

Question 3 Radiation Protection Services Full Time Equivalents

NAME	POSITION	AREA OF EFFORT	FTE%
Erin DeSemple	Health Physicist	Licensing RAD Emergency Response	100%
Lee Lind	Administrative Assistant	Licensing/Fiscal RAD Emergency Response	100%
Sharon Ross	Administrative Assistant	RAD Emergency Response	5%
Daryl Leon	Health Physicist	RML Inspections/Licensing Review RAD Emergency Response Laboratory Operations	100%
Hillary Haskins	Health Physicist	RML Inspections/Licensing Review RAD Emergency Response Laboratory Operations	100%
Tom Pfahler	Health Physicist	RML Inspections Training RAD Emergency Response Laboratory Operations	10%
Brent Herring	Health Physicist	RML Inspections Training RAD Emergency Response Laboratory Operations	10%
Joe Enger	Health Physicist	RML Inspection Training Laboratory Operations RAD Emergency Response	10%
Michelle Martin	Health Physicist	RML Inspections Training Laboratory Operations RAD Emergency Response	10%
Thomas Mynes	Health Physicist	RML Inspections RAD Emergency Response Laboratory Operations	50%

As of April 1st, 2021, Hillary has been promoted to Operations Manager for X-ray and RML programs, changing her FTE to 50%. In addition, Hillary provided position coverage for the COVID-19 response team. Over the calendar year of 2020. The rotation is scheduled end on April 1, 2022.

Note: Tom Mynes is currently on a rotation position for the COVID-19 response team. Expected return date is September 1, 2021.

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Rama Wusirika	Health Physicist	RML Inspections RAD Emergency Response Laboratory Operations	50%
David Howe	Program Director	Administration RAD Emergency Response	30%
Todd Carpenter	Program Manager	Administration RML Licensing RAD Emergency Response	50%
Richard Wendt	Program Manager	Administration RML Operations RAD Emergency Response	50%
TOTAL FTE			6.75

4. Please provide a listing of all new professional personnel hired into your radioactive materials program since the last review, indicate the date of hire; the degree(s) they received, if applicable; additional training; and years of experience in health physics or other disciplines, as appropriate.

Name	Position	Experience and Education
Brent Herring Hire Date: April 2018	Health Physicist	<ul style="list-style-type: none"> * Lenoir Community College, Associate Degree, Science, June 1992 * UNC-Wilmington, Bachelor's Degree, Biology/Chemistry * Florida Department of Health, Bureau of Radiation Control, Environmental Specialist III, July 2017 – February 2018 * Florida Department of Health, Bureau of Radiation Control, Environmental Specialist II, July 2013 – July 2017. * Florida, Department of Health, Broward County Health Department, March 2012 – July 2013. * Certified as an ARRT, The American Registry of Radiologic Technologist, expired in 2018. <p>See training journal for training experience.</p>
Joseph Enger Hire Date: July 2018	Health Physicist	<ul style="list-style-type: none"> * Oregon State University, Bachelor's Degree, Radiation Health Physics, December 2016. * Arizona Department of Health Services, Bureau of Radiation Control, Health Physicist II, October 2017 – June 2018. * Arizona Department of Health Services, Bureau of Radiation Control, Health Physicist I, February 2017 – October 2017 <p>See training journal for training experience.</p>
Thomas Pfahler Hire Date: November 2018	Health Physicist	<ul style="list-style-type: none"> * Portland State University, Bachelor's Degree, Health Studies, March 2018. * Naval Nuclear Power School, Certified, March 2007 * United States Navy, USS Frank Cable, January 2007 – June 2013 Radiological Controls Training Division Supervisor; Monitoring Program Supervisor; and Radiological Controls Technician Division Supervisor. <p>See training journal for training experience.</p>

Question 5.

Please list all professional staff who have not yet met the qualification requirements for a radioactive materials license reviewer or inspector. For each, list the courses or equivalent training/experience they need and a tentative schedule for completion of these requirements.

Michelle Martin is primarily assigned to X-ray therapy machine and mammography enforcement. Is currently being trained for radioactive material inspections for uptake and dilution, brachytherapy, gamma knife, and portable gauges. Has completed the following NRC's core training courses: H117, H122, H201, G108, G109, G205, H119 and H304. Currently in progress with H308 and registered for brachytherapy and gamma knife.

Joe Enger is primarily assigned to X-ray, tanning enforcement and recently has been assigned to conduct portable and fixed gauges license reviews and inspections. Has completed the following NRC's core training courses: G205, H308, G109, S201, and G108. Registered for H312S.

Rama Wusirika is primarily assigned to X-ray and tanning enforcement and is now assigned to provide fixed and portable gauge inspections. Has completed the following NRC's core training courses: G108, G205, H308, G109, S201, H122, H301S, and H312S.

Tom Pfahler is primarily assigned to X-ray, tanning enforcement, and coordinates RPS's analytical laboratory. Currently being trained and mentored for fixed and portable gauge inspections. Has completed the following NRC's core training courses: G108, G109, H308, H117S, H122S and registered for H312S.

Brent Herring is primarily assigned to X-ray therapy machine and mammography enforcement. Is currently being trained for inspections to radioactive materials diagnostic licensees. Has completed the following NRC's core training courses: G108, G205, H304, H308, H313 and H117. Has been promoted a Lead worker for the X-ray program starting April 1, 2021

Tom Mynes is primarily assigned to X-ray and tanning machine inspections. Has been authorized to conduct fixed and portable gauge, and industrial radiography inspections. Has completed NRC's core training courses: G101, G108, H122, H305, H308, and S201. Currently on a rotational position with the COVID-19 response team starting March of 2020. Upon Tom's return from the Covid response rotation, he'll be oriented to inspection types previously authorized prior to the departure from the RML program.

Question 6.

Identify any changes to your qualification and training procedure that occurred during the review period.

No changes in training expectations and documentation. During the Covid pandemic, RPS switched from in-person to virtual training and promoted webinar training opportunities for staff to keep current on technologies and regulatory practices.

Question 7

Please identify the technical staff that left your radioactive materials program during the review period and indicate the date they left.

Eric Packard, Health Physicist; tanning, X-ray and industrial RML inspections; January 01, 2018.

Glenda Villamar, Health Physicist; RSO, X-ray and MQSA Inspections; August 1, 2018.

Nic Riley, Administrative Support 1 (AS); AS services for radioactive materials licensing; 04/01/2019.

Sudhir Oberoi, Health Physicist; X-ray and fixed/portable gauge inspections, January 31, 2018

Question 8.

List any vacant positions in your radioactive materials program, the length of time each position has been vacant, and a brief summary of efforts to fill the vacancy.

No vacancies in the radioactive material program. One position vacancy for an executive administrative support and Environmental Health Specialist exist within RPS's section exist.

Question 9

For Agreement States, does your program have an oversight board or committee which provides direction to the program and is composed of licensees and/or members of the public? If so, please describe the procedures used to avoid any potential conflict of interest.

Yes, authority is Oregon's Revised Statute 453.645. The Director of the Oregon Health Authority shall appoint a Radiation Advisory Committee consisting of eight members representing various disciplines with the radiation industry. The Committee is advisory with no oversight authority. Committee meets every four months.

Conflict of Interest is addressed in the Radiation Advisory Committee's Bylaws in Article XI - Ethical Conduct, Conflict of Interest.

Article VIII—Parliamentary Authority

The current edition of the Standard Code of Parliamentary Procedure will govern the meetings of RAC Committee unless inconsistent with these bylaws or Oregon law.

Article IX—Adoption and Amendment of Bylaws

- (1) These bylaws will become immediately effective upon approval by five (5) committee members of the RAC at a duly convened meeting. Members must be given at least 48 hours advance notice of such a vote prior to the meeting.
- (2) The bylaws may be amended by five (5) committee member votes of the RAC at a duly convened meeting. A change in the bylaws cannot be voted upon unless such a proposal has been included in the written agenda provided to RAC members at least 48 hours prior to the meeting.

Article X—Travel and Subsistence

Members of the RAC may claim reimbursement for actual and necessary travel expenses incurred during the performance of their official duties, including the attendance at RAC and related meetings. Such reimbursement will be subject to policies and guidelines adopted by the OHA. Reimbursement amounts will use state of Oregon per diem meal and lodging allowances and follow state travel expense rules. Expense claims will be paid, subject to availability, from RPS funds.

Article XI – Ethical Conduct, Conflict of Interest

RAC members will adhere to the highest standards of ethical conduct and will be responsible for understanding and acting in accord with the provisions of ORS chapter 244, including the code of ethics.

Adopted: February 11, 2009
Revised: February 8, 2012
October, 10, 2012
Reviewed by the RAC Committee: October 8, 2014 (no changes noted)

Question 10.

Please identify individual licensees or categories of licensees the State is inspecting less frequently than called for in NRC's Inspection Manual Chapter (IMC) 2800 and explain the reason for the difference. The list only needs to include the following information: license category or licensee name and license number, your inspection interval, and rationale for the difference.

Oregon Radiation Protection Services follows the NRC recommended frequency schedule based on assigned priority except for portable gauges which are inspected every four years rather than every 5 years.

Question 11.

Please provide the number of routine inspections of priority 1, 2, and 3 licensees as defined in IMC 2800 and the number of initial inspections that were completed during each year of the review period.

	Priority 1,2,3,	Initial
07/16/2017 - 12/31/2017	18	0
01/01/2018 - 12/31/2018	26	0
01/01/2019 - 12/31/2019	22	1
01/01/2020 - 12/31/2020	20	1
01/01/2021 - 06/01/2021	10	0

Question 12

Please submit a table, or a computer printout, that identifies inspections of Priority 1, 2, and 3 licensees and initial inspections that were conducted overdue.

