

AGREEMENT STATE ANNUAL MEETING SUMMARY FOR GEORGIA

DATE OF MEETING: JANUARY 15, 1998

ATTENDEES:

NRC

Richard L. Woodruff, RSAO, Region II
Kathleen Schneider, ASPO, OSP

STATE

Thomas E. Hill, Manager, Radioactive Materials Program
Henry P. Copeland, Principle Radiation Specialist

DISCUSSION:

A meeting was held with the Georgia representatives on January 15, 1998, in Mr. Hill's office. The topics listed in NRC letter dated November 3, 1997, to Mr. Hill were discussed. Details for each area are discussed below.

Action on Previous Review Findings

The previous IMPEP review was conducted during the period of February 12-16, 1996. During this review, eight recommendations were made to the State concerning: (1) the scheduling of initial inspections; (2) the Program's announced inspection policy; (3) the annual accompaniment of inspectors; (4) the tracking of enforcement actions; (5) the reporting of incidents; (6) the documentation of events; (7) the requirement for sealed source and device manufacturers to have a quality assurance/quality control program; and (8) the updating of regulations pertaining to the sealed source and device program. In addition, the review team made four suggestions concerning: (1) the adoption of standardized inspection forms; (2) the assessment of their quality assurance program on reports and enforcement letters; (3) the development of inspector guidance for evaluation and documentation of medical QM programs; and (4) additional documentation and close out for two incidents. The State responded in a letter dated August 2, 1996, outlining the steps being taken in response to the recommendations and suggestions made by the review team.

During this annual meeting, the NRC representatives discussed the details of the State's actions taken in response to the recommendations and suggestions. Based upon the discussions with Georgia representatives, the actions taken as described in the State's letter dated August 2, 1996, have been implemented and the ongoing actions are on schedule. In addition, the NRC representatives confirmed that the State's regulations were amended on May 6, 1997, to add provisions compatible with 10 CFR Part 30.32(g) and 32.210. These amended regulations are found in the Georgia Rules and Regulations for Radioactive Materials, Chapter 391-3-17, .02(7)(I), and .02(11)(I), and were determined by the RSAO to be essentially identical (compatibility categories A and B) with the NRC regulations.

Enclosure

Program Strengths and/or Weaknesses

In general, the Georgia representatives related that their programs were strong, with adequate support from the Department of Natural Resources, legislative support, stable sources of funding, administrative support, legal support, good equipment, and well trained staff. No performance type weaknesses were identified by NRC during this meeting.

Status of Program and/or Policy Changes

There have been no changes in the structure of the organization since the last review. The Director of the Environmental Protection Division (EPD) reports to the Commissioner, Department of Natural Resources (a cabinet level position) and the Board of Directors. The Radioactive Materials Program and the Environmental Radiation Program are located in the Program Coordination Branch under EPD.

The Materials Program is headed by the Program Manager and has one Secretarial position, one accountant position, and eight Radiation Specialist positions. The Materials Program has one vacancy which was in the process of being filled at the time of the meeting. During previous years, the program also utilized one individual attached to the EPD's Southern Regional Office located in Brunswick, GA for licensing, inspections, and incident response functions. This individual retired on October 31, 1997. This function is currently being handled out of the central office in Atlanta, but the Program Manager related that an individual had been selected to take over these functions, and would work out of the EPD office located in Savannah, GA.

The Environmental Radiation Program is headed by the Program Manager has seven technical positions, and manages the contract for the Environmental Radiation Laboratory. The contracted Laboratory is located at the Georgia Institute of Technology. Three Specialist in the Environmental Program also have experience and training in the Materials Program area which provides a backup capability for Agreement type materials.

The Materials Program manager reported that the State currently has 481 specific licenses of which 29 are considered to be major licenses. The Materials Program reported having no licensing, inspection, or enforcement backlogs.

Impact of NRC Program Changes

The NRC representatives discussed NRC program changes that could impact the State, such as the 10 CFR Part 35 revision, the termination of the State environmental monitoring contracts, and the current status of NRC's policies involving decommissioning of formerly licensed sites and NRC's training program. In response to the discussions, the Materials manager related that the program would continue to provide training for their staffs to the extent possible. Since the vacancy had not been selected at the time of the meeting, the Program manager could not predict what training would be requested. The Programs utilize the NRC's Region II training to the extent possible for workshops provided for Region II technical staff. The State had just recently been informed of the environmental monitoring contract issue, and the impact had not been fully assessed. Decommissioning of formerly licensed facilities (AEC/NRC) is not expected to be a problem in Georgia.

Status of Allegations Previously Referred

The NRC allegation program was discussed in general with the State representatives. The Manager related that their agency had very few allegations, that allegations were processed on a case-by-case basis, and that follow-ups were conducted as needed. A review of the allegations referred to the State by the NRC Region II office indicated that there were no outstanding NRC issues related to the referrals, and that the State had been very responsive to the Regional requests when replies were needed to close out the allegations.

Nuclear Material Events Database (NMED) Reporting

A general discussion was held with the representatives concerning the NMED reporting system. In response, State representatives related that they appreciated the training efforts provided by the AEOD's office concerning the NMED system, and that the reporting system was being utilized. Representatives also related that the data entry system was very time consuming. The Program also maintains the event data on their own tracking system, that includes complaints and non-AEA materials.

Compatibility of State Regulations

The new compatibility policy was discussed in general with the State representatives. Representatives stated that all current NRC regulations needed for compatibility up to the year 1999 have been adopted and implemented, and that plans were to draft another revision of their regulations during this calendar year. The NRC representatives discussed the Office of State Programs (OSP) procedure for reviewing proposed State regulations, and the recent OSP actions to complete the reviews of State equivalents to 10 CFR Part 20. The State requested updated copies of the current chronology of amendments needed for compatibility also expressed the need for the chronology to identify each regulation by the Federal Register (FR) Notice, to help identify each definition, and part(s) affected by the rule change. The RSAO has prepared this type of document and the chronology was provided to the State by e-mail on February 5, 1998.

Following the annual meeting, the RSAO discussed the compatibility status of regulations adopted by the State since the previous IMPEP review with the Office of State Programs and again with the State representative, and determined that NRC had not provided Georgia with any comments concerning compatibility since the IMPEP review. The Program manager provided the RSAO with an electronic version of the revised regulations on February 9, 1998. These revisions will be reviewed for compatibility in accordance with the OSP procedures, and comments will be provided to the State in writing.

Schedule for the Next IMPEP Review

The State was informed that the next Georgia review under the IMPEP procedure is scheduled for FY 2000. The NRC representatives expressed their appreciation to the Program manager for Georgia's participation in the IMPEP Program, and for the excellent support in providing well trained and experienced personnel for participation on the IMPEP teams. The Program manager expressed his opinion that the participation had helped their program in preparation for IMPEP reviews, that their program had benefited from the exchange of information received from other IMPEP team members and their interactions with other programs during the reviews. The program utilizes a team approach for implementing their own program, and has implemented an operating plan that establishes goals and objectives for the fiscal year, including program assessment and accomplishments.

CONCLUSION:

The Georgia program has good support from the Department of Natural Resources, good managers, and trained, experienced staff. By all indications (performance), the Georgia program has the resources to be adequate to protect public health and safety, and compatible under the IMPEP criteria.

ACTION ITEM:

This report will serve as an acknowledgment that the Georgia regulation amendments were received electronically on February 9, 1998. The regulations will be reviewed for compatibility in accordance with the OSP procedures and the State will be notified of the results in writing.