

Washington Agreement State Program Improvement Plan (PIP)

| RECOMMENDATION | TASKS | MILESTONES | ASSIGNMENTS | ANTICIPATED COMPLETION DATE | STATUS | ACTUAL COMPLETION DATE |
|--|--|---|-----------------|--|-------------|------------------------|
| <u>Technical Staffing & Training</u> | | | | | | |
| <p><i>Washington should review, revise, and update the training and qualification requirements for all aspects of its Agreement State Program to ensure the essential objectives of the IMC 1248 appendices A, B, E, H, and I are adopted.</i></p> | Revise Staff Training & Qualifications Procedure | <p>Revised draft available Under review again as of 6/01/23</p> | Section Sup | <p>6/30/22 6/30/2023</p> | In progress | 6/15/2022 |
| | | Additional revision, if needed after NRC review | | | | - |
| | Staff review of revised S&T Procedure | <p>Program Leads sign off Under review again as of 6/01/23</p> | Program Leads | <p>7/15/2022 7/15/2023</p> | In progress | 6/20/2022 |
| | Section Sup approval | <p>Section Supervisor approves document Under review again as of 6/01/23</p> | Section Sup | <p>7/25/2022 6/7/15/2023</p> | In progress | 6/30/2022 |
| | Train Staff on New Procedure | <p>Provide staff training on new Training & Qual Procedure Under review again as of 6/01/23</p> | Section Sup | <p>8/30/2022 08/30/2023</p> | In progress | 8/30/2022 |
| Final approval signatures | Train Staff on Who can sign qual card | <p>Provide direction and answers questions Under review again as of 6/01/23</p> | Section Sup | <p>8/30/2022 08/30/2023</p> | In progress | 7/30/2022 |
| Supervisor Turnover Contribution to other issues | Look to increase salaries | Work within DOH to raise salaries | Office Director | 12/30/2023 | In progress | Unknown |
| | Recruiting practices | Alter standard PD language | Section Sup | 9/30/2022 | Completed | 11/30/2022 |

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| | Active Post-hire mentoring | Fully engage new Supervisor and direct the learning | Deputy Director and Program Leads | 10/30/2023 | Mentoring process in progress | 6/30/2023 |
| <u>Status of Materials Inspection Program</u> | | | | | | |
| Status of Materials Inspection Program | Update the Reciprocity section of Inspection procedure | Add steps to observe dry-runs at irradiator source exchanges/removals | Reciprocity Lead | 8/30/2022 | Step added to stand alone Inspection Procedure | |
| <u>Technical Quality of Inspections</u> | | | | | | |
| <i>Washington should revise their Radioactive Material Section Standard Operating Procedure, and train staff on the revised procedure.</i> | Revise Inspection Procedure | Verify procedure components are compatible with NRC guidance | Lab Program Lead | 9/30/2022 | Complete | |
| | Train staff on procedural changes | | Program Leads | 10/31/2022 | Complete | |
| | Supervisor Review set to 100% of all inspections | Ensure compatibility with NRC (IMC 0610) | Section Sup | Continuous | On-going | n/a |
| | Supervisor Accompaniments | Annually if staff performed inspection in calendar year | Section Sup | Continuous | Qualified Inspectors accompanied in 2022 | n/a |
| <u>Technical Quality of Licensing Actions (3 Recs)</u> | | | | | | |
| 1. Washington should perform an extent of condition review across all licensing categories by performing a smart sampling of licenses | <i>(a) ensure that maximum possession limits are accurate and in accordance with applicable licensing guidance (e.g., applicable SS&D registration); (b) ensure that only the radioactive material requested by</i> | After verifying all licensing templates are correct, conduct smart sampling (10 or 10% whichever is greater) of licenses issued since 5/4/2018 for 5 tasks (see column to the left) under this recommendation for each type of license issued by | Program Leads (verify templates and conduct smart sampling) | 5/31/23 | Start upon PIP approval; licensing templates verified; | |

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| <p>issued since May 4, 2018, to: (see TASKS)</p> | <p><i>the licensee remains on the license (such as, remove additional gauge models placed on the license by Washington);</i></p> <p><i>(c) ensure that locations of use and storage are accurate</i></p> <p><i>(d) ensure that license reviewers considered the licensee's inspection and enforcement history for license renewal reviews; and</i></p> <p><i>(e) revise the license templates to be consistent with NRC's licensing guidance.</i></p> | <p>Washington (e.g., industrial, medical, lab).</p> <p>If other than a few errors note, raise sampling rate to 50%</p> | | | <p>license verification in progress</p> | |
| <p>2. Washington should revise their licensing procedure to be compatible with NRC's NUREG-1556 licensing guidance. The revised licensing procedure should also include a periodic assessment or audit to review a smart sampling of completed licensing actions to ensure proper issuance of licenses in accordance with the appropriate NUREG-1556 volume.</p> | <p>Revise Licensing Procedure (stand alone document) to be consistent with NUREG-1556 licensing guidance, including periodic (every year) smart sampling audit</p> | | <p>Section Sup and Reciprocity Lead</p> | <p>2/28/2023</p> | <p>In progress</p> <p>(Licensing Procedure rewrite complete; needs addition of annual audit)</p> | |

