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**POLICY ISSUE**  
(NEGATIVE CONSENT)

March 3, 1994

SECY-94-055

FOR: The Commissioners  
FROM: James M. Taylor  
Executive Director for Operations

SUBJECT: REPORT OF AGREEMENT STATES AD HOC COMMITTEE ON  
DATA GATHERING AND USE

PURPOSE:

To gain Commission approval of (1) the enclosed proposed response to the Agreement States Ad Hoc Committee recommendations and (2) NRC's participation in a joint meeting to address those recommendations.

DISCUSSION:

The Executive Committee of the Organization of Agreement States (OAS) appeared before the Commission on January 29, 1993, and announced the appointment of an Ad Hoc Committee on Data Gathering and Use. The Ad Hoc Committee was created February 1, 1993, as an adjunct to NRC's National Performance Review efforts. The Ad Hoc Committee was charged with reviewing the NRC's current methods for collecting data from Agreement States, both on an ad hoc basis and as part of their program reviews. The OAS Committee's report and recommendations were transmitted to the Commission via letter dated August 23, 1993 from G. Wayne Kerr, now past-Chair of the OAS and are enclosed for your information.

The conclusions reached by the Ad Hoc Committee indicate:  
(1) There are currently a number of standing and ad hoc data requests per year from NRC to the Agreement States, which they find a drain on resources; (2) there is no compiled data available to States which submit data to NRC and no data are submitted by non-agreement States. Also, data submitted to NRC cover only the Atomic Energy Act (AEA) materials and are of

Contact: Rosetta Virgilio, OSP  
504-2307

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limited value; and (3) the Conference of Radiation Control Program Directors (CRCPD) requests data from all States covering all radiation sources but the lengthy questionnaire discourages participation. The Ad Hoc Committee recommended: (1) The formation of a joint working group of Agreement States, NRC, CRCPD, OAS, FDA and EPA to explore the best method and organization to collect all radiological regulatory data; and (2) that the organization, selected to collect, compile and report all radiological regulatory data, should be specifically funded for this purpose.

The Office of State Programs sponsored an Agreement State Workshop on August 17-19, 1993, in which the subject of data gathering and use was discussed at length. Management from AEOD participated in this discussion and committed to work with Agreement States to develop an AEA materials database accessible to the Agreement States and NRC. Since that meeting, the Offices of NMSS, AEOD, and OSP have been working on the development of a database, which would include all the AEA material and fuel fabrication events reported by NRC regulated licensees and equivalent reports submitted to NRC by Agreement States. This effort is being coordinated with the Agreement States. The database, being developed with the support of an NRC contractor, Idaho National Engineering Laboratory (INEL), is expected to be functional before the end of FY94, and will be available to all concerned, including the Agreement States. However, this database, as originally conceived, will not compile all (AEA and non-AEA) radiological events. Since the database software is being developed under NRC contract, it will be available to Agreement States for modification or expansion.

We believe that the Agreement States, and thus NRC, can receive substantial benefit by participating in the development of and providing reports to the shared AEA materials event database to facilitate identification and feedback of significant safety lessons. Consistent coding and increased data population reduce the likelihood that an important lesson is overlooked. Although the NRC database structure is being designed for NRC/Agreement State equivalent reports, we believe there is merit in the recommendation from the Ad Hoc Committee that a single national database for radiological events be established. With appropriate access provisions and management controls on AEA data, NRC could support a single national database administered by an organization other than NRC.

In order to better understand the scope and resource needs for an expanded system, OAS could form a working group to further explore the merits and obstacles of a national data base. The NRC will be prepared to participate on the working group if invited. Any recommendations from the working group would be considered along with comments or recommendations from other outside parties.

