MEMORANDUM FOR:

Stewart D. Ebneter, Director Division of Radiation Safety and Safeguards, RI

Douglas M. Collins, Acting Director Division of Radiation Safety and Safeguards, RII

Charles E. Norelius, Director Division of Radiation Safety and Safeguards, RIII

Richard L. Bangart, Director Division of Radiation Safety and Safeguards, RIV

Ross A. Scarano, Director Division of Radiation Safety and Safeguards, RV

FRON:

Richard E. Cunningham, Director Division of Industrial and Medical Nuclear Safety, NMSS

SUBJECT:

1. 1 ;

15

* 1 :

11

NATIONAL PROGRAM REVIEW SCHEDULE AND AGENDA

On January 24, 1989, we sent you the final schedule for the 1989 regional visits to review fuel cycle and materials programs. This memorandum confirms the schedule, and transmits our proposed discussion topics and a questionnaire to be completed and provided to us at the time of the visit. The NKSS review teams will include members from each of the NMSS regionalized programs-materials, fuel cycle, low-level waste, safeguards, and transportation.

We would appreciate it if you could make appropriate members of your licensing, inspection, and resource management-staffs available during our wisit. The available during our wisit. The available during

Please note that the visits are not only to review the regional programs, but the also to evaluate the quality of the support and guidance which Headquarters provides to you. Also, we intend to issue our reports more promptly than in past years. We will send draft reports to the Regions for comment no later than April. If you have further questions, please call me, or have a member of your staff contact John Hickey, or George Deegan (FTS 49-20625).

IS: BSBM * DENSC-OMBN-BL-S

Richard E. Cunningham, Director Division of Industrial and Medical Nuclear Safety, NMSS

68 '80

cc: Hugh L. Thompson, Jr. Robert M. Bernero

Enclosures:

- 1. Schedule.
- 2. Discussion Topics
- 3. Questionnaire

ENCLOSURE 1

MASS NATIONAL PROGRAM REVIEW SCHEDULE-1989

Region I	Region 11*	Region III
Date: March 9-10	Date: Feb 28-March 1	Date: March 7-8
1. G. Sjoblom	1. G. Sjoblom	1. G. Sjoblom
2. M. Lamastra	2. N. McElroy	2. J. Austin
3. J. Swift	3. G. Bidinger	3. J. Swift
4. D. Cool	4. J. Hickey	4. D. Cool
5. A. Grella	5. W. Floyd	5. J. White
6. M. Floyd	6. G. Pangburn	6. A. Grella
7. L. Person	7. L. Baypard	7. L. Person
8. C. Seelig	8. P. McLaughlin	8. C. Seelig
Region IV(URFO)	Region IV(Arl. TX)	Region V
Dáte: Feb 27-March 1	Date: March 2-3	Date: Feb-22-23
1. D. Sollenberger 2. D. Loosley 3. L. Rouse 4. M. Filegel	1. G. Sjoblom 2. M. Lamastra 3. L. Rouse 4. J. Hickey 5. A. Grella 6. D. Sollenberger 7. D. Loosley	1. G. Sjoblom 2. N. McElroy 3. G. Bidinger 4. G. Deegan 5. A. Greila 6. W. Floyd 7. L. Person 8. P. McLaughlim

*Region-II - Transportation Feb 7-8 -A. Grella. Hereita in the second on Day 2.

1 1

1



· Aztis ·.

os'

5.

