



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
475 ALLENDALE ROAD, SUITE 102
KING OF PRUSSIA, PA 19406-1415

March 4, 2025

Jill Wood, Director
Office of Radiation Protection
Washington Department of Health
P.O. Box 47827
Olympia, WA 98504-7827

SUBJECT: WASHINGTON PERIODIC MEETING SCHEDULING LETTER AND AGENDA

Dear Jill:

To help the Agreement States and the U.S. Nuclear Regulatory Commission (NRC) remain knowledgeable of each other's program and to initiate planning for the next Integrated Materials Performance Evaluation Program (IMPEP) review, the NRC conducts one-day periodic meetings with Agreement States in between IMPEP reviews.

In accordance with the Office of Nuclear Material Safety and Safeguards (NMSS) Procedure SA-116, "Periodic Meetings between IMPEP Reviews," and after previous coordination with you and your staff, we have scheduled the periodic meeting for April 15, 2025. The meeting will be held at the Radiation Control Program offices in Olympia, Washington.

Based on our previous discussions, the likely topics for discussion at the meeting are listed on the enclosed agenda. If there are any additional specific topics you would like to cover, or if you would like to focus on a specific area, please let me know. If you have any questions, please call me at 610-337-5143, or via email at Farrah.Gaskins@nrc.gov.

Sincerely,

A handwritten signature in cursive script, reading "Farrah C. Gaskins", is positioned above the typed name.

Signed by Gaskins, Farrah
on 03/04/25

Farrah C. Gaskins
Regional State Agreements Officer
Division of Nuclear Materials Safety

Enclosure:
Washington Periodic Meeting Agenda

**Periodic Meeting Agenda with Washington Department of Health
April 15, 2025**

Topic areas for discussion during the meeting may include:

1. Program reorganizations:

Discuss any changes to the program organization, including program/staff relocations and new appointments.

2. Changes in program budget/funding.

3. Status of the NRC or State's program, including:

a. Technical Staffing and Training

- i) Number of staff in the program and status of their training and qualifications.
- ii) Any program vacancies.
- iii) Staff turnover since the last IMPEP review.
- iv) Adequacy of FTEs for the materials program.
- v) Status of implementation of IMC 1248

Recommendation: 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.

b. Status of Materials Inspection Program

- i) Number of Priority 1, 2, and 3 inspections completed on time and overdue since the last IMPEP review.
- ii) Number of initial inspections completed on time and overdue since the last IMPEP review.
- iii) Number of reciprocity inspections completed each year since the last IMPEP.
- iv) Inspection frequencies (changes to or those that differ from NRC's inspection frequencies).

Recommendation: Perform a root cause analysis of the cause for overdue inspections and provide a list of corrective actions with a schedule to complete the implementation of the corrective actions within 6 months.

Recommendation: Implement an effective management tool to track the status of the inspection program. Include a schedule of actions to complete implementation within 6 months.

c. Technical Quality of Inspections

- i) Status of inspector accompaniments.
- ii) Management review process
- iii) Significant inspection activities/challenges

d. Technical Quality of Licensing Actions

- i) Number of licensing actions and types performed since the last IMPEP review.

Recommendation: Washington should revise their licensing procedure to be compatible with NRC's NUREG-1556 licensing guidance and to include a periodic assessment or audit to ensure proper issuance of licenses in accordance with the appropriate NUREG-1556 volume.

Recommendation: Washington develop and implement a process to ensure that financial assurance mechanisms are received and maintained for each licensee subject to financial assurance, and that the mechanisms meet the criteria of NRC's NUREG-1757, Volume 3, Revision 1, Financial Assurance, Recordkeeping, and Timeliness. Perform an assessment to identify issues with financial assurance with existing licenses.

e. Technical Quality of Incident and Allegation Activities

- i) Status of allegations and concerns referred by the NRC for action.
- ii) Significant events and generic implications.
- iii) Number of reportable events received since the last IMPEP and event reporting, including follow-up and closure information in NMED.

Recommendation: Washington should revise its allegation and incident procedures to include necessary follow-up actions (e.g., ensure proper and complete documentation of the closure of incidents and allegations, ensure that follow-up inspections are scheduled and completed, ensure that management is consulted in follow-up and closure activities), and to assure that the updated procedures are implemented and followed.

Recommendation: Washington should locate all allegation records received during the review period and assess whether appropriate closure actions were taken; and verify that the allegation files were complete, accurate, and documented in the tracking system, including management oversight and approval of any audits of the electronic allegation files and tracking system.

f. Legislation, Regulations, and Other Program Elements, if applicable

- i. Regulations
 - a. Compatibility requirements
 - b. Discuss status of State's regulations and actions to keep regulations up to date, including the use of legally binding requirements and sunset requirements.
- ii. Legislative changes affecting the program.
- iii. Sunset Requirements
- iv. Other Program Elements

Recommendation: 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.

- g. Sealed Source and Device (SS&D) Evaluation Program, if applicable
 - i) Technical Staffing and Training
 - a. Number of qualified SS&D reviewers and their signature authority.
 - b. Number of current or anticipated program vacancies.
 - c. Staff turnover since the last IMPEP review.
 - ii) Technical Quality of the Product Evaluation Program
 - a. Number of cases since the last IMPEP review to include new cases, amendments, inactivations and transfers.
 - iii) Evaluation of Defects and Incidents Regarding SS&Ds
 - a. Any cases noted involving manufacturing defects since the last IMPEP review?
- h. Low-Level Radioactive Waste Disposal Program (LLRW), if applicable
 - i) Technical Staffing and Training
 - ii) LLRW Status of the Inspection Program
 - iii) LLRW Technical Quality of Inspections
 - iv) LLRW Technical Quality of Licensing
 - v) LLRW Technical Quality of Incident and Allegation Activities

Recommendation: 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. Uranium Recovery Program (UR), if applicable
 - i) Technical Staffing and Training
 - ii) UR Status of the Inspection Program
 - iii) UR Technical Quality of Inspections
 - iv) UR Technical Quality of Licensing
 - v) UR Technical Quality of Incident and Allegation Activities

Recommendation: 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.

- 4. Information Exchange:
 - a. Current program initiatives;
 - b. Emerging technologies;
 - c. Large, complicated, or unusual authorizations for use of radioactive materials;
 - d. Major decommissioning and license termination actions;
 - e. Mechanisms to evaluate performance such as self-audits;
 - f. Operating/strategic plan metrics and outcomes, if applicable; and,
 - g. Current NRC initiatives.
- 5. Schedule for the next IMPEP review. (~April 2026)

6. Next Steps/Meeting Summary/Q&A.
7. Exit with Senior Management.

WASHINGTON PERIODIC MEETING SCHEDULING LETTER AND AGENDA DATE March 5, 2025

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