The joint working group could explore the merits of a national database, including: (1) methods of collecting data, i.e., misadministrations, overexposures, number of lost or abandoned devices or contamination events, from multiple sources; (2) the alternatives to the administration, maintenance and management of such a database and compare those to the use of multiple databases, i.e., who, how and where the expanded (non-AEA events and administrative statistics) database would be maintained; (3) what the estimated costs are and how it will be funded; and (4) the establishment of standard and compatible reporting requirements, i.e., define data needs, fields, parameters, formatting, entry, including the use of common terminology and definitions and ensuring system hardware and software compatibility.

An option for maintaining a national database might include, but should not be limited to, having each organization be responsible for its own piece of the database, i.e., NRC to bear the responsibility for maintaining the AEA event related data and the Agreement States to bear the responsibility for that portion of the database for radiation-related events outside NRC's scope, including administrative statistical information.

We do not completely agree with the Ad Hoc Committee position that there is no compiled data available to States which submit data to NRC. The Office for Analysis and Evaluation of Operational Data (AEOD) maintains relatively simple databases on medical misadministration events and other events reported to the NRC by NRC regulated nuclear medicine and material licensees and events reported to the NRC by Agreement States. The NRC acknowledges however that these databases are inadequate to support future NRC and Agreement State needs.

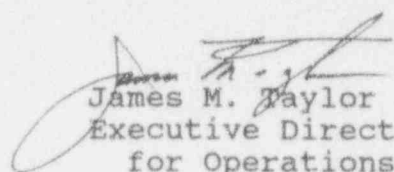
The databases on NRC licensee events cover the period 1981 through 1992, and contain approximately 5000 records of diagnostic and 500 therapy medical misadministrations (MISAD database), and approximately 4000 records of other events such as, personnel radiation overexposure, losses of radioactive material, releases of radioactive material, leaking radioactive sources, radiography equipment problems, and fuel cycle criticality events (NRER database). These databases contain about 140 records of medical misadministrations and 1000 records of other events submitted by Agreement States in 1991 and 1992. These data are available on diskette or a printed form. The events are summarized in AEOD annual reports on nonreactor events. The data in these two current material events databases will be incorporated into the database being developed by INEL.

The staff plans to send the attached letter to Robert R. Kulikowski, Ph.D., current Chair of the OAS and to participate in a working group should OAS decide to sponsor such to address the recommendations contained in the OAS Ad Hoc Committee on Data Gathering and Use. The NRC's involvement in this project will have resource implications which will be better defined through

the efforts of the working group before any agency commitments are made.

RECOMMENDATION:

That the Commission note that the letter to Mr. Kulikowski will be issued within 10 working days from the date of this paper unless instructed otherwise by the Commission.

  
James M. Taylor  
Executive Director  
for Operations

Enclosures:

1. OAS Report
2. Proposed Response

SECY NOTE: In the absence of instructions to the contrary, SECY will notify the staff on Friday, March 18, 1994, that the Commission, by negative consent, assents to the action proposed in this paper.

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# REPORT OF AGREEMENT STATES

Ad Hoc Committee on Data

Gathering and Use

August 7, 1993

## MEMBERS

Richard A. Ratliff, Texas, Chair  
Rita Aldrich, New York, Dept. of Labor  
Steve Collins, Illinois  
Trisha Edgerton, California  
Rick Kelley, Arkansas

Report of the Ad Hoc Committee on Data Gathering and Use - July 1993

I. Introduction

The Ad Hoc committee on data gathering and use (the committee) was created on February 1, 1993, by G. Wayne Kerr, Chair, Organization of Agreement States. The committee was given the following charge:

The committee is charged with reviewing the Nuclear Regulatory Commission's (NRC) current methods for collecting data from Agreement States both on an ad hoc basis and as part of their program reviews. The committee shall compile a list of NRC's standing requests and the purported purpose of each request. The committee shall consider the interaction of the data gathering efforts of NRC with those of the Conference of Radiation Control Program Directors (CRCPD). During its deliberations the committee may consult with NRC as the committee deems appropriate. The committee shall pay particular attention to the need for use of consistent terminology when reporting information to NRC, other Federal agencies, and to other Agreement States.

