



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

September 15, 2025

Juli Blalock, Bureau Chief
Department of Environmental Services
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

SUBJECT: SOUTH CAROLINA PERIODIC MEETING SUMMARY

Dear Juli Blalock:

A periodic meeting was held with you and your staff on August 6, 2025, at your office in Columbia, South Carolina. The purpose of this meeting was to review and discuss the status of the South Carolina Agreement State Program. The scope of the meeting was limited to activities conducted by the Radiation Control Program. The U.S. Nuclear Regulatory Commission was represented by Marc Ferdas, acting Deputy Division Director, Division of Radiological Safety and Security, and me.

I have completed and enclosed a general meeting summary, including any specific actions resulting from discussions. Based on the criteria established in Section IV.D.1 of the Office of Nuclear Material Safety and Safeguards Procedure SA-116 "Periodic Meetings between IMPEP Reviews," a Management Review Board meeting for this periodic meeting is not required at this time.

If you feel that our conclusions do not accurately summarize the meeting discussion or have any additional remarks about the meeting in general, please contact me at 610-337-5102, or by email at shawn.seeley@nrc.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Shawn W. Seeley", is located below the "Sincerely," text.

Signed by Seeley, Shawn
on 09/15/25

Shawn W. Seeley
Regional State Agreements Officer
Division of Radiological Safety and Security

Enclosure:
South Carolina Periodic Meeting Summary

cc:

Susan Jenkins, Assistant Bureau Chief
Radiation Protection Programs

Stacey French, Assistant Bureau Chief
Land and Waste Management

Andrew Roxburgh, Director
Radioactive Materials Licensing and Compliance

Kent Krieg, Director
Waste Management Division



INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM

PERIODIC MEETING WITH THE STATE OF SOUTH CAROLINA

TYPE OF OVERSIGHT: NONE

August 6, 2025

Enclosure

PERIODIC MEETING PARTICIPANTS

NRC

- Marc Ferdas, acting Deputy Director, Division of Radiological Safety and Security
- Shawn Seeley, Regional State Agreements Officer

State of South Carolina

- Susan Jenkins, Director, Radiation Protection Program (RPP), Bureau of Land and Waste Management (BLWM)
- Stacey French, Assistant Bureau Chief, Bureau of Land and Waste Management
- Andrew Roxburgh, Director, Division of Radioactive Materials Licensing and Compliance, RPP
- Kent Krieg, Director, Division of Waste Management, BLWM
- Adam Gause, Manager, Medical Section, Division of Radioactive Materials Medical Licensing and Compliance
- Korina Koci, Manager, Industrial Section, Division of Radioactive Materials Industrial Licensing and Compliance
- Kimberley Noonan, Manager, Radioactive and Infectious Waste Management Section

1.0 INTRODUCTION

This report presents the results of the periodic meeting held between the U.S. Nuclear Regulatory Commission (NRC) and the State of South Carolina (SC). The meeting was conducted in accordance with the Office of Nuclear Material Safety and Safeguards State Agreement Procedure (SA) [SA-116](#) "Periodic Meetings between IMPEP Reviews," dated October 6, 2021.

The meeting focused on the radioactive materials program as it is carried out under Section 274b.(of the Atomic Energy Act of 1954, as amended) Agreement between the NRC and the SC. The SC Agreement State Program is administered by two deputy areas within the Bureau of Land and Waste Management. The radioactive materials program is administered by the Radiation Protection Program (RPP) and the low-level radioactive waste (LLRW) disposal program is administered by the Division of Waste Management (DWM). The change in the organizational structure of the Agreement State Program occurred in November 2022 with the final implementation occurring July 1, 2024. This moved both programs under the Department of Environmental Services.

At the time of the periodic meeting, the SC Agreement State Program regulated approximately 310 specific licenses authorizing possession and use of radioactive materials. RPP maintains oversight for 300 specific licenses while DWM maintains oversight for 10 specific licenses.

The RPP portion of the Agreement State Program is supported by licensee fees as well as money received from state budget appropriations. The DWM portion of the Agreement State Program is totally funded by licensee fees received.

