September 4, 2012

MEMORANDUM TO: Joseph E. DeCicco, Senior Health Physicist
Division of Materials Safety and State Agreements
Office of Federal and State Materials and
Environmental Management Programs

FROM: Charles A. Casto ***/RA by Cynthia D. Pederson acting for/***
Regional Administrator

SUBJECT: SUBMISSION OF REGION III'S INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM REVIEW QUESTIONAIRE RESPONSE

In accordance with your May 30, 2012, memorandum, I am pleased to provide Region III's completed IMPEP Questionaire to support the September 24-28, 2012, IMPEP review. The enclosed Questionnaire response covers Regional activities during the period of August 31, 2007, through August 29, 2012.

The following provides a few noteworthy highlights of our programs since the last review in 2007:

- With rare exception, met or exceeded all relevant Operating Plan Performance Measures,
- Completed 4658 licensing actions,
- Completed 1793 routine inspections,
- Issued approximately 109 escalated enforcement actions for safety significant findings,
- Responded to 116 allegations and 64 incidents (reactive inspections),
- Implemented highly effective approaches to address communications and significant performance deficiencies at the Department of Veterans Affairs (VA), including the establishment of a VA Task Group,
- Completed decommissioning oversight of several complex, decommissioning sites, including the Breckenridge site,
- Provided oversight of the Zion Nuclear Plant Decommissioning, a unique, large scale, 2-unit project,
- Utilized inspection program flexibilities to provide more effective oversight of large, complex, or poor performing licensees,
- Continued exceptional relationships, support, and oversight of our Agreements States, including unique challenges such as the Minnesota shutdown,

CONTACT: Anne Boland, DNMS
(630) 829-9800

- Provided substantial support for the IMPEP program through Regional participation as Team Leaders and team members,
- Implemented an aggressive self-assessment program for continuous improvement of our processes, including a comprehensive validation of licensing and inspection data in the Licensing Tracking System,
- Re-assessed and revised, as appropriate, internal programmatic procedures and conducted bi-weekly training sessions for the staff on changes,
- Led or supported numerous Agency programmatic activities in the form of Steering Committee and Working Group membership, including Part 37 and the various NUREG-1556 volumes,
- Substantially supported Agency training efforts for the Agreements States, inspectors, and license reviewers through providing instructors and assisting in course development activities,
- Actively participated in Regional Incident Response activities, including conduct of a unique exercise with Mallinckrodt,
- Effectively participated in counterpart activities at the inspector, Branch, and Division level to foster open communications and consistency, and
- Implemented effective staffing strategies, organization realignment, and staff development approaches to meet organizational challenges presented by the changing workforce and implementation of program changes.

In summary, the Region has been highly successful in implementing the materials safety program through our focus on safety and security, investment in our staff, and improvement of our processes. I look forward to the team's review and the insights they will have regarding our program.

If you have any questions, please feel to contact Mr. Robert Gattone, 630-829-9823, of my staff, who is facilitating your visit for me.

Enclosure:
As Stated

Approved by OMB[1]
No. 3150-0183
Expires 11/30/2013

INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM QUESTIONNAIRE

NRC Region III
Reporting Period: August 31, 2007 to Present

Note: If there has been no change in the response to a specific question since the last IMPEP questionnaire, the State or Region may copy the previous answer, if appropriate.

A. GENERAL

1. Please prepare a summary of the status of the State's or Region's actions taken in response to each of the open recommendations from previous IMPEP reviews.

The 2007 Region III IMPEP review did not result in any recommendations.

B. COMMON PERFORMANCE INDICATORS

I. Technical Staffing and Training

2. Please provide the following organization charts, including names and positions:

(a) A chart showing positions from the Governor down to the Radiation Control Program Director;

Not Applicable.

(b) A chart showing positions of the radiation control program, including management; and

[1] Estimated burden per response to comply with this voluntary collection request: 53 hours. Forward comments regarding burden estimate to the Records Management Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0183), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

DIVISION OF NUCLEAR MATERIALS SAFETY

7/10/12

FY2012

Director	Anne Boland
Deputy Director	Louden
RSAO	Lynch
Admin TL	Clay
Admin Asst.	Murray

