

Rhode Island Agreement State Program Improvement Plan

RECOMMENDATION	TASKS	MILESTONES	ASSIGNMENTS	ANTICIPATED COMPLETION DATE	STATUS	ACTUAL COMPLETION DATE
Rhode Island management take measures to ensure licensing and inspection documentation is complete and stored in a centralized filing system	Fill in missing licensing and inspection information	Transfer data from inbox A to shared drives	Dundulis, Hamm	1/30/22	Complete	1/5/22
		Transfer data from inbox B to shared drive	Hamm	9/30/22	Complete	11/10/22
	Develop audit program to review licensing and inspection file completeness	First audit performed, next audit scheduled	All staff	10/31/22, thereafter annual review	13 of 40 licensing reviews complete, inspection pending	-
	Train staff to adopt new filing procedures	Acquire Adobe Acrobat for all staff	Hamm	3/31/22	Complete	2/21/22
	Create digital repository for licenses and inspection reports	Fully integrate new organization system	All staff	1/18/22	Complete	1/18/22
		Put all current license renewals and last two inspection reports of active licenses from the physical files online	All Staff	10/15/22	Complete	10/20/22

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Implement the Pre-Licensing guidance (and any updates, as necessary) and provide training to ensure staff understands how to properly identify unknown applicants and transfer of control requests, and how to document the basis for the known entity determination.	Hold pre-licensing guidance training	Hold specific training on enhanced pre-licensing guidance	Hamm to train: Dundulis, Barnes, Klaczynski	2/28/22	Complete	3/23/22
	Practice using the checklist	Document old licensing actions with enhanced pre-licensing guidance	Hamm, Dundulis, Barnes, Klaczynski	4/30/22	Complete	4/28/22
	Develop scheme to have other reviewers check on employment of the guidance	Ensure the pre-licensing guidance checklist is used by each staff member for all new licenses and transfers of control received	Hamm	Ongoing	Implementation complete, new license application in process	Ongoing

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Implement the RSRM checklist (and any updates, as necessary) and provide additional training to ensure staff understand when to use the checklist.	Hold RSRM checklist training	Hold specific training on programmatic implementation and use of RSRM Checklist	Hamm to train: Dundulis, Barnes, Klaczynski	2/28/22	Complete	3/23/22
	Practice using the checklist	Add RSRM Checklist to licenses reviewed in IMPEP period	Hamm, Dundulis, Barnes, Klaczynski	3/31/22	Complete	4/28/2022
	Develop scheme to have other reviewers check on employment of the guidance	Ensure RSRM checklist is used for licensing actions as defined in the guidance and is placed in the file by the staff member assigned the action	Hamm	Ongoing	Implementation complete, new license application in process	Ongoing

RECOMMENDATION	TASKS	MILESTONES	ASSIGNMENTS	ANTICIPATED COMPLETION DATE	STATUS	ACTUAL COMPLETION DATE
Implement a financial assurance program consistent with State regulations; that licenses that authorize possession of radioactive material in excess of quantities requiring financial assurance post financial assurance; and, that financial assurance license conditions be consistent with possession limits authorized on the license.	Review licenses to assess financial assurance needs	Audit current licenses and make sure that all financial assurance licenses are identified	Hamm	11/20/21	Complete	11/20/21
		Maintain up-to-date records of financial assurance and develop annual process	Hamm	12/18/21, thereafter annual review	Complete	12/18/21, now ongoing
	Amend licenses that choose not to post financial assurance	Discuss beneficial amendments with license RSOs	Hamm	11/12/21	Complete	11/12/21
		Amend University A license to not require financial assurance at University A's request	Hamm, Dundulis	11/22/21	Complete	11/22/21
		Amend Pharmacy A license to not require financial assurance at Pharmacy A's request	Hamm, Dundulis	1/7/22	Complete	1/7/22
		Amend Pharmacy A license with new DFA	Dundulis	4/30/22	Complete	4/18/22
		Amend Hospital A license to not require financial assurance at Hospital A's request	Hamm, Dundulis	11/25/21	Complete	11/25/21
		Amend Hospital B to not require financial assurance at Hospital B's request	Hamm, Dundulis	12/5/21	Complete	12/5/21

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<p>Implement a financial assurance program consistent with State regulations; that licenses that authorize possession of radioactive material in excess of quantities requiring financial assurance post financial assurance; and, that financial assurance license conditions be consistent with possession limits authorized on the license. <i>(cont.)</i></p>	<p>Collect effective documentation with those licenses that prefer to keep their license limits high</p>	<p>Obtain financial assurance documents from University B</p>	<p>Hamm</p>	<p>12/10/21</p>	<p>Complete</p>	<p>12/10/21</p>
		<p>Store Financial Assurance documentation on secure file system</p>	<p>Hamm</p>	<p>2/3/22</p>	<p>Complete</p>	<p>2/3/22</p>
		<p>Financial assurance highlighted in license review checklists</p>	<p>Dundulis</p>	<p>12/15/21</p>	<p>Complete</p>	<p>12/15/21</p>

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Develop a balance in the staffing of licensing and inspection programs	Finish training of license reviewer in RI IMC 1248 equivalent	G-205 Root Cause Analysis, scheduled 3/14-3/18	Barnes	3/18/22	Complete	3/18/22
		Nuclear Gauge Licensee A Renewal	Barnes	12/12/21	Complete	12/12/21
		H-122 Lab NRC Course, scheduled 1/24-1/28	Barnes	1/28/22	Complete	1/28/22
		Organize and execute trial review of Academic/Industrial broad scope license from out-of-state license application	Hamm, Barnes	6/30/22	Complete	7/15/22
	Build out peer review capabilities	Hold in-house license review training	Dundulis, Hamm, Klaczynski	3/31/22	Complete	3/29/22
		G-109 NRC Licensing Course, scheduled 3/27-3/31	Hamm	3/31/22	Complete	4/1/22
	Bolster cross-coverage to maintain program capabilities if any one staff member has to be absent	Have 10 licensing actions done principally by someone other than License Reviewer A	Hamm, Barnes, Klaczynski, Dundulis	3/31/22, then ongoing	Complete, now ongoing	4/1/22, now ongoing
		Develop license review rotation schedule	Hamm	3/31/22, then ongoing to maintain it	Ongoing	Ongoing