The SC Agreement State Program underwent an Integrated Materials Performance Evaluation Program (IMPEP) review in October 2022. A Management Review Board (MRB) meeting to discuss the outcome of the IMPEP review was held on February 2, 2023. Based on the findings presented, the MRB found SC's performance satisfactory for all performance indicators reviewed. Overall, SC was found adequate to protect public health and safety and compatible with the NRC's program. The next review was scheduled for October 2027 with a periodic meeting in approximately 2.5 years.

2.0 COMMON PERFORMANCE INDICATORS

Five common performance indicators are used to review the NRC Regional Office and Agreement State radioactive materials programs during an IMPEP review. These indicators are: (1) Technical Staffing and Training, (2) Status of Materials Inspection Program, (3) Technical Quality of Inspections, (4) Technical Quality of Licensing Actions, and (5) Technical Quality of Incident and Allegation Activities.

2.1 Technical Staffing and Training: (2022 IMPEP review: Satisfactory)

The RPP is comprised of the program director, a division director, two managers, five technical staff and one program coordinator. This equates to approximately 9.5 full-time equivalent (FTE) in the RPP.

Since the 2022 IMPEP review they have added one FTE, the program coordinator. Since the 2022 IMPEP, three personnel left the program, one promotion and five new hires. The vacancies ranged from a period of six months to thirteen months to fill. SC has a training and qualification program that is compatible with the NRC's Inspection Manual Chapter (IMC) [IMC 1248](#). Qualified licensing and inspection staff complete at least 24 hours of refresher training every 2 years.

2.2 Status of the Materials Inspection Program: (2022 IMPEP review: Satisfactory)

SC completed 74 Priority 1, 2, and 3 and 10 initial inspections since the 2022 IMPEP review. There was one Priority 1, 2, 3, or initial inspection conducted overdue, due to a data entry error in the database. It was conducted three days overdue. SC completed 12 reciprocity inspections since the 2022 IMPEP Review. SC's approach to conducting reciprocity inspections is risk informed. At the time of the periodic meeting, there were no overdue inspections.

2.3 Technical Quality of Inspections: (2022 IMPEP review: Satisfactory)

SC's inspection procedures are compatible with [IMC 2800](#), "Materials Inspection Program." The SC program has an adequate number of calibrated and operable radiation survey instruments available to support the inspection program. Supervisory accompaniments are conducted as required.

2.4 Technical Quality of Licensing Actions (2022 IMPEP Review: Satisfactory)

SC has approximately 300 specific licensees. At the time of the meeting, SC completed approximately 560 licensing actions since the 2022 IMPEP. Due to extenuating circumstances, there were five licensing actions that had been in-house over a year. The RPP had a plan to prioritize and close out these actions within the next few months.

SC follows the NRC's NUREG 1556 series as guidance when completing licensing actions along with the most current versions of the NRC's Pre-Licensing Guidance and the RSRM Checklist. License reviewers are responsible for the performance of pre-licensing visits when warranted. SC issues licenses with 10-year expiration dates.

2.5 Technical Quality of Incident and Allegation Activities: (2022 IMPEP review: Satisfactory)

There were 44 events reported in SC since the 2022 IMPEP. Of which 27 were required to be reported to the NRC. There were four allegations, one of which was referred by the NRC. SC followed all internal procedures when responding to events and allegations. SC's procedures are compatible to the NRC's incident and allegation procedures. All events and allegations were appropriately tracked in their database. With the exception of 4 events and 1 allegation, all were closed and/or marked complete. The RPP has a plan to close and complete these in their system.

3.0 NON-COMMON PERFORMANCE INDICATORS

Four non-common performance indicators are used to review Agreement State/NRC Region programs: (1) Compatibility Requirements (LROPE), (2) Sealed Source and Device (SS&D) Evaluation Program, (3) LLRW Disposal Program, and (4) Uranium Recovery Program. The NRC's Agreement with SC only includes the non-common performance indicators LROPE, SS&D and LLRW.

