

NOTE: This Document is intended to be a communication between the MSDH Radiation Program and NRC Region 4. It is used as a "Program Improvement Plan" designed to serve as a "Working Document" that will facilitate monthly status update calls.



Green is a visual indicator that the ACTION is Complete or ONGoing with no identified "Points of Friction."



Amber is a visual indicator that the Action is initiated however waiting on additional actions to navigate internal or external "Friction Points"



Red is a visual indicator that the Action desired has not been initiated due to available resources or there is a significant "Friction Point" that must be addressed

Mississippi Program Improvement Plan
ML24008A079

RECOMMENDATION	TASK	MILESTONE / MEASURABLE	ASSIGNED	ANTICIPATED COMPLETION DATE	FRICTION POINTS	STATUS	ACTUAL COMPLETION DATE	COMMENTS
Mississippi provide training to its staff on all programmatic procedures revised	Provide Formal Training to Existing Staff on changes to current procedures	Complete training with ALL Staff	Materials Team Lead	1-Jul-23	NONE	Complete	21-Jul-23	
	Implement an Annual Procedures review and refresher training process	Schedule each Year for July (new FY)	Materials Team Lead	On Going	NONE	Complete	21-Jul-23	
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).	External Audit of Medical Licenses 2017 - Current	Completion of Audit	Director / Deputy	November 2022	NONE	Complete	15 March 2023	Complete with 8 individuals identified. Review Complete, names sent to NRC 13DEC2023. All individuals have been removed from existing licenses in Mississippi.
	Provide Formal Training to Existing Staff on changes to current procedures	Conduct Quarterly "Town Hall" meeting to conduct refresher training	Materials Team Lead / Admin Staff	1-Jul-23	NONE	Complete	21-Jul-23	next meeting in Jan 23
	Mississippi develops and implements a reliable and comprehensive scheduling and tracking process to ensure completion of inspections including reciprocity inspections.	Audio Visual Display in Common Area with scheduling Priorities	Materials Team Lead / Admin Staff		1-Dec-23	NONE	Complete	15-Nov-23

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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	Director/ Materials Lead	April 2022	NONE	COMPLETE	April 2022	
	Have Single Point for Training MGT	Duty Assignment / Training Files	Director/ Deputy	April 2022	NONE	COMPLETE	April 2022	NONE
	Develop Quarterly Training Meeting to prioritize and track training	Initial Meeting Completed 0930 28JUNE2022	Director/ Materials Lead	June 2022	Identifying Available Training Seats	COMPLETE	1 July 2022	
	Pay for "in house" Refresher / HP related Training Annually. The desired Training will address the quality of inspection reporting and documentation	Completion and Documented	Director	December 2022	Identifying Available Internal and external Trainers	COMPLETE	February 2023 and quarterly updated	
Hire, Train and Position HP to better balance Qualified HPs between Licensing and Inspections	Staffing and Training of HPs (One new HP)	Director/ Materials Lead	June 2023	MSDH Hiring Timelines / MPBS Approval	Complete and ongoing as staff are hired and progress	All Existing Staff are in the Training "Pipeline" and qualified to conduct one or more inspection type as of Mrch 2023	For staff without "strong" radiation background and knowledge H-117S and H-122 will be required prior to attending other training	

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Mississippi develops and implements a reliable and comprehensive scheduling and tracking process to ensure completion of inspections including reciprocity inspections.	Review of inspection and reciprocity procedures	Review and Approval	Director/ Materials Lead/ Licensing Lead	APRIL 2022	NONE	Complete	May-22	incorporated
	Appoint Materials Supervisor to Track and Schedule	Position Filled	Director/ Deputy	FEB 2022	HR permanent	Complete	Feb-22	Complete
	Incorporate Scheduling and Tracking in WBL	Migration and Training Complete "Train the Trainer" followed by In house training of all inspectors	Director/ Materials Lead	June 2023	TRAINING / AVAILABILITY	MS will continue to use internal scheduling and tracking	Decision to suspend Inspection Module until all licenses have been processed in WBL as of March 2023	Currently using Access managed by Materials Lead
	Integrate Monthly Staff Meeting to prioritize and schedule inspections	Meetings	Director/ Materials Lead	JULY 2022	NONE	complete	1-Dec-22	monthly to / bi monthly
Mississippi develops a method to ensure licensees are provided the results of the inspection (e.g., cover letters) in a timely manner.	Integrate Monthly Staff Meeting to prioritize and schedule inspections	Meetings	Director/ Deputy	July 2022	NONE	complete	1-Dec-22	monthly to / bi monthly
	Appoint Materials Supervisor to Track and Schedule	Position Filled	Director/ Deputy	JAN 2022	HR permanent	Complete	Dec-22	complete
The 2017 recommendation remains open: 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	Director/ Materials Lead	FEB 2023	Limited Staff / Compatibility Review	complete	Dec-22	
	Provide Training as needed at team meetings	Schedule Training as Needed	Director/ Materials Lead	FEB 2023	NONE	complete	Dec-22	Internal updates and training to be provided as needed due to available "white space" in calander