The committee shall make recommendations on the continued need for such data collection, the depth of detail which can reasonably be requested, and methods for streamlining and avoidance of duplication of data gathering. The committee report shall include a discussion of how well pertinent information generated by such data collection is compiled and provided to the Agreement States and what value it is to the Agreement States.

The need for this review of data required by the U.S. Nuclear Regulatory Commission was evident in December 1992, when NRC required all Agreement States to collect and provide data on medical licensees and misadministrations with only a few days to assemble the data. This was the result of pressure NRC was under due to a series of articles in the Ohio newspaper, the Cleveland Plain Dealer, and due to the pending report of the U.S. Government Accounting Office concerning the NRC and Agreement State regulatory effectiveness.

Most states felt that the data they were required to quickly assemble had been previously provided to NRC in routine reports and during the in depth program reviews conducted by the NRC prior to this time. Additionally, this request for data contained a new category of licensee not used before, community hospitals. This made it even more essential to assess the entire data collection requirements of NRC.

## II. Historical Data Collection Requirements.

Prior to 1984, the NRC obtained data on agreement state activities through "semi-annual statistical reports" that each Agreement State prepared and submitted to the NRC. These reports contained statistics on the number and type of licenses issued and inspections performed as well as general incident data. Abnormal occurrences had been reported since 1977 and additional data was collected during program reviews.

In a letter to "ALL AGREEMENT STATES" dated November 24, 1984, the NRC announced that they planned to integrate part of "Our Exchange of Information Program" with the CRCPD annual state profile data system. This letter stated that "With the exception of data on incidents (discussed below), we will rely upon the Conference State Profile for data on Agreement State programs that had previously been kept in our semi-annual reports."

The letter went on to say "With respect to data on radioactive materials incidents we have become aware of the need to improve the data bases for such incidents. Our objective is to improve the overall data base for materials incidents so that trends and potential problems, including those that are generic in nature, can be identified early and enable rapid feedback to regulatory staff for action."

The closing paragraph of the letter stated:

"Our Office for Analysis and Evaluation of Operational Data will review all of the incident data from the NRC and Agreement States and will prepare periodic reports of their analyses which will be distributed to you. If problems or trends are identified that require immediate attention, such information will be promptly furnished to Agreement States and to NRC staffs.

We hope that you will see the same advantages that we foresee in these changes: streamlining and minimizing paperwork, improving our data bases on radioactive materials incidents, and providing feedback to you and to NRC staffs on possible problems that become evident through reporting of incidents."

The committee could find no evidence that the NRC took both Agreement State data and nonagreement state data on incidents and put them in a data base that could analyze for trends and provide quick effective feedback on generic problems. In fact, the NRC sent a letter to all Agreement States December 11, 1992, titled "Annual Summaries of Incidents (SP-92-165)." In this letter the NRC requested that all agreement states prepare a report of all incidents for the 1992 calendar year by placing all data on event report and medical misadministration report forms provided by NRC.

The letter stated "The Office for Analysis and Evaluation of Operating Data (AEOD) will compile, review and analyze the data."

The committee also was told by Office of State Programs staff that there is not a computer data base currently in place to input the data into, let alone to analyze it.

### III. Committee Action

The committee decided that in order to review NRC's current methods for collecting data from Agreement States both on a routine and ad hoc basis, it needed to obtain from NRC a list of all current data reporting requirements that the NRC expects of Agreement States and the purpose and use of each. A letter requesting this was sent to the NRC on February 11, 1993. Secondly, the committee sent a letter to each Agreement State and requested the following: 1) a list of all ad hoc requests for data from the NRC during the past two calendar years, 2) a list of all the routine reports and data that they send to NRC, and 3) their comments on a draft list of generic license categories the committee had developed.

The committee also reviewed a CRCPD report titled "Report on the Profiles Project, T. Devine, April 22, 1991," concerning the participation, content, and use of the CRCPD annual profiles report.

