

Recommendation	Tasks	Milestones	Assignments	Expected completion date	Status	Completion date	State Comments	NRC comments
Unsatisfactory evaluation for LROPE: New York DOH and DEC establish processes, with appropriate milestones, to expedite the review and adoption of NRC regulations in accordance with the current NRC policy on adequacy and compatibility with the goal of adopting all overdue regulations by the next IMPEP review. (DOH/DEC)							Express terms for the new Part 384 and the revised Part 381 have been drafted. The public comment period for Part 381 ended on June 24 with no comments submitted. Part 384 was released as a proposed rulemaking on July 17. Hearings for Part 384 are scheduled for September 17.	
	Develop and update DEC regulations to adopt all overdue regulations by the next IMPEP review	DEC Development of Express Terms	DEC Radiation program and legal staff	11/30/23	Completed	Part 381 completed 11/17. Part 384 completed 1/12/2024		
		DEC Approval of Regulations	DEC Executive Staff	4/11/24	Completed	Part 381 completed 1/17/24. Part 384 completed 4/11/24		
		Governor's Office Approval of proposed regulations	NYS Regulatory Reform Unit	6/15/24	Completed	Part 381 was approved 3/18/24. Part 384 was approved June 20, 2024.		
		DEC Public Notice / Public Hearing	DEC Radiation program and legal staff	9/17/24	Underway	Part 381 hearing was conducted 6/18/24 with no comments offered. Part 384 public notice set for July 17, hearing scheduled for September 17 2024.		
			DEC Comment response/finalize regulations	DEC Radiation program and legal staff	11/30/24	Underway		
	DOH Develop and update regulations adopting all overdue regulations by the next IMPEP							
			Bureau Staff	02/20/22	Completed	02/20/22		
		DOH managements review and approval	Alex Damiani	03/31/23	completed	03/31/23		
	DOH Commisioner approval	DOH exec and general counsel approval	06/30/23	Completed	10/25/23			
		NYS Regulatory Reform Unit sending the regulation and supporting documents to the Governor's Office for review.	11/03/23	in progress				
	Governor's Office review							
	Governor's Office Approval of proposed regulations	Gov Office Reg Reform unit	01/31/24	in progress				
		Public Health and Health Planning Council (PHHPC) Preparing for PHHPC information session in November. This will be followed by a Q+A session in January at which time the council votes to publish or not.	02/08/24	not started		Necessary regulations will appear as revisions to existing Title 10 NYCRR 16 of the state sanitary code		
		Public Health and Health Planning Council (PHHPC) approval						
		Publish in NY State Register and Address Comments	Department of State for publication	03/31/23	Not started			
1) New York DOH implement a plan to assure all inspectors have calibrated instruments and that all instruments would be calibrated by the summer of 2023.								
	Develop fiscal plan and schedule meters calibrations	Written plan submitted to Director	Christine Dobert	12/15/22	Completed	12/15/22		
		Milestone is an average of 8-10% of meters get calibrated per month for the next 6 months	Christine/Alex/Nikki	Monthly check	in progress		monthly evaluation of meter cals, assesment of any fiscal issues	
		Target is > 85% of meters calibrated by 9/30		evaluating time table for comepletion of this task	in progress	targeting Q1 2024	Retiring 5 older PICs (NOT being calibrated) and purchasing 5 new ones by 3/31/2023	

