



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

September 22, 2025

Clark Eldredge, Chief
Bureau of Radiation
Control Department of Health
4052 Bald Cypress Way, Bin C21
Tallahassee, FL 32399-7017

SUBJECT: 2025 FLORIDA PERIODIC MEETING SUMMARY

Dear Mr. Eldredge:

A periodic meeting was held with you and your staff on July 9, 2025, at your office in Tallahassee, Florida. The purpose of this meeting was to review and discuss the status of the Florida Agreement State Program. The U.S. Nuclear Regulatory Commission was represented by Mark Ferdas, Acting Deputy Division Director, Division of Radiological Safety and Security, Region I, and Katie Barnes, Acting Regional State Agreements Officer, Region I, 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 (817) 200-1143, or by email at Randy.Erickson@gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Randy Erickson", is positioned above the typed name.

Signed by Erickson, Randy
on 09/22/25

Randy Erickson
Regional State Agreements Officer

Enclosure:
Florida Periodic Meeting Summary

cc: Kevin Kunder, Administrator
Radioactive Materials Program



INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM

PERIODIC MEETING WITH THE STATE OF FLORIDA

TYPE OF OVERSIGHT: NONE

FINAL

July 9, 2025

Enclosure

PERIODIC MEETING PARTICIPANTS

NRC

- Marc Ferdas, Acting Deputy Director, Division of Radiological Safety and Security, Region I
- Katie Barnes, Acting Regional State Agreements Officer, Division of Radiological Safety and Security, Region I
- Randy Erickson, Regional State Agreements Officer, Division of Radiological Safety and Security, Region IV

State of Florida

- Clark Eldredge, Chief, Florida Bureau of Radiation Control
- Kevin Kunder, Environmental Administrator, Florida Bureau of Radiation Control
- Jorge Laguna, Environmental Administrator, Florida Bureau of Radiation Control
- Lori Jobe, Senior Attorney, Office of the General Counsel, Florida Department of Health

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 Florida. The meeting was held on July 9, 2025, and was conducted in accordance with Nuclear Materials Safety and Safeguards (NMSS) Procedure SA-116, "Periodic Meetings between IMPEP Reviews," dated October 29, 2021.

The Florida Agreement State Program is administered by the Bureau of Radiation Control (Bureau), which is designated as the State's radiation control agency. The Bureau is in the Division of Emergency Preparedness and Community Support in the Department of Health. At the time of the 2023 IMPEP review, the Bureau regulated 1521 specific licenses authorizing possession and use of radioactive materials. At the time of the 2025 Periodic Meeting, the Bureau regulated 1511 specific licenses. The Periodic Meeting focused on the radiation control program as it is carried out under Section 274b. (of the Atomic Energy Act of 1954, as amended) Agreement between the NRC and the State of Florida.

The Bureau is currently 100 percent funded by fees. The State has the authority to take Bureau funds when needed. At the time of the Periodic Meeting, Florida's fees were approximately 25-30 percent of NRC's fees with their last fee increase occurring on August 16, 2007.

The Bureau last underwent an Integrated Materials Performance Evaluation Program (IMPEP) review during the week of June 12-16, 2023. A copy of the 2023 IMPEP report is available in the NRC's Agencywide Documents Access and Management System using the Accession No. [ML23289A168](#). A Management Review Board (MRB) meeting to discuss the outcome of the IMPEP review was held on October 5, 2023. Overall, the MRB Chair found the Florida Agreement State Program adequate to protect public health and safety and not compatible with the NRC's program.

The MRB Chair found the Bureau's performance satisfactory for the performance indicators: Technical Staffing and Training, Status of Materials Inspection Program, Technical Quality of Inspections, Technical Quality of Licensing Actions, Technical Quality of Incidents and Allegation Activities, and the Sealed Source and Device (SS&D) Evaluation Program; and found Florida's performance unsatisfactory for the performance indicator Legislation, Regulations, and other Program Elements. Additionally, the team recommended and the MRB Chair agreed to close the three recommendations from the 2019 IMPEP review, and open a new recommendation related to the Legislation, Regulations, and other Program Elements performance indicator. The MRB Chair agreed with the teams recommendation that a Periodic Meeting take place in approximately 2 years with the next IMPEP review take place in approximately 4 years.