At a minimum, the list should include the following information for each inspection that was conducted overdue during the review period:

- (1) Licensee Name
- (2) License Number
- (3) Priority (IMC 2800)
- (4) Last inspection date or license issuance date, if initial inspection
- (5) Date Due
- (6) Date Performed

License Number	Licensee Name	Inspection Frequency	Previous Inspection	Due Date	Overdue Date	Inspected Date	Days Late	Findings Issued
91014	Providence Health & Services-Oregon	2	6/27/2017	6/27/2019	6/27/2020	7/13/2020	16	7/13/2020
90651	International Inspection, Inc.	1	9/12/2019	9/12/2020	3/12/2021	4/12/2021	30	4/12/2021

Question 13

Please submit a table or computer printout that identifies any Priority 1, 2, and 3 licensees and initial inspections that are currently overdue, per IMC 2800. At a minimum, the list should include the same information for each overdue inspection provided for Question 12 plus your action plan for completing the inspection. Also include your plan for completing the overdue inspections.

None

Question 14. Reciprocity Inspection Frequencies



Reciprocity History Detail



Run Date: 4/19/2021
Run Time: 10:48

From: 8/1/2017 To 7/31/2018
All Licensees
Selected NRC Frequencies: 1, 2, 3

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License #	Name	Times in State	Previous Inspection	Inspected	NRC Freq
96078	ELEKTA, Inc.	46	10/14/15	12/13/2018	2
96130	Mistras Group, Inc.	15	5/11/15	5/15/2019	1
96131	Northwest Inspection, Inc.	47	6/26/14	6/15/2017	1
96169	Thomas Gray & Associates, Inc./EMC	16	9/19/16	7/29/2019	2
96214	APPLUS RTD USA, INC	44	initial -->	7/24/2017	1
96254	Braun Intertec Corporation	2	initial -->	3/16/2018	1

Total Licensees:			Total of Frequencies	
Within Date Range	6	5	1	4
Total Inspections:	1	1	2	2
Inspection Ratio:	16.67%	20%	3	0
			5	0



Reciprocity History Detail



Run Date: 4/19/2021
Run Time: 10:49

From: 8/1/2018 To 7/31/2019
All Licensees
Selected NRC Frequencies: 1, 2, 3

License #	Name	Times in State	Previous Inspection	Inspected	NRC Freq
96078	ELEKTA, Inc.	50	10/14/15	12/13/2018	2
96130	Mistras Group, Inc.	10	5/15/17	5/15/2019	1
96131	Northwest Inspection, Inc.	105	6/26/14	6/15/2017	1
96161	US Ecology Texas, Inc.	1	initial -->	10/5/2010	2
96169	Thomas Gray & Associates, Inc./EMC	17	9/19/16	7/29/2019	2
96196	TEAM Industrial Services, Inc.	1	7/23/13	8/6/2019	1
96214	APPLUS RTD USA, INC	23	initial -->	7/24/2017	1

Total Licensees:	7	Total of Frequencies	
Within Date Range		1	4
Total Inspections:	3	2	3
Inspection Ratio:	42.86%	3	0
		5	0

Reciprocity History Detail



Run Date: 4/19/2021
Run Time: 10:52

From: 8/1/2019 To 7/31/2020
All Licensees
Selected NRC Frequencies: 1, 2, 3

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License #	Name		Times in State	Previous Inspection	Inspected	NRC Freq
96078	ELEKTA, Inc.		36	10/14/15	12/13/2018	2
96130	Mistras Group, Inc.	Not Eligible	17	5/15/17	5/15/2019	1
96131	Northwest Inspection, Inc.		62	6/26/14	6/15/2017	1
96169	Thomas Gray & Associates, Inc./EMC	Not Eligible	18	9/19/16	7/29/2019	2
96185	Philotechnics, Ltd.		1	1/07/09	8/28/2019	2
96196	TEAM Industrial Services, Inc.		6	7/23/13	8/6/2019	1
96210	Quality Control Inspection & Testing Laboratories		4	initial -->	3/14/2012	1
96214	APPLUS RTD USA, INC		2	initial -->	7/24/2017	1
96265	Metals Testing Services, Inc.		2			1

Total Licensees:		9	7		Total of Frequencies	
Within Date Range				Protocol 216 amended 7/7/2020 adopted NRC memo on reciprocities. Major change "attempt 10% inspections"	1	6
Total Inspections:	2	2			2	3
Inspection Ratio:	22.22%	28.57%			3	0
					5	0



Reciprocity History Detail



Run Date: 5/27/2021
Run Time: 14:23

From: 8/1/2020 To 7/31/2021
All Licensees
Selected NRC Frequencies: 1, 2, 3

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License #	Name	Times in State	Previous Inspection	Inspected	NRC Freq
96078	ELEKTA, Inc.	39	12/13/18	5/24/2021	2
96130	Mistras Group, Inc.	3	5/15/17	5/15/2019	1
96131	Northwest Inspection, Inc.	16	6/26/14	6/15/2017	1
96169	Thomas Gray & Associates, Inc./EMC	8	9/19/16	7/29/2019	2
96196	TEAM Industrial Services, Inc.	2	7/23/13	8/6/2019	1
96214	APPLUS RTD USA, INC	22	initial -->	7/24/2017	1
96265	Metals Testing Services, Inc.	1			1
Total Licensees:		7	6	Total of Frequencies	
- Within Date Range				1	5
Total Inspections:		1	1	2	2
Inspection Ratio:		14.29%	16.67%	3	0
				5	0

Question 15

Technical Quality of Inspections

What, if any, changes were made to your written inspection procedures during the reporting period?

Since the last IMPEP review period, listed below are either revised or current protocols being drafted.

They are:

Protocol 210 "Sensitive Unclassified Official Use Only Information." Revision date 04/03/2019, Change titles, repeals and add authorities, references, secure email procedures, and change title of protocol.

Protocol 209 "Inspection of Fixed and Portable Gauge Programs." Revision date 1/09/2019, major edits and updates .

Protocol 218 "National Source Tracking System", Revision date 08/10/2018, updated regulations, hyperlinked documents, and websites.

Protocol 219 "RML Generic Inspection Preparation" Revision date 09/15/2017, Major edits to content and attachments.

Protocol 241 "Pre-licensing Protocol" revision date 06/29/2018, review version 1.3, added "specific license" under initial screening 1)a and remove pre-licensing self-assessment.

Protocol 239 "Gamma Knife and HDR Inspection", currently being revised by updating information and splitting the protocol into two separate protocols. They are:

Protocol 239 "HDR (High Dose Rate); and

Protocol 239 (B) Gamma Knife Inspection.

Covid-19 Pandemic Inspection Changes

The Public Health Division's Continuity of Operations Plan (COOP) was established and implemented in March 2020 to continue mission-essential functions from various remote locations. RPS enacted time-phased implementation procedures to address on-site inspections with medical diagnostic-therapy and material safety and security licensees. Inspection frequency 4 through 5 were conducted through an administrative inspection program engineered to reduce regulatory staff from potential Covid-19 exposures.

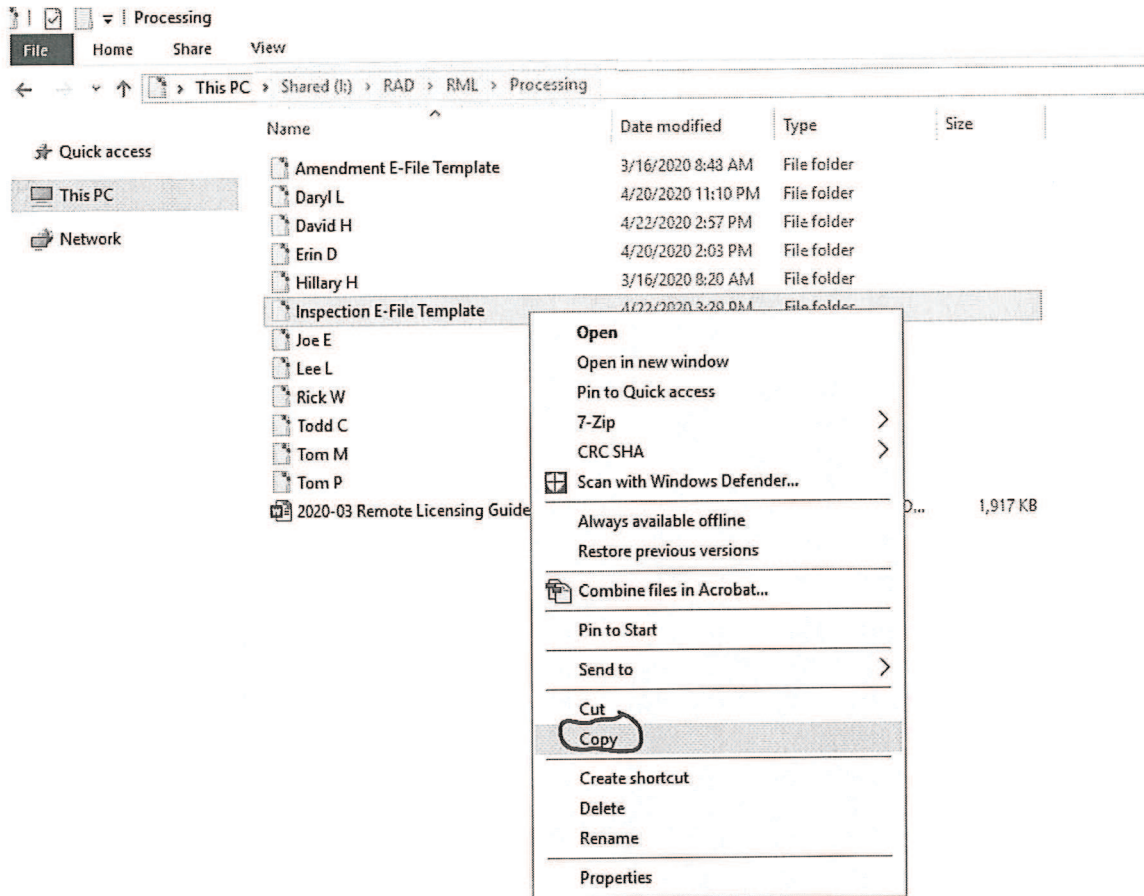
In addition, RPS inspection staff developed and used the new process listed below for remote inspection file management.