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| 3. Washington should revise their <i>Radioactive Material Section Standard Operating Procedure</i> to provide guidance for electronic transfers of sensitive security-related documents. | Develop new section in Licensing Procedure or stand alone procedure and train staff | Procedure Development Training | Lab Program Lead | April 30, 2022 | Elect transfer section created. Staff trained. Procedur will be stand alone. | |
| QA Checklists | Ensure obsolete wording "IS HAND DELIVERY NEEDED" is not present on QA checklist (Dispose of any QA checklists with this wording.) | | Program Leads | 9/30/2022 | Complete | 6/30/2022 |
| Technical Quality of Incident and Allegation Activities (3 Recs) | | | | | | |
| 1. Washington should document the actions they took in response to the UW contamination incident in 2019. These include actions taken and basis for release at a personal residence, a restaurant and with a state vehicle. The written report should document the dose assessments (e.g., external dosimetry, | Find written reports from parties involved and verify missing information required by Recommendation | Find reports from parties Verify information within reports Interview parties for missing information Document actions taken for release of personal residence, restaurant, and state vehicle (see "Staff write-up" folder in WA-19-015) | Affected ORP staff | 1/30/2023 | Material obtained from affected ORP staff. Stored in UW Incident File; need 2nd review. | 5/18/2023 |

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| urinalysis, and whole-body scans) of the two contaminated inspectors involved in the incident. | Dose assessment review | Document dose assessment (write memo to file) | Deputy Director | | | |
| 2. Washington should revise their allegation and incident procedures to include all necessary actions (e.g., require protection of allegor identity as allowed by law, ensure proper and complete documentation of the receipt and closure of incidents and allegations, ensure that follow-up inspections are scheduled and completed, ensure allegations are properly maintained with allegations and not mixed with incidents, and ensure that allegations are documented and easily retrievable). | <p>Revise Incident procedure and Allegation procedure ensuring each procedure contains appropriate sections (as noted in Recommendation and NRC guidance)</p> <p>Ensure Incidents & Allegations are properly stored and easily retrievable (both in hard copies and/or electronically) (WDOH only stores electronic copies of Incidents & Allegations)</p> | <p>Identify missing portions of procedure(s)</p> <p>Procedures updated</p> <p>Secure electronic storage established</p> <p>Allegations separated from Incidents in electronic files available to RADMAT staff only</p> | Section staff under Medical Program lead | 3/31/2023 | <p>In Progress;</p> <p>new Incident Procedure under review</p> <p>Allegations procedure under review</p> | n/a |
| 3. Washington should locate all allegation records received during the review period and | Locate all allegation records received since May 4, 2018 | | RADMAT staff | 12/31/2022 | In process | |

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| assess whether appropriate closure actions were taken; and verify that the allegation files were complete, accurate, and documented in the tracking system. | Assess whether appropriate closure actions were taken | | RADMAT staff | 12/31/2022 | In process | |
| | Verify allegation files are complete, accurate, and filed in tracking system | | RADMAT staff | 12/31/2022 | In process | |
| <u>Legislation, Regulations, and Other Program Elements</u> | | | | | | |
| Washington should perform a review of all their license conditions, identify non-standard license conditions, and submit the non-standard license conditions to the NRC for a compatibility review. | | Identify any non-standard license condition(s) needing NRC approval | Program leads | 9/30/2022 | In process | |
| | | Submit non-standard LC's to NRC for approval w/ justification (One identified and submitted for review. Disapproved. Being removed from licenses.) | Deputy Director | 12/30/2022 | Complete | |
| | | Remove non-standard LC from licensing templates and existing licenses | Program Leads | Templates complete: 9/30/2022 Licenses: 12/31/2022 | Email sent 1/6/2023 to all medical licensees voiding LC | |
| Regulations & OPE's | | RATS 2018-2 adopted | Deputy Director | June 2022 | Complete | June 2022 |

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| | Complete adoption of RATS 2018-1 and 2018-2 | NRC review of 2018-2 | NRC | August 5, 2022 | Complete | 8/5/2022 |
| | | RATS 2018-1 adopted | Deputy Director | 10/21/2022 | In 31 day wait | n/a |
| | | NRC review of new state regs (RATS 2018-1) | NRC | 12/31/2022 | Submitted 11/1/22 | |
| | Compatibility with IMC 0610 | Set policy for 100% supervisor review | Section Supervisor | 6/30/2022 | Complete | |
| | | Section supervisor conducts 100% review of inspections | Section Supervisor | On-going | Initial reviews complete; on-going effort | No completion date. Continuous task |
| | | Add requirement to Inspection procedure | Section Supervisor | 1/30/2023 | Complete Section 4.A | |
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