2.0 COMMON PERFORMANCE INDICATORS

Five common performance indicators are used to review the NRC's 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: (2023 IMPEP Rating: Satisfactory)

The Bureau, when fully staffed, has 58 technical staff equaling 27.5 full-time equivalents (FTE) dedicated to the radioactive materials program. Most licensing staff are FTE and work from the

Tallahassee office, while the inspection staff are based out of their homes across the State and perform both radioactive materials and X-ray inspections with none of them being more than 50 percent dedicated to the materials program. The Bureau has staff assigned to emergency response and laboratory positions and they also have two fully qualified licensing contractors who work remotely and perform licensing activities.

At the time of the 2023 IMPEP review, 23 staff left the Bureau for various reasons and 21 had been hired to replace them. At the time of the 2025 Periodic Meeting, 17 additional staff had left the Bureau and 12 had been hired to replace them. Of the staff who left the Bureau following the 2023 IMPEP review, two retired, one stepped down from management, one passed away, eight either left the Bureau or transferred to another part of State government and all noted leaving for increased salary. The remaining staff who left the Bureau left for other undisclosed reasons. The Bureau stated that the main hurdle in retaining inspectors has been, for the most part, uncompetitive salaries. They stated that most inspectors who they hire spend three to four years with the Bureau, get solid training and work experience, and then often depart for higher-paying positions elsewhere. The Bureau noted that even while knowing that this turnover will likely continue, the Bureau continues to ensure that their inspectors are well trained, and fully prepared as inspectors and meticulous in their assessments of licensee programs, so they can effectively evaluate the impact of licensed activities on health, safety, and security. The Bureau noted that even with this frequent staff turnover, a substantial number of dedicated inspectors have committed five or more years to the Bureau.

At the time of the Periodic Meeting, the Bureau had five staff vacancies. Vacancies typically remain open anywhere from 91 to 336 days and average approximately 161 days. In response to this slow hiring process and the constant staffing needs, staff resources must be reassigned from other areas of the Bureau to supplement staffing demands. Senior level positions are generally filled in a timely manner, and as a result, licensing and inspection work is completed successfully without impacting public health and safety. The Bureau reported that they could use four new additional staff positions with three placed in regional offices and one in the Tallahassee office.

The Bureau reported that due to consistently high staff turnover, there is a continual need for training. Bureau managers continue to apply for seats in the NRC classes, but due to high demand across all the Agreement States and limited seating in classes, they are not always able to get them. However, the NRC has been successful in getting many of the Bureau's staff into classes. The Bureau reported that in 2023 a total of 23 staff were admitted into classes, in 2024 a total of 31 staff were admitted into classes, and as of the date of the Periodic Meeting, 18 staff had been admitted into classes for 2025. But because there is such a strong need for training in Florida, the Bureau is also hosting the G-108 Inspection Procedures course, and if successful, they may host other courses in the future to help meet their training needs.

The Bureau also reported they have a training and qualification program that is consistent with NRC's Inspection Manual Chapter (IMC) [1248](#), "Qualification Programs for Federal and State Materials and Environmental Management Programs." Program management tracks continuing education requirements of 24 hours every 2 years and provides ample opportunities for staff to fulfill this requirement.

2.2 Status of the Materials Inspection Program: (2023 IMPEP Rating: Satisfactory)

The Bureau's inspection frequencies are the same or more restrictive than the NRC's inspection frequencies listed in [IMC 2800](#), "Materials Inspection Program." Since the 2023 IMPEP review, Bureau inspectors performed 626 total inspections with 162 performed in 2023 from the IMPEP

review through the end of the year, another 328 performed in 2024, and up to the date of the 2025 Periodic Meeting, performed an additional 146 inspections. During that time, only one inspection was performed overdue. Of the total number of inspections performed, 197 were initial inspections and none of those were performed overdue.

