

*Minutes*

DEC 31 1969

Dr. Arnold M. Reeve  
Director of Health  
Nebraska State Department  
of Health  
State House Station, Box 9757  
Lincoln, Nebraska 68509

Dear Dr. Reeve:

As Mr. Herr discussed with you at the conclusion of the November 20-21, 1969, meeting in Lincoln, it is our practice, following each program review meeting, to confirm our comments and suggestions regarding the State's radiation control program. Based on our discussions during the review meeting, a review of selected State license and inspection files, and the information we receive through our continuing contacts with the State, the following comments and suggestions are provided for your consideration.

We believe the keystone of an effective radiation control program is the adequacy of personnel, both in numbers and qualifications. This can only be obtained by providing adequate funding and salaries that are sufficient to enable the State to attract and retain qualified personnel. We trust that you will be able to resolve the staffing problem in the near future.

We noted that licensing and inspection of agreement material users is essentially current. The licensing actions which Mr. Herr reviewed were well substantiated and the inspection reports were generally adequate to determine the status of the licensee's program and his compliance with the regulations and license conditions. Some minor comments regarding these reports were provided to Mr. Herr during the meeting. We do recommend that the program for making independent surveys during inspections

OFFICE

9101110050 900829  
PDR FOIA  
KARMAZI90-264 PDR

A17

DEC 31 1969

include the collection of smear samples at facilities where significant quantities of radioactive material in loose forms are being used.

After each of the past three meetings with Nebraska we have stated our interest in the proposed updating of the State's radiation control regulations. These regulations have not been updated since Nebraska entered into the agreement with the AEC and at that time included appropriate amendments to AEC's regulations up to May 1, 1955. We urge that priority be given to updating the State's regulations.

We note that most of the initial inspections of x-ray users, except for dental and industrial units, were completed in fiscal year 1968. However, very few followup inspections of these units have been done and some 900 dental units have never been surveyed except by the CURBAC method. We believe both the initial survey of dental and industrial units and reinspection of other units should be given some priority as soon as adequate staff resources are available.

We hope that the State's radiological emergency plan will be formalized in the near future. We believe that the adoption of such a plan is a useful corollary to a state's overall radiation control program. In accordance with your request, we are enclosing a copy of North Dakota's Radiological Emergency Guide which you may find useful in developing Nebraska's emergency plan.

We were pleased to note the completion of the initial inspection of radium users during the last fiscal year. We understand that follow-up inspections of these users, which should be a continuing program, will probably be delayed until additional staff is available.

We also noted an increase of some \$10,000 in the budget for the current biennium over the previous biennium. Since this is a rather modest increase we hope that the Department will use its best efforts to assure that adequate funding is available for administering the total radiological health program.

DEC 31 1969

I would like to confirm our availability to consult with you and your staff on any special or unique regulatory problems or other matters that may arise from time to time. Depending upon the degree of complexity involved, such problems can frequently be handled by telephone or correspondence. Where more detailed discussion is necessary, we would be willing to have an appropriate number of our staff meet with you or your staff, as the occasion warrants.

I hope that you will find our comments and suggestions helpful. If you have any questions about them, please let me know. Your cooperation is much appreciated.

Sincerely,

"Signed" Eber R. Price

Eber R. Price, Director  
Division of State and  
Licensee Relations

Enclosure:  
North Dakota Radiological  
Emergency Guide

cc: Mr. Ellis Simmons

bcc: R. H. Engelman, CO:HQ, w/o encl.  
D. I. Walker, CO:IV, w/o encl.

OFFICE

SLR:SAB

SLR:SAB

SLR:ADIR

SLR:DIR