The NRC partially responded to the committee's letter on March 29, 1993. The letter, signed by Mr. Carlton Kammerer, Director, Office of State Programs, provided a list of documents requesting information from the Agreement States since 1982. This list is contained in Attachment A.

The NRC letter stated that: the "information exchange" process first described in 1984, is probably the starting point for data collection about specific activities, although the more general basis for data collection may be found in the construction of the Agreement between a given state and the NRC. These additional data collection requirements are best demonstrated in the recent letter to Maine dated April 3, 1992. When necessary, the Commission has requested specific information on a "one time" basis. The Maine letter is Attachment B to this report.

The NRC letter also said "NRC has not made use of the information found in the Conference of Radiation Control Program Directors, Inc.'s annual state program profile reports." This was surprising since the NRC November 23, 1984, letter had indicated that the CRCPD profile report would be used in lieu of the semi-annual statistical reports previously required by NRC. However, a review of the CRCPD report revealed that there has been a steady decline in the number of states participating in the annual program profiles report since 1987 when all states and radiation control



programs participated. In 1988, five states did not participate. One was a multi-agency Agreement State program. In 1989, eight states, including three Agreement States did not participate. In 1990, 23 of the 55 radiation control programs did not contribute their updates and in 1991 only 30 of the radiation control programs contributed data to the profile report. The 1991 report did not have data from 12 of the 29 agreements states.

The committee wrote NRC a second letter to ascertain the purpose and use of the data collected from agreements states. NRC responded as follows:

The purpose in collecting information from the Agreement States (AS) is to provide information to the Commission about the individual AS regulatory programs. The expectation is that the information will be used to improve the regulatory process. Additionally, the collection of data provides valuable insight into the programmatic activities of an individual AS. Furthermore, the data collected from all the AS offers the Commission a collective "snapshot" of the State Agreements Program. This "snapshot" is useful when comparing the State Agreements Program to the NRC's materials program.

Collected data, while not integrated into a data base, is accessible by the AS. Information from the last two years is generally available to electronic D.2.E format. Older information is available only in hard copy subject to the collection format in use at the time of the collection.

In addition, the committee had asked NRC if they would consider using the CRCPD annual program profiles report if it was modified and updated in a timely manner. The NRC response was:

"The NRC does not currently use the data available from the collection program maintained by the Conference of Radiation Control Program Directors (CRCPD). The NRC would consider the use of the CRCPD data at some time in the future, should CRCPD modify its questionnaire and keep the information up-to-date."

The CRCPD has established an ad hoc committee on Information Resources (G-41). Its charge is to "develop a consistent information exchange program for radiation control programs."

At the present time, however, there is no central data base being kept for all uses of sources of radiation by any state or federal agency.

The committee has reviewed the above information along with historical data and current NRC requirements and concludes that a uniform data gathering system that collects only necessary data and provides reports and access to such data by the states is needed.

#### Committee's Report on Each Item in the Charge

- (1) The committee shall compile a list of NRC's standing requests for data and the purported purpose of each.

The committee review of the NRC letters and the responses from the 14 Agreement States that responded to the committee's letter has been compiled into a list of all NRC standing requests for data from agreement states. The list is contained in Attachment C. The list is divided into three parts. First are items that are submitted on an "as completed" basis (i.e., copies of each license the Agreement State issues). The second list contains the NRC reporting requirements such as abnormal occurrences, enforcement actions, and other similar items. The third list is ad hoc requests the Agreement States replied to in the past two years.

- (2) The committee shall consider the interaction of data gathering efforts of NRC with those of the CRCPD.