68 '80

IS: RSEM

DISCUSSION TOPICS

- 1	Durin	ng the	a visits, the following topics may be discussed:
in the s	1 1.		Thoroughness, completeness, technical quality of licensing and inspection programs we set quality of the review as #1 over No. of reviews # Inspectant reports are new ever(by Sect. Ch. # Br. ch. Timetica
		- ·	Trends in timeliness for licensing casework and inspections; how delays are identified and corrected in licensing process Frances fields much reports on their around frame. Frey, discussion with reviewer.
**.		•	Supervisory participation and feedback in licensing casework and inspection activities and involvement with inspector accompaniments
RY TRUM	ing or	HP.	and training. Sect. Chief & Br. Ch. represe all venerts fishes Lie. Case Training programs for reviewers and inspectors Beth weaths brief bethered at heed to get refuesh as thereing for all aspectors friends have h Inspection performance on allegations, incidents, decommissioning.
: ^ ·	t : " "	-	Inspection performance on allegations, incidents, decommissioning,
- 19	'I	- '	Procedures for license application resubmissions, deficiency letters, abandonment letters, telephone deficiencies, expired licenses, returned mail
		•	Over 12 inspections - Use Inspection Rat. Tracking Sys shows day tell
1 11		•	Procedures for prelicensing visits - De but net procederelyzed "
dir por 1	••••••	- 12.	Resource utilization and operating plan accomplishments
	•	-	Open action items from Executive Seminar, Reviewer Workshop, last year's program reviews etc.
· ·			Regional initiatives - Lesson Lesved from
: <u>n</u>	•	*.	Interface with licensees; proposed seminars/workshops etc; dealing with problem licensees
· 1.			Interface with Headquarters
		-	Performance Evaluation Factors

* DENSC-OMBN-BI-30

MMSS-1989 REGIONAL QUESTIONNAIRE

This questionnaire is for the purpose of obtaining information about regional MMSS ficensing and inspection activities. The space provided is not adequate for responding to the questions, so we ask that you provide separate sheets for each question and response. Include as part of the response a copy of any pertinent written internal procedure which you have developed and have in place. It is not necessary for the responses to be sent to NMSS Headquarters. Rather, eight copies of the responses should be given to the National Program Review Team when it conducts its review at your office.

- Using the current version of your regional staffing plan related to the NMSS program, specify the approximate percentage of time that each 1. individual spends on the following activities: fuel cycle licensing, fuel cycle inspection, materials licensing, materials inspection, safeguards activities, and inspections of decommissioned facilities and reactors.
- Provide a summary of actual expenditures and accomplishments as compared 2. to operating plan/budgeted expenditures and accomplishments, for FYBS and FY89 to date.
- Are there any changes needed in the estimate of workload projection 3. (licensing actions and inspections conducted) for the current fiscal year? If so, please provide your suggested changes with justification. Are there any poreseeable barriers to completing inspection modules in accordance with Manual Chapters 2600 and 2800? Dunny fronter Histin
- Are regional administrative support functions performed in a timely 4. manner? Are changes needed in the manner in which these support functions are performed? If so, please be prepared to discuss the changes needed which would result in optimal administrative support for the programs.....
- Please provide your comments on the programs for interaction of 5. Headquarters with your Region. Please include your comments on the usefulness of the conference calls, licensing workshops, executive management seminars, inspection accompaniments, telephone calls on case reviews, technical assistance provided on a day-to-day basis, standard review plans, guides, etc. Include in your comments your suggestions and recommendations for modifications, changes, improvements, etc., in the interaction programs.

Summarize regional initiatives to improve the quality of inspections and license reviews, particularly those simed toward preventing licensee safety problems, or those aimed at licensee's performing their transportation activities in a safe manner.

Press manuel V: 1. Summarize the total number of inspections of Transportation activities at MC 2800 licensed program facilities (Procedure 86740) including average staff-hours per inspection and a brief summary of the most typically observed violations. Summarize (Regions II and V) referrals to other regions of state identified violations on shipments by NRC licensees to commercial burial sites. Summarize the completion status of inspections of transportation activities at 2600 (#86740) and 2500 (#86740) and #86721) program facilities. Please provide early observations on the impact of the Core Inspection Procedure #83750 on the inspection of transportation activities at 2500 program facilities.

I JOOK

1

6.

Partonaugio ser Fostasti ...

2 1 1 1 1

+ 14ª + 1 + 1 1 Sector Same

> 08' 68 IS: 855M * DENEC-OMEN-BI-39 ·20

> > 01

11 5146.3.

Date

ROUTING AND TRANSMITTAL SLIP

2/8/89

10: (Nams, office symbol bulkling, Agency/Po Bob	Initials	Date		
2.				
I .				
۱.				
8.				
Action	File	Note	and Retu	m
Approval	Per	Conversati	ion	
As Requested	Prep	are Reply		
Circulate	For Your Information	See	Me	
CELOSORY AND AND AND AND AND AND CHARTER POWER OF A PARTICULAR	For Your Information	Antonia antonia	Me ature	

REMARKS

111111

A reminder, I will be on leave during the NMSS review. Art will be acting for me and will have a briefing book prepared. I anticipate no problems in the NMSS areas of licensing (they may comment on how long it takes us to complete a case), inspections transportation or route surveys. Bill Floyd will be the one to conduct the review and he will be talking with Art next week.

