

Mission:

To protect, promote & improve the health of all people in Florida through integrated state, county & community efforts.



Ron DeSantis
Governor

Joseph A. Ladapo, MD, PhD
State Surgeon General

Vision: To be the **Healthiest State** in the Nation

August 24, 2023

Adelaide S. Giantelli, Chief
State Agreement and Liaison Programs Branch
Division of Materials Safety, Security, State,
and Tribal Programs
Office of Nuclear Material Safety and Safeguards
United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Via Email

Dear Ms. Giantelli:

Thank you for the opportunity to review and comment on the draft Integrated Materials Performance Evaluation Program (IMPEP) report documenting the results of the Florida Agreement State review conducted this year.

In our review of the draft IMPEP report, we identified two items that appear erroneous and one item that we feel did not adequately reflect the programmatic conditions.

On page 6, second paragraph, the report states: "Florida's high staff turnover rate made it difficult to complete all the required accompaniments in a timely manner. Missing some of the inspector accompaniments did not affect Florida's ability to protect public health and safety." We would offer the following statement that more clearly represents programmatic conditions: "Florida's high staff turnover rate made it difficult to complete all the required accompaniments in a timely manner. Florida's inspection program managers and lead inspectors were required to spend time training new inspection staff resulting in missing some of the inspector accompaniments for seasoned staff. This did not affect Florida's ability to protect public health and safety."

On Page 6, in third paragraph under item C. Evaluation for section 3.3 Technical Quality of Inspections, the state is identified as Illinois rather than Florida.

Finally, on Page 6, section titled MRB Chair's Determination is also notated as item C for section 3.3 Technical Quality of Inspections. We believe it should be item D.

Mr. Kevin Kunder and I look forward to attending the Management Review Board meeting in Rockville, MD, on October 5.

Sincerely,

Clark Eldredge
Environmental Administrator
Radiation Machine Section

cc: Randy Erickson
Darren Piccirillo