Director's Office
4.0 Overhead
1.0 Direct

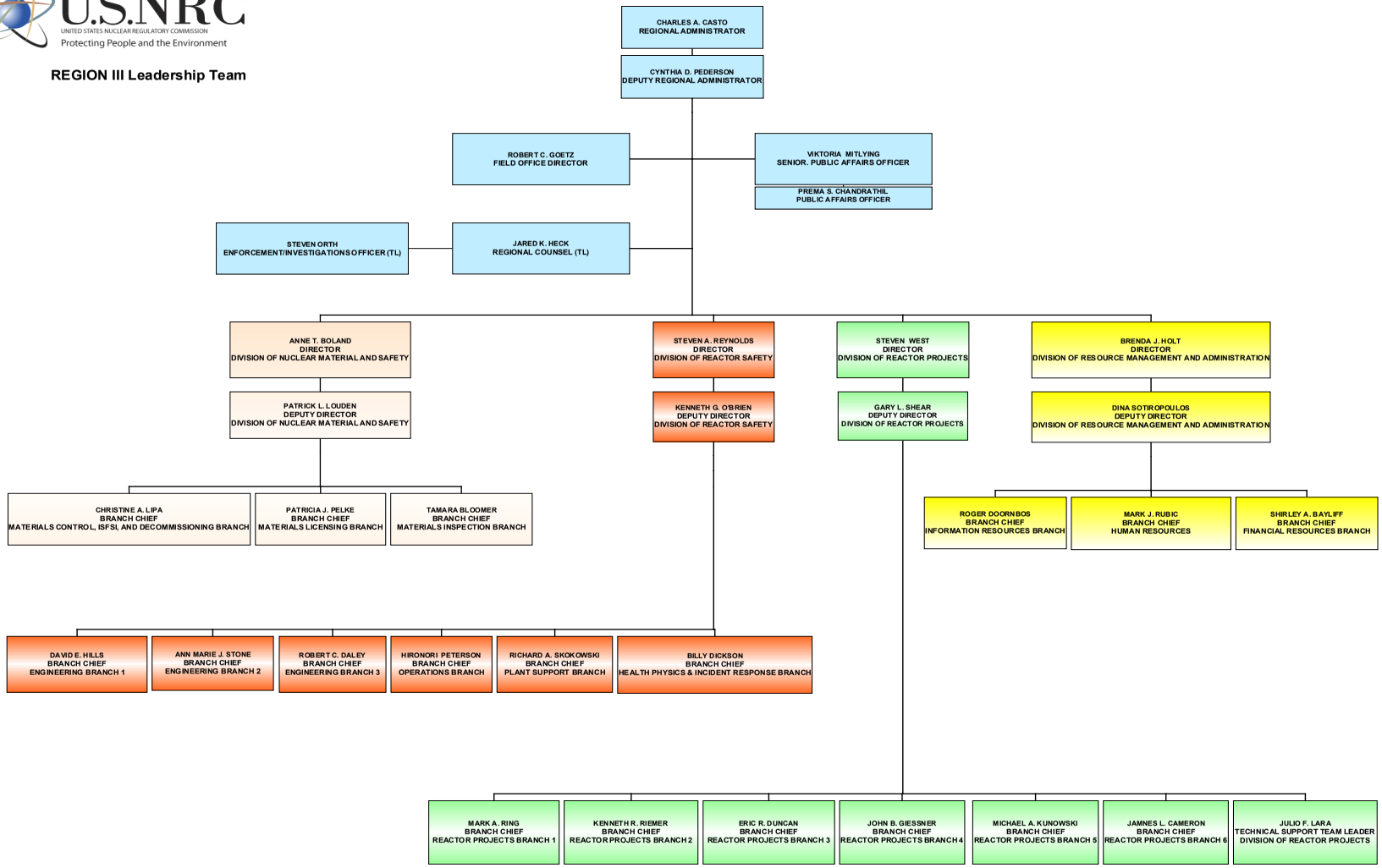
Total = 5.0

Mat'l Controls, Independent Spent Fuel Storage Installation (ISFSI), Decommissioning			**Materials Licensing Branch**			**Materials Inspection Branch**		
Grade	**Position**	**Name**	**Grade**	**Position**	**Name**	**Grade**	**Position**	**Name**
GG-15	Branch Chief	Lipa	GG-15	Branch Chief	Pelke	GG-15	Branch Chief	Bloomer
GG-14	Sr. HP	Slawinski	GG-14	Sr. HP	Frazier	GG-14	Sr. HP	Gattone
GG-14	Sr. HP	LaFranzo	GG-14	Sr. HP	Null	GG-14	Sr. HP	Lambert
GG-13	Rx Insp. (Decomm)	Lee	GG-13	HP (Licensing)	Casey	GG-14	Sr. HP	McCraw
GG-12	Rx Insp. (Decomm)	Rodriguez	GG-13	HP (Licensing)	O'Dowd	GG-13	HP (Inspector)	Craffey
GG-13	Rx Insp. (Decomm)	Learn	GG-13	HP (Licensing)	Simmons	GG-13	HP (Inspector)	Herr
GG-13	HP (Inspector)	Bonano	GG-13	HP (Licensing)	Reichhold (0.5)	GG-13	HP (Inspector)	Hays
GG-13	HP (Inspector)	Tapp	GG-13	HP (Licensing)	Parker	GG-13	HP (Inspector)	Kulzer
GG-13	HP (Inspector)	Edwards	GG-13	HP (Licensing)	Tran	GG-13	HP (Inspector)	Piskura
			GG-13	HP (Licensing)	Forster	GG-13	HP (Inspector)	Warren
GG-09	HP (NSPDP Overhead)	Tehrani	GG-13	HP (Licensing)	Bishop	GG-13	HP (Inspector)	Bramnik
			GG-13	HP (Licensing)	vacant	GG-13	HP (Inspector)	Lin
						GG-09	HP NSPDP (Direct)	Wellinghoff
			GG-6	Matls Proccessing Asst	vacant			
			GG-5	Records Mgmt Clerk	Bernadino			
	As shown on staffing plan	8.00	As shown on staffing plan		10.5	As shown on staffing plan		12.00
	Direct FTE Total	**8.00**		**Direct FTE Total**	**10.50**		**Direct FTE Total**	**12.00**
	Total FTE for MCID	**10.00**		**Total FTE for MLB**	**13.50**		**Total FTE for MIB**	**13.00**

FY2012	**Ovhd/Ovrg**	**Direct**	**Total**
Dir. Office	4.00	1.00	5.00
MCID	2.00	8.00	10.00
MLB	3.00	10.50	13.50
MIB	1.00	12.00	13.00
Division Total	**10.00**	**31.50**	**41.50**

U.S.NRC
UNITED STATES NUCLEAR REGULATORY COMMISSION
Protecting People and the Environment

REGION III Leadership Team



Current as of 9/4/2012

(c) Equivalent charts for sealed source and device evaluation, low-level radioactive waste and uranium recovery programs, if applicable.

Not Applicable for the Region III Office.

3. Please provide a staffing plan, or complete a listing using the suggested format below, of the professional (technical) full-time equivalents (FTE) applied to the radioactive materials program by individual. Include the name, position, and, for Agreement States, the fraction of time spent in the following areas: administration, materials licensing & compliance, emergency response, low-level radioactive waste, uranium recovery, other. If these regulatory responsibilities are divided between offices, the table should be consolidated to include all personnel contributing to the radioactive materials program. If consultants were used to carry out the program's radioactive materials responsibilities, include their efforts.

Note: The information below was current as of 8/29/12.

NAME	POSITION	AREA OF EFFORT	% Effort
Patty Pelke	**Branch Chief** **Materials Licensing Branch**	**Management**	**100**
Cassandra Frazier	**Senior License Reviewer**	**Licensing** **Inspection**	**90** **10**
Kevin Null	**Senior License Reviewer**	**Licensing** **Inspection**	**70** **30**
Jennifer Bishop	**License Reviewer**	**Licensing**	**100**
Colleen Casey	**License Reviewer**	**Licensing**	**100**

NAME	POSITION	AREA OF EFFORT	% Effort
Sara Forster	License Reviewer	Licensing	100
Dennis O'Dowd	License Reviewer	Licensing	100
Bill Reichhold	License Reviewer	Licensing	100
Bryan Parker	License Reviewer	Licensing	100
Toye Simmons	License Reviewer	Licensing	100
Frank Tran	License Reviewer	Licensing	100
Tammy Bloomer	Branch Chief Materials Inspection Branch	Management	100
Ken Lambert	Senior Materials Inspector	Inspection	100
Aaron McCraw	Senior Materials Inspector	Inspection	100
Bob Gattone	Senior Materials Inspector	Inspection	100

NAME	POSITION	AREA OF EFFORT	% Effort
Bob Hays	Materials Inspector	Inspection	100
Ed Kulzer	Materials Inspector	Inspection	100
Michael Herr	Materials Inspector	Inspection	100
Debbie Piskura	Materials Inspector	Inspection	100
Geoff Warren	Materials Inspector	Inspection	100
Bill Lin	Materials Inspector	Inspection	100
Ryan Craffey	Materials Inspector	Inspection	100
Claire Wellinghoff	Materials Inspector (NSPDP)	Inspection	100
Andrew Bramnik	Materials Inspector	Inspection	100
Christine Lipa	Branch Chief Decommissioning Branch	Management	100

NAME	POSITION	AREA OF EFFORT	% Effort
Wayne Slawinski	Senior Decommissioning Inspector	Decommissioning Inspection/Project Management	100
Mike LaFranzo	Senior Decommissioning Inspector	Decommissioning Inspection/Project Management Decommissioning Licensing/Project Management	50 50
Eugenio Bonano	Decommissioning Inspector	Decommissioning Inspection/Project Management ISFSI Security Inspection	70 30
Navid Tehrani	Decommissioning Inspector (NSPDP)	Decommissioning Inspection	100
Rhex Edwards	Decommissioning Inspector	ISFSI Inspection/Project Management	100

NAME	POSITION	AREA OF EFFORT	% Effort
Peter Lee	Decommissioning Inspector	Decommissioning Inspection/Project Management	65
		Decommissioning Licensing/Project Management	35
Matt Learn	Decommissioning Inspector	ISFSI Inspection/Project Management	100
Jeremy Tapp	Decommissioning Inspector	ISFSI Inspection/Project Management	20
		Decommissioning Inspection/Project Management	80
Lionel Rodriguez	Decommissioning Inspector	Decommissioning Inspection/Project Management	30
		Decommissioning Licensing/Project Management	30
		ISFSI Inspection	40

4. Please provide a listing of all new professional personnel hired into your radioactive materials program since the last review, indicate the date of hire; the degree(s) they received, if applicable; additional training; and years of experience in health physics or other disciplines, as appropriate.