I gave copies of the attached to have, + all Bearde a Section chiefs in Dass.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Neme, org. symbol, Agency/Post)	Room NoBidg.
Doug ,	Phone No.
6041-102	OPTIONAL FORM 41 (Rev. 7-76) Prescribed by 65A

#U.S.GPO:1985-0-461-274/20015 FPMR (41 CFR) 101-11.206



CC: ADM, LRN

NOTE NUCLEAR REGULA TORY COMMISSION 3 WEEKS FAX NO'S 301 - FTS - 492-0259, 4220000, 492-1137 VERIFICATION ND. 301 - FTS - 492-0262 LOCAL () OR FTS (LT PLEASE TYPE OR USE BOLD FELT TIP PIN. TELECOPIES WILL NOT BE RETURNED. LOCATION 1. Doug Schuesker Region V FAX 1 FTS-463-3804 VERIFICATION FTS-463-3721 . 2. FAX # ______ VERIFICATION 3. FAX Ø VERIFICATION 00 4. 0 FAX # _______ VERIFICATION _____ 5. BB VERIFICATION FAX # VERIFICATION FAX OF PAGES IS 4 AND COVER SLEET FROM W. C. FLOYD .. PHONE EXT. 2-0480

OS' 08'88 IS:855M * DENSC-OMEN-BI-38

2

BRIEFING INFORMATION FOR NMSS REVIEW

1. Number of Materials Licensees 323

1

Rc ion V does the licensing reviews for 293

Also Region V does assist inspections (approx 20/year) for the broad licensees i.e., Department of Agriculture, Air Force, and Navy.

2. Headquarters Personnel doing Review

G.	Sjoblom	NMSS/IMNS	Industrial & Medical Nuclear Safety
N.	McElroy	NMSS/LMAB	Medical Academic & Commerc.al Use
G.	Bidinger	NMSS/IMSB	Fuel Cycle Safety
G.	Deegan	NMSS/IMOB	Operations Branch, Industrial & Medical
Α.	Grella	NMSS/SGOB	Operations Branch, Safeguards &
			Transportation
₩.	Floyd	NMSS/SGOB	Operations Branch, Safeguards &
			Transportation
۱.	Person	NMSS/LLTB	Technical Branch
Ρ.	McLaughlin	NMSS/PMPA	Program Analysis

3. Backlog Data

"Oldies" are renewal requests received prior to January 1, 1988. There are 6 renewals on our "Oldie" List. 2 of these were completed in February 1989 - Chevron and EPA Las Vegas 4 others are:

V. A. Sepulveda - Pending University of Hawaii - Management Meeting March Plant Inspection - Second round deficiency letter Army Yuma - Technical Assistance Request to Headquarters

Greater than 180 days

New Applications and Amendments 0 Renewals 11

Greater than 90 days

New Applications and Amendments. 3

Renewals

8

4. Performance Evaluation Factors as of January 31, 1989.

a. Number of licensees evaluated using PEFs:

Industrial: 46 Medical: 10 Academic: 1

Total of 57 licensees

b. Number of licensees evaluated as showing degraded performance:

Industrial: 16 with violations on 591 form. 3 with Notice of Violation letter.

Medical: 4 with violations on 591 form. 3 with Notice of Violation letter.

-2-

c. Types of follow-up action taken for each case of degraded performance:

Industrial: 1. The violations on the 591 form are to be reviewed during the next inspection.

- One NOV lead to an enforcement conference and a \$2,000. civil penalty.
- One NOV lead to a management meeting with an early re-insepction.
- 4. One NOV lead to an early re-inspection only.
- Medical: 1. The violations on the 591 form are to be reviewed during the next inspection.
 - One NOV lead to an enforcement conference and a \$2,500. civil penalty.
 - Two other NOVs rated an early re-inspection status.