Remote Inspection E-File Guide

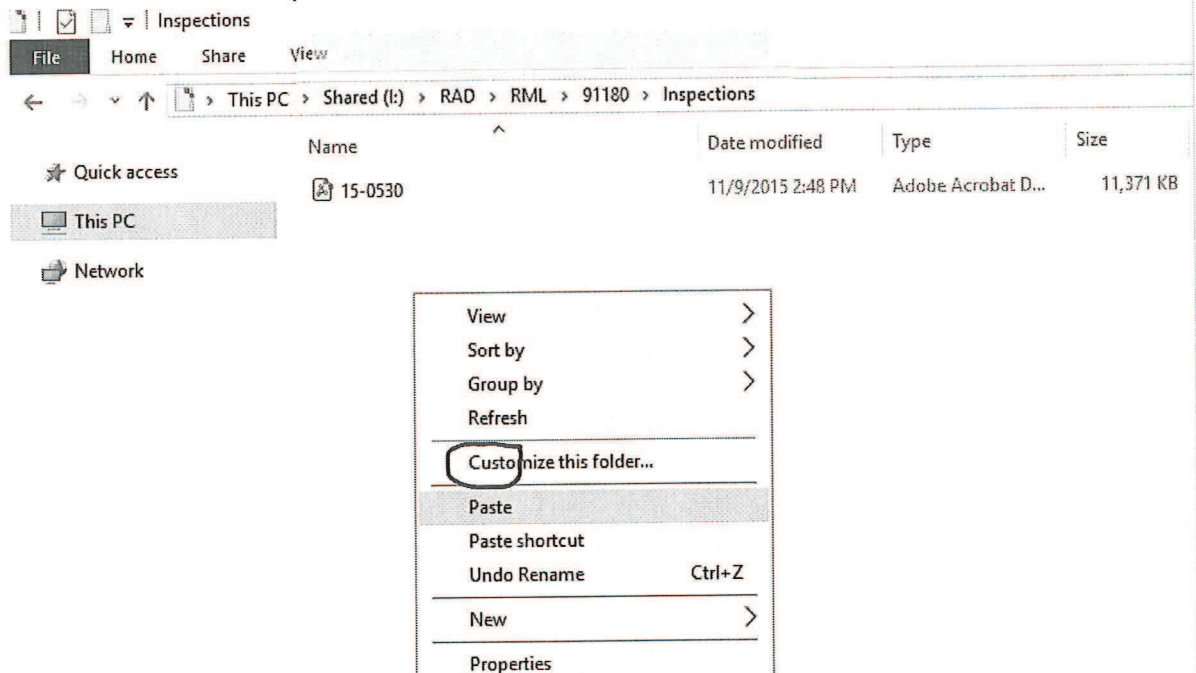
Creating the Inspection E-File and where to put it on the I: Drive (INSPECTOR will be performing this step)

This is the same process as creating a hard file for an inspection, but electronically. The inspector will perform the following steps:

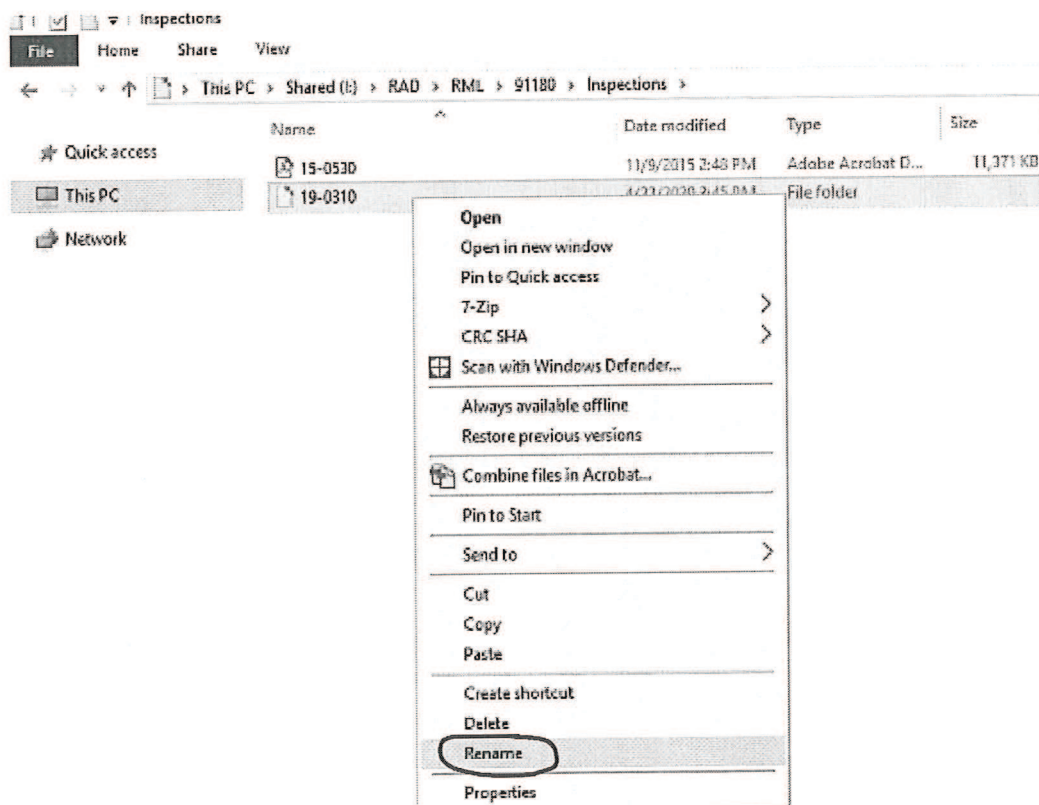
1. Copy the "Inspection E-File Template" from RAD>RML>Processing



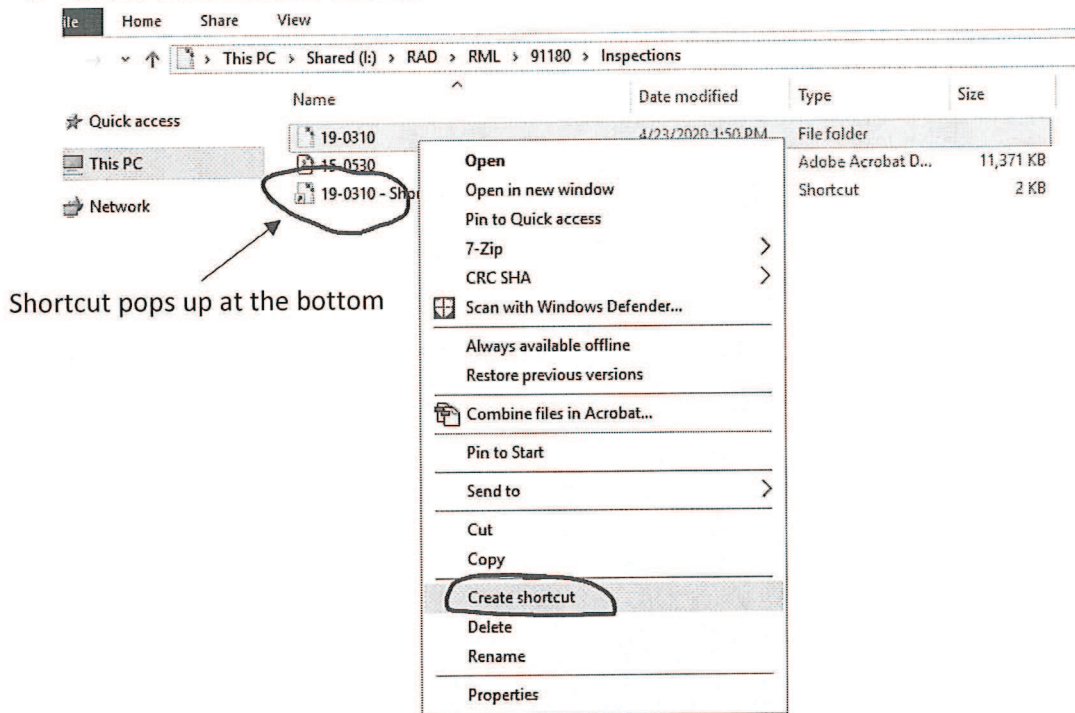
2. Paste "Inspection E-File Template" into the correct RML Licensee file under RAD>RML>XXXXX>Inspections