[redacted]

[redacted]

5. Please list all professional staff who have not yet met the qualification requirements for a radioactive materials license reviewer or inspector. For each, list the courses or equivalent training/experience they need and a tentative schedule for completion of these requirements.

Note: The information below was current as of 8/29/12.

<u>Ryan Craffey</u> needs to complete the courses listed below, in addition to on-the-job training, self-study, and supervisory assessments in accordance with IMC 1246, to meet the qualification requirements for a materials inspector. His Qualification Board is projected for December 2012.

H-111: Environmental Monitoring for Radioactivity (10/15-19/12)

G-108: Inspection Procedures (10/22-26/12)

G-205: Root Cause/Incident Investigation Workshop (1/7-11/13)

<u>Navid Tehrani</u> is in the Nuclear Safety Professional Development Program (NSPDP). He needs to complete the course listed below, in addition to on-the-job training, self-study, and supervisory assessments in accordance with IMC 1246, to meet the qualification requirements for a decommissioning inspector. His Qualification Board is projected for October 2013.

H-410: RESRAD (4/9-12/13)

Claire Wellinghoff is in the NSPDP. She needs to complete the courses listed below, in addition to on-the-job training, self-study, and supervisory assessments in accordance with IMC 1246, to meet the qualification requirements for a materials inspector. Her Qualification Board is projected for February 2013.

H-308: Transportation of Radioactive Materials (10/1-5/12)

H-312: Internal Dosimetry (12/3-7/12)

Jennifer Bishop needs to complete the courses listed below, in addition to on-the-job training, self-study, and supervisory assessments in accordance with IMC 1246, to meet the qualification requirements for a license reviewer. She completed a Qualification Board when she worked in the Division of Reactor Projects; therefore, she will not complete another Qualification Board. She is projected to obtain signature authority by March 2013.

H-305: Safety Aspects of Industrial Radiography (2/25-3/1/13)

H-313: Brachytherapy, Gamma Knife, and Emerging Technologies (3/18-22/13)

Dennis O'Dowd has completed the required training courses to meet the qualification requirements for a materials reviewer. He needs to complete applicable on-the-job training, self-study, and supervisory assessments in accordance with IMC 1246, to meet the qualification requirements for a materials reviewer. His Qualification Board is projected for November 2012.

6. Identify any changes to your qualification and training procedure that occurred during the review period.

Region III follows IMC 1246 for qualification of Materials Inspectors, Decommissioning Inspectors, and Materials Licensing Reviewers. In addition, Region III has been actively participating in considerable dialog regarding changes to the qualification program that will occur once the new IMC 1248 is issued. When the new IMC 1248 is issued, Region III will plan to adopt those requirements for new personnel and evaluate any appropriate training for currently qualified staff as necessary.

7. Please identify the technical staff that left your radioactive materials program during the review period and indicate the date they left.

Note: The information below was current as of 8/29/12.

Magda Gryglak, Decommissioning Inspector, was reassigned to EICS in May 2008.

John Madera, Inspection Branch Chief, retired in January 2009.

Loren Hueter, Materials License Reviewer, retired in December 2009.

William Snell, Senior Decommissioning Inspector, retired in April 2010.

George Parker, Materials Inspector, retired in June 2010.

Jose Macatangay, Materials License Reviewer, left the NRC to pursue other employment opportunities in July 2010.

Sarah Bakhsh, Decommissioning Inspector, was on rotation to EICS starting in February 2010 and then reassigned to EICS in December 2010.

Samuel Mulay, Materials Inspector, retired in December 2010.

George McCann , Senior Decommissioning Inspector, retired in February 2011.

Darrel Wiedeman, Senior Materials Inspector, retired in April 2011.

Katie Streit, Decommissioning Reviewer, transferred to RES as a Graduate Fellow Selectee in July 2011.

James Mullauer, Materials License Reviewer, retired in July 2011.

8. List any vacant positions in your radioactive materials program, the length of time each position has been vacant, and a brief summary of efforts to fill the vacancy.

Note: The information below was current as of 8/29/12.

MLB currently has one vacant license reviewer position. Action to fill this position has been held in abeyance pending assessment of our licensing/inspection support process and any realignment needed due to the implementation of Web Based Licensing. Interim actions have been taken to ensure continuity of licensing and the associated support.

9. For Agreement States, does your program have an oversight board or committee which provides direction to the program and is composed of licensees and/or members of the public? If so, please describe the procedures used to avoid any potential conflict of interest.

Not Applicable.

II. Status of Materials Inspection Program

10. Please identify individual licensees or categories of licensees the State is inspecting less frequently than called for in NRC's Inspection Manual Chapter (IMC) 2800 and explain the reason for the difference. The list only needs to include the following information: license category or licensee name and license number, your inspection interval, and rationale for the difference.

Region III conducts inspections at the frequencies authorized by IMC 2800. Pursuant to Item 06.05 of IMC 2800, at the discretion of regional management, changes in inspection interval were made, on occasion, to achieve efficiencies in the use of inspection resources and to reduce the regulatory impact on some licensees.

11. Please provide the number of routine inspections of Priority 1, 2, and 3 licensees, as defined in IMC 2800 and the number of initial inspections that were completed during each year of the review period.

Note: The information below was current as of 8/29/12.

	2007 (9/1 thru 12/31)	2008	2009	2010	2011	2012 (through 8/29/12)
Routine Pr. 1 Insp.:	**8**	**19**	**19**	**20**	**17**	**10**
Routine Pr. 2 Insp.:	**21**	**88**	**43**	**81**	**83**	**38**
Routine Pr. 3 Insp.:	**23**	**74**	**42**	**69**	**112**	**30**
Initial Inspections	**8**	**32**	**45**	**37**	**51**	**23**
Routine Pr. 5 Insp.:	**25**	**172**	**129**	**145**	**190**	**129**
Reactive Insp.:	**7**	**10**	**14**	**13**	**10**	**10**
Total:	**92**	**395**	**292**	**365**	**463**	**240**

12. Please submit a table, or a computer printout, that identifies inspections of Priority 1, 2, and 3 licensees and initial inspections that were conducted overdue.