5. July Meeting with Licensees.

We are planning a two day workshop to discuss the implementation of 10 CFR Part 35. The agenda items currently planned include:

- ° Effective date for Part 35
- Responsibilities and Authority of the Radiation Safety Committee
- Responsibilities and Authority of the Radiation Safety Officer
- Visiting Authorized Users
- ^o Misadministration Report and Record Keeping
- Training Requirement for Professional and Ancillary Staff
- "Moonlighting" personnel in Nuclear Medicine and Radiation Therapy
- Performance Evaluation Factors Program
- Quality Assurance Questionnaire

6. Licensing Action Turnaround Time

1

\$

Target			75	days
Average	1988		49	days
Average	1989	(10/1-1/31)	44	days

Cases pending as of January 31, 1989

New and Amendment	36
Renewals	34
Terminations	3
Total	73

the to

8

An interim update to the Performance Evaluation Factors (PEF) Program as of February 21, 1989.

(1) Number of licensees evaluated using PEFs:

Industrial:	58
Medical:	12
Academic:	4

Total of 74 licensees

(2) Number of licensees evaluated as showing degraded performance:

Industrial:	25	with	violations	s on 591 form.
	4	with	Notice of	Violation letter.
	2	with	escalated	enforcement actions.

Medical: 6 with violations on 591 form. 3 with Notice of Violation letter. 1 with escalated enforcement actions.

Academic: 1 with violations on 591 form. 1 with escalated enforcement actions.

(3) Types of follow-up action taken for each case of degraded performance:

Industrial:	1.	The violations on the 591 form are to be
		reviewed during the next inspection.
	2.	One NOV lead to an enforcement conference and
		\$2,000. civil penalty.

- One NOV lead to a management meeting with an early re-insepction.
- 4. One NOV lead to an early re-inspection only.
- 5. One NOV lead to an enforcement conference.

Medical:

4

15

.

- The violations on the 591 form are to be reviewed during the next inspection.
- One NOV lead to an enforcement conference and a \$2,500. civil penalty.
- Two other NOVs rated an early re-inspection status.

Academic:

1. One NOV lead to an enforcement conference.

Pater Revised 2/2007

9.

REGION V MATERIALS SAFETY AND SAFEGUARDS PRJGRAMS RESPONSES TO NMSS-1989 REGIONAL QUESTIONNAIRE

 Using the current version of your regional staffing plan related to the NMSS program, specify the approximate percentage of time that each individual spends on the following activities: fuel cycle licensng, fuel cycle inepction, materials licensing, materials inspection, safeguards activities, and inspections of decommissioned facilities and reactors.

See attached chart

	%)	of Time Spent	(% of Time Spent by each Individual)	tual)		
Chart for Question 1	Cion Cuclo	Motorials	alcinoteM	Cafooniande	Cafannande	
Name	Inspection	Licensing	Inspection	Licensing	Insp. & other	Decommissioning
R. Fish, Chief EP Section	5					
B. Brock Inspector	100					
Other Fuel Cycle Inspection Support (Various Inscretors)	1 FTE					
H. North, Act.Chief EP&RP Branch						2
M. Cillis Sr, Rad. Spec.						20
R. Thomas, Chief NMS Section		50	50			
J. Montgomery Sr. Matls. Spec.		40	60			
<pre>B. Riedlinger Health Physicist (Lic.)</pre>		98				2
F. Pang Rad. Spec.			100			
D. Skov Rad. Spec.		10	06			
P. Zurakowski Rad. Spec.			75			

Activities (1)
(% of Time Spent by each Individual)

**	-1
5	-
101	
+	
20	n
-	37
-	
24	2
+	
3	-
CH3	110
5	2

Name	Fuel Cycle Inspection	Materials Licensing	Materials Inspection	Safeguards Licensing	Safeguards Insp. & other	Decommissioning
F. Browne Lic. Asst.		50	50			
E. Garcia I/R Coord.						52
Schuster, Chief SG Section				10	30	
L. Norderhaug Sr. M/C Analyst				40		
A. McQueen Phy. Sec. Spec.					30	
D. Schaefer Security Inspec.					15	
G. Nelson MC&A Insp.					80	

(1) Fuel Cycle Licensing is not done in Region V

 Provide a summary of actual expenditures and accomplishments as compared to operating plan/budgeted expenditures and accomplishments, for FY 88 and FY 89 to date.

