



TERRY E. BRANSTAD, GOVERNOR

DEPARTMENT OF PUBLIC HEALTH
CHRISTOPHER G. ATCHISON, DIRECTOR

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April 15, 1994

Richard L. Bangart, Director
Officer of State Programs
Nuclear Regulatory Commission
Mailstop 3 D23
Washington, D.C. 20555

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Dear Mr. Bangart:

This refers to your letter dated April 11, 1994. In that correspondence you reported the results of the NRC review and evaluation of the Iowa radiation control program. You also requested a response within thirty days, to the items in enclosure 2 of that letter. I have addressed each item in the same order in which it appeared in your correspondence and am forwarding our remarks as the enclosure to this letter.

We are proud of the findings of adequacy and compatibility. The recovery of our program was a total team effort on the parts of the staffs of not only the Iowa Department of Public Health, but also the NRC. We appreciate the efforts in our behalf of the Office of State Programs and NRC Region III, especially Mr. James Lynch, Regional State Agreements Officer, and the licensing and inspection staffs. The commitment of all who were involved in this process is reflected in the successful completion of the last review.

Sincerely,

Christopher G. Atchison, Director
Iowa Department of Public Health
515/281-5605

cc: James Lynch, USNRC

Enclosure

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1. Status and Compatibility of Regulations (Category I)

We recommend that the above rules ["Notification of Incidents, Quality Management Program and Misadministrations, Licenses and Radiation Safety Requirements for Irradiators, Decommissioning Recordkeeping and License Termination: Documentation Additions"] and any others needed for compatibility, be promulgated expeditiously as effective State radiation control regulations.

"Notifications of Incidents, Quality Management Programs and Misadministrations and Decommissioning Recordkeeping and License Termination: Documentation Additions" will be effective September 7, 1994. There is a question of applicability concerning "Licenses and Radiation Safety Requirements for Irradiators." This question is outlined in a March 24, 1994, letter from the Chief, Bureau of Radiological Health to Mr. Richard Bangart. Action to implement the conditions of 10 CFR36 will depend on resolution of the applicability question.

2. Quality of Emergency Planning

We recommend that the radioactive materials drill be performed as scheduled in 1994.

A specific date for the materials drill has not yet been set. We have submitted this item for scheduling in the State's emergency training schedule. The exercise will be completed by the end of calendar year 1994.

3. Office Equipment and Support Services (Category II)

We recommend that the computer tracking system be updated to better track licensee responses.

The tracking system now prints a report containing the due dates of licensee responses in a time frame defined by the operator. This report is included in the regular monthly tracking reports.

4. Staffing Level (Category II)

We recommend that staff cross-training be continued for program security and enhancement.

Two former staff members participate in inspection activities quarterly.

5. Training (Category II)

We recommend that the Program Coordinator attend the Licensing course. We recommend that the Environmental Specialist attend the industrial radiography course and we recommend that the newly hired Environmental Specialist attend all the NRC core training courses as scheduled.

The Program Coordinator will attend the Licensing course in fiscal year 1995. The Environmental Specialist will attend the industrial radiography course scheduled 6/6 - 6/10, 1994. The new employee is scheduled to attend all NRC core courses as a part of the RCP's qualification program.

6. Staff Continuity (Category II)

We recommend that the State continue in its effort to recruit and retain a highly qualified technical staff.

Program management is committed to gaining and maintaining technical excellence and personnel stability.

7. Technical Quality of Licensing Actions (Category I)

We recommend that License Terminations be documented in one central location, the license file, as opposed to being dispersed in various files. In addition, to assist in the centralization, completeness and standardization of termination information, we recommend that licensees be required to complete a form similar to the NRC "Certification of Disposition of Materials". This form is used to certify that radioactive materials and/or contamination are not present at the facility at the time of a license termination and is used to document that appropriate radiation surveys have been conducted.

In terminations involving the release of an area or facility for unrestricted use, the RCP has used and will continue to use a form similar to NRC's "Certification of Disposition of Materials". The vast majority of the terminations done in the last two years have involved situations that didn't involve unrestricted use. The Program Coordinator has instituted a system in which a "paper-trail" exists. This system will resolve any questions of how or why a license was terminated.

8. Status of Inspection Program (Category I)

We recommend that the State perform reciprocity inspections and industrial radiography field inspections as a part of the inspection program.

The program goal is to inspect 50% of all reciprocal licensees in the State this calendar year. This will include radiography field inspections. Additionally, field inspections are planned for all Iowa licensed radiographers this inspection cycle.