At a minimum, the list should include the following information for each inspection that was conducted overdue during the review period:

(1) Licensee Name
(2) License Number
(3) Priority (IMC 2800)
(4) Last inspection date or license issuance date, if initial inspection
(5) Date Due
(6) Date Performed
(7) Amount of Time Overdue
(8) Date inspection findings issued

Note: The information below was current as of 8/29/12.

Licensee Name	License Number	Pri.	Last Insp. Date	Date Insp. Due	Date Insp. OD	Date Insp. Comp.	Amt. of Time OD	Date Insp. Find. Issued
MISTRAS	**12-16559-02**	**1**	**10/24/06**	**10/24/07**	**1/25/08**	**9/22/08**	**237 Days**	**1/2/09**

Licensee Name	License Number	Pri.	Last Insp. Date	Date Insp. Due	Date Insp. OD	Date Insp. Comp.	Amt. of Time OD	Date Insp. Find. Issued
Central Indiana Cancer Centers	13-32241 -01	2	4/18/06	4/18/08	10/19/08	2/18/09	120 Days	3/27/09
MISTRAS Holding Group	12-16559-02	1	4/14/09	4/14/10	7/15/10	9/3/10	49 Days	9/21/10
St. Mary's of Michigan Medical Center	21-03646-03	2	4/10/08	4/10/10	10/11/10	11/1/10	21 Days	11/2/10
Mercy Hospital	21-02187-01	2	7/31/08	7/31/10	2/1/11	2/24/11	23 Days	4/29/11
Ball State University*	13-06231-01	3	3/29/07	3/29/10	12/30/10	6/15/11	165 Days	6/15/11
Entergy Nuclear Operations, Inc.*	21 -08606-08	3	2/21/06	2/21/09	11/22/09	9/26/11	674 Days	9/26/11
Hope College*	21-13583-01	3	10/27/05	10/27/08	7/28/09	6/24/11	696 Days	6/24/11
Methodist Hospital*	13-16558-01	2	8/25/08	8/25/10	2/26/11	5/25/11	91 Days	5/26/11
St. Joseph Mercy Health Systems*	21-00943-03	2	2/26/07	2/26/09	8/27/09	4/11/11	589 Days	4/21/11

Licensee Name	License Number	Pri.	Last Insp. Date	Date Insp. Due	Date Insp. OD	Date Insp. Comp.	Amt. of Time OD	Date Insp. Find. Issued
Washington University in St. Louis**	**24-00167-14**	**2**	**N/A**	**9/2/11**	**9/3/11**	**7/20/12**	**317 Days**	**7/20/12**
DCS Corporation**	**SUB-1603**	**T**	**N/A**	**3/17/12**	**3/18/12**	**7/26/12**	**128 Days**	**Pending as of 8/29/12**
American Tower Scanning	**21-32347-01**	**3**	**8/21/07**	**8/21/10**	**5/22/11**	**8/28/12**	**461 Days**	**Pending as of 8/29/12**
Petnet Solutions, Inc.**	**41-32720-02**	**2**	**N/A**	**9/14/11**	**9/15/11**	**7/24/12**	**309 Days**	**8/9/12**

*** In 2011, an extensive self-assessment was conducted to revalidate inspection and licensing tracking data in LTS, which resulted in identification of 9 overdue inspections that were not previously identified. The review was conducted based on indications of data quality issues which could impact program implementation, and included 100% review of all Region III licensee data.**

** **Identified during 2012 effectivenss review of corrective actions from 2011 validation effort.**

13. Please submit a table or computer printout that identifies any Priority 1, 2, and 3 licensees and initial inspections that are currently overdue, per IMC 2800. At a minimum, the list should include the same information for each overdue inspection provided for Question 12 plus your action plan for completing the inspection. Also include your plan for completing the overdue inspections.

As of 8/29/12, no inspections are currently overdue.

14. Please provide the number of reciprocity licensees that were candidates for inspection per year as described in IMC 1220 and indicate the number of reciprocity inspections of candidate licensees that were completed each year during the review period.

Note: The information below was current as of 8/29/12.

Year	Candidates	Completed Candidate Inspections
2007	**6**	**3**
2008	**7**	**5**
2009	**6**	**3**
2010	**4**	**1**
2011	**6**	**2**
2012 (See note below)	**16**	**5**

Note: As an outcome of the IMPEP preparations we questioned the methodology used to determine candidates for inspection. We coordinated with the other regions, agreed on a methodology, and committed to timely coordination of cross boundary candidates. As a result, an increase in the number candidates is indicated in 2012.

III. Technical Quality of Inspections

15. What, if any, changes were made to your written inspection procedures during the reporting period?

Note: The information below was current as of 8/29/12.

Region III's inspections are conducted in accordance with guidance provided in current NRC Inspection Manual Chapters and Management Directives. There have been revisions to the inspection guidance, including a significant revision to IMC 2800 during the IMPEP review period; however, those changes are not presented here. Instead, the NRC inspection information provided here relates to the Regional Procedures (RP) and Divisional Instructions (DI) used to provide guidance for our inspection activities.

The RPs closely parallel many agency procedures, such as the handling of allegations, and communications with outside agencies.

The DIs address routine processes that were not otherwise documented in Agency or Regional Procedures. The RPs and DIs that were deleted or modified are listed below. DIs that were deleted were determined to be redundant with other existing guidance.

Deleted:

- **RP-NR-004, "Recommending Third Party Assistance to Licensees" (11/06/07)**
- **DI-4.8, "Self-Assessment Process" (1/17/08)**
- **DI-IMC-0610, "Division Inspection Report Writing Guidance" (3/30/09)**
- **DI-IMC-2800.01, "Use of Inspection In-Office Review" (3/2/12)**
- **DI-NR-001, "Large Materials Licensee Initiative" (3/30/12) (See note below)**
- **DI-10.43, Division Time Accounting Guidance" (4/26/12)**

Note: DI-NR-001 was deleted due to the revision of IMC-2800 which now allows regional management to modify the inspection intervals in order to achieve resource efficiencies. DI-NR-001 involved the inspection of some large broad scope licensees (e.g., Mallinckrodt, University of Michigan) on an increased frequency to ensure that inspectors have the opportunity to focus on higher risk activities, without significantly increasing the regulatory burden on those licensees. For a broad scope licensee, each annual inspection was about half the scope of the inspection that would normally occur biennially. This initiative continues under the guidance of IMC-2800 rather than the Divisional Instruction.

