

**From:** Rogers, Ronald <[Ronald.Rogers@msdh.ms.gov](mailto:Ronald.Rogers@msdh.ms.gov)>  
**Sent:** Wednesday, August 10, 2022 2:31 PM  
**To:** Johnson, Robert <[Robert.Johnson@nrc.gov](mailto:Robert.Johnson@nrc.gov)>  
**Cc:** Cook, Jackie <[Jackie.Cook@nrc.gov](mailto:Jackie.Cook@nrc.gov)>; Modes, Kathy <[Kathy.Modes@nrc.gov](mailto:Kathy.Modes@nrc.gov)>; Algee, Jeffrey <[Jeffrey.Algee@msdh.ms.gov](mailto:Jeffrey.Algee@msdh.ms.gov)>; Clark, James <[James.Clark@msdh.ms.gov](mailto:James.Clark@msdh.ms.gov)>; McRoberts, Julia <[Julia.McRoberts@msdh.ms.gov](mailto:Julia.McRoberts@msdh.ms.gov)>; Craft, Christy <[Christy.Craft@msdh.ms.gov](mailto:Christy.Craft@msdh.ms.gov)>  
**Subject:** [External\_Sender] RE: Comments on Mississippi's Draft PIP

Mr. Johnson, I appreciate your critical and comprehensive comments. Please find attached revised as I interpreted. Some I chose to leave in place and will adjust as our monthly meetings or as program changes and opportunities change or dictate.

I did sanitize the TBDs and OnGoing from the dates and left several blank in the completion date. For the record I am hesitant with forecasting completion dates with so many variables which exist out of my scheme of control and even influence in some cases. However, I did populate month and date. I am uncomfortable reporting a date based on an uneducated guess.

A Few notes on changes recommended but “not incorporated.” With a brief Comment.

SMIP Tab, Recommendation 2, Task 2: Verify the DEC 2021 date? During the review in February 2022, it was not clear to the team that Mr. Algee had accepted this position. **Jeff Algee verbally accepted the position in DEC 2021 and was confirmed FEB following the IMPEP. He has functioned as the supervisor following IMPEP. Due to MPBS restructure of position classifications the “Official Request” to move him into the PIN officially was processed in March. Effective date for Pay is July 2022.**

General Tab, Observation 1: Clarify the term “WBL Light.” **Removed as it is not relevant. This language was picked up during WBL training and during the CRCPD calls where WBL updates have been provided. Referring to the additional opportunity to incorporate Items like training tracking, invoicing, calibration records and other program Activities to include X-Ray / Mammography. I do not have an availability date on this.**

Training Table Tab: Consider expanding the Training Table to include a complete list of contractor names, current staff names (both licensing and qualified inspectors) and remove individuals who are no longer with the Program since February 2022. **Removed Training Table as this is not intended to be an official “Training File” and would be redundant to Training Meetings Documentation.**

As always thank you for your valuable input. As I understand Jackie and Mary Muessle will be at my table on 30 August (1<sup>st</sup> Scheduled Conference Call.) This is the two weeks following the OAS Conference. I hope to regain some traction and dialogue which should add additional “Meat” to this plan.

V/R

Ron

Ron Rogers  
Director of Radiological Health  
MS Department of Health

3150 Lawson Street  
Post Office Box 1700  
Jackson, MS 39215-1700

**Phone:** 601-987-6893  
**Fax:** 601-987-6887

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**From:** Johnson, Robert <[Robert.Johnson@nrc.gov](mailto:Robert.Johnson@nrc.gov)>  
**Sent:** Thursday, August 4, 2022 10:59 PM  
**To:** Rogers, Ronald <[Ronald.Rogers@msdh.ms.gov](mailto:Ronald.Rogers@msdh.ms.gov)>  
**Cc:** Cook, Jackie <[Jackie.Cook@nrc.gov](mailto:Jackie.Cook@nrc.gov)>; Modes, Kathy <[Kathy.Modes@nrc.gov](mailto:Kathy.Modes@nrc.gov)>  
**Subject:** Comments on Mississippi's Draft PIP

Mr. Rogers,

Thank you for providing Mississippi's draft Program Improvement Plan (PIP). The draft PIP appears to be complete, comprehensive, and identify tasks necessary to address almost all the 2022 IMPEP review recommendations and improve Program performance.

Based on a quick review, I attached a short list of suggestions for your review and consideration prior to officially submitting the PIP to NRC. I also attached an updated copy of the PIP spreadsheet that includes some minor editorial changes to help with clarity consistency. Some of the cells in that spreadsheet have been highlighted purple to help locate some of the comments referenced in the first attachment.