The interaction of data gathering efforts of the NRC with those of the CRCPD has not been successful. Not only have the NRC and CRCPD not coordinated efforts as envisioned in 1984, the Agreement States have not participated in the CRCPD annual program profiles report program sufficiently to make it a complete data base. The CRCPD has recently formed a new task force, G-41, which is charged with review and revision of the annual profiles report. It is to develop a consistent information exchange program for radiation control programs. It would specifically identify information appropriate to exchange between states and the federal government and develop or identify a data base system that states may use to collect data for their own management purposes and for exchange with other states and federal agencies.

- (3) The committee shall pay particular attention to the need for use of consistent terminology when reporting data.

The committee felt that the consistent use of terminology is primarily a problem with the use of different license categories by the NRC and the individual Agreement States. The committee has developed a list of licensee categories that it thinks could be used by all parties. The list is contained in Attachment D.

- (4) The committee shall make recommendations on the continued need for such data collection, the depth of detail and methods for streamlining and avoiding duplication.

The committee supports the need for a data base containing up-to-date information on all state Radiological Health Programs and comparable federal agency data. It also supports the need and value of a data base on accidents and incidents involving radiation sources.

To be of real value the data must be submitted by all states and include all radiation sources. Therefore, the data gathering system:

- (a) must gather data from Agreement and non-Agreement states;
- (b) must cover all radiation sources regulated;
- (c) must impose the minimum possible reporting burden in order to ensure a faithful reporting and updating of data.

Criteria 1 and 2 preclude locating the data gathering within the USNRC, which is not involved with non-Agreement states, NARM or machine radiation sources. These are compelling arguments even if non Agreement States were willing to report to NRC, since NARM and machine sources comprise about three-quarters of the work of state regulatory programs. Criterion 2 also requires that the data base have input from the USFDA which regulates machine sources and radiopharmaceuticals, and possibly USEPA.

This leads inevitably to the conclusion that the CRCPD should maintain this reporting since this would meet the three criteria above. This organization also has considerable experience in maintaining such a data base and has recently set up a Committee to revise the format for reporting. This Committee could also address setting up an incident reporting format, and has a charge to simplify existing reporting and offer the states maximum convenience. Finally the states must have access to this data base and while we have always been able to obtain data from the CRCPD we have no guarantee of access to NRC maintained data.

- (5) The committee report shall include a discussion of how well pertinent information generated by such data collection is compiled and provided to the Agreement States and what value it is to them.

Almost all states, whether they are Agreement States or NRC States, compile data for various reasons and agencies. The states are required to collect data for the NRC which is used to determine Agreement State adequacy and compatibility status at the time of annual or bi-annual program reviews. Agreement States, and, possibly some NRC states, also provide information to the CRCPD at least annually for that agency's year end report. In addition, states collect and supply data to the Federal Emergency and Management Agency (FEMA) to comply with NUREG-0654 and the state's required participation in nuclear power plant exercises. Finally, states must provide other data to other federal agencies frequently throughout the year as requested. This duplicative and exhaustive reporting puts an undue burden on the states.

The CRCPD report could be the central comprehensive source to be used by the NRC, U.S. Congress, other states and federal agencies, and finally, the public. Uniform state data reporting would be beneficial to all by providing consistency between those supplying the data and those trying to use and/or interpret the data.

A uniform data form could be obtained by Agreement States and/or NRC States agreeing to use a common form for the different license categories that are used in each state. An example of a common form has been circulated to all committee members. If this form were to be adopted, it could be sent to all Agreement States and/or NRC States to adopt and use. Individual states could modify the form after the basic format to fit their individual state's needs. The Agreement States and the NRC could send out a questionnaire or compile their own lists from existing data bases to compile the basic form for all states. The basic form could be a word processing format used by most state programs and the NRC, i.e., WordPerfect, WordStar, etc.

The value of a universal data collection system would benefit the NRC, CRCPD, FDA, FEMA, U.S. Congress, Agreement States, and the public. This system would provide the information suppliers and the information users with a uniform data base to make comparisons between Agreement States and/or NRC States. Data could be cross-referenced between all the states that participate in this collection system. The overall value to radiation programs could be significant if used properly and would significantly reduce the burden of multiple reporting and data collection requirements.