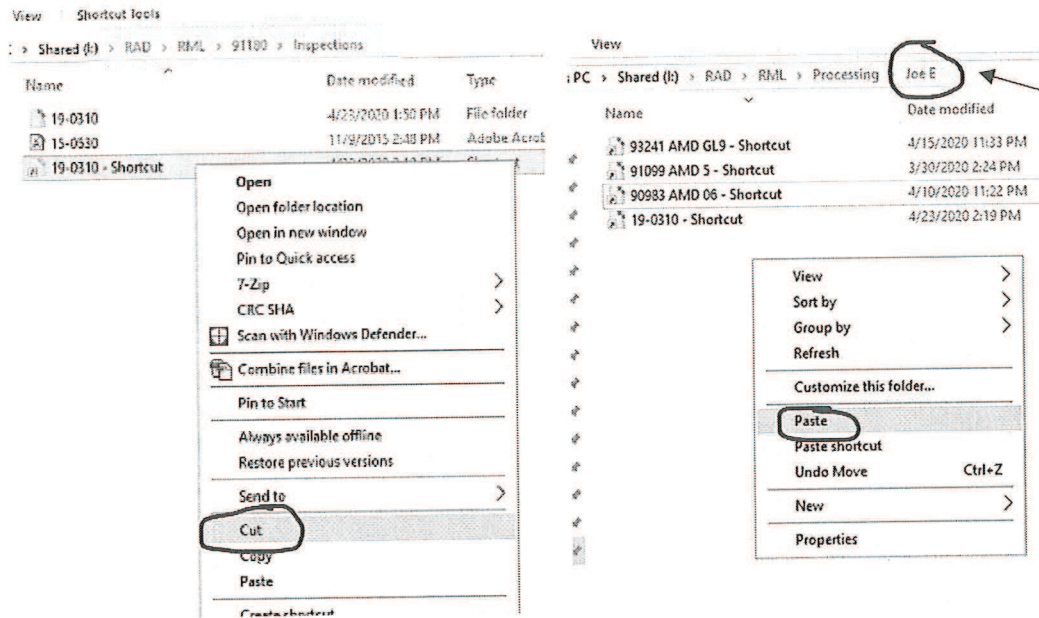
3. Rename the pasted "Inspection E-File Template" to the docket number of the inspection: "XX-XXXX" (Example: 19-0310)



4. Create a shortcut to the file



5. Cut (not copy) the shortcut you just created and paste it into your personal processing folder to work on (Under RAD>RML>Processing). Processing folders are discussed more in depth in the *Transferring Files to and From Each Other* section.



Personal Processing Folder. This is also used for licensing review one stop shop for what some are working on/needs to work on

Components of the Inspection E-File

Shared (I:) > RAD > RML > 91180 > Inspections > 19-0310				
Name	Date modified	Type	Size	
Correspondence	4/23/2020 12:01 PM	File folder		
Inspection Report	4/22/2020 2:59 PM	File folder		
Inventory	4/23/2020 11:55 AM	File folder		
Supporting Documents	4/23/2020 12:08 PM	File folder		
19-0310 Tracking Sheet	4/22/2020 3:53 PM	Adobe Acrobat D...	474 KB	






Inside the "Inspection E-File" are 4 folders (**A current copy of the inspection tracking sheet should be kept on the outside of these 4 folders (see picture above) when the inspection is complete and is being sent around for various approvals/signatures - the inspector/reviewer/manager will need to electronically sign off on this sheet as they do with paper tracking sheets**):

1. Correspondence
 - a. Any correspondence from the licensee (emails, letters, replies to the inspection etc.)
 - b. Any correspondence from RPS to the licensee (591 forms, NOV's, requests for missing information, close loop letter, etc)
 - c. All files should be converted into PDF and named starting with the date received (from licensee) or sent on date (if from RPS)

Note: Files should be named: "YEAR-MO-DA DOCKET# SHORT DESCRIPTOR" (this can be changed if people don't like this format – This is the easiest format to sort by date with)

Example: 2020-01-22 19-0310 Reply (see below)

C > Shared (I:) > RAD > RML > 91180 > Inspections > 19-0310 > Correspondence

Name	Date modified	Type	Size
 2020-01-22 19-0310 591	4/22/2020 3:53 PM	Adobe Acrobat D...	474 KB
 2020-01-29 19-0310 Partial Reply	4/22/2020 3:53 PM	Adobe Acrobat D...	474 KB
 2020-01-30 19-0310 Missing Info Email	4/22/2020 3:53 PM	Adobe Acrobat D...	474 KB
 2020-02-10 19-0310 Reply	4/22/2020 3:53 PM	Adobe Acrobat D...	474 KB
 2020-02-12 19-0310 Close Loop Letter	4/22/2020 3:53 PM	Adobe Acrobat D...	474 KB

2. Inspection Report

- a. This is where the final inspection report goes along with any notes from the inspection

Note: File should be named "YEAR-MO-DA DOCKET# Final Report"

Example: 2020-01-22 19-0310 Final Report


3. Inventory

- a. Current RAM inventory for this inspection – PRINT RAM PDF from database with any notes you took during the inspection regarding the inventory (Verifying/correcting Serial numbers, verifying all devices/sources are accounted for, etc).

Note: Should be named: "DOCKET# Inventory"

Example: 19-0310 Inventory

C > Shared (I:) > RAD > RML > 91180 > Inspections > 19-0310 > Inventory

Name	Date modified	Type	Size
 19-0310 Inventory	4/22/2020 3:53 PM	Adobe Acrobat D...	474 KB

4. Supporting Documents

- a. Any documents that is used in the inspection process (for example - SS&D certs, emails between RPS staff, prior inspection reports, prior incidents, etc.)

Transferring Files to and From Each Other

Instead of transferring files to and from our desks, we will be transferring them to and from our personal processing folders on the I: Drive*(I created one for everyone under RAD>RML>Processing – I recommend pinning this to your quick access toolbar for easy access).

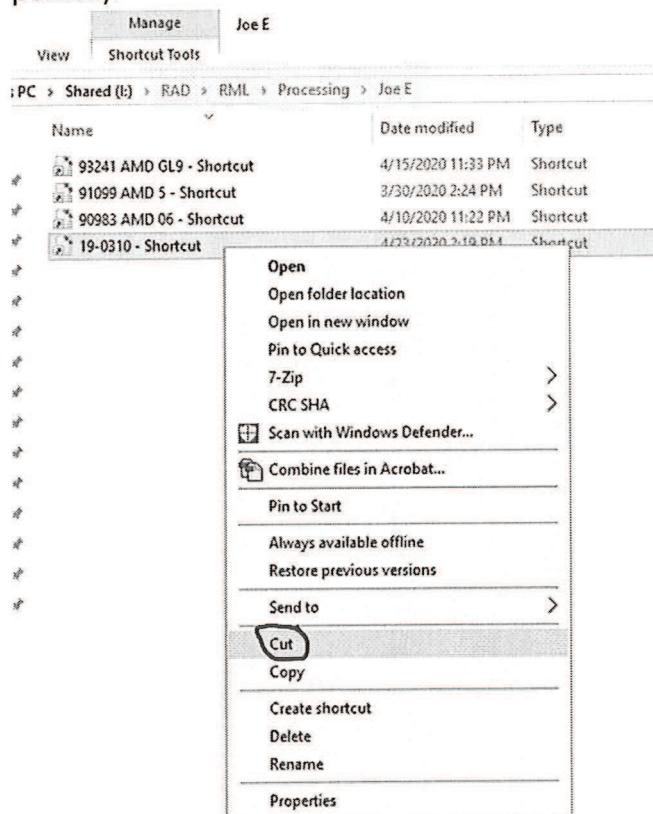
Using these processing folders makes it incredibly easy to transfer files to each other (after doing it a few times).

These processing folders act as our personal electronic inboxes for items that we need to work on. When an item enters your processing folder you need to perform your normal duties on that item and then send it to the next person in the line.

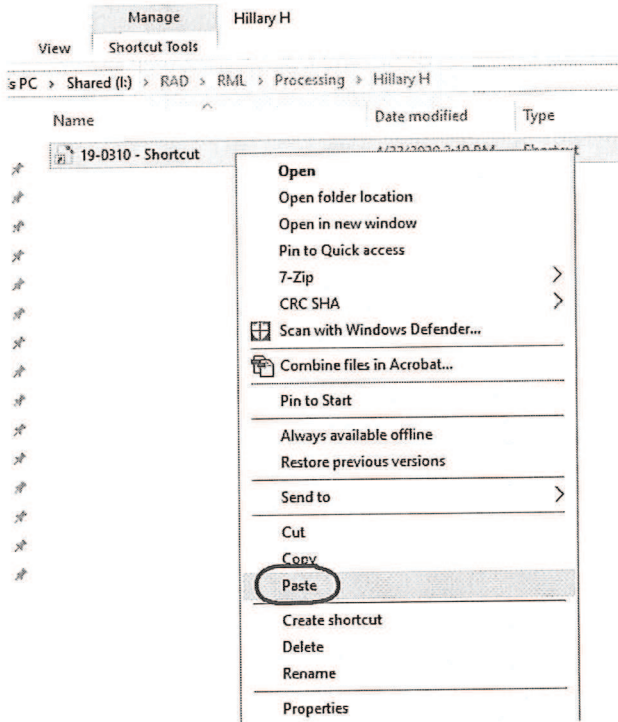
***Important note: We will be transferring SHORTCUTS of these inspection e-files back and forth. NEVER NEVER NEVER move the original inspection e-file from out of the licensee's RML folder once it has been created. This prevents us from losing or accidentally deleting the real e-file. See instructions below:**

The following steps assume the inspector has already created the inspection e-file in the RML licensee's folder and cut and paste a shortcut of it into their processing folder.