See attached charts.

Accomp1 i shments		The inspection program was completed at all Fuel Facilities with minor exceptions.	Planned license cases 180 Completed cases 192	Planned inspections 156 Completed inspections 155 Increased workload due to U. S. Testing and Finlay Testing Laboratories	Planned license cases 5 Completed cases 6 All planned security inspections were completed. Transportation inspections planned and completed 1 Route survey completed 1			
FTE Expenditures	0.00	1.77 (1)	1.42	3.22	1.22	1.19		
Current Allocation	0.00	1.65	1.38	3.09	1.36	0.60	8.08	tion Support
Budget Allocation	0.00	2.30	1.38	2.44	1,36	0.60	8.08	C, OI and Allega
Program Activity	FC Licensing	FC Inspections	Materials Licensing	Materials Inspections 2.44	Safeguards	Section Chief	Totals:	$\underline{1}/$ Includes .22 for FC, OI and Allegation Support

FY 88 NMSS PROGRAM ACCOMPLISHMENTS

-

		Accomplishments	None planned	Inspection program on target to complete all modules at all facilities.	Planned license cases 206 Completed cases 52	Planned inspections 120 Completed inspections 60	Loma Linda VAMC team inspection. More frequent inspections of broad scope medical licensees. <u>Planned</u> workshop on Part 35 for VA, Military and Agreement State Hospitals.	Planned license cases 10 Completed cases 2 Planned SG inspect. 6 Completed SG inspect. 2 Planned trans. insp. 1 Completed inspections Budget reduced due to General Atomics and Rockwell contract falling through	
PROGRAM ACCOMPLISHMENTS	1988 - January 31, 1989	FTE Expenditures	0.00	0.64	0.49	1.38	0.00 (2)	0.41	inputs. ort.)
FY 89 NMSS PR	r 1,	Current Allocation	0.00	2.30	2.10	2.70	.80	1.80	Two man weeks of inspection in one week. No charges have been made due to problem with RITS inputs. Should be approximately 0.2 (3 man-weeks direct effort.)
		Budget Allocation	0.00	2.30	1.60	2,50	.80	2.40	Two man weeks of inspection in one week. No charges have been made due to problem Should be approximately 0.2 (3 man-weeks
		Program Activity	FC Licensing	FC Inspections	Materials Licensing	Materials Inspection	Medical Program Improvement	Safeguards	(1) Two man weeks of(2) No charges haveShould be approx

FY 89 NMSS PROGRAM ACCOMPLISHMENTS

Program Activity	Budget Allocation	Current Allocation	FTE Expenditures	Accomplishments
LLW, Lic. Inspection	.20	.20	0.00 (3)	
Decommissioning (Non-Power)	0.10	0.10	0.00	
Section Chief	1.00	1.00	0.46	

(3) RITS data incorrect

3. Are there any changes needed in the estimate of workload projection (licensing actions and inspections conducted) for the current fiscal year? If so, please provide your suggested changes with justification. Are there any foreseeable barriers to completing inspection modules in accordance with Manual Chapters 2600 and 2800?

Fuel Cycle Inspection

No changes are needed for FY 89 fuel fabrication inspection program. If Atomics International and/or General Atomics become involved in decontamination/decommissioning of their facilities, some changes may be necessary. There are no foreseeable barriers to completing the MC 2600 inspection modules for FY 89.

Materials Inspection

No changes are needed for FY 89. The estimated 120 inspections will be completed in accordance with MC 2800.

Materials Licensing

The estimated case workload projection may need to be adjusted due to the increased effort necessary to complete the "old" cases and the escalated enforcement activities by reviewers - Skov and Montgomery.

Safeguards Fuel Facility Licensing Program

Our experiece for FY 88 reveals that while 3 casework estimated receipts were projected; actual receipts were 6 cases. The fuel facilities regional safeguards licensing casework estimated receipts for FY 89 is projected as 8 cases, and two cases were received in the first quarter. The projections are therefore, at present, right on for FY 89.