#### IV. Conclusions and Recommendations

The following conclusions and recommendations are submitted by the committee:

##### Conclusions:

- 1) There are currently a number of standing and ad hoc data requests per year from NRC to the Agreement States, and the states find this a drain on resources.
- 2) There is no compiled data available to states who submit data to NRC and no data is submitted by non-agreement states. Also data submitted to NRC covers only AEA materials and is of limited value.
- 3) The CRCPD requests data from all states covering all radiation sources but the lengthy questionnaire discourages participation.

##### Recommendations:

- 1) There is a need for a joint working group of Agreement States, NRC (AEOD, OSP, etc.), CRCPD, OAS, FDA and EPA to explore the best method and organization to collect all radiological regulatory data.
- 2) The organization, selected to collect, compile and report all radiological regulatory data, should be specifically funded for this purpose.

ATTACHMENT A

DOCUMENTS RELATED TO DATA COLLECTION:

01/12/82 Semi annual statistical report  
07/08/82 Semi annual statistical report  
01/17/83 Semi annual statistical report  
07/07/83 Semi annual statistical report  
02/08/84 Internal Procedures D.9 (non-routine event reporting)  
12/27/84 Internal Procedure D.17 (collection of data)\*  
07/10/84 Semi annual statistical report  
11/23/84 Exchange of information program - \*  
09/23/85 Exchange of information program  
10/31/85 Meteorological data acquisition report  
05/12/86 Inventory of DOE material  
07/22/86 Exchange of information (Incidents)\*  
11/23/88 Review guidelines  
02/07/89 Review procedures (call for comments)  
01/08/91 Request information (mixed waste storage)  
22/08/91 Draft procedures for program reviews  
02/05/92 Revised abnormal occurrence criteria SP92-042\*  
02/21/92 Agreement state program data SP92-038\*  
17/04/92 Revised abnormal occurrence criteria (medical) SP92-74\*  
18/05/92 Request information (SDMP sites) SP92-085\*  
08/05/92 Final policy on agreement state reviews SP92-096\*  
11/12/92 Annual summaries of incidents  
11/12/92 Information collection forms SP92-174\*

\*documents enclosed



ATTACHMENT B

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20549

April 3, 1992

Mr. W. Clough Toppan, Manager  
Radiological Health Program  
State House, Station 10  
Augusta, ME 04333

Dear Mr. Toppan:

Under section 274g. of the Atomic Energy Act of 1954, as amended, the Commission is authorized and directed to cooperate with Agreement States to assure that the Nuclear Regulatory Commission (NRC) and Agreement State programs for protection against the hazards of radiation will be coordinated and compatible. As a part of our mutual "best efforts" program to achieve these objectives, the NRC and the Agreement States have agreed to exchange certain information on a periodic schedule.

I would like to inform you of the information currently being exchanged between the Commission and the Agreement States and request that the State of Maine supply us with the same type of information which the other Agreement States are now forwarding to us. The NRC will provide Maine with the following:

1. NRC regulatory guides pertinent to agreement materials.
2. NRC regulations (10 CFR), including proposed and effective amendments.
3. NRC and Agreement State sealed source and device registration catalog.
4. NRC and Agreement State licensing statistics and data on inspections and other selected aspects of Agreement State programs.
5. Selected data on incidents in Agreement States.
6. Selected information related to escalated enforcement proceedings.
7. Copies of regulations published in the Federal Register by other Federal agencies, as appropriate.
8. NRC bulletins and information notices.
9. Responses to specific requests for procedural, technical, and regulatory information concerning the Commission's regulatory program.
10. NUREG reports of interest.

The Commission also will supply, from time to time, additional information which we feel will be of interest to the Agreement States.