Please let me know if you have any questions. I'd be happy to walk through the comments and address any questions you all might have. Addressing these comments on the draft PIP should expedite the staffs review (and hopefully approval) of the official PIP.

Thanks,

**Robert K. Johnson**  
**IMPEP Program Coordinator**  
**NRC / NMSS / MSST / SLPB**  
**Office / MS: TWFN05-B69 / TWFN05-B60**  
**PHONE: 301.806.8061**

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**From:** Rogers, Ronald <[Ronald.Rogers@msdh.ms.gov](mailto:Ronald.Rogers@msdh.ms.gov)>  
**Sent:** Thursday, August 11, 2022 5:28 PM  
**To:** Johnson, Robert <[Robert.Johnson@nrc.gov](mailto:Robert.Johnson@nrc.gov)>  
**Cc:** Cook, Jackie <[Jackie.Cook@nrc.gov](mailto:Jackie.Cook@nrc.gov)>; Modes, Kathy <[Kathy.Modes@nrc.gov](mailto:Kathy.Modes@nrc.gov)>; Craft, Christy <[Christy.Craft@msdh.ms.gov](mailto:Christy.Craft@msdh.ms.gov)>; Vail Fuller, Melanie <[Melanie.VailFuller@msdh.ms.gov](mailto:Melanie.VailFuller@msdh.ms.gov)>; Craig, Jim <[Jim.Craig@msdh.ms.gov](mailto:Jim.Craig@msdh.ms.gov)>  
**Subject:** [External\_Sender] RE: Comments on Mississippi's Draft PIP

Thank you for your patience and assistance. I know it is still not a perfect document but I had two other sets of eyes on it this time..

I removed the general TAB as it reflects some items not IMPEP generated and intended for overall improvement indicatives.. If approved I will use the original for inhouse updates and this version for NRC reported IMPEP Improvement progress moving forward.

Again Thanks

V/R

Ron

Ron Rogers  
Director of Radiological Health  
MS Department of Health  
3150 Lawson Street  
Post Office Box 1700  
Jackson, MS 39215-1700

**Phone:** 601-987-6893  
**Fax:** 601-987-6887

**From:** Johnson, Robert <[Robert.Johnson@nrc.gov](mailto:Robert.Johnson@nrc.gov)>  
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spreadsheet that includes some minor editorial changes to help with clarity consistency. Some of the cells in that spreadsheet have been highlighted purple to help locate some of the comments referenced in the first attachment.

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Thanks,

**Robert K. Johnson**  
**IMPEP Program Coordinator**  
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**Office / MS: TWFN05-B69 / TWFN05-B60**  
**PHONE: 301.806.8061**

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RECOMMENDATION	TASK	MILESTONE	ASSIGNED	ANTICIPATED COMPLETION DATE	FRICTION POINTS	STATUS	COMPLETION DATE	COMMENTS
Mississippi performs an independent evaluation to ensure all license reviewers and inspectors are appropriately qualified through initial and refresher training to perform the duties they are assigned.	Develop Database To Track Training	Currently using spreadsheet / will integrate to WBL when available	Ron Rogers / Jeff Algee	April 2022	NONE	COMPLETE	April 2022	NONE
	Have Single Point for Training MGT	Duty Assignment / Training Files	Drew Clark / Ron Rogers	April 2022	NONE	COMPLETE	April 2022	NONE
	Develop Quarterly Training Meeting to prioritize and track training	Initial Meeting Completed 0930 28JUNE2022	Ron Rogers / Jeff Algee	June 2022	Identifying Available Training Seats	COMPLETE	1 July 2022	This includes formal NRC training outlined in 2023 Appendix A and B for Licensing and Inspections
	Pay for "in house" Refresher / HP related Training Annually. The desired Training will address the quality of inspection reporting and documentation	Completion and Documented	Ron Rogers	December 2021	Identifying Available Internal and external Trainers	Scheduled with FEMA in DEC 2022 and JAN 2023		FEMA Dose Assessment / Modeling Training for 2022-2023. New courses for 2023 not yet identified.
Hire, Train and Position HP to better balance Qualified HPs between Licensing and Inspections	Staffing and Training of HPs (2x new HPs) as well as use of contracts to support transition	Jeff Algee / Ron Rogers	June 2023	MSDH Hiring Timelines / MPBS Approval	Announcements have been reopened to increase candidate pool		This process ins ongoing with no near term closure of "Qualified" staff. Strategy will be contracts to fill void as hiring and training continues	

