



IEMA-OHS

ILLINOIS EMERGENCY MANAGEMENT AGENCY AND OFFICE OF HOMELAND SECURITY

JB Pritzker
Governor

Alicia Tate-Nadeau
Director

TO: Elaine Raphael, Regulatory Review Specialist
NMSS/MSST

FROM: Gary Forsee, Radioactive Materials Division Chief

DATE: June 21, 2023

RE: Illinois FY2023 Draft IMPEP Report

Thank you for the opportunity to review the draft FY2023 Illinois IMPEP Report. The Agency understands the team did not make any new recommendations for Illinois and appreciates their efforts to identify two good practices. As requested, we have reviewed the draft report and would offer the following comments prior to submittal to the NRC's Management Review Board.

- Page 1, paragraph 3. *“The Illinois Agreement State Program is administered by the Radioactive Materials Branch (RAM Branch) and the Radiation Protection Services Branch (RPS Branch), which are located within the Division of Nuclear Safety (the Division).”* Based on previous conversations, the IMPEP team (we believe) elected not to update the organizational structure and Agency name in order to maintain consistency with the questionnaire and the construct of the Agency at the time of the review. However, section 4.1(b) on page 10 lists the updated Agency name and organizational structure. No objections, however, this may cause an inconsistency in the report.
- Page 1, paragraph 3: “In addition, since 2014, the RPS Branch has been the lead for responses to triggered alarms for radioactive material at scrap yards and ~~orphan radioactive sources~~ landfills. They also coordinate the Division’s orphan source recovery program.”
- Page 4, 3rd paragraph: It would appear as though this paragraph addresses the State of Illinois’ plan to address reciprocity inspections, although that is not directly stated. IEMA-OHS would recommend clarifying this paragraph to specifically state the blended procedure and focus on risk-significant inspections was limited to reciprocity candidates:

“During this review period, Illinois focused available staffing resources on performing Priority 1, 2, and 3 *reciprocity* inspections. During the beginning of this review period when staffing was in transition, Illinois developed a blended procedure requiring the inspection of 10 percent of all *reciprocity* candidates eligible for inspection, with an emphasis of inspecting risk-significant licensees. Illinois performed 11 percent of reciprocity inspections in 2018, 10 percent in 2019, 15 percent in 2020, 15 percent in 2021, and 23 percent in 2022. The team confirmed that Illinois complied with their reciprocity procedure.”

- Page 6, fourth paragraph, 3rd line. [its’s] > its
- Page 13, 1st paragraph. Illinois would like to clarify there were five corrective actions for this SS&D incident. In addition to the three identified, IEMA also: 4) required relabeling of the devices with the correct source information and reissuance of the distributor reports to all affected jurisdictions, and 5) solicited a commitment for return / disposal of the Am-241 source since there is no domestic disposal option for foreign sourced Am. All corrective action had a set date for completion.
- Page 13, 1st paragraph, last line. In order to fully capture the corrective actions taken, we would recommend the following addition to the last line: “Illinois updated the SS&D registration to include the new sealed source, updated diagrams and labels.”

If we may offer any clarification or answer questions on the comments above, please do not hesitate to contact me at the number / email below. Thank you again for the opportunity to comment and it was a pleasure hosting the IMPEP team.

Respectfully,



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