Modified:

- **RP-10.131, Protection of Region III Employees Against Ionizing Radiation" (6/2/10)**
- **DI-3.1, "Freedom of Information Act Requests" (8/27/10)**
- **DI-IMC-2800, "Identification and Closure of Nuclear Materials Events Database (NMED) Items" (5/4/11)**
- **DI-0273, "Processing Incoming and Outgoing Correspondence into ADAMS" (7/8/11)**
- **DI-IMC-2800.02, "Communication of Program Code Changes and Significant Program Changes" (1/6/12)**
- **DI-NR-003, "Preparation and Verification of the Division's Operational Management Information (OMI)/Operating Plan Reports and Data" (1/31/12)**
- **DI-IMC-2800.03, "Use of NRC Form 591M, Part 1" (2/5/12)**
- **DI-10.130, "Confined Space Entry Guidance for DNMS Inspectors" (2/16/12)**
- **DI-IMC-2800.04, "Inspection Planning and Management Process" (3/2/12)**
- **DI-IMC-2800.30, "Generally Licensed Device Tracking" (3/12/12)**
- **DI-IMC-2561, "Evaluation of Licensee Radiation Survey Program and Performance of Independent and Confirmatory Surveys" (6/22/12)**
- **DI-NR-002, "Inspection Follow-up to Suspended, Revoked, or Expired Licenses" (6/22/12)**
- **DI-IMC-1200, "Processing, Approving and Tracking Reciprocity Request" (8/6/12)**

16. Prepare a table showing the number and types of supervisory accompaniments made during the review period.

Note: The information below was current as of 8/29/12.

Inspector	Supervisor	Licensee	Licensee Type	Date	To Date
Bakhsh	Lipa	Palisades	ISFSI	05/12/08	
Bakhsh	Lipa	D.C. Cook Meeting	ISFSI	09/03/08	
Bakhsh	Lipa	ISFSI Workshop	ISFSI	02/18/09	02/19/09
Bakhsh	Lipa	Palisades	ISFSI	05/26/09	
Bishop	Pelke	Saginaw Asphalt Paving Co.	Materials	04/25/12	
Bonano	Louden	Sigma Aldrich	Decommissioning	10/30/07	10/31/07
Bonano	Lipa	Mallinckrodt	Decommissioning	06/12/08	06/13/08
Bonano	Lipa	GE Morris	ISFSI Security	11/05/08	
Bonano	Lipa	Dresden	ISFSI Security	02/25/09	
Bonano	Duncan	Kewaunee	ISFSI Security	04/29/09	
Bonano	Lipa	GE Morris	ISFSI Security	12/01/09	
Bonano	Lipa	Palisades	ISFSI Security	02/24/10	02/25/10
Bonano	Lipa	Braidwood	ISFSI Security	03/10/11	
Bonano	Lipa	U of IL RTR	Decommissioning	07/23/12	
Bramnik	Louden	ARC, Inc	Decommissioning	01/23/08	01/25/08
Bramnik	Louden	ARC, Inc	Decommissioning	03/14/08	03/15/08
Bramnik	Bloomer	Strang & Assoc, Plymouth Tube Co., and Warsaw Health System	Materials	06/21/10	06/22/10
Bramnik	Bloomer	Flint Cardiovascular	Materials	07/25/11	
Bramnik	Bloomer	Radiation Oncology Associates	Materials	05/08/12	
Bramnik	Bloomer	Univ. of Michigan	Materials	02/06/12	
Casey	Pelke	EPA	Materials	08/07/08	

Inspector	Supervisor	Licensee	Licensee Type	Date	To Date
Casey	Pelke	Hot Shots N.M.	Materials	01/14/10	
Edwards	Lipa	Perry	ISFSI	08/01/10	08/02/10
Edwards	Lipa	Byron	ISFSI	08/26/10	
Edwards	Lipa/Boland	D.C. Cook	ISFSI	02/28/11	
Edwards	Giessner	LaCrosse	ISFSI	05/16/12	
Forster	Pelke	Covanta	Materials	11/01/11	
Forster	Pelke	Indiana University Health Saxony Hospital	Materials	11/04/11	
Forster	Giessner	Vascular Imaging Professionals	Materials	06/26/12	
Frazier	Pelke	VA Philadelphia	Materials	09/10/08	09/12/08
Frazier	Reynolds/Pelke	NRSC, Wash. D.C.	Materials	11/13/08	
Frazier	Pelke	VA, NHPP	Materials	12/08/08	12/12/08
Frazier	Pelke	VA Philadelphia	Materials	06/22/09	06/26/09
Frazier	Pelke	VA, Hines, IL	Materials	10/01/09	
Frazier	Pelke	VA Little Rock, AR	Materials	09/27/10	10/01/10
Frazier	Louden/Pelke	VA Biennial, Little Rock, AR	Materials	10/01/10	
Gattone	Pelke	Mallinckrodt	Materials	02/04/08	02/08/08
Gattone	Pelke	Mallinckrodt	Materials	03/12/08	03/13/08
Gattone	Pelke	Mallinckrodt	Materials	04/24/08	
Gattone	Bloomer	BRK Brands, Inc.	Materials	09/16/09	
Gattone	Bloomer	ARC, Inc	Materials	08/05/10	
Gattone	Bloomer	St. Louis University	Materials	06/30/11	07/01/11

Inspector	Supervisor	Licensee	Licensee Type	Date	To Date
Gattone	Bloomer	Bay Regional Med Ctr	Materials	01/11/12	
Gattone	Bloomer	Univ. of Michigan	Materials	02/07/12	
Hays	Madera	H.H. Holmes Testing	Materials	02/27/08	
Hays	Louden	ARC, Inc	Materials	04/01/09	
Hays	Bloomer	St. Francis Hosp/Dickenson County Mem Hosp	Materials	09/13/10	09/14/10
Hays	Bloomer	St. Anthony's Med Ctr	Materials	01/26/11	
Hays	Bloomer	Bradley Bastow	Materials	02/28/12	
Herr	Frazier	PQ Corporation	Materials	12/17/10	
Herr	Pelke	Hot Shots N.M.	Materials	01/14/10	
Herr	Bloomer	Jackson Cardiology Assoc.	Materials	08/20/12	
Herr	Bloomer	Midwest Engineering and Testing/Downriver Cardiology Consultants	Materials	08/21/12	
Kulzer	Madera	Indiana Toll Road	Materials	09/11/07	
Kulzer	Madera	K & S Eng.	Materials	03/05/08	
Kulzer	Louden	Forest Park Hospital	Materials	06/04/08	
Kulzer	Bloomer	Macbrady Assoc.	Materials	09/28/09	
Kulzer	Bloomer	Shannon Wilson/Buzzi Unichem	Materials	08/04/10	
	Bloomer	Perkin Elemer, PSI, Clare County Road Commission	Materials	08/29/11	

