel Thompson Davis, RIII Bernere, NMSS

DEPARTMENT OF PUBLIC HEALTH CHRISTOPHER G. ATCHISON, DIRECTOR

TERRY E. BRANSTAD, GOVERNOR

December 8, 1992

James M. Taylor
Executive Director of Regional Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Taylor:

Reference is made to a telephone conversation between Donald A. Flater, of my staff, and Carlton Kammerer, of your staff, on December 4, 1992, regarding my response to your letter of October 22, 1992. Based on the conversation, I would like to take this opportunity to directly respond to the three items in paragraph 5. These items were commitments made by Radiation Program staff which were not followed through on. This was an inadvertent error and every effort will be made to assure that such a situation does not occur in the future.

- 1. NRC Information Notices: All back notices appropriate for our licensees were sent to them on September 15, 1992, and October 12, 1992. Copies of the correspondence regarding these actions have been forwarded to Mr. Lynch of NRC Region III. A policy has been established to assure that within 45 days of receipt of all new notices will be forwarded to the appropriate Iowa licensees.
- Licensing Audit Checklists: Please refer to item 3, paragraph 1 of my November 25, 1992 letter. As indicated, with the assistance of NRC Region III staff who are providing Iowa staff training on licensing, we are currently using the appropriate NRC checklist.
- 3. Licensing Notebooks: Please refer to item 7 of my November 25, 1992 letter. As training by NRC Region III is given for each type of license, the appropriate documents are assembled to establish Iowa Licensing Notebooks. By June 30, 1993, we will have fully developed the Iowa notebooks for the license types which we have the most of (medical, gauges, etc.). Until that time, we will continue to use the NRC licensing guides.

I would like to take this opportunity to update you on two things which have occurred since you received my November 25, 1992 letter. First, please refer to item 3 of that letter. The portion of the University of Iowa's license file, which was lost, has been found incorrectly filed in our "dead files". The suggestions for amendments by Mr. Holt, furnished during our August 1992 review will completed by March 1, 1993.

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Page 2 Kammerer 12/8/92

Please refer to item 5 of my November 25, 1992, letter. The final adjustments are being made on a new table of organization (TO). By December 18, 1992 everything will be finalized. The Bureau that houses the radioactive materials program will consist of two areas, namely radioactive materials and radiation machines. By taking that action, we have reduced the personnel that Mr. Flater is responsible for by approximately 60% and reduced the program areas from 10 to 2. As soon as the new TO is finalized, we will forward a copy to Mr. Lynch.

If you have any questions regarding the above, please contact me or Mr. Flater at (515) 281-3478.

Sincerely,

John R. Kelly, Director

Division of Health Protection

cc: J. Lynch, NRC Region III

C. Kammerer, State Programs, NRC

D. Flater, IDPH



NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

December 9, 1992

Mr. Donald A. Flater, Chief Bureau of Environmental Health Iowa Department of Public Health Lucas State Office Building Des Moines, IA 50319

Dear Mr. Flater:

Please find enclosed our first monthly progress report on Iowa's Agreement program as provided to the NRC's Executive Director for Operations.

A second copy is being provided to be placed in your local public document room. Also note, this progress report was prepared prior to receiving Mr. Kelly's response to our review findings.

Please feel free to contact me if you have any questions. I can be reached at 301-504-2321.

Sincerely,

Carlton Kammerer, Director Office of State Programs

Enclosures: As stated

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UNITED STATES

NUCLEAR REGULATORY COMMISSION

REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

November 20, 1992

MEMORANDUM FOR: James M. Taylor, Executive Director for

Operations

FROM: A. Bert Davis, Regional Administrator, RIII

Carlton Kammerer, Director, Office of State

Programs

SUBJECT: IOWA AGREEMENT PROGRAM PROGRESS REPORT

As stipulated in SECY-92-360, this is the first monthly progress report regarding the Iowa Agreement State program. Since the August 31-September 4, 1992, follow-up review, NRC staff has provided significant assistance to the Iowa Department of Public Health (IDPH). The goal of this assistance is to help Iowa return its radioactive materials program to an adequate and compatible condition. Another follow-up review is scheduled for February 1993 to assess the State's progress.