Safeguards Fuel Facility Inspection Program

No changes are needed for FY 89. There are no foreseeable barriers to completing the inspection modules in accordance with MC 2681.

4. Are regional administrative support functions performed in a timely manner? Are changes needed in the manner in which these support functins are performed? If so, please be perepared to discuss the changes needed which would result in optimal administrative support for the programs.

Regional support functions appear adequate to support the NMSS programs in Region V.

5. Please provide comments on the programs for interaction of Headquarters with your Region. Please include your comments on the usefulness of the conference calls, licensing workshops, executive management seminars, inspection accompaniments, telephone calls on case reviews, technical assistance provided on a day-to-day basis, standard review plans, guides, etc., in the interaction programs.

Materials Licensing and Inspection

Interaction with headquarters has improved over the recent months. The conference calls have become more useful since topics are being assigned to individuals for resolution. The licensing workshops are still important for the resolution of problems common to all regions and headquarters. Inspection accompaniments are valuable to the headquarters staff in that a better understanding of regional activities is obtained. Reviewer's guides and review plans should be upgraded. Radiography guides do not address the transportation requirements, the RSO requirement, and the quality assurance program. The medical review plan has disagreement between RG 10.8, Rev. 2 (Aug. 87) Appendix P and RG 8.20 relative to a bioassay requirement for I-131 capsules. Also, final guidance is needed for well-logging applications prepared relative to Part 39. How do we handle Part 39.41 for well-logging devices which do not meet new criteria after July 14, 1989? Should we expand the type of cases which require technical assistance, i.e., 5 half lives vs. ten half lives for decay in storage?

Safeguards Licensing and Inspection

Interaction between the regional safeguards inspector and the licensing reviewer and their NMSS counterparts has been effective and such interaction is conducted on an as needed basis.

The monthly safeguards inspection conference call sponsored by the NRR Safeguards Branch, and has been participated in by NMSS, appear to be an effective means of communicating generic type safeguards issues, problems, and program changes. We recommend they continue and that NMSS continue to participate when topics also appear to reflect on NMSS programs.

There have been no safeguards licensing workshops (formerly sponsored by NMSS) since the reorganization splitting materials and reactor safeguards licensing and inspection functions. This was a disappointment as these were considered to have been one of the most valuable mediums for interchange by all regions with the various headquarters elements managing or administrating regional safeguards program activities. They should be reinstituted, whether on a joint basis by NMSS and NRR or on a separate basis by each. The joint workshops would appear to be most desirable and efficient based on experience of the previous workshops.

0

Question 5 Cont'd.

An NMSS/SGOB representative accompanied a Region V inspector during a Category 1 Fuel Facility safeguards inspection in February 1988. The interchange between the two during this inspection was considered to have been outstanding by the regional inspector. Recommend consideration be given to documenting these accompaniments in a manner to preserve the positive and/or problem areas encountered during the inspection. This could also serve as educational feedback for other regions as well as the one involved.

Telephone calls on case reviews are made on an "as needed" basis. In all cases where a licensee change appears unacceptable; where policy or generic issues may be involved; or where a potential problem is identified or perceived; the case is telephonically discussed between region and the headquarters cognizant program office.

Safeguards licensing reviews are based on guidance contained in the NMSS provided "Safeguards Regional Guidance" Manual.

Fuel Cycle Inspection

There presently are no scheduled interactions between the Region and Headquarters in the area of fuel fabrication facilities. Contacts on an "as needed" basis have been satisfactory and responsive.

In the past Headquarters accompaniments on our fuel fabrication inspections have been most beneficial and we encourage continued support in this area.

We believe the Region (Fuel Facility Inspector) should be informed in a timely manner of the results of discussions between the licensee and NRC licensing on matters related to fuel fabrication license renewal or major modification.

We suggest a fuel facility counterpart meeting in Headquarters, possibly in connection with the Fuel Cycle Workshop being scheduled for April/May 1989.

7. Summarize the total number of inspections of Transportation activities at MC 2800 licensed program facilities (Procedure 86740) including average staff-hours per inspection and brief summary of the most typically observed violations. Summarize (Regions II and V) referrals to other regions of state identified violations on shipments by NRC licensees to commercial burial sites. Summarize the completion status of inspections of transportation activities at 2600 (#86740) and 2500 (#86740) and (#86721) program facilities. Please provide early observations on the impact of the Core Inspection Procedure #83750 on the inspection of transportation activities at 2500 program facilities.