Inspector	Supervisor	Licensee	Licensee Type	Date	To Date
Kulzer					
Kulzer	Bloomer	Alfred Benesch & Co./CTI and Associates	Materials	08/22/12	
LaFranzo	Madera	Mittal Steel	Materials	09/18/07	
LaFranzo	Delligatti	City of Kirksville	Materials	06/25/08	06/26/08
LaFranzo	Louden	Hartford Quality	Materials	03/24/09	
LaFranzo	Bloomer	St. Louis Testing	Materials	03/24/10	
LaFranzo	Bloomer	Mercy Hospital	Materials	02/24/11	02/25/11
LaFranzo	Boland	Westinghouse Hematite	Decommissioning	06/14/11	
LaFranzo	Lipa	Univ. of MO Pickard Hall	Decommissioning	06/23/11	
LaFranzo	Lipa	Hematite	Decommissioning	09/25/12 (Planned)	
Lambert	Louden	Non-Destructive Testing	Materials	09/02/08	
Lambert	Louden	MI Wireline Services	Materials	09/03/08	
Lambert	Pelke	VA, NHPP	Materials	12/08/08	12/12/08
Lambert	Lipa/Bloomer	Washington University	Materials	02/22/10	02/24/10
Lambert	Pelke	VA Little Rock, AR	Materials	09/27/10	10/01/10
Lambert	Louden/Pelke	VA Biennial, Little Rock, AR	Materials	10/01/10	
Lambert	Bloomer/Boland	Washington University	Materials	01/27/11	
Lambert	Bloomer/Casto	Mallinckrodt	Materials	04/02/12	
Lambert	Peterson	JANX	Materials	06/12/12	

Inspector	Supervisor	Licensee	Licensee Type	Date	To Date
Lambert	Giessner	Deaconess	Materials	06/13/12	
Learn	Lipa	D.C. Cook Meeting	ISFSI	09/03/08	
Learn	Lipa	ISFSI Workshop	ISFSI	02/18/09	02/19/09
Learn	Lipa	Palisades	ISFSI	05/26/09	
Learn	Lipa	LaSalle	ISFSI	10/16/09	
Learn	Lipa	Byron	ISFSI	08/26/10	
Learn	Lipa	Zion Public Mtg.	Decommissioning	02/22/11	
Learn	Lipa	Palisades	ISFSI	10/13/11	
Learn	Lipa	Braidwood	ISFSI	01/05/12	
Lee	Louden	Fermi	Decommissioning	09/26/07	
Lee	Lipa	LACBWR	Decommissioning	08/12/08	08/13/08
Lee	Lipa	ABC Labs	Decommissioning	07/20/09	
Lee	Lipa	Fermi	Decommissioning	03/17/10	
Lee	Lipa	Fermi 1	Decommissioning	04/07/11	
Lee	Lipa	U of MO	Decommissioning	09/19/12 (Planned)	
Lin	Bloomer	Cardiovascular Consultants	Materials	01/23/12	
Lin	Bloomer	Dalton	Materials	01/23/12	
Lin	Peterson	JANX	Materials	06/12/12	
Macatangay	Pelke	Therametric Tech, Inc.	Materials	05/12/10	
Macatangay	Pelke	Midwest Proton Radiotherapy Institute	Materials	05/13/10	
McCann	Louden	Ohio EPA	Decommissioning	09/25/07	

Inspector	Supervisor	Licensee	Licensee Type	Date	To Date
McCann	Louden	Sigma Aldrich	Decommissioning	10/30/07	10/31/07
McCann	Louden	Westinghouse Hematite	Decommissioning	11/06/07	
McCann	Louden	ARC, Inc	Decommissioning	01/23/08	01/25/08
McCann	Louden	ARC, Inc	Decommissioning	03/13/08	03/14/08
McCann	Lipa	Breckenridge Meeting	Decommissioning	08/14/08	
McCann	Lipa	Westinghouse Hematite	Decommissioning	01/08/09	
McCann	Lipa	ABC Labs	Decommissioning	07/20/09	
McCann	Lipa	ARC, Inc & Sigma-Aldrich	Decommissioning	10/19/09	10/20/09
McCann	Lipa	Univ. of MO Pickard Hall	Decommissioning	06/23/11	
McCraw	Bloomer	Cardiology and Vascular Assoc. and Somat Eng	Materials	08/08/11	
McCraw	Giessner	K & S Eng.	Materials	06/28/12	
Mulay	Louden	Terre Haute Reg. Hosp	Materials	07/29/08	
Mulay	Lipa	Dresden	ISFSI Security	02/25/09	
Mulay	Duncan	Kewaunee	ISFSI Security	04/29/09	
Mulay	Bloomer	Univ. of MO	Materials	02/09/10	02/10/10
Null	Bloomer	ARC, Inc	Materials	10/27/09	
Null	Pelke	Univ. of Michigan	Materials	09/24/09	
Null	Pelke	VA Los Angeles, CA	Materials	02/14/11	02/16/11
Null	Pelke	VA San Francisco, CA	Materials	02/17/11	

Inspector	Supervisor	Licensee	Licensee Type	Date	To Date
Null	Pelke	VA Seattle, WA	Materials	02/28/11	03/02/11
Null	Pelke	VA Washington, D.C.	Materials	05/26/11	
Null	Pelke	Michigan State U.	Materials	06/30/11	
O'Dowd	Pelke	Van Andel Institute	Materials	04/24/12	
O'Dowd	Pelke	Heart Care Associates	Materials	04/25/12	
Parker	Reynolds	Heart Cardio/McLaren Reg. MC/MDD Imaging	Materials	03/03/08	03/05/08
Parker	Persinko	Washington University	Materials	03/10/09	03/12/09
Piskura	Delligatti	Earth Exploration, Cardio. Clinics	Materials	08/14/08	08/15/08
Piskura	Pelke	VA, Durham, NC	Materials	04/20/09	04/22/09
Piskura	Pelke	VA, Richmond, VA	Materials	04/22/09	04/24/09
Piskura	Pelke	VA, Philadelphia	Materials	06/22/09	06/26/09
Piskura	Bloomer	Dow Chemical, Franklin Medical, and JANX	Materials	07/20/10	07/21/10
Piskura	Bloomer/Boland	Washington University in St. Louis	Materials	01/27/11	
Piskura	Giessner	University of MO, St Louis	Materials	05/21/12	
Rodriguez	Lipa	GE Morris	ISFSI	11/05/08	
Rodriguez	Lipa	Byron	ISFSI	08/26/10	
Rodriguez	Lipa	Holtec site visit	ISFSI	03/16/11	
Rodriguez	Lipa	Palisades	ISFSI	10/13/11	

Inspector	Supervisor	Licensee	Licensee Type	Date	To Date
Rodriguez	Giessner	LaCrosse	ISFSI	05/16/12	
Rodriguez	Lipa	LaCrosse	ISFSI	06/11/12	
Rodriguez	Lipa	U of IL RTR	Decommissioning	07/23/12	
Rodriguez	Boland	LaCrosse	Decommissioning	09/04/12	09/05/12
Slawinski	Lipa	Zion	Decommissioning	08/24/10	
Slawinski	Lipa/Michalak	Westinghouse Hematite and Gov't outreach	Decommissioning	08/31/10	
Slawinski	Reynolds	Zion Station EPA Tour	Decommissioning	10/22/10	
Slawinski	Lipa	Zion Open House	Decommissioning	10/28/10	
Slawinski	Lipa/Satorius/ Pederson	Zion	Decommissioning	01/26/11	
Slawinski	Lipa	Zion Public Mtg.	Decommissioning	02/22/11	
Slawinski	Boland	Zion	Decommissioning	06/10/11	
Slawinski	Lipa/Uhle	Zion	Decommissioning	01/12/12	
Slawinski	McCraw	Zion	Decommissioning	02/23/12	
Slawinski	Casto/McCraw	Zion	Decommissioning	04/02/12	
Slawinski	Giessner	Zion	Decommissioning	06/14/12	
Snell	Cameron	Univ. of Michigan	Decommissioning	11/29/07	
Snell	Lipa	LACBWR	Decommissioning	08/12/08	08/13/08
Snell	Lipa	Dresden	Decommissioning	09/23/08	
Snell	Lipa	Westinghouse Hematite	Decommissioning	11/19/08	11/21/08
Snell	Lipa	Westinghouse Hematite	Decommissioning	01/08/09	