RECOMMENDATION	TASK	MILESTONE	ASSIGNED	ANTICIPATED COMPLETION DATE	POINTS OF FRICTION	STATUS	COMPLETION DATE	COMMENTS
<b>Mississippi develops and implements a reliable and comprehensive scheduling and tracking process to ensure completion of inspections including reciprocity inspections.</b>	Review of inspection and reciprocity procedures	Review and Approval	Jeff Algee / Julia McRoberts	APRIL 2022	NONE	Complete	May-22	Will incorporate Annual Review of RAD Health Procedures
	Appoint Materials Supervisor to Track and Schedule	Position Filled	Ron Rogers / Drew Clark	FEB 2022	HR permanent	Complete	Feb-22	Jeff Algee has accepted Interim Position until HR can make permanent
	Incorporate Scheduling and Tracking in WBL	Migration and Training Complete "Train the Trainer" followed by In house training of all inspectors	Ron Rogers / Jeff Algee	OCT - NOV 2022	TRAINING / AVAILABILITY	Pending Training for individual Inspectors partially done		Currently using Access managed by Jeff Algee until WBL function is available
	Integrate Monthly Staff Meeting to prioritize and schedule inspections	Meetings	Ron Rogers / Jeff Algee	JULY 2022	NONE	ongoing		First "Formal" Staff Meeting for 5 July 2022 completed frequency every 2 weeks
<b>Mississippi develops a method to ensure licensees are provided the results of the inspection (e.g., cover letters) in a timely manner.</b>	Integrate Monthly Staff Meeting to prioritize and schedule inspections	Meetings	Ron Rogers / Drew Clark	July 2022	NONE	ongoing		First "Formal" Staff Meeting for 5 July 2022 completed frequency every 2 weeks
	Appoint Materials Supervisor to Track and Schedule	Position Filled	Ron Rogers / Drew Clark	JAN 2022	HR permanent	Complete	Dec-21	Jeff Algee has accepted Interim Position until HR can make permanent
<b>The 2017 recommendation remains open:</b> Mississippi should review its guidance, including licensing, incident, and allegation guidance; update this guidance, as appropriate; and provide training to all staff on the new procedures.	Use External Review of Procedures	Review and Approval	Ron Rogers / Jeff Algee	FEB 2023	Limited Staff / Compatibility Review	Ongoing		Currently Planning on qualified HPs form OAS programs. Contract in place with Alabama Program and Pending contract with Oklahoma (currently assisting with peer review)
	Provide Training as needed at team meetings	Schedule Training as Needed	Ron Rogers / Jeff Algee	FEB 2023	NONE	Ongoing as required		There is a GAP in Planning to create the "white space" in schedule to evaluate and address necessary changes in procedures

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<p>Mississippi develops and implements IPs that are consistent with the NRC's IPs and provide training on the proper method of documenting inspections. Checklists may be used, but the final inspection documentation needs to be clear, consistent, and comprehensive to ensure that the inspection covered all required safety focus areas.</p> <p>These procedures should ensure (1) inspection documentation is complete, comprehensive, focused on safety and security, as applicable, and meets the documentation requirements in IMC 2800; and (2) violations are adequately documented, licensee corrective actions reviewed for adequacy and documented, and sufficient follow-up of violations is performed and documented consistent with the safety or security significance (repeat from 2009 IMPEP review).</p>	Ensure Procedures are Inclusive and Compatible	Procedures Review	Jeff Algee / Rob Sims	June 2022	Ongoing	NONE		Review is in Draft awaiting final adjustments and processing
	Formal Training	Inspection Training Seats	Jeff Algee / Ron Rogers	NOV 2022	Request Submitted	Available training seats		Formal Training Requested for 2 New Hires (TBD)
	External Refresher Training	OAS / NRC provide training to existing staff	Ron Rogers	OCT 2022	Hold scheduling meeting with NRC Region IV to schedule training and accompaniments with staff	None		
	Establish Internal / External Audits of Reports	Audits Conducted	Jeff Algee / Rob Sims	FEB 2022	Pending Refresher Training	None		Identifying Available HPs for external Audits
	Staff Visits to other Agreement States for Inspector Accompaniments	Inspector Accompaniments	Ron Rogers/ Jeff Algee	SEPT 2022	Scheduled with LDEQ	Time and Inspection Coordination		Working with Florida/ LDEQ / Alabama as schedules permit
Mississippi develops a systematic approach to ensure that annual supervisory inspector accompaniments are completed.	Incorporate Bimonthly Staff Meeting	Staff Meetings	Ron Rogers / Drew Clark	5 July 2022	Ongoing	NONE	July 2022	5 July Meeting Complete, scheduled every 2 weeks moving forward
	Accompaniments Documented in Training Records	Conduct / Documentation	Jeff Algee / Ron Rogers	October 2022	Ongoing	NONE		
Mississippi ensures staff have access to the SS&D Registry and the National Source Tracking System in order to provide inspectors with information they will need for inspection preparation.	SSDR / NSTS	SSDR / NSTS Access Granted	Ron Rogers / Jeff Algee	March 2022	Complete	NONE	FEB 2022	Currently All 4 Qualified inspectors / license employees have access
	Request Access for New Hires	SSDR / NSTS Access Granted	Ron Rogers / Jeff Algee	OCT 2022	New Hires Have been registered for 108 and 109	Initial Training Availability		Will Initiate the process prior to Initial Training Completion. Jeff or Rob can provide OJT using their access