Material Licensing and Inspection

The transportation activities under the (Procedure 86740) MC 2800 has involved a total of 108 inspections (10/1/87 to 12/31/88) for 30, 40, and 70 docket type of licensees. A total of 148 hours was expended. A total of 34 violations was identified. The majority of the violations were associated with shipping paper requirements, labelling, and the Special Form and DOT 7A certifications. We have not had any regional referrals of NRC licensees with violations at the burial sites during FY 88.

Activities associated with Inspection Procedure 84850 have been as follows: 030 and 070 Dockets

Number of inspections 16

Number of inspection hours 40

Number of violations 0

Safeguards Licensing and Inspection

As provided for in the letter from the Director, Division of Safeguards and Transportation, NMSS, to all regional Directors, Divisions of Radiation Safety and Safeguards, Subject: SAFETY/SAFEGUARDS TRANSPORTATION INSPECTIONS, dated November 4, 1987; three transportation safeguards inspections were conducted in FY 88 and one to date in FY 89. Two more are programmed for FY 89, if the appropriate transport activities become available for inspection.

In FY 88, the three inspections indicated for Region V in the "FY 1988 NMSS Inspection Schedule" were one each for: Spent Fuel Imports, Category II Shipments, and Domestic Spent Fuel Shipments. One each was conducted for Category II Shipments and Domestic Spent Fuel Shipments; however, since no Spent Fuel Imports were reported, a Spent Fuel Export was substituted.

Question 7 Cont'd.

\$

The FY 89 inspection pertained to a Category II shipment being exported through the Port of Oakland.

Inspection Modules used during Safety/Safeguards Transportation Inspections were 81335, 85301, and 86740.

No transportation activity has been available for inspection at 2500 program facilities; therefore no safeguards experience exists to date to gauge the impact of the Core Inspection Program on the inspection of transportation activity at those facilities.

Fuel Cycle Inspection

Transportation activities have been inspected (Procedure 86740) at all fuel fabrication facilities within the last year.

Reactor Facilities (MC 2500)

Procedure 86740 has been completed at two Region V facilities (Diablo Canyon and Palo Verde). Procedure & 721 has been completed at one Region V facility (Palo Verde). Not enough of the Core Inspection Program has been completed to assess the impact of procedure 83750.

6. Summarize regional initiatives to improve the quality of inspections and license reviews, particularly those aimed toward preventing licensee safety problems, or those aimed at licensee's performing their transportation activities in a safe manner.

Materials Licensing and Inspection

The following initiatives have been implemented:

More time is spent with the licensees in discussing the license conditions and the associated regulations.

Inspections are more in depth using performance factors.

Problem licensees have reduced inspection frequencies and management meetings.

Transportation module 86740 is reviewed during each inspection where applicable.

Safeguards Licensing and Inspection

The Region V Safeguards Section initiated in the first quarter of FY 89, a goal of training an alternate inspector for fuel facility physical security inspections. For the past three years, fuel facilities had been inspected by one principal safeguards inspector. While an alternate had been designated for the same time period, the alternate performed no inspections or accompaniments at fuel facilities. A second inspector accompanied the principal inspector on an inspection of General Atomics, a Category I Fuel Facility, during December 1988. This allowed accomplishment of all semiannual program goals in one trip, instead of the usual two trips per semiannual inspection cycle at this facility. It is intended to rotate these two inspectors in the future in a manner which will allow both to remain familiar with each fuel facility site and to be experienced in fuel cycle physical security inspections.

Fuel Cycle Inspection

Regional management expects to visit each fuel fabrication facility each year.

The Fuel Facility Inspector attended an OSHA training course in FY 88.

Additional inspectors are scheduled to attend OSHA training courses (Hazardous Materials and Fire Protection) during FY 89.

Additional inspector training on transportation requirements is expected to be accomplished during FY 89.

Reactor Radiation Specialist and Emergency Preparedness Analysts are being used to support the Fuel Facility Inspector.