3.1 LROPE: (2022 IMPEP review: Satisfactory)

SC's current effective statutory authority is contained in Act 60, the Department of Health and Environmental Control restructuring Act of 2023 of the SC Statutes. The Radiation Protection Program is the designated State Radiation Control Agency under the SC Bureau of Land and Waste Management within the Department of Environmental Services. No legislation affecting the radiation control program was passed since the 2022 IMPEP. SC's administrative rulemaking process takes approximately 6-8 months from drafting to finalizing a rule. The public, the NRC, other agencies, and potentially impacted licensees and registrants are offered an opportunity to comment during the process. Comments are considered and incorporated, as appropriate, before the regulations are finalized and approved. The State's rules and regulations are not subject to "sunset" laws.

Since the 2022 IMPEP, one regulation came due for adoption. SC staff were reminded that 2023-1 would become due for adoption before the next IMPEP. SC committed to ensuring this entered their administrative rulemaking process to ensure timely adoption. Currently they have one Regulation Amendment Tracking System Identification Numbers that received the NRC comments and have ensured the changes have been entered into their process. They are scheduled to be adopted in late 2025.

3.2 SS&D: (2022 IMPEP: Satisfactory)

SC has authority to conduct SS&D evaluations for byproduct, source, and certain special nuclear materials. They have one qualified SSD reviewer and have three working on their qualifications. One qualified SS&D reviewer left the program. If a second reviewer is required, they intend to contact an Agreement State or the NRC for assistance before approving any new or amended SS&D evaluations.

Technical Staffing and Training

RPP has one fully qualified SS&D reviewer. No vacancies existed at the time of the periodic meeting. Three additional staff are working toward becoming fully qualified SS&D reviewers. RPP has a training and qualification manual for SS&D reviewers that is equivalent to the NRC's IMC 1248 Appendix D.

Technical Quality of Product Evaluation Program

RPP has one SS&D licensee with three active registration certificates. RPP has received three SS&D applications (new, amendment, or termination) since the last IMPEP review.

Evaluation of Defects and Incidents Regarding SS&Ds

No incidents involving SS&D registered products occurred since the last IMPEP review.

3.3 LLRW: (2022 IMPEP: Satisfactory)**Technical Staffing and Training**

DWM has a Division Director, a Section Manager, one environmental health managers, one part-time geologist, one part-time transportation staff, one vacant environmental health manager, and one resident inspector at the Barnwell LLRW facility, making up 6 FTE, to implement the LLRW Disposal Program. Since the last IMPEP review, DWM has reorganized and shuffled people into various positions with promotions and hiring. They intend to fill the vacant position within the next year.

DWM has a training and qualification manual equivalent to NRC training requirements in IMC 1248, Appendix E. Staff going through the qualification process are given a copy of the manual to ensure training and qualification is obtained as appropriate.

Status of LLRW Disposal Inspection Program and Technical Quality of inspections

DWM performed 6 semi-annual inspections of the Barnwell license and 149 weekly inspections at the facility since the last IMPEP review. Additionally, DWM performed 15 inspections on the other 9 licensees that fall under Bureau of Land and Waste Management. All inspections were performed timely. There were no overdue inspections at the time of the periodic meeting. DWM performs supervisory accompaniments of all inspectors on an annual basis.

Technical Quality of LLRW Licensing Actions

DWM has 10 specific licensees. All licensing actions, as of the periodic meeting, have been completed in a timely manner. DWM has completed 12 licensing actions since the last IMPEP review. Currently, there is one renewal action in-house for the Barnwell license which was received in September 2019. Due to extenuating circumstances, the issuance of the renewal has been delayed. The licenses are on a 5-year renewal term.

Technical Quality of Incident and Allegation Activities

DWM received no incidents or allegations since the last IMPEP review.

4.0 SUMMARY

SC continues to be a strong, effective, and well managed Agreement State Program. There has been little staff turnover since the 2022 IMPEP review. Any staff turnover is addressed as it occurs. They did have a mandated reorganization in 2024 and have adjusted well to the transition under one Department. This is a benefit to both organizations.

No concerns or issues were identified during the periodic meeting. The next IMPEP review is scheduled to be held in October 2027.

SOUTH CAROLINA PERIODIC MEETING SUMMARY DATE September 16, 2025

DISTRIBUTION:

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