Overall, the Iowa program has made acceptable progress in the past month. Some of the progress can be attributed to the NRC assistance, but much has been self-initiated. The positive and negative indicators are described below:

POSITIVE INDICATORS

- NRC training in licensing and inspection is well received by IDPH management and staff. Noticeable improvements in staff licensing and inspection technique have been observed. Most of the training to date has been in the medical and nuclear gauge areas which constitute the bulk of State-licensed programs.
- * The IDPH approved a contract for a consultant on November 2, 1992, to assist in the improvement of their radicactive materials regulatory program. The consultant is highly qualified in NRC materials program policies and practices. He has drafted program procedures, similar to NRC Manual Chapter 2800, for the IDPH program. Training in those procedures, and in communications and enforcement is scheduled for November and December 1992. The consultant has also scheduled inspection accompaniments in January 1993.
- * The Region III Regional State Agreements Officer (RSAO), a qualified materials inspector, has been providing technical assistance and has been

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James M. Taylor

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November 20, 1992

accompanying IDPH inspectors in the field. Due to IDPH's procurement of competent consulting services and the RSAO's support, the need for DRSS inspector support will be limited to several IDPH staff accompaniments on scheduled NRC inspections in Iowa and in neighboring states. The first such accompaniment is scheduled for January 1993 in Iowa and Wisconsin.

- * The licensing backlog has been significantly reduced due, in large part, to NRC assistance. Only nine license renewal requests and six amendment requests are currently awaiting action.
- One of the two IDPH inspector/reviewers continues to show significant improvement regarding knowledge of regulations and overall program issues.
- An inspection/licensing tracking system is being developed by State computer experts. The shell has been completed and looks promising. Full implementation of the system is expected by January 1993.
- All regulations which require compatibility have been adopted into the IDPH regulations.
- * IDPH management has taken a more active role in the day-to-day operations of the radiation safety program. One example is the Bureau Chief's tracking of inspection reports which are due to be issued within 20 days of an inspection.
- Specific NRC Information Notices are now promptly sent to licensees after receipt.
- * Another State organization has been contracted to calibrate the Bureau's radiation survey instruments.

MEGATIVE INDICATORS

- * There has been no success with respect to the hiring of staff to fill the two positions released by the Iowa Governor. One promising outside candidate turned down an offer.
- * There has been no change in the previously proposed and then delayed restructuring of the Department to decrease other responsibilities of the Program Director. Region III sent a letter on November 19, 1992, to Jack Kelly, Director, Division of Health Protection addressing this concern (Enclosure 1).

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- The second full-time IDPH inspector/reviewer has not shown expected progress to date. He apparently is overwhelmed by the aggressive efforts being made to turn the program around. Additional one-to-one training will be provided by the RSAO. An assessment of his inspection abilities will be performed by the RSAO during an inspection trip on November 23-25, 1992.
- Inspection letters and Notices of Violation currently produced are not timely, are not of good quality and in some cases are not legally defensible. This issue was discussed with staff and management and the RSAO offered to review draft letters and Notices for a reasonable period prior to issuance. IDPH staff accepted this offer. This matter was also discussed with IDPH's consultant who will provide enforcement training (using NRC examples) in December 1992.

A project plan dated November 3, 1992, for assistance to the State of Iowa was developed with input from Region III DRSS (Enclosure 2). An updated training schedule, dated November 18, 1992, was submitted by the State including extensive training by their consultant (Enclosure 3). The State is currently in the process of preparing an action plan as requested by the NRC.

a Bert Lano

A. Bert Davis

Regional Administrator, RIII

Carlton Kammerer, Director, Office of State Programs

Enclosures:

Letter to J. Kelly dated November 19, 1992

2. Project plan dated November 3, 1992

3. Training schedule dated November 18, 1992

cc w/enclosure:

H. Thompson, EDO

V. Miller, OSP

R. Cunningham, NMSS

R. Bernero, NMSS

K. Schneider, OSP

C. Maupin, OSP

W. Axelson, RIII



NUCLEAR REGULATORY COMMISSION

REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

November 19, 1992

John R. Kelly, Director Division of Health Protection Iowa Department of Public Health 321 East 12th Street Lucas State Office Building Des Moines, IA 50319-0075

Dear Mr. Kelly:

This letter refers to our conversation on November 13, 1992, regarding the proposed restructuring of the Division which would allow the Chief of the Bureau of Environmental Health to concentrate more time on the radiation protection program. As you recall, in our September 4, 1992, review meeting, IDPH proposed that the Bureau Chief's responsibilities be limited to the radiation protection program. This idea was viewed positively by the NRC as the lack of management supervision was identified as a program weakness during the past three reviews.