We would like the State of Maine to provide the NRC Office of State Programs with the following information:

1. One copy of all licenses and amendments issued by the State (monthly).
2. Selected annual program information including statistical data on licensing and inspection activities per the All Agreement States Letter SP-92-038 (enclosed).
3. Updated statistical data and other programmatic information which will be requested in connection with the conduct of our periodic reviews of the Maine program.
4. Copy of each order or equivalent document issued in enforcement proceedings.
5. Draft proposed and effective regulations (2 copies, 2nd copy to Region 1). Draft regulations should be furnished to us with at least a 60-day period for us to review and comment.
6. Copies of sealed sources and devices registrations issued by the State.
7. State issued licensing guides and similar regulatory documents which may be prepared from time to time and which may be of interest to NRC and all Agreement States.
8. Abnormal Occurrence Reports.
9. Miscellaneous information as may be requested.
10. Information on significant incidents occurring in Maine involving licensed material.

I would appreciate confirmation that such information will be provided to NRC.

I appreciate your cooperation and that of your staff during our pre-agreement negotiations and wish to assure you of our commitment to be of assistance as necessary in the future. Please call Mr. Vandy L. Miller at (301) 504-2326 if you have any questions.

Sincerely,  
original signed by Carlton Kammerer

Carlton Kammerer, Director  
Office of State Programs

Enclosure:  
As stated



## ATTACHMENT C

### NRC's Requests for Data

#### A. Items that are submitted as completed

- 1) A copy of all licenses and amendments issued by the State (monthly)
- 2) Draft proposed and effective regulations
- 3) A copy of all sealed source and device registrations issued by the State
- 4) A copy of all State issued licensing guides and similar regulatory documents
- 5) Statistical data report for program review (SP-92-096)
- 6) Selected annual program information including statistical data on licensing and inspection activities (SP-92-038) and (SP-92-173)
- 7) Environmental monitoring reports for nuclear reactor facilities (NRC contract reports)

#### B. Incident and Enforcement Reports

- 1) Abnormal occurrence reports (SP-92-042 and SP-92-074)
- 2) A copy of each order or equivalent document issued in enforcement proceedings
- 3) Telephone reports of incidents or events that may receive significant media attention
- 4) Medical misadministration reports (SP-92-042 and SP-93-028)
- 5) Annual summaries of incidents (SP-092-165)

#### C. One time and state specific ad hoc requests by NRC

- 1) Request for information on decommissioned sites in Agreement States (SP-91-146 and SP-92-085)
- 2) Information collection forms (SP-92-174)
- 3) Annual summaries of incidents
- 4) Mixed waste storage questionnaire (SP-92-105)
- 5) List of licensees that qualify for joint EPA/NRC study (Washington state [WA])
- 6) Uniform manifest request for comments (SP-92-151)
- 7) Comments on waste solidified with high strength asphalt (WA)
- 8) Uranium mill questionnaire (SP-92-058)
- 9) LLW shipment information and reporting (SP-92-092)
- 10) Concentration averaging (SP-92-110)
- 11) Requests to confirm close out survey of former NRC/AEC licensee sites (WA)
- 12) Estimate of cost of development and regulation of a LLW site (WA)
- 13) Request for cooperation with contractor on NRC study of portable instrument calibration (NY)

- 14) Request to send state licensees copy of NRC's revised fee schedule (SP-91-51)
- 15) Request for data on program funding (SP-92-26)
- 16) Uranium license actions and status involving alternate to standards (TX)
- 17) Low level radioactive waste license plan (SP-91-147)
- 18) Requests for comments on NRC rules and regulatory guides
- 19) Physician licensing (SP-91-138)
- 20) Interim licensing guidance (SP-92-117)

Gauges

Fixed Gauge  
Portable Gauge

Service

Leak Testing Service  
Calibration Service  
Device Installation, Maintenance & Repair Service  
Leak Testing & Instrument Calibration Service  
Medical System Service  
Full H.P. Consulting Service

Laboratory & Misc. Use

Laboratory Analysis  
Analytical Instrument  
Gas Chromatograph  
X-Ray Fluorescence Analyzer