At the time of the 2025 Periodic Meeting, the Bureau had not revised their reciprocity inspection guidance to align with the latest revision to IMC 2800 which could make their approach to reciprocity inspections risk informed. The Bureau's guidance remained aligned with the now retired IMC 1220 requiring them to perform inspections on at least 20 percent of all candidate licensees coming into Florida to work under reciprocity. The Bureau reported that they exceeded the 20 percent requirement in each year following the 2023 IMPEP review. In 2023, following the review, they performed 13 reciprocity inspections, in 2024 they performed an additional 24 reciprocity inspections, and up to the date of the 2025 Periodic Meeting, the Bureau had already performed 29 reciprocity inspections.

The Bureau further reported that inspection findings are communicated to the licensees within Florida's goal of 30 days after the inspection exit or 45 days after a team inspection exit.

2.3 Technical Quality of Inspections: (2023 IMPEP Rating: Satisfactory)

The Bureau uses inspection procedures that are consistent with the inspection guidance outlined in the NRC's IMC 2800. All field inspectors are home based and are scattered across the State, performing inspections of both radioactive materials licensees as well as X-ray registrants. The Bureau has four inspection managers in districts across Florida, with each supervising multiple inspectors. While inspection managers perform annual accompaniments of field inspectors, previous IMPEP reviews have determined that there have been times when determining who needs an inspector accompaniment becomes difficult and can become overlooked, especially when staff abruptly terminates employment prior to an accompaniment being performed. In the past, this has been documented in IMPEP reports and has even resulted in recommendations being issued, but the Bureau continues to strive towards keeping up with accompaniments as required. The Bureau reported that since the 2023 IMPEP review, there was only one instance when an annual accompaniment exceeded the required time due to a management vacancy that exceeded six months.

To guarantee the quality of inspections, Bureau managers promptly review all inspection reports to ensure that licensed activities maintain a sharp focus on health, safety, and security, and that all findings are accurate and clearly documented. Managers also ensure that inspectors have addressed any outstanding issues, events, or violations. Any identified deficiencies leading to a direct discussion with inspectors, reports are corrected before being submitted to the materials licensing program within 30 days of completing an individual inspection or 45 days for a team inspection.

2.4 Technical Quality of Licensing Actions: (2023 IMPEP Rating: Satisfactory)

Between the 2023 IMPEP review and the 2025 Periodic Meeting, the Bureau completed 3883 licensing actions that included 3049 amendments, 398 renewals, 243 new licenses, and 193 terminations. The Bureau reported that staff use the NRC guidance documents (e.g. NUREG-1556 Series guidance, Pre-licensing Guidance, and Risk Significant Radioactive Materials Checklists) when completing licensing actions.

During the 2023 IMPEP review, the team found that even with persistent turnover in staffing, the Bureau benefited from the expertise of long-term staff who were highly qualified, using them to

review actions performed by newer staff who had not yet obtained broad qualifications. In addition to regular staff, the Bureau contracted with two fully qualified outside licensing reviewers to assist in keeping up with licensing actions, and are considering adding additional qualified contractors to assist them.

2.5 Technical Quality of Incident and Allegation Activities: (2023 IMPEP Rating: Satisfactory)

Between the 2023 IMPEP review and the date of the 2025 Periodic Meeting, 285 events of all types were reported to the Nuclear Material Events Database by the Bureau. These events included medical events, recycling events, scrap events, waste events and events involving non-licensees, with only three of the most recent events remaining open. The Bureau reported that when an event is reported to them, management evaluated it and determined its health and safety significance, and then would decide on the appropriate response which could range anywhere from responding immediately to reviewing the event during the next inspection. For each incident that the Bureau determined to have potential health and safety significance, they would respond immediately. The Bureau reported that they responded to events in accordance with their established procedure and made all the NRC's Headquarters Operations Officer reports within the required time frame, in accordance with State Agreements Procedure (SA) [SA-300](#).

