



STATE OF WASHINGTON

DEPARTMENT OF HEALTH

OFFICE OF RADIATION PROTECTION

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July 14, 2025

Andrea Kock, Acting Director  
Office of Nuclear Material Safety and Safeguards  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dear Ms. Kock,

Congratulations on your new role with the NRC! In preparation for the upcoming Management Review Board (MRB) meeting on July 15, 2025, with Washington State, we wanted to provide some background and context that may be helpful.

The Washington State Department of Health's Office of Radiation Protection (ORP) is a large and multifaceted office. It comprises six key sections: Air Emissions, Environmental Science, Radioactive Materials, Radioactive Waste, Radiation Emergency Preparedness, and X-Ray. The office employs approximately 80 staff members, with about 70% serving as Radiation Health Physicists.

In 2022, following a comprehensive IMPEP review in April, the ORP Radiation Materials (RadMat) Section was placed under NRC Heightened Oversight. This action stemmed largely from challenges linked to high staff turnover in previous years, which adversely impacted both staffing stability and training quality. ORP identified this turnover as a root cause of the issues faced.

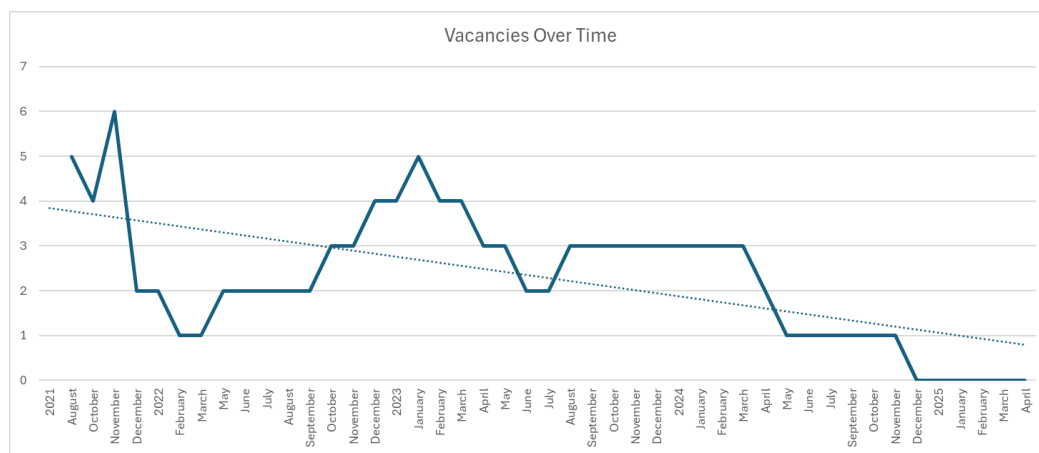
To address this, ORP prioritized enhancing the health and well-being of the RadMat team to improve staff retention. We recognize that fostering a positive culture is essential to our success, and we are fully committed to investing in our team to become an employer of choice—where qualified professionals feel valued and supported. Changing organizational culture is a long-term endeavor that cannot be rushed, but we have made significant progress since 2022. A healthy and effective program depends on cultivating a healthy office culture, which is why rebuilding our team has been a foundational focus.

### **Culture Changes**

Immediately following the 2022 MRB, ORP partnered with DOH Human Resources team to revise the standard position descriptions for Radiation Health Physicists (RHP). These revisions made the language more inclusive and flexible, placing greater emphasis on life experience over formal educational requirements. Our goal was to broaden the candidate pool for job vacancies—and we're proud to report that this effort has been successful.

In addition, ORP initiated a comprehensive evaluation of RHP salary and compensation. In 2023, we conducted a thorough needs assessment, which led to a review of the salary and compensation package for RHPs agency-wide, aimed at closing the pay gap. I'm excited to share that Governor Ferguson approved the updated budget in May, which includes a 20% salary increase for RHPs. This change took effect on July 1, 2025, marking a significant milestone. Notably, the last salary review for RHPs was in 2007. This increase is expected to enhance employee retention, attract skilled professionals, boost productivity, and foster a stronger workplace culture.

Another notable success is that despite facing significant turnover and loss of RadMat team members between 2018 and 2023, we have maintained full (9 staff), or close to full, staffing levels. This achievement is a direct result of the culture change initiatives and efforts implemented over recent years.