Inspector	Supervisor	Licensee	Licensee Type	Date	To Date
Snell	Lipa	Univ. of Michigan, AAR, Breckenridge & Fermi 1	Decommissioning	10/21/09	10/23/09
Snell	Lipa	Hematite	Decommissioning	12/14/09	
Snell	Lipa	Breckenridge & Public Meeting	Decommissioning	07/21/10	
Snell	Lipa	Breckenridge site and meeting	Decommissioning	09/21/11	
Streit	Lipa	ABC Labs	Decommissioning	07/20/09	
Streit	Lipa	ARC & Sigma-Aldrich	Decommissioning	10/19/09	10/20/09
Streit	Lipa	Braidwood	ISFSI Security	03/10/11	
Streit	Lipa	Univ. of MO Pickard Hall	Decommissioning	06/23/11	
Tapp	Lipa	GE Morris	ISFSI	11/05/08	
Tapp	Lipa	ISFSI Workshop	ISFSI	02/18/09	02/19/09
Tapp	Louden/Satorius	Westinghouse Hematite	Decommissioning	01/12/10	
Tapp	Louden	Zion	Decommissioning	04/26/10	
Tapp	Lipa/Michalak	Hematite and Gov't outreach	Decommissioning	08/31/10	
Tapp	Lipa	Zion Open House	Decommissioning	10/28/10	
Tapp	Magwood/ Reynolds	Zion	Decommissioning	10/16/10	
Tapp	Lipa/Watson	Univ of IL RTR	Decommissioning	09/26/11	
Tapp	Lipa	LaCrosse	ISFSI	06/12/12	
Tapp	Lipa	U of IL RTR	Decommissioning	10/26/11	
Tran	Pelke	VA Brooklyn, NY	Materials	02/22/11	02/24/11

Inspector	Supervisor	Licensee	Licensee Type	Date	To Date
Tran	Pelke	VA Seattle, WA	Materials	02/28/11	03/02/11
Tran	Pelke	VA Washington, DC	Materials	05/26/11	
Tran	Pelke	VA Albany, NY	Materials	06/08/11	
Tran	Pelke	Indiana University Health Saxony Hospital	Materials	11/04/11	
Tran	Pelke	Covanta	Materials	11/04/11	
Tran	Pelke	Gentex Corporation	Materials	04/24/12	
Tran	Pelke	Marathon Petroleum Company	Materials	04/24/12	
Warren	Delligatti	Methodist Hosp., Purdue	Materials	08/26/08	08/27/08
Warren	Persinko	VA, Hines, IL	Materials	02/02/09	02/03/09
Warren	Persinko	Washington University	Materials	03/10/09	03/12/09
Warren	Bloomer	Hartford Quality	Materials	08/24/09	
Warren	Bloomer	Floyd Memorial Hosp.	Materials	08/24/09	08/25/09
Warren	Bloomer	3M	Materials	12/03/09	
Warren	Pederson	Palisades, St. Louis University	Materials	02/02/10	
Warren	Bloomer	Palisades, MEDI-PHYSICS, IN	Materials	09/26/11	
Warren	Louden	Earth Explorations	Materials	12/14/11	
Warren	Louden	IUPUI/Indiana Univ. Med Ctr	Materials	03/19/12	
Wiedeman	Louden	Forest Park Hospital	Materials	06/04/08	

Inspector	Supervisor	Licensee	Licensee Type	Date	To Date
Wiedeman	Pelke	VA Philadelphia	Materials	09/10/08	09/12/08
Wiedeman	Pelke	VA, NHPP	Materials	12/08/08	12/12/08
Wiedeman	Pelke	VA, Philadelphia	Materials	06/22/09	06/26/09
Wiedeman	Bloomer	Univ. of MO	Materials	02/09/10	02/10/10
Wiedeman	Pelke	VA San Diego, CA	Materials	11/16/10	11/18/10
Wiedeman	Pelke	VA Jackson, MS	Materials	12/07/10	12/08/10
Wiedeman	Pelke	VA Ann Arbor, MI	Materials	12/13/10	12/14/10
Wiedeman	Pelke	VA Boston, MA	Materials	02/10/11	02/11/11
Wiedeman	Pelke	VA Brooklyn, NY	Materials	02/22/11	02/24/11

Note: Region III tracks accompaniments based on the fiscal year.

17. Describe or provide an update on your instrumentation, methods of calibration, and laboratory capabilities. Are all instruments properly calibrated at the present time? Were there sufficient calibrated instruments available throughout the review period?

Note: The information below was current as of 8/29/12.

Region III has over 100 portable radiation detection instruments available for use.

NRC RIII Survey Instrument Capabilities				
Capability	Detectors	Manufacturer	Meter(s)	Detector(s)
Alpha	Zinc-Sulfide (ZnS) Scintillators	Ludlum	2241-2, 2241-3	43-5, 43-92
		Rotem	RAM R-200	PA-100/M
Beta	Plastic Scintillators	Ludlum	2241-2, 2241-3	44-142
	Plastic Scintillator Sensitive to Beta	Ludlum	2241-2	44-1
Gamma	Sodium-Iodide (NaI) Crystal Scintillators	Ludlum	2241-2, 2241-3	44-10
		Rotem	RAM R-200	RP-11
	Lanthanum-Bromide (LaBr) Scintillators	BNC	SAM 940-2LH	7001
	Sodium-Iodide (NaI) Crystal Scintillators for Low Energy Gammas (FIDLER)	Luldum, Alpha-Spectra	2241-3, 2241-2	12DT063QB2/3, 20DT063QA2/5B
	Sodium-Iodide (NaI) Crystal Scintillator for Low Energy Gammas	Ludlum	2241-2	44-17
Alpha / Beta	Gas Proportionals	Ludlum	2221, 2241-2	43-37, 43-68
	Zinc-Sulfide (ZnS) w/ Plastic Scintillator	Ludlum	2241-3	44-93
Alpha / Beta / Gamma	Geiger-Mueller (GM) Pancakes	Ludlum	2241-2, 2241-3, 2402, 2403, Model 3	44-9
		Rotem	RAM R-200	RG-10
		Victoreen	Model 190	489-110D
Neutron	Gas Filled Helium-3 (3He)	BNC	SAM 940-2LH	7037
Dose Rate	Energy Compensated Geiger-Muellers (GMs)	Rotem	RAM GAM-1	N/A
		NDS	ND-2000C	N/A
		Canberra	MRAD213	N/A
	Geiger-Muellers (GMs)	Ludlum	2241-2, 2241-3, 2403, 2402, Model 3	44-38
		Rotem	RAM R-200	RG-40, RG-42
	Ion Chambers	Eberline	PIC-6A, PIC-6B	N/A
	Lanthanum-Bromide (LaBr) Scintillator	BNC	SAM 940-2LH	7001
	Sodium-Iodide (NaI) Crystal Scintillators for microR/hr	Ludlum	Model 19	N/A
Other	Satellite GPS	Trimble	GeoXT, GeoXH	N/A
		Garmin	etrex	N/A
	Air velocity instruments	Alnor	9850	N/A
	Air Monitors	RADeCO	H-811	N/A