The Bureau reported that since the 2023 IMPEP review and the date of the 2025 Periodic Meeting, 27 allegations were received directly by Florida with 8 additional allegations referred to them by the NRC. When allegations are received, the Bureau evaluates them and takes prompt and appropriate action in response to each of the concerns raised, and whenever there is enough information provided to make it possible, including the NRC referrals. The Bureau reported that the allegations were reviewed and are closed, and concerned individuals are notified timely of the actions taken. All concerned individuals' identities are protected in accordance with State law. The Bureau also reported that it responded to allegations in accordance with their established procedure.

3.0 NON-COMMON PERFORMANCE INDICATORS

Four non-common performance indicators are used to review Agreement State programs: (1) Legislation, Regulations, and Other Program Elements; (2) SS&D Evaluation Program; (3) Low-Level Radioactive Waste (LLRW) Disposal Program; and (4) Uranium Recovery (UR) Program.

The NRC retains regulatory authority for the LLRW Disposal Program and the UR Program; therefore, only the first two non-common performance indicators applied to this meeting.

3.1 Legislation, Regulations and Other Program Elements: (2023 IMPEP Rating: Unsatisfactory)

The Bureau reported that there have been no legislative changes impacting the Program since the 2023 IMPEP review. At the time of the Periodic Meeting there were 29 amendments that had not yet been adopted by Florida. Regulations applicable to the Florida Agreement State Program are not subject to sunset requirements.

The Bureau reported that the rulemaking process can be a slow and difficult process. To begin the rule promulgation process, the Bureau submits a Notice to Develop Rulemaking to the Department of Health (Department). The Department will then send the Notice to the Office of

Program Policy Analysis and Government Accountability in the Governor's Office for review and approval. Once approved the Department publishes a Notice to Develop Rulemaking in the Florida Administrative Register (FAR) for a period of 21 days offering to hold a rule development workshop. If a workshop is requested, it is published in the FAR at least 7 days prior to the workshop. The Notice of Proposed Rulemaking must be published within 1 year from the Notice of Rule Development. If the Notice is not published within 1 year, Florida is required to refile the Notice. After the Notice is filed, the proposed regulations were reviewed by the Department's Office of General Counsel (OGC).

During the Periodic Meeting, a meeting was held with the Bureau management and a senior attorney within the Department's OGC to discuss the rulemaking process and potential strategies for rule development including in part, reducing the size of the rule packages going through OGC to improve the likelihood of more timely approvals. The Bureau is also considering adopting rules by reference. Their senior attorney reported that there are now a total of four levels of management review within the OGC alone, extending the time required for OGC to complete their review, and which can have a significant impact on timely rule adoption. The Bureau records show that the last adopted rule package occurred prior to August 2019, with none having been fully completed and adopted since that time. The Bureau reported, and provided records to identify that for Regulation Amendment Tracking System Identification Number (RATS ID) 2020-3, license conditions have been utilized for specific parts of RATS ID 2020-3 to ensure that they can enforce regulations, and that no regulatory gaps exist for those specific requirements which would allow the Bureau to maintain protection of public health and safety. Specific details on which specific regulations are covered by the license conditions are noted below under RATS ID 2020-3.

At the time of the Periodic Meeting, the Bureau provided documentation demonstrating that the following amendments had not yet been adopted:

- "Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiography Operations Parts 30, 34, 71, and 150, that was due for Agreement State adoption on June 27, 2000.
- "Requirements for Certain Generally Licensed Industrial Devices Containing Byproduct Material Parts 30, 31, and 32, that was due for Agreement State adoption on February 16, 2004.
- "Medical Use of Byproduct Material Parts 20, 32, and 35", that was due for Agreement State adoption on October 24, 2005.
- "Medical Use of Byproduct Material - Recognition of Specialty Boards Part 35", that was due for Agreement State adoption on April 29, 2008.
- "Minor Amendments Parts 20, 30, 32, 35, 40 and 70", that was due for Agreement State adoption on March 27, 2009.
- "Requirements for Expanded Definition of Byproduct Material Parts 20, 30, 31, 32, 33, 35, 61, and 150", that was due for Agreement State adoption on November 30, 2010.
- "Exemptions From Licensing, General Licenses, and Distribution of Byproduct Material: Licensing and Reporting Requirements Parts 30, 31, 32, and 150", that was due for Agreement State adoption on December 17, 2010.