1. Cut the shortcut you need to move to the next person (if your signature is needed on the tracking sheet, please make sure to electronically sign before sending to the next person).



2. Paste it into the next reviewer's processing folder (Located under RAD>RML>Processing).



3. You are done with this inspection e-file (make sure to update database destination field!!). The next reviewer can now complete their review using all available materials within this e-file and move to the next person using the same instructions above. At first, we should all be sending emails when we place a file in someone's processing folder as this is not a normal process for everyone.
4. Once all reviews are done and the RML Admin verifies that the original inspection e-file is in the correct RML Licensee e-file (as opposed to scanning the inspection folder items into the RML licensee e-file), the amendment e-file shortcut that has been passed around can be deleted and the destination field in the database can be changed to "filed".

Picture of individual processing folders for reference:

PC > Shared (i:) > RAD > RML > Processing

Name	Date modified	Type	Size
Amendment E-File Template	3/16/2020 8:48 AM	File folder	
Daryl L	4/20/2020 11:10 PM	File folder	
David H	4/22/2020 2:57 PM	File folder	
Erin D	4/23/2020 3:09 PM	File folder	
Hillary H	3/16/2020 8:20 AM	File folder	
Inspection E-File Template	4/23/2020 2:14 PM	File folder	
Joe E	4/23/2020 2:25 PM	File folder	
Lee L	4/14/2020 2:30 PM	File folder	
Rick W	4/22/2020 2:58 PM	File folder	
Todd C	4/23/2020 7:40 AM	File folder	
Tom M	4/22/2020 2:57 PM	File folder	
Tom P	4/22/2020 2:58 PM	File folder	
2020-03 Remote Licensing Guide	3/22/2020 10:49 AM	Microsoft Word D...	1,917 KB
2020-04 Remote Inspection E-File Guide (...)	4/23/2020 3:38 PM	Microsoft Word D...	1,611 KB

Example of the entire process:

Inspector performs an inspection that includes non-compliances. They create the inspection e-file and put the shortcut in their processing folder. Once they receive an adequate reply from the licensee and issue a close loop letter, they will electronically sign the tracking sheet and send the shortcut to the RML Lead Worker's processing folder to review – the folder will include PDF copies of the tracking sheet, all correspondence, 591, final report, inventory, etc. The RML Lead Worker will complete a review and electronically sign the tracking sheet. Then they will send the shortcut to the RPS Operations Manager's processing folder for review. The manager will electronically sign the tracking sheet and forward to the RML Section manager to review. The section manager performs the review, electronically signs the tracking sheet, and forwards to the RML admin. The RML Admin can verify the original inspection e-file is in the correct RML Licensee e-file (as opposed to scanning the inspection folder into the file) and delete the shortcut (then can change "destination" field in the database to "filed"). All the documents from the inspection are retained in the original inspection e-file which is parked in the RML Licensee's e-file for anyone to review in the future.

NOTES

1. This does not affect using the database. It is still crucially important to update the "Destination" field when you give a shortcut to someone else, even if it is an E-File. We do not want to lose track of files.
2. Electronically signing a PDF document: Instead of signing the tracking sheet on paper we will have to electronically sign the PDF version. This can be done on Adobe Acrobat using the "Fill & Sign" Tool. Directions below if you are unfamiliar with this tool:
 - a. Open tracking sheet PDF in Adobe Acrobat (Can be any version)
 - b. Click on "Tools" in the upper left corner

- c. Click on "Fill & Sign"
- d. Click on "Fill & Sign" again (skip this step if using adobe reader)
- e. Click on "Sign" at the top center
- f. Click on "Add Signature"
- g. Type or draw your name
- h. Click "Apply" and wait for window to close
- i. Place your signature where it needs to be on the page
- j. Save Document

3. Last reminder – NEVER move the actual file from out of the RML licensee's file. ONLY CUT AND PASTE THE SHORTCUT!!!

2020 Oregon Radiation Protection Services

IMPEP

Supervisory Accompaniments

In 2020, as we all know we entered a Pandemic that greatly affected the way that we perform our job duties. Oregon as with many other states, ceased performing On-Site Inspections of Licensed facilities.

Oregon worked to develop a "administrative" inspection process that allowed us to continue our contact with our licensees that were due for inspections. Staff developed checklists and document review forms to share with our licensees. The inspectors worked with the licensee RSO to request documents be sent to us for review. The administrative inspection process followed our on-site inspection process in regards with documents submitted for review. The inspectors had the licensee's send photos of items that could only be evaluated with a "eye's on" approach. (2 tangible barriers, security, etc.)

I reviewed reports from each of our inspectors that were performing RML inspections. Daryl Leon, Rama Wusirika and Joe Enger. During this time, our inspectors Hillary Haskins and Thomas Mynes, were on a job rotation or alternate duty assignment with our COVID response team and did not perform any inspections.

I reviewed the inspectors emailed documents to the licensee's, responses from licensees. I was able to review the planning documents prepared by our inspectors as well as any violations noted and corrective actions received in response to the inspection. While, I was not able to participate in the inspection personally, I feel that the review process and discussions with the staff fulfilled the expectations of the accompaniment and assured that the inspectors are well trained and prepared for completing their qualified inspections.

Richard Wendt

Operations/Emergency Response Manager

17. Describe or provide an update on your instrumentation, methods of calibration, and laboratory capabilities. Are all instruments properly calibrated at the present time? Were there sufficient calibrated instruments available throughout the review period.

Survey instruments used for materials inspections are calibrated annually. When an instrument is removed from inspection to calibration mode, the inspector is given a replacement survey meter during the interim that is the same make and model of the original. Radiation Protection Services has enough duplication of meters to ensure inspectors have a calibrated survey meter for use at all times. All portable survey equipment is calibrated according to the criteria outlined in ANSI N323 AB-2013. Calibration records are kept in both electronic (pdf) and printed forms and are available for review. These records are reviewed annually by a representative of FEMA.

18. How many specific radioactive material licenses does your program regulate at this time?
276.

Question 19

Please identify any major, unusual, or complex licenses which were issued, received a major amendment, were terminated, decommissioned, submitted a bankruptcy notification or renewed in this period.

Please identify any major, unusual, or complex licenses which were issued, received a major amendment, were terminated, decommissioned, submitted a bankruptcy notification or renewed in this period.

91209, OHSU, Center for Radiochemistry Research Nuclear Pharmacy, new specific license, 224 days to issue. Research and Medical Isotopes. Application received 05/11/2018. License then amended to add two IRE Galli-Eo generators for production of Ga-68 radiopharmaceuticals for use only under an IND.

90703, Cardinal Health Nuclear Pharmacy Services, amendment 44, add Ge-68/Ga 68 generator, 141 days for licensing action. Licensee's Financial Assurance was not developed at the time of the amendment request and required time to adjust their Financial Assurance and Stand-by Trust Agreement prior to the release of the amended license.

91170, David R. Beaudry, amendment 1, termination of portable gauge, authorize user died.

91212, Northstar Glassworks, Depleted uranium oxide powder used with glass manufacturing. License type is special nuclear material-unsealed. 725 days to issue due to applicant was required to: Conduct training regarding the use and safety with RAM, development of procedures, radiation safety officer training prior to the issuance of the license. The applicant was not planning to use the materials until 2020. No adverse effects due to the length of licensing.

90298, McKenzie Willamette Medical Center, Received Chapter 11 bankruptcy notice for Quorum Health Corporation. Incident number 20-0014, docket number 20-0132.

Question 20

Discuss any variances in licensing policies and procedures or exemptions from the regulations granted during the review period.

90005 Oregon State University, amendment 114, Request for exemption of 333-102-0910, IRB request. 11/02/2017.

90898, Providence Portland Medical Center, amendment 16, request for license condition requiring annual preventive maintenance for a irradiator that currently is out of service and scheduled to be removed through the Radiological Security Irradiator Replacement Program. 12/15/2020.

Question 21

What, if any, changes were made in your written licensing procedures (new procedures, updates, policy memoranda, etc.) during the reporting period?