Subsequent conversations with you have indicated that the proposed reorganization has been delayed. Please provide us with your plans regarding this important matter.

Thank you for the assistance and courtesy extended to me and to Loren Hueter of the Region III staff this past week.

Sincerely,

James L. Lynch

Regional State Agreements Officer

cc: C. Atchison, IDPH

D. Flater, IDPH

A. B. Davis, RIII

C. Kammerer, OSP

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November 3, 1992

PROJECT PLAN

ASSISTANCE TO IOWA DEPARTMENT OF PUBLIC HEALTH

Objective:

Over a six-month period, assist the Iowa Department of Public Health in the reestablishment of an adequate and compatible radioactive materials program.

NRC technical assistance over this six-month period shall consist of one half-time inspector and one half-time license reviewer from the Region III DRSS program (Total 0.5 FTE) and at least one-half of the Regional State Agreements Officer's time (0.25 FTE). The assistance will be in the form of training and direct observation of inspection activities so as to allow Iowa personnel the opportunity to learn how to properly manage and operate an effective radioactive materials program. The RSAO will act as Project Manager and will, with input from DRSS, issue a monthly progress report to the Regional Administrator, the Office of State Programs and the Executive Director for Operations.

A follow-up review will be performed by the RSAO in February 1993 to assess the efforts made by the IDPH and to determine whether continued assistance by the NRC is warranted. If appropriate State commitments have not been made by that time, NRC assistance will be orminated.

INSPECTION TRAINING

The goal of the NRC assistance project is to, over a six-month period, help IDPH establish a fully functioning inspection program capable of independently inspecting all materials licensees from a health and safety perspective. Inspection training will be conducted at the IDPH office in Des Moines and at Iowa licensee facilities. The training effort will be designed to teach Iowa personnel inspection technique, inspection program administration and to increase inspectors' technical knowledge in the various program areas. A qualification journal will be maintained for each inspector which will require concurrence by the inspector's supervisor. The supervisory oversight of the program will be a focal point of this training effort. NOTE: This training plan may be modified to reflect the addition of other inspection personnel to fill the vacancies recently approved by the Iowa Governor.

Inspection Personnel: Dan McGhee

At the end of three months, in February 1993, we anticipate that Mr. McGhee will be qualified to perform inspections of the following types of licensees:

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(* currently qualified)

Fixed gauges and devices * (* c
Portable gauges and devices *
Diagnostic nuclear medicine *
Radiopharmaceutical therapy
Brachytherapy
Industrial radiography *
Research and development (non-broadscope)
Self-shielded irradiators
Nuclear pharmacies

At the end of six months, in May 1993, we expect that Mr. McGhee will be qualified to perform inspections of all categories of licenses, adding the following to the above list:

Broadscope research and development Teletherapy Well logging

Inspection personnel: Tom Wuehr

At the end of three months, we anticipate that Mr. Wuehr will be qualified to perform the following types of inspections:

Fixed gauges and devices *
Portable gauges and devices
Diagnostic nuclear medicine
Industrial radiography
Research and development (non-broadscope)
Self-shielded irradiators

At the end of six months, we expect that Mr. Wuehr will be qualified to perform the following types of inspections in addition to the above list:

Radiopharmaceutical therapy Brachytherapy

Technical assistance for all inspection matters will be handled by Jim Lynch, RSAO.

LICENSING TRAINING

The goal of the NRC assistance project is to, over a six-month period, help IDPH establish a fully functional licensing program capable of independently licensing all but the most complex licenses in their materials program. The training effort will be designed to teach Iowa personnel licensing technique, develop the licensing administration program and to increase knowledge of applicable health physics issues. Approximately one week-long trip per month will be made by Region III licensing staff to Des Moines.