- “Medical Use of Byproduct Material – Authorized User Clarification Part 35”, that was due for Agreement State adoption on September 28, 2012.
- “Technical Corrections”, that was due for Agreement State adoption on August 6, 2015.
- “Advance Notification to Native American Tribes of Transportation of Certain Types of Nuclear Waste Part 71”, that was due for Agreement State adoption on August 10, 2015.
- “Requirements for Distribution of Byproduct Material Parts 30, 31, 32, 40 and 70”, that was due for Agreement State adoption on October 23, 2015.
- “Decommissioning Planning”, that was due for Agreement State adoption on December 17, 2015.
- “Physical Protection of Byproduct Material, Parts 20, 30, 32, 33, 34, 35, 36, 37, 39, and 71”, that was due for Agreement State adoption on March 19, 2016.
- “Distribution of Source Material to Exempt Persons and to General Licensees and Revision of General License and Exemptions, Parts 30, 40 and 70”, that was due for Agreement State adoption on August 27, 2016.
- “Domestic Licensing of Special Nuclear Material – Written Reports and Clarifying Amendments Part 70”, that was due for Agreement State adoption on January 26, 2018.
- “Safeguards Information - Modified Handling Categorization, Change for Materials Facilities Parts 30, 37, 73, and 150”, that was due for Agreement State adoption on January 28, 2018.
- “Revisions to Transportation Safety Requirements and Harmonization with International Atomic Energy Agency Transportation Requirements, Part 71”, that was due for Agreement State adoption on August 15, 2020.
- “Miscellaneous Corrections, Parts 37 and 40”, that was due for Agreement State adoption on September 9, 2018.
- “Miscellaneous Corrections, Parts 19, 20, 30, 32, 37, 40, 61, 70, 71 and 150”, that was due for Agreement State adoption on December 31, 2018.
- “Miscellaneous Corrections – Organizational Changes, Parts 37, 40, 70 and 71”, that was due for Agreement State Adoption on December 21, 2021.
- “Medical Use of Byproduct Material – Medical Event Definitions, Training and Experience, and Clarifying Amendments, Parts 30, 32 and 35”, that was due for Agreement State adoption on January 14, 2022.
- “Miscellaneous Corrections, Parts 1,2,34,37,50,71, 73 and 140”, that was due for Agreement State adoption on July 30, 2022.
- “Miscellaneous Corrections, Parts 2, 21, 37, 50, 52, 73 and 110”, that was due for Agreement State adoption on December 18, 2022.

- “Organizational Changes and Conforming Amendments Parts 1, 2, 37, 40, 50, 51, 52, 55, 71, 72, 73, 74, 100, 140, and 150”, that was due for Agreement State adoption on December 30, 2022.
- “Individual Monitoring Devices 10 CFR Parts 34, 36, and 39”, that was due for Agreement State adoption on June 16, 2023.
- “Social Security Number Fraud Prevention 10 CFR Pats 9 and 35”, that was due for Agreement State adoption on August 17, 2023.
- “Miscellaneous Corrections 10 CFR Parts 1, 2, 19, 20, 21, 30, 34, 35, 40, 50, 51, 52, 60, 61, 62, 63, 70, 71, 72, 73, 74, 75, 76, 110, and 140”, that was due for Agreement State adoption on November 16, 2023. ***Note: The proposed and subsequently approved medical license condition only applies to the changes in the rule text required in RATS ID 2020-3; and the proposed and approved license condition is intended to supersede the existing Florida rules listed that are required by 10 CFR Part 71 and to clarify that only NRC may issue package Certificates of Compliance.*** (See Florida letter dated 6/23/23 and NRC response letter dated 8/18/23)
- “Miscellaneous Corrections 10 CFR Parts 2, 11, 20, 25, 32, 35, 37, 50, 52, 55, 70, 72, 73, 95, and 110”, that was due for Agreement State adoption on September 8, 2024.
- “Miscellaneous Corrections 10 CFR Parts 9, 37, 40, 50, 51, 52, 55, 71, 73, and 110”, that was due for Agreement State adoption on December 30, 2024.