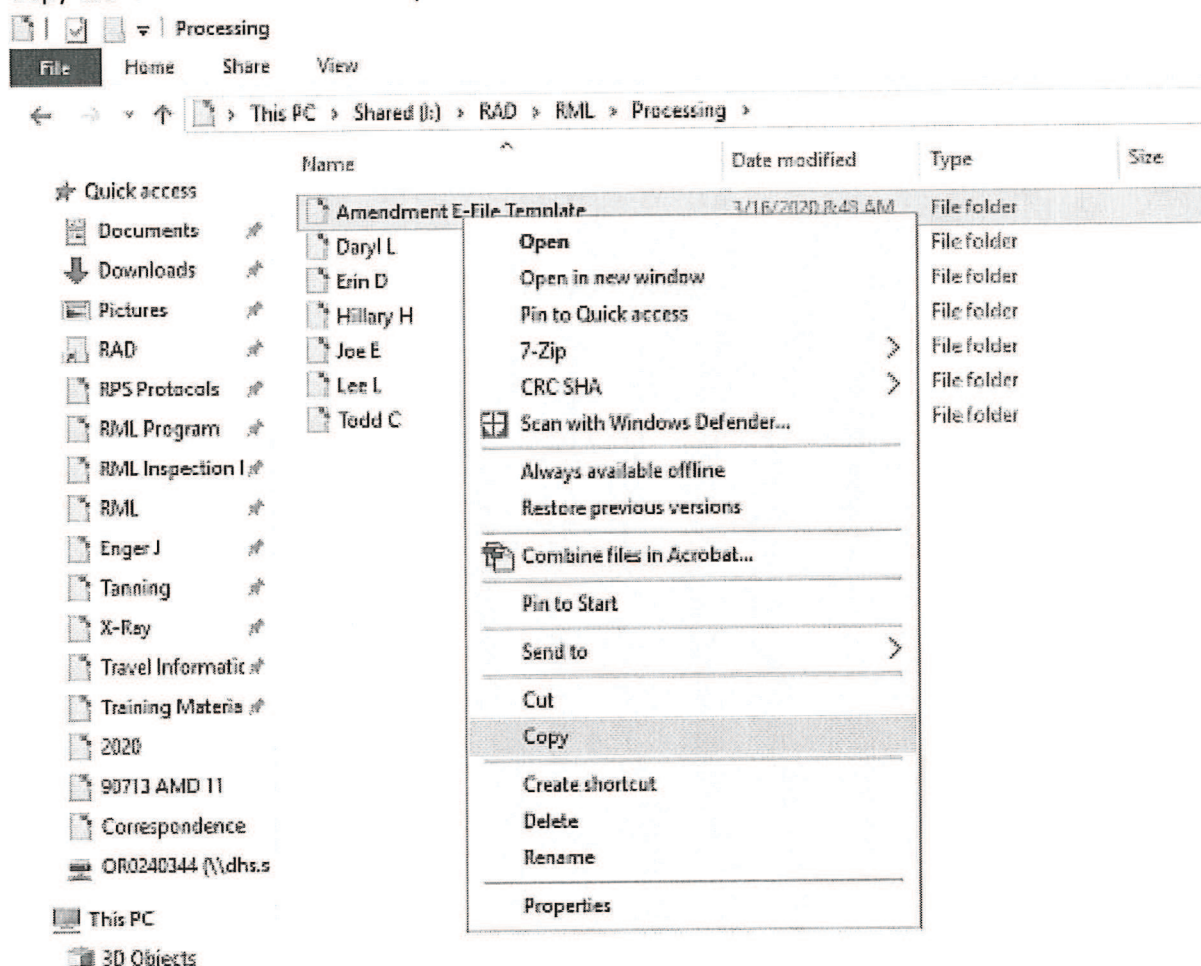
To address the Public Health Division's Continuity of Operations Plan, licensing review staff reengineered licensing review procedures from hardcopy on-site review process to electronic file management and remote review processes.

Remote Licensing Guide

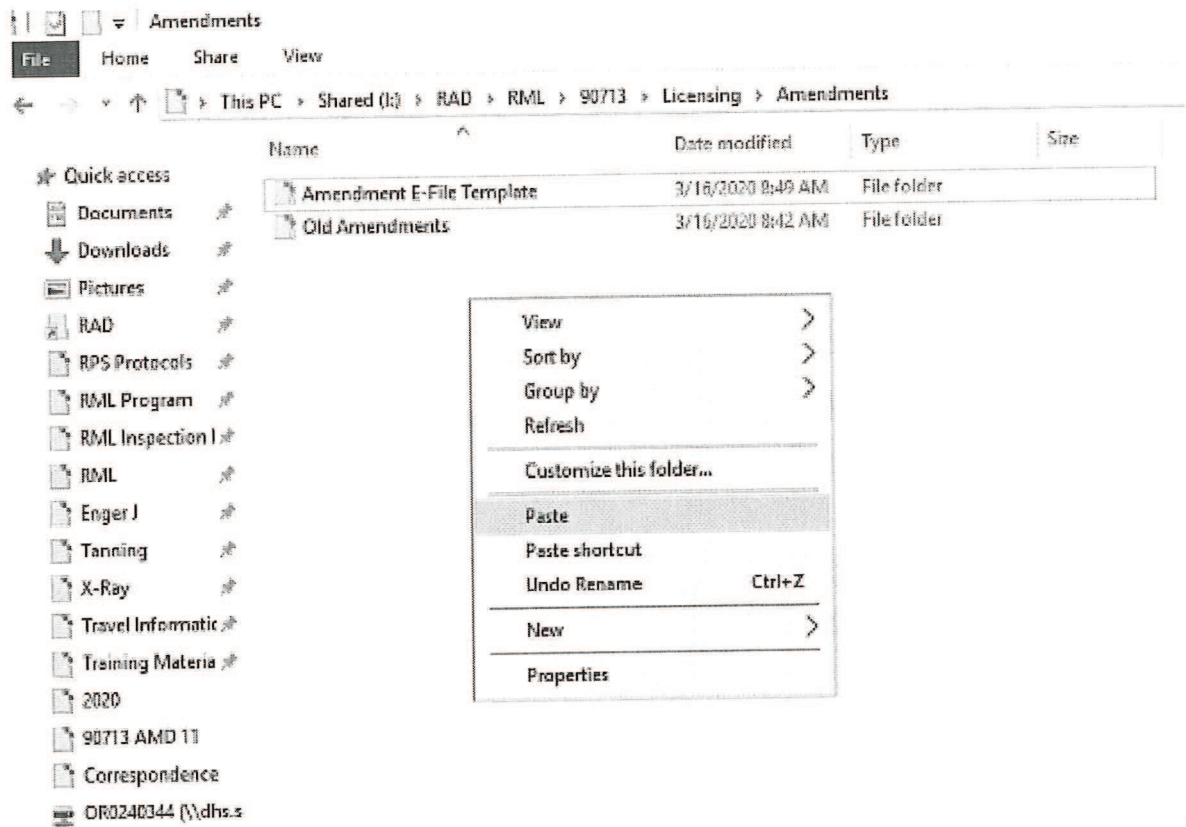
Creating the amendment e-file and where to put it on the I: Drive

This is essentially the same process as creating a hard file for an amendment, but electronically. Usually Erin or Lee will be the ones starting the amendment and creating an e-file for it.

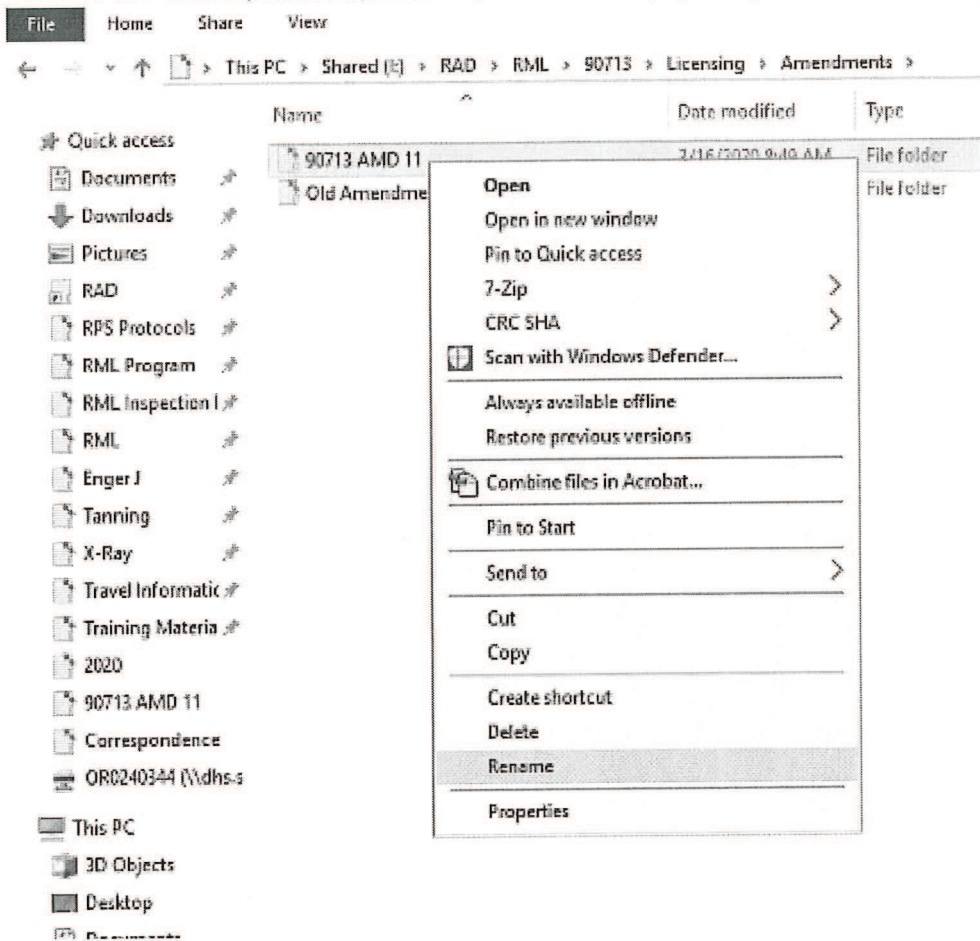
1. Copy the "Amendment E-File Template" from RAD>RML>Processing



2. Paste file into the correct licensee file under RAD>RML>XXXXX>Licensing



3. Rename file "XXXXX(License #) AMD XX(Amendment #)" (Example: 90713 AMD 11)



Components of the Amendment E-File

Name	Date modified	Type	Size
Correspondence	3/16/2020 8:43 AM	File folder	
Inventory	3/16/2020 8:43 AM	File folder	
License	3/13/2020 2:45 PM	File folder	
Supporting Documents	3/16/2020 8:43 AM	File folder	
19-0704 Tracking Sheet	3/13/2020 2:48 PM	Adobe Acrobat D...	445 KB

Inside the amendment e-file are 4 folders **(A current copy of the tracking sheet and any QA Checklists should be kept on the outside of these 4 folders (see picture above), as they are the first thing a reviewer will look at to see where in the process each amendment is):**

1. Correspondence

- a. Any correspondence from the licensee (mostly emails, sometimes letters, etc.)
- b. Any correspondence from RPS to the licensee (requests for missing information, etc)
- c. All files should be PDF and named starting with the date received (see below – YEAR-MO-DA) – we can talk about file naming conventions – I just put the docket number and a simple description in them to make them unique to this amendment.