IDPH personnel will also be trained at the Region III office several days each month, as needed. Additional training will be performed through the use of telephone, mail and facsimile critiquing of licensing actions. A qualification journal will be maintained for each reviewer and signed off by the reviewers' supervisor.

Licensing Personnel: Dan McGhee

At the end of three months, in February 1993, we anticipate that Mr. McGhee will be qualified to perform new, renewal and amendment actions for the following license categories:

Fixed gauges and devices *
Portable gauges and devices *
Diagnostic nuclear medicine
Radiopharmaceutical therapy
Brachytherapy
Teletherapy
Industrial radiography
Self-shielded irradiators

(* currently qualified)

After six months, in May 1993, Mr. McGhee should be able to complete licensing actions for the following types of licenses in addition to those above:

Well logging Nuclear pharmacies Research and development (non-broadscope)

Licensing Personnel: Tom Wuehr

After three months, Mr. Wuehr is expected to be qualified to complete licensing actions for the following categories of licenses:

Fixed gauges and devices Portable gauges and devices Diagnostic nuclear medicine Self-shielded irradiators

In six months, Mr. Wuehr should be able to license the following additional categories:

Radiopharmaceutical therapy Brachytherapy Industrial radiography

Licensing Personnel: Charlene Rogers

Ms. Rogers will be trained to license gauge programs and to assist the other reviewers by independently completing minor amendments such as name changes, addition of users and possession limit increases.

It is expected, after the six-month assistance period, that IDPH personnel will be capable of licensing most of the programs in Iowa. Future assistance for a few complex programs such as broadscope research and development licenses and nuclear laundries will be coordinated by the RSAO. If licensing casework involving complex programs is due to be completed in the next six months, and Iowa staff is not yet qualified, Region III staff will perform the necessary reviews involving the IDPH staff as appropriate. These actions will be signed by the program supervisor.

Technical assistance (licensing) contacts for IDPH are as follows:

Gauges- Debbie Piskura
Medical- Bob Gattone
Radiography- John Madera
Pharmacies- Loren Hueter
R & D- Sandy Frazier

SCHEDULE

The following is a proposed training schedule through February 1993. Additional assistance with regard to program management will be provided as needed. Additional consultant training will also be scheduled by the IDPH.

October 28-30, 1992
Licensing training by Mike McCann and Kevin Null for nuclear medicine, radiation therapy, fixed gauges and devices and portable gauges.

November 9-13, 1992 Licensing training by Loren Hueter for nuclear pharmacies including a renewal review with site visit.

November 12-13, 1992
Inspection training by Jim Lynch including a review of inspections performed since the last program assessment.
Review of consultant procedure development. Review of program management.

- November 23-25, 1992
 - Inspection training for gauges and diagnostic nuclear medicine programs by Jim Lynch at licensee facilities.
- November 1992
 - Licensing training for portable and fixed gauges via mail by Debbie Piskura.
- December 9-11, 1992
 - Licensing training for nuclear medicine, brachytherapy and mobile nuclear services by Bob Gattone.
- December 16-18, 1992
 - Inspection training for nuclear medicine, radiopharmaceutical therapy, brachytherapy, research and development, selfshielded irradiators by Jim Lynch.
- January 6-8, 1993
 - Inspection training for industrial radiography, research and development and teletherapy by Jim Lynch.
- January 11-15, 1993
 - Licensing training for industrial radiography and teletherapy by Debbie Piskura.
- January 20-22, 1993
 - Inspection training for nuclear pharmacies by DRSS inspector.
- February 8-12, 1993
 - Licensing training for research and development by Peter Lee and Sandy Frazier.
- February 22-26, 1993
 - Follow-up review of Iowa program by Jim Lynch.

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November 18, 1992 - Schultz

- NRC License Training
- NRC Inspection Training

Month of	October	ger, somer den en oans van voorden gescht. West so	_ Year	1992		
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
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				NRC Informal Progre Jim Lynch	88	
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	23 Schuitz to Review Paperwork System	24	25	26 HOLDAY	27 HOLIDAY	
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	30 Schultz Training For Inspections					

Enclosure 3

Month of	December		Year	1992		
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	25 Schultz Inspection Fi RAM Field Staff		27	28	29	

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Enclosure .