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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	Materials Lead / Sr Inspector	FEB 2023	Ongoing	NONE	March 2022	Procedures approved but will continually be evaluated to maintain compatability
	Formal Training	Inspection Training Seats	Director/ Materials Lead	NOV 2022	will be on ongoing process as staff are hired and progress	Available training seats	OCT 2022	108 and 109 complete. Accompaniments being conducted. Medical on-line training and portable guage radiography pending coordination
	Establish Internal / External Audits of Reports	Audits Conducted	Materials Lead / Sr Inspector	FEB 2022	Materials Lead will review / Audit as time and resources are available	None	1 DEC 2022	Will use existing contracts with out of state staff to assist in external audits
<p>Mississippi develops a systematic approach to ensure that annual supervisory inspector accompaniments are completed.</p>	Incorporate Bimonthly Staff Meeting	Staff Meetings	Director/ Deputy	5 July 2022	Ongoing	NONE	July 2022	Monthly to Bi Monthly
	Accompaniments Documented in Training Records	Conduct / Documentation	Director/ Materials Lead	October 2022	Ongoing	NONE	March 2023	Materials Lead at 75% on Accompaniments
<p>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.</p>	SSDR / NSTS	SSDR / NSTS Access Granted	Director/ Materials Lead	March 2022	Complete	NONE	FEB 2022	Currently All 4 Qualified inspectors / license employees have access
	Request Access for New Hires	SSDR / NSTS Access Granted	Director/ Materials Lead	March 2023	Complete	Initial Training Availability	FEB 2023	Will Initiate the process prior to Initial Training Completion. Existing staff can provide material as needed

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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	Materials Lead / Licensing Lead	On Hold pending completion of external Audits	Qualified Personnel to Complete Audit and Balance Inspections	Complete / Internal Audit Suspended	Peer reviews are being utilized currently and Audits are being conducted by external Audit team	Review Complete, names removed from licenses and compiled list sent to NRC 13DEC2023
	External Audit of Medical Licenses 2017 - Current	Contract Initiation	Director / Deputy	November 2022	Location of Qualified and Available Personnel	Complete	April 2023	Complete with 8 individuals identified. Review Complete, names sent to NRC 13DEC2023. All individuals have been removed from existing licenses in Mississippi.
	Incorporate External PEER Reviews	Initiate Peer Review of current licensing actions	Licensing Lead	March 2023	NONE	complete	March 2022	Review Complete, names removed from licenses and compiled list sent to NRC 13DEC2023
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	Licensing Lead	March 2023	NONE	Complete	March 2022	
	Incorporate Internal PEER Reviews	Initiate Peer Review of current licensing actions	Materials Lead / Licensing Lead	March 2023	NONE	ONGOING	March 2022	Materials and Licensing Leads PEER Review all Licensing Actions.
	Incorporate External PEER reviews	External Peer Review of current licensing actions	Licensing Lead	March 2023	NONE	Contract Awarded	December 2022	Oklahoma assisting with this review

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Mississippi assesses their incident and allegation casework completed for the review period to ensure proper closure of cases.	Review of Procedures	Ensure Procedures are Compatible	Materials Lead	March 2022	NONE	Complete	March 2023	Procedures are Compatible pending review of new SA-300
	Internal Retraining	Training	Materials Lead	March 2022	NONE	Complete	March 2023	Ongoing with new hires / no identified needs pending the new SA300 publication and feedback
	Internal Audit of Incidents and Allegations 2017 - Current	Review	Materials Lead / Deputy	April 2022	NONE	Complete	April 2022	Complete
	Integrate Bi-monthly Staff Meeting to prioritize and schedule inspections	Meetings	Director / Deputy	5 JULY 2022	NONE	Ongoing	July 2022 and ongoing biweekly meetings	Monthly and Bi Monthly