This PC > Shared (I:) > RAD > RML > 90713 > Licensing > Amendments > 90713 AMD 11 > Correspondence

Name	Date modified	Type	Size
2019-10-29 19-0704 Termination	3/13/2020 3:03 PM	Adobe Acrobat D...	3,527 KB
2019-11-07 19-0704 Email	3/13/2020 3:01 PM	Adobe Acrobat D...	1,779 KB
2019-11-07 19-0704 RPS Email	3/13/2020 3:02 PM	Adobe Acrobat D...	428 KB
2019-11-12 19-0704 Email	3/13/2020 2:58 PM	Adobe Acrobat D...	354 KB
2019-11-20 19-0704 Email & Leak Test	3/13/2020 2:57 PM	Adobe Acrobat D...	781 KB
2019-11-20 19-0704 RPS Email	3/13/2020 2:57 PM	Adobe Acrobat D...	435 KB
2020-01-02 19-0704 Email & Leak Test	3/13/2020 2:56 PM	Adobe Acrobat D...	666 KB
2020-02-20 19-0704 Email	3/13/2020 2:54 PM	Adobe Acrobat D...	317 KB
2020-03-02 19-0704 Email & Troxler Letter	3/13/2020 2:54 PM	Adobe Acrobat D...	602 KB

2. Inventory

- a. Current RAM inventory for this amendment – PRINT RAM PDF from database
- b. Again, we can talk about file naming conventions – I just put docket number and “inventory”

This PC > Shared (I:) > RAD > RML > 90713 > Licensing > Amendments > 90713 AMD 11 > Inventory

Name	Date modified	Type	Size
19-0704 Inventory	3/13/2020 2:51 PM	Adobe Acrobat D...	322 KB

3. License

- a. Current draft of license, signed final draft, amendment letter we send out to licensee, etc.

4. Supporting Documents

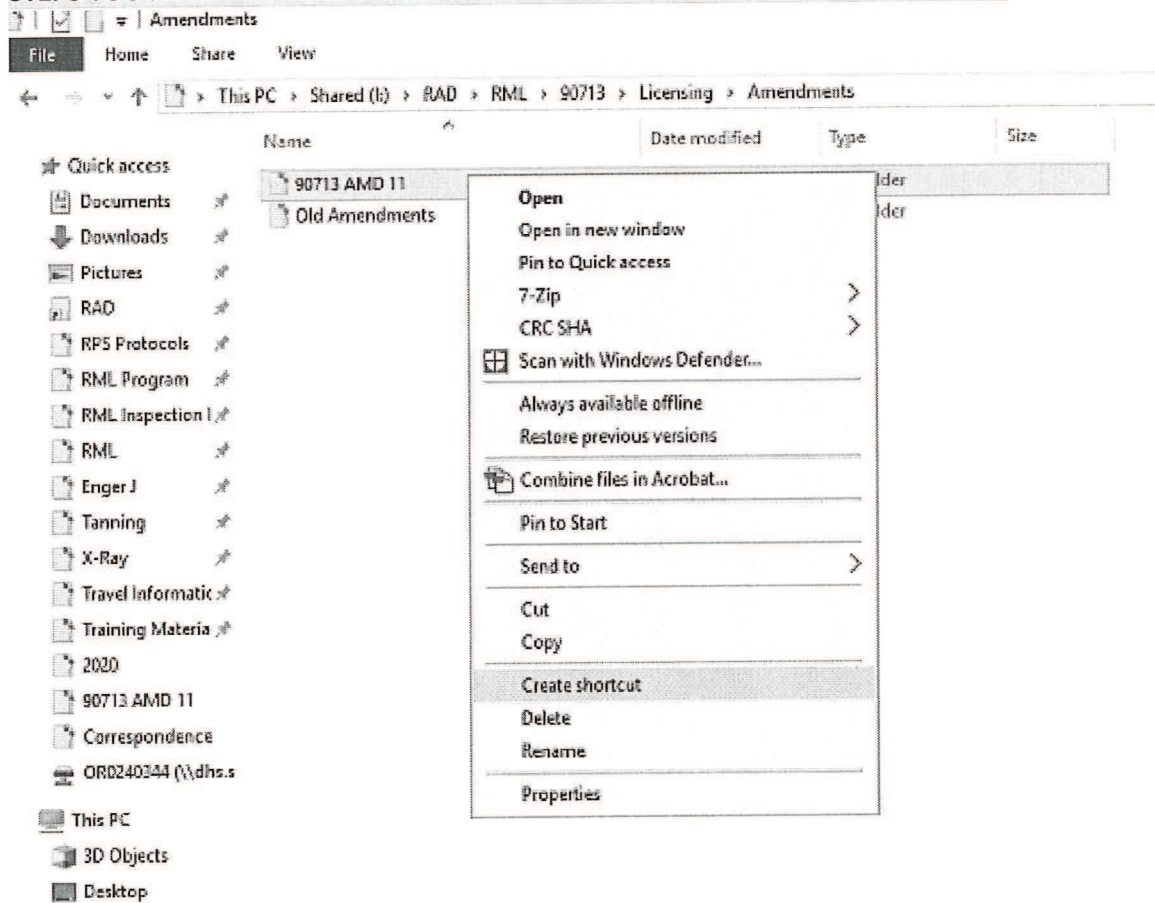
- a. Any documents that we use in the licensing process (for example - SS&D certs, emails between RPS staff, etc..) – basically the stuff that is usually on the left side in the hard file.

Transferring Files to and From Each Other

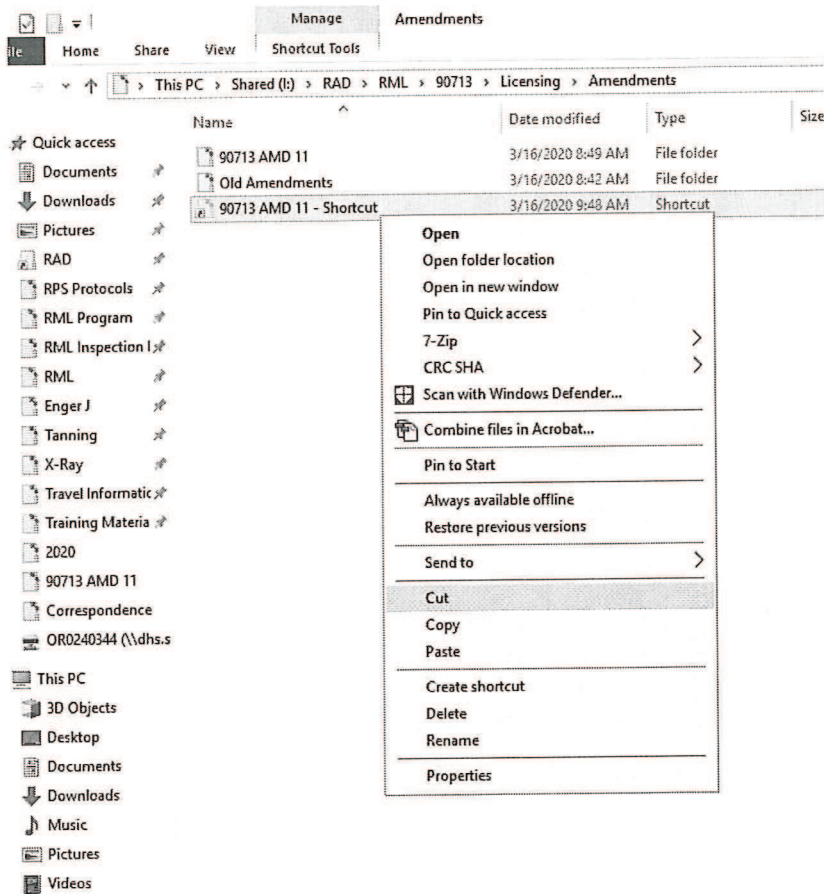
Instead of transferring files to and from our desks, we will be transferring them to and from our individual processing folders (I created one for everyone under RAD>RML>Processing – please pin this to your quick access toolbar) on the I: Drive*

* Important note: We will be transferring SHORTCUTS of these amendment e-files back and forth. Never move the real file from out of the licensee's folder. This prevents us from losing or accidentally deleting the real file. See instructions below:

