



June 14, 2021

Stephen Poy, Program Manager
US Nuclear Regulatory Commission
State Agreement and Liaison Programs Branch
Washington, DC 20555-0001

Dear Mr. Poy:

We look forward to your Integrated Materials Performance Evaluation Program (IMPEP) team visit August 9-13, 2021....

Oregon Radiation Protection Services (RPS) has completed the attached IMPEP Questionnaire in preparation for the Nuclear Regulatory Commission's upcoming review. Despite the substantial challenges that COVID caused our state radiation control program, I believe you will see satisfactory results relating to all performance indicators since our last IMPEP in 2017.

Since the last IMPEP review there have been significant changes for the RPS program and staff/management team. Four staff members separated from RPS to take other state agency or private sector positions during the past four years. Three technical (RML Inspectors) and one licensing/administrative staff member left our section. However, core team members remain intact.

As a result, we hired three new technical staff and assigned one existing administrative staff member to have Radioactive Material Licensing (RML) program roles. Seven RPS staff, including the three new members, have RML inspection, licensing, Emergency Response Team (ERT) and/or Radioanalytical Laboratory responsibilities. Except for one staff member, all are cross trained to complete X-ray inspections. One member serves as our RSO and laboratory coordinator, and another as our electronic products program Lead Worker who is also one of two FDA-certified MQSA inspectors. The newly assigned administrative specialist also serves in an ERT support role.

RPS' succession plan is addressing the pending retirement of our existing Field Operations/Emergency Response Manager this August 2021. RPS obtained approval to initiate a one-year Operations Manager job rotation position, effective April 1, 2021. Three viable RPS candidates applied for the position with our RML Lead Worker being selected. She brings a strong academic background (MS-Radiation Health Physics/MPH -Biostatistics) and work experience (Navy Nuclear program), plus seven years as a staff member with RPS, to her new role.

RPS Management continues to make it a high priority to ensure that staff members have adequate training and equipment to provide quality licensing services, timely completion of inspections and incident-allegation follow up. IT enhancements are being made to improve performance and efficiency. Funding has been an ongoing challenge. RPS continues to derive its revenue largely from legislatively approved user-fees and an FDA mammography contract. There is no state general fund support.

The number of our staff has decreased due to budgetary constraints. This has led to an RPS management heightened focus on cross-training to increase staff “depth”.

A House Bill has been introduced to the 2021 Legislative Assembly to increase radiation user registration and licensing fees in support of current operations through the 2025-2027 biennium. Increased fees will place RPS in a position to achieve Oregon Public Health Division modernization and health equity goals. The RPS Radioactive Material Licensing program is also submitting a Policy Option Package to increase radioactive material licensing fee revenue by \$559,000.

These two measures will generate an additional \$1,982,000 to support all RPS programs. This will allow recruitment of five staff, including three Environmental Specialists (facility inspectors) to address a growing X-ray facility inspection backlog and be cross-trained to conduct radioactive material licensing reviews and inspection tasks, and two administrative specialists to provide X-ray database registration and managerial support.

Noteworthy 2017-2021 program accomplishments include acquiring drones to support emergency response efforts and more portal monitors for community reception centers, and improving our radioanalytical laboratory capacity through involving more staff, obtaining new ISOCS gamma spectroscopy software, repairing/enhancing radiation detection equipment and initiating an annual maintenance program. In addition, RPS continued to strengthen its databases and moved a significant amount of paper records to electronic document/record keeping. In response to COVID, our staff are transitioning to permanent remote work.

The RPS staff is very professional, responsive, flexible, and resilient. I am proud of our team and the level of service they deliver. I am confident that members of the review team will find quality RML performance.

If you have any questions regarding the attached questionnaire, please contact our Licensing Manager, Todd Carpenter (971-673-0500; todd.s.carpenter@dhsosha.state.or.us) or Operations Manager, Hillary Haskins (971-673-0501; hillary.k.haskins@dhsosha.state.or.us).

We look forward to your visit and consider the IMPEP review process as a means for improving program effectiveness to protect the health and safety of Oregonians. If you have any other questions, please contact me at 971-673-0499.

Sincerely,

David Howe

David M. Howe, Program Director
Radiation Protection Services Section
Center for Health Protection
Oregon Public Health Division

cc: Rachael Banks, Director, Public Health Division
Andre Ourso, Administrator, Center for Health Protection
Jackie Cook, State Agreements Officer, NRC Region IV