Regulation development has been a longstanding challenge for the Bureau, stemming back several years and it is a problem that continues to grow. To exacerbate the problem, the individual within the Bureau, who had primarily been responsible for the in-house portion of rule development, recently passed away and the Bureau is now having to identify and then reassign that task to another individual who will need to be brought up to speed in the process before they can become fully proficient.

At the time of the 2023 IMPEP review, the team found that a detailed, realistic timeline of regulation promulgation had not been established or monitored by senior Division of Emergency Preparedness and Community Support management within the Department of Health. The team determined that these actions would likely help to avoid cross-organizational challenges and assist the Bureau in meeting the 3-year implementation deadline for rule adoption. Because of those challenges, the team recommended that the Bureau manage implementation of the compatibility plan to establish realistic timelines and leverage senior Division of Emergency Preparedness and Community Support management engagement to ensure timely adoption of current and future regulations. While the Bureau has continued to work towards this goal, as of the date of the 2025 Periodic Meeting, no progress has been made as no regulations have been completed since the 2023 IMPEP review. Progress on this recommendation will be evaluated during the next IMPEP review tentatively scheduled for June 2027.

3.2 SS&D Evaluation Program: (2023 IMPEP Rating: Satisfactory)

The Bureau reported that at the time of the 2025 Periodic Meeting they have two qualified SS&D reviewers with one vacancy. Since the 2023 IMPEP review, one individual had left the program and no replacement was hired. The Bureau reported that their training program is equivalent to NRC's [IMC 1248](#), Appendix D. They further reported that they currently have seven SS&D licensees and processed six SS&D actions since the 2023 IMPEP review including

one amendment, one renewal, two acknowledgements, one termination, and one new application. Since the 2023 IMPEP review, there have been no incidents related to manufacturing or design of sources or devices manufactured or distributed by a licensee holding a Florida issued SS&D registration.

4.0 SUMMARY

The Florida Agreement State Program continues to be an effective and vital part of both the Florida Department of Health and the National Materials Program. At the time of the meeting, they had 5 staff vacancies and since the 2023 IMPEP review, 17 staff had left the program and 12 had been hired to replace them. Most departures were for higher salaries. The Bureau continues to struggle to retain staff due to a longstanding low salary history. While these continued staff losses have stressed the Bureau, they have effectively shifted resources, as necessary, to keep up with work. Florida performed a total of 626 inspections since the 2023 IMPEP review with only one inspection being performed overdue, they met their reciprocity inspection goal of greater than 20 percent of candidate licensees over the same period and performed 3883 licensing actions. To help keep up with future workloads, the Bureau stated that they could use four additional staff positions so they could place them in strategic locations across the state.

Regulation development is another area where the Bureau continues to struggle and has for several years. This is not due to a lack of staff, but more so the Florida process for rule adoption. The Florida process has time constraints built in, and several levels of concurrence where workflow tends to slow to a stop, and once the time constraint has been exceeded, they are forced to start over again. The Bureau's last completed rule package occurred prior to August 2019, and they currently have 29 rule packages that have not been adopted, with the oldest dating back to having an adoption date of June 27, 2000.

NRC staff recommends that the next IMPEP review for the Florida Agreement State Program be conducted as scheduled in 2027. The Bureau did not request an MRB meeting following the Periodic Meeting.

2025 FLORIDA PERIODIC MEETING SUMMARY DATE September 22, 2025

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