RECOMMENDATION	TASK	MILESTONE	ASSIGNED	ANTICIPATED COMPLETION DATE	POINTS OF FRICTION	STATUS	COMPLETION DATE	COMMENTS
Mississippi performs an extent of condition review of all their medical licenses issued since April 28, 2017, to ensure that all Radiation Safety Officers, Authorized Users, Authorized Nuclear Pharmacists, and Authorized Medical Physicists are appropriately qualified in accordance with applicable licensing guidance (e.g., equivalent 10 CFR Part 35 regulations and NUREG-1556, Volume 9, Revision 3).	Internal Audit of Medical Licenses 2017 - Current	Complete Through Current	Jeff Algee / Julia McRoberts	FEB 2022	Qualified Personnel to Complete Audit and Balance Inspections	2017-2018 Complete		Ongoing Due to number of qualified licensing personnel
	External Audit of Medical Licenses 2017 - Current	Contract Initiation	Ron Rogers / Drew Clark	SEPT 2022	Location of Qualified and Available Personnel	Contract awarded		Alabama Program will scheduled and complete audit
	Incorporate External PEER Reviews	Initiate Peer Review of current licensing actions	Julia McRoberts	March 2022	NONE	ONGOING		Oklahoma and Alabama are assisting with this review
	Incorporate Internal PEER Reviews	Initiate Peer Review of current licensing actions	Jeff Algee / Julia McRoberts	March 2022	NONE	ONGOING		Julia and Jeff PEER Review all Licensing Actions. Discussions with AL for permanent contract for Licensing
Mississippi develops a licensing review process that follows the NUREG-1556 series. The licensing review process should use standard or approved license conditions on Mississippi radioactive material licenses to ensure that they do not cause conflicts, duplications, gaps, or other conditions that would jeopardize an orderly pattern in the regulation of agreement material on a nationwide basis. In addition, Mississippi should perform an extent of condition review of licenses renewed since April 28, 2017, to determine if the licensee's compliance history/enforcement history at the time would have made Mississippi not renew the license based on this additional information in accordance with NUREG-1556, Volume 20, Revision 1.	Refresher Training	WBL Integration	Julia McRoberts	March 2022	NONE	Complete	March 2022	Oklahoma and Region IV assisted in refresher training
	Incorporate External PEER reviews	External Peer Review of current licensing actions	Julia McRoberts	March 2022	NONE	ONGOING		Oklahoma and Alabama are assisting with this review
	Incorporate Internal PEER Reviews	Initiate Peer Review of current licensing actions	Jeff Algee / Julia McRoberts	March 2022	NONE	ONGOING		Julia and Jeff PEER Review all Licensing Actions. Discussions with AL for permanent contract for Licensing
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	Incorporate Internal PEER Reviews	Initiate Peer Review of current licensing actions	Jeff Algee / Julia McRoberts	March 2022	NONE	ONGOING		Julia and Jeff PEER Review all Licensing Actions. Discussions with Alabama for permanent contract for Licensing



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<b>Mississippi assesses their incident and allegation casework completed for the review period to ensure proper closure of cases.</b>	Review of Procedures	Ensure Procedures are Compatible	Jeff Algee	March 2022	Interpretation of Inspector vs NRC	Complete	March 2022	Procedures are Compatible
	Internal Retraining	Training	Jeff Algee	March 2022	NONE	Complete	March 2022	Ongoing with new hires
	Internal Audit of Incidents and Allegations 2017 - Current	Review	Jeff Algee / Drew Clark	April 2022	Interpretation of Inspector vs NRC	Complete	April 2022	Pending External Audit
	External Audit of Incidents and Allegations 2017 - Current	Contract Initiation	Ron Rogers / Drew Clark	SEPT 2022	Location of Qualified and Available Personnel	Working to identify external agency to conduct audit		Conditions of Work Submitted and Funding is Available
	Integrate Bi-monthly Staff Meeting to prioritize and schedule inspections	Meetings	Ron Rogers / Drew Clark	5 JULY 2022	NONE	Ongoing	Ongoing	First "Formal" Staff Meeting for 5 July 2022 complete with every 2 week frequency