2) New York DEC should develop and implement incident and allegation procedures, and New York DOH should ensure their incident and allegation procedures include the level of detail needed to properly close incidents and allegations.	DEC - Establish Division Guidance for responding to radiation incidents and allegations which fall under DEC oversight	Draft Guidance Document and complete internal review	Radiation program and legal staff, DMM Division Management	10/30/23	Completed	9/1/2023	
		Receive Comments/Finalize Guidance	Radiation program and legal staff	11/30/23	Completed	11/28/2023	
		Distribute Final Guidance	DMM Guidance & Policy Coordinator	11/30/23	Completed	11/29/2023	
	DOH - Update and implement Incident closeout policy	Section Chief Approval of revision to incident manual to include closeout guidance Director approval	Nate/Dan Dan/Alex	2/28/23 done 3/15/23 done		06/12/23 10/20/23	
3) New York should update its incident and allegation procedures, ensure that they are appropriately consistent for their activities, and train staff on the updated procedures	DEC - procedures will be established in item 2 above. DEC radiation staff will be trained in its implementation	Training of radiation staff in final I&A procedures	DEC Radiation bureau director and section supervisors	1/30/24	Completed	12/22/2023	All DEC Radiation staff have completed the training.
	DOH - Update and implement Close out policy	Section Chief Approval of revision to incident manual to include closeout guidance Director approval	Nate/Dan Dan/Alex	2/28/23 done 3/15/23 done		06/12/23 10/20/23	
4) New York DOH review, revise, and update the SS&D training and qualification procedures to ensure the essential objectives of Appendix D, of IMC 1248, including training on the appropriate industry codes and standards.	DOH - update and implement training and qualification procedures	Review the needed update to the training and qualification program Update Procedures	Procedures - Dan; Qual log - Dan and Nate Dan	02/28/23 done 04/30/23 done		01/26/23	
	Transferred to NRC	Update Qualification log Provide updated procedure to all currently qualified staff and implement for future staff	Dan/Nate Dan	07/01/23 in progress			
5) New York DOH develop a mechanism to ensure SS&D reviewers follow the applicable guidance in NUREG-1556, Volume 3, when developing new or amending existing registrations.	To ensure consistency with NRC guidance in NUREG-1556 Vol 3 staff will identify any differences in current review process and NRC guidance	Staff will review NRC guidance and identify variances in NYS procedures.	Dan and Nate reread the guidance and discuss	02/24/23 completed			
	Transferred to NRC	Satff will update SSDR procedures		06/01/30			As the program has been returned to NRC, no additional work on NYS procedures will be done
		Review a sample of SS&D actions issued each year to ensure consistency and adherence to establish procedures	Alex & Dan				
6) New York DOH close inactive SS&D registrations and identify them as inactive in the National SS&D Registry.	Determine which entities are inactive	Perform a websearch for each company that appears inactive	The entire RAM section	02/02/23 completed		02/13/23	
	Transferred to NRC	Determine whether an entity is still distributing in another State or under another name and determine if there is another SS&D that qualifies					
	For entities that are truly inactive, contact Tomas Herrera to obtain an inactive vendor code	Review SS&D registry Inactive vendor codes obtained	Dan, Nate, Emily Dan	04/01/23 completed 05/01/23 completed		04/13/23 04/17/23	

	Create a new registration for each of the 34 inactive sheets	New registraions comleted	Dan and Nate	06/30/23	pending		
7) New York review and update the LLRW Disposal Program training and qualifications to adopt the essential objectives in IMC 1248, Appendix E, including initial qualification and refresher training requirements, adjusted for the status of the LLRW disposal facilities.	DEC - establish and implement procedures to meet the requirements of IMC 1248, App E.	Establishment of a training procedure that is equivalent to IMC 1248 Appendix E	DEC radiation staff.	1/31/24	Completed	1/24/2024	
		Initial training will be conducted for existing staff. Training will be implemented as part of protocol for new staff on an on-going basis.	DEC radiation staff.	6/24/24	Completed	6/24/2024	Date moved back in recogintion of additional staff recently hired and additional time needed for training new staff.
	Compare SDA facility scope of operations licensed by NYSDOH to other similar facilities to determine level of training for license and inspection staff.	Description of scope of activities at existing LLRW facilities compared to WVDP/SDA	Several staff	2/28/23	completed	03/30/23	
	Determine appropriate type of DOH inspector training based on SDA operations relative to other facilities and review of existing training classes and available resources.	Update inspector qual log Director review and approval	Chuck Alex	6/30/23 8/30/23	Completed Completed	08/30/23 10/19/23	
8)New York develop, train staff on, and implement procedures for the generation, approval, distribution, management, and retention of the LLRW Disposal Program licensing, inspection, and incident and allegation documentation.	DEC - Develop licensing, inspection, and incident and allegation procedures associated with DEC's implementation of the LLRW disposal program	1. Prepare draft procedures. 2. Finalize and implement procedures. 3. Review procedures to evaluate effectiveness.	DEC radiation staff. Regional radiation staff	1/31/24	Completed	1/24/2024	Updated/Draft procedures developed 01/2024. Procedures to be updated with Approved I&A procedures
	DEC- Train Staff on revised procedures	1. Initial training 2. Annual refresher training.	DEC radiation staff. Regional radiation staff	Upon Finalization (3/2024)	Completed	6/24/2024	Additional time to train recently hired staff.
	DEC - Evaluate the effectiveness of the procedures	1. Review a sample of completed licensing actions to determine consistency and determine if the guidance is effective or if further changes need to be made. 2. Review a sample of inspection reports to determine consistency and determine if the guidance is effective or if further changes need to be made. 3. Review a sample of incident and allegation files to determine consistency and determine if the guidance is effective or if further changes need to be made.				Pending	Effectiveness will be evaluated as actions, inspections, and I&A's occur

Monthly/Quarterly Equipment Report 12/31/2023

Meter Type	Total	Calibrated	% in Calibration
GM/ Pancake	22	17	81%
GM/Side Wall	3	3	100%
GM/ Endwall	2	2	100%
GM/ Scintillation Probe	2	2	100%
Other GM	2	1	50%
Total GMs	31	25	81%
Pressurized Ion Chamber	19	11	58%