## Fee Work

The ORP RadMat Section is fully funded by fees collected from licensees. Following findings from the 2022 IMPEP and MRB, the ORP initiated a financial evaluation in January 2023 to assess the program's fiscal sustainability. The evaluation revealed that a fee increase was necessary to ensure sufficient revenue to support the section's operations both now and in the near future. Without this increase, projections showed that, by 2025, revenue would fall short of the costs required to maintain a successful program. As a result, a formal fee increase process was completed, and a new fee schedule went into effect in October 2024.

The additional revenue has been allocated to several key areas: continued support for contractors, maintaining the current RadMat team without staff reductions, development of a new database, and improvements to the RHP salary and compensation structure.

Sustainable funding is essential to the long-term success of the team and the program. The implementation of this updated fee structure demonstrates WA ORP's commitment to maintaining a strong, stable, and adequately resourced program.

### **Consultants**

Due to significant staffing changes, ORP recognized the need for additional expertise to stabilize operations. Starting in 2023, ORP engaged multiple states, contractors, and a consulting firm for licensing, inspection, and training support to ensure continued public health protection.

Currently, two separate contracts support ongoing work, staff training, mentoring, and qualification. These consultants collaborate closely with the WA ORP team, aiming to restore the program to full capacity. We will maintain these contracts until the ORP team is fully qualified in licensing and inspection and program improvements are complete. Our consultants remain a valuable resource, helping prevent a regression to Heightened Oversight.

As we strengthen internal capacity, we are gradually reducing reliance on contractors. For example, after SummitET handled all licensing and QA in 2023, the ORP now completes licensing internally with SummitET providing QA support. By fall 2025, ORP aims to manage licensing and QA independently, reserving SummitET's involvement for complicated cases. As we stated in the 2024 MRB meeting, the program will be fully self-sufficient in licensing actions by December 2025—and we are on track to achieve this ahead of schedule.

### **2025 Challenges**

During the April 15, 2025 NRC Periodic Review, there was discussion surrounding current challenges. In January 2025, there was a transition in the Governor's office. Upon confirmation of Governor Ferguson's position, he promptly issued several executive orders focused on increasing government efficiency. These directives required state agencies to shift priorities and dedicate time and resources to evaluate and respond. Additionally, the DOH experienced leadership changes in January, with an interim Secretary serving until July 7, when the new Secretary officially began.

Washington State is currently facing significant budget reductions, prompting multiple exercises across agencies to reduce staffing and program expenditures. Fortunately, ORP has not experienced staffing reductions.

The combination of these leadership transitions and statewide fiscal challenges had a considerable impact during the early part of 2025. In particular, large-scale organizational and operational changes demanded significant attention. This required ORP to focus on public health and safety issues while ensuring our inspection and licensing commitments were met, resulting in delays and slower overall progress on the initial timeline identified in the Program Improvement Plan (PIP). Currently, the changes have stabilized for DOH and in return allowed the team to focus more of their time on the program work.

### **Period Meeting Summary**

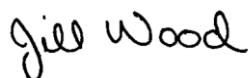
We appreciate the Washington Periodic Meeting Summary developed by your team and have a few comments.

- 1) Technical Quality of Licensing Actions: Recommendation: "*Washington should develop and implement a written procedure for the marking and handling of sensitive documents*". All seven tasks associated with this recommendation have been completed since the April 15, 2025 Periodic Meeting.

- 2) Technical Quality of Incident and Allegations. 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 document in the tracking system, including management oversight and approval of any audits of the electronic allegation files and tracking system*”. 3 of the 4 tasks are closed and the 1 open task is 95% complete. ORP has reviewed all allegations with one allegation that remains open. Our review found no significant public health risk associated to the one open allegation. The Periodic Meeting Summary includes a reference to files being stored in a centralized location, which aligns with best practices for the office.
- 3) A current PIP, developed and finalized in Fall 2024, is attached to this letter to share our progress and provide a clear picture of our status. As you will see, the majority of tasks have been completed, and the remaining items are on track for completion by December 2025.

In closing, our goal is to be in a strong position to lift NRC oversight by the 2026 IMPEP and MRB in July 2026. We remain focused on addressing the items identified during the 2024 IMPEP and are on track to complete the PIP by December 2025. Congratulations again on your new role as Acting Director. I look forward to seeing you at the MRB on July 15, 2025, and hope you find this information helpful.

Sincerely,



Jill Dinehart Wood  
Director of the Office of Radiation Protection  
Environmental Public Health Division  
Washington State Department of Health

cc:

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