Storage Only

Smoke Detector Collection  
Storage Only (contaminated equipment, out-of-service sources & devices, etc.)  
Possession Incident to Exempt Distribution (NRC)

General License

General License (*in-vitro* GLs)  
*In-vivo* GLs

Waste Service

Nuclear Laundry  
Decontamination & Decommissioning Service  
Waste Repackaging and Reprocessing  
Incineration

Waste Disposal

Waste Disposal Facility Licenses

Source Material-Mill

Heap Leach, In-situ, Conventional Source Material-Mill Operations  
Rare Earth Processing  
Source Material Disposal Site

Civil Defense

Calibration  
Training

Medical

Medical - Broad  
Medical - Specific  
Medical - Private Practice  
Brachytherapy (HDR, LDR and Sr-90 Eye Applicators)  
Teletherapy (including Gamma Knife)  
Medical Accelerators  
Mobile Nuclear Medicine Service

Small Irradiators

Self-Shielded Irradiators  
Self-contained, Small

Large Irradiators

Open Irradiator - >10,000 Ci

Wireline Services

Well Logging (sealed sources)  
Field Flooding and/or Tracer Studies, Oil and Gas Well  
Tracer Studies, Non-oil and Gas Well

Industrial Radiography

Fixed Facilities, Shielded Bays  
Temporary Jobsites (may include fixed facilities)

Academic & Research

Research & Development - Broad Scope  
Research & Development - Specific  
Academic - Broad Scope  
Academic - Specific

Manufacturing & Distribution

Broad Scope Manufacturing & Distribution  
Specific Manufacturing & Distribution  
Specific Manufacturing / No Distribution  
Medical Manufacturing & Distribution  
Nuclear Pharmacy

Distribution Only

Medical Distribution - No Manufacturing  
Redistribution  
GL Distribution - No Manufacturing  
Demonstration Sales

Robert R. Kulikowski, Ph.D., Chair  
Organization of Agreement States  
New York City Department of Health  
111 Livingston Street, 20th Floor  
Brooklyn, New York 11201

Dear Mr. Kulikowski:

I am writing on behalf of Chairman Selin to thank the Organization of Agreement States (OAS) for its Report of the Ad Hoc Committee on Data Gathering and Use. The report was frank and comprehensive and we found its content useful in providing a description of the status and worth of current data collection procedures.

As discussed at the Agreement States Managers' Workshop, I agree that an information system should be established that meets our collective needs in the most efficient manner. As you know, the NRC is currently developing an Atomic Energy Act (AEA) materials event database with the support of NRC's contractor, Idaho National Engineering Laboratory (INEL). It is expected to be functional before the end of FY94, and will be available to NRC and the Agreement States. The database structure is being designed for NRC/Agreement State equivalent event reports. We believe that the Agreement States, and thus NRC, can receive substantial benefit and provide valuable input by participating in the development of and providing reports to the database to improve our joint ability to extract and feedback significant lessons of experience and precursors to more serious events to users of radioactive materials. There is merit in considering the expansion of the NRC database, if practical, to include non-AEA and administrative statistical information which the Ad Hoc Committee Report suggests.

In order to better understand the scope and resource needs for an expanded system, OAS could form a working group to further explore the merits and obstacles of a national data base. The NRC will be prepared to participate on the working group if invited. Any recommendations from the working group would be considered along with comments or recommendations from other outside parties.

Robert R. Kulikowski, Ph.D. 2

If you have any questions or comments, please feel free to call me at (301) 504-3340. I look forward to continued discussions on these important issues.

Sincerely,

Richard L. Bangart, Director  
Office of State Programs

cc: C. Hardin, CRCPD  
M. Oge, EPA  
B. Burlington, M.D., FDA  
G. Wayne Kerr, OAS Past-Chairperson  
Richard A. Ratliff, OAS Chairperson-Elect