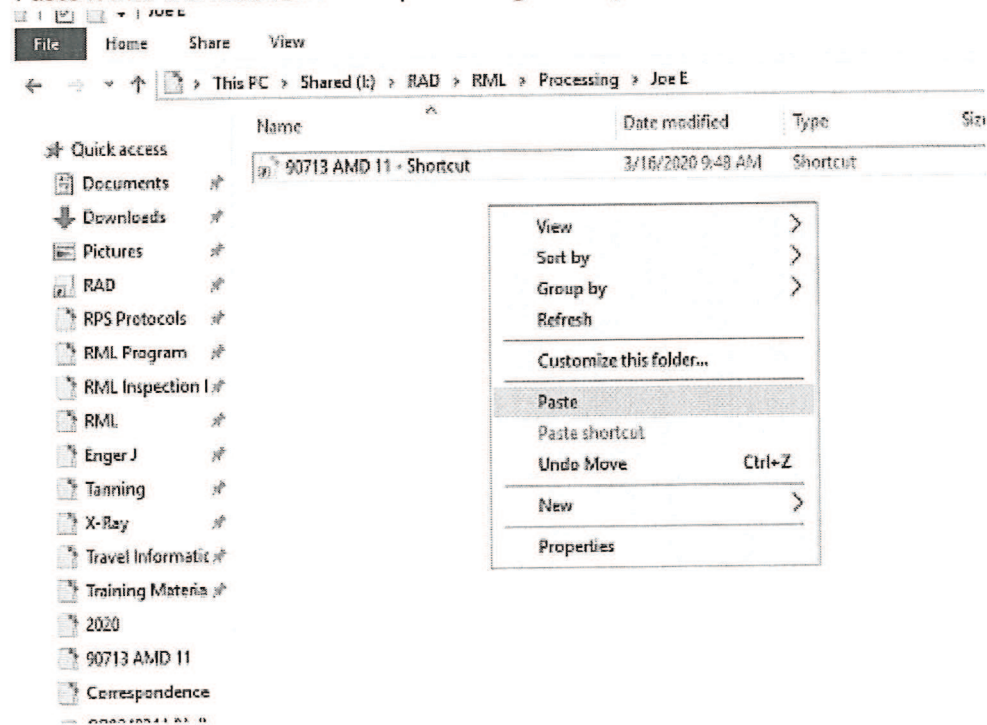
1. Right click and select "Create shortcut" of the amendment e-file you want to transfer to the next reviewer (**ONLY ONE SHORTCUT NEEDS TO BE CREATED, WHICH WILL USUALLY BE DONE BY ERIN OR LEE IF THEY START THE AMENDMENT. ONCE A SHORTCUT IS CREATED THE ONLY STEPS YOU NEED TO FOLLOW ARE 2-4 BELOW TO TRANSFER TO THE NEXT PERSON**).



2. Cut the shortcut.

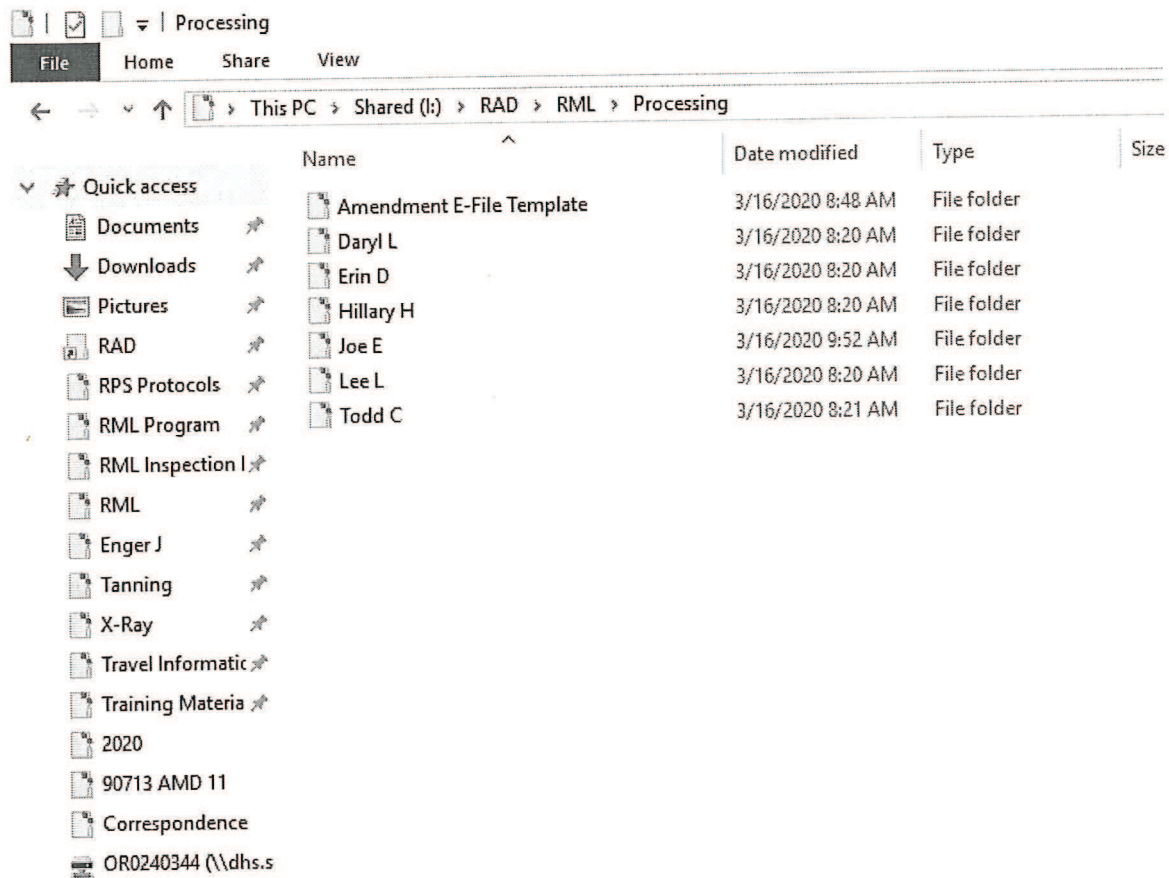


3. Paste it into the next reviewer's processing folder (Located under RAD>RML>Processing).



4. You are done with this amendment e-file. The next reviewer can now complete their review using all available materials within this e-file and move to the next person using the same instructions above. We should all be sending emails when we place a file in someone's processing folder as this is not a normal process for everyone.
5. Once all reviews are done and the license is emailed/mailed out, the amendment e-file shortcut that has been passed around can be deleted.

Picture of individual processing folders for reference:



NOTES

1. This does not affect using the database. It is still crucially important to update the "Destination" field when you give a file to someone else, even if it is an e-file.
2. If we get to a point where we are emailing licenses without physically signing them we can just save that email with the license that was sent in the "license" folder.

Question 22

Identify by licensee name and license number any renewal applications that have been pending for one year or more. Please indicate why these reviews have been delayed and describe your action plan to reduce the backlog.

90731, Oregon Health Science University (OHSU) Broadscope A Academic, amendment 90, 420 days to renewal license. The Radiation Safety Office (RSO) position for this license retired and the position was not immediately filled. The RSO with 90013, Broadscope A-Medical was assigned to manage this license in addition to being responsible for radiation safety practices for both their radioactive material and X-ray programs. The vacant RSO position has been filled and normal operations now continue with timely responses received for both inspection and licensing inquiries.

90651, International Inspection, amendment 52, 385 days to renewal license. This renewal was delayed due to the primary license reviewer commencing maternity leave upon receipt of the renewal application. The licensing action was assigned to a technical reviewer but was stalled rather than continuing forward with the licensing task. The action plan for this incident is to ensure that all licensing actions are assigned and monitored for the number of days each licensing action is taking. In addition, management will interview persons who plan long term leave in relation to developing a licensing assignment plan.

Question 23

Technical Quality of Incident and Allegation Activities

For Agreement States, please provide a list of any reportable incidents not previously submitted to NRC (See Procedure SA-300, Reporting Material Events, for additional guidance, OMB clearance number 3150-0178).

All reportable incidents have been reported to NRC/HOO or NMED per Procedure SA-300, Reporting Material Events. In addition, all incidents are reviewed monthly during the program's staff meeting to ensure that all reportable incidents are forwarded per SA-300 procedures.

Question 24

Identify any changes to your procedures for responding to incidents and allegations that occurred during the period of this review.

Protocol 143, Management of Allegations was reviewed 01/10/2021 with no revisions made.

Question 25

Please list all currently effective legislation that affects the radiation control program. Denote any legislation that was enacted or amended during the review period.

House Bill 2075 has been introduced to the 2021 legislative assembly to increase radiation user registration and licensing fees to support current operations through the 2025-2027 biennium. Increased fees will place Radiation Protection Services (RPS) in a position to achieve PHD modernization and health equity goals. In conjunction with HB 2075, the Radioactive Material Program is submitting a Policy Option Package and if approved, will increase radioactive material licensing fee revenue by \$559,000.

The proposed HB will generate an additional \$1,982,000 in revenue for RPS programs. Increased revenue allows recruitment of three (one vacancy to be filled, establish two new positions) Environmental Health Specialists (facility inspectors) to address a growing X-ray inspection backlog and be cross-trained to conduct radioactive material licensing review and inspection tasks. Added revenues will provide fiscal solvency over the next three biennia.

Question 26

Are your regulations subject to a "Sunset" or equivalent law? If so, explain and include the next expiration date for your regulations.

No, but all Administrative Rules must be reviewed every five years.

Question 27

Please review and verify that the information in the enclosed State Regulation Status (SRS) sheet is correct. For those regulations that have not been adopted by the State, explain why they were not adopted, and discuss actions being taken to adopt them. If legally binding requirements were used in lieu of regulations and they have not been reviewed by NRC for compatibility, please describe their use.

Letter dated January 13, 2021, addressed to David M. Howe with SRS attached is incorrect. Oregon rulemaking for RATS-1 has been proposed and reviewed by the NRC. Rulemaking for RATS 2018-2 has been proposed and finalized by the NRC. Amended rules will be filed and published by the Oregon Secretary of State after the 2021 legislative session.

Question 28

28. If you have not adopted all amendments within three years from the date of NRC rule promulgation, briefly describe your State's procedures for amending regulations in order to maintain compatibility with the NRC, showing the normal length of time anticipated to complete each step.

N/A

Questions 29 through 32 are not applicable to Radiation Protections Service's program.