These instruments range from simple hand held dose rate instruments to more complex instruments used for decommissioning purposes which consist of ion chamber, Geiger-Mueller, scintillation, and gas flow proportional detectors. Please see the table below for a more detailed listing of the region's survey capabilities.

Included in the table above is the BNC SAM 940 which is a powerful handheld instrument used for the identification of unknown radioactive isotopes. The table also includes Global Positioning Systems (GPS), which give the region the capability to do GPS mapping of surveys.

In addition to the survey capabilities discussed above, Region III uses, as necessary, the Oak Ridge Institute for Science and Education (ORISE) (an NRC contractor) for performing confirmatory surveys at decommissioning licensee facilities. For soil, water, and/or vegetation samples, the region uses the ORISE laboratory under contract for sample analysis.

The instrument program is maintained in accordance with Regional Procedure 10.131, "Protection of Region III Employees Against Ionizing Radiation".

Region III no longer maintains any calibration or laboratory capabilities. Region III uses a vendor (MJW Technical Services) to calibrate and repair its instruments. All calibrations are performed with NIST traceable sources. Instruments are calibrated at least annually and any instruments that are out of calibration are stored in a labeled cabinet and have a tag attached to them indicating that they are out of calibration. Calibration due dates are tracked by the Radiation Safety Officer (RSO) and instruments are sent for calibration typically once or twice per quarter. The region maintains a sufficient inventory of survey instruments to ensure that inspection activities are not affected by instrument exchanges for calibration.

IV. Technical Quality of Licensing Actions

18. How many specific radioactive material licenses does your program regulate at this time?

Note: The information below was current as of 8/29/12.

Currently, Region III regulates 1,116 specific licenses. Region III has 15 Priority 1 licensees, 125 Priority 2 licensees, 212 Priority 3 licensees, and 764 Priority 5 licensees.

19. Please identify any major, unusual, or complex licenses which were issued, received a major amendment, were terminated, decommissioned, submitted a bankruptcy notification or renewed in this period.

Note: The information below was current as of 8/29/12.

a. **Materials**

Major, unusual or complex materials licensing actions reviewed and issued during the IMPEP review period include the following:

Heart and Vascular Physicians; 21-32562-01

A license amendment was submitted requesting removal of authorized users and replacement of the RSO. This was a challenge because of disharmony between the users and owners of the practice. To resolve this issue, the licensee decided to separate the practice. The license was terminated and new licenses were issued, at separate locations, to the two authorized users.

Advanced Virtual Radiology; 21-32618-01

A license amendment was submitted by an individual who was not the licensee. There was a misunderstanding between a cardiologist, the authorized user, and the RSO listed on Advanced Virtual Radiology's license. The cardiologist attempted to replace the RSO and the authorized user rather than obtain his own license. This action was voided. Additionally, the staff reinforced the roles and responsibilities for NRC licensees with the consultant who prepared the request.

Cardiac Specialists of St. Luke's Hospital; 24-32734-01

A new applicant had requested a location of use that was already listed on an NRC license. There were numerous problems with the application because the applicant failed to follow the format currently used in the NUREG guidance and failed to proof read their application. There were many errors in the application such as the address for the location of use, identifying the applicant, failure to provide sufficient information to approve the RSO, and an updated commitment for evaluating occupational dose. The applicant submitted responses to a request for information; however, they resubmitted the same application and did not address the deficiencies. After a long process of repeated reviews and requests for additional information, a new license was issued to Cardiac Specialists of St. Luke's Hospital concurrent with an amendment to remove the same location of use from the previous license.

Gentex Corporation; 21-32837-01

An applicant applied for a new license for smoke detectors manufactured by Delta Corporation that contained a nominal 3.5 microcurie americium-24 foil source. The smoke detector would be used to test smoke detectors that do not contain radioactive materials manufactured by the applicant. The device was not registered in the SSDR and the conditions of use were not well defined. Region III submitted a TAR to headquarters for a custom review of the device.

B&B Dredging; 12-32244-02

This licensee requested termination of their NRC license after it had submitted a license renewal application. The license authorized the use of sealed sources in fixed gauges on two vessels at temporary jobsites. The reviewer determined that one vessel (Columbia) possessed a generally licensed gauge device. The Columbia was sold to a company who applied for a general license registry. The second vessel (Atchafalaya) was purchased by a NRC licensee located in Massachusetts and it was authorized on the license by Region I. Subsequently, the license was terminated.

MidMichigan Medical Center; 21-01549-02

This was the first Region III application and licensure of the new Leksell Perfexion Gamma Knife stereotactic radiosurgery device. Region III submitted a TAR to HQ for the device, as did Region I, and Region III participated in writing new licensing guidance for the Perfexion device under 10 CFR 35.1000. There was some Congressional interest expressed in the case when the licensee perceived NRC's guidance development process as "not being timely." The review of the TAR was 99 percent completed at the time the licensee's Congressman made the inquiry on their behalf. The development of the guidance was completed in approximately 2.5 months. The guidance was provided to the licensee and a license amendment was promptly issued. Region III was onsite for the loading of cobalt-60 sources into the Perfexion device at the licensee's facility over Labor Day weekend 2007.

Thermo Engineering, Inc.; 24-19500-01

This industrial radiography licensee was seeking to add its first permanent radiographic installation. During an independent review of calculations submitted that were similar to NUREG 1556, Vol. 2, Appendix L, the reviewer noted that the licensee had inadvertently based its calculations on only one curie each of cobalt-60 and iridium-192 used in the hot cell, which resulted in inaccurate, underestimated exposure results. The licensee should have used 55 Ci of cobalt-60 and 100 Ci of Ir-192, which it subsequently did. The permanent radiographic installation was eventually approved.

Curators for the University of Missouri – Research Reactor; 24-00513-39

The licensee requested an amendment to add 0.5 gram of U-235 to its broad scope byproduct materials license for an upcoming radiochemistry training course offering. Although not mentioned in NUREG 1556, Vols. 7, 11 or 17, the reviewer asked about the enrichment of the U-235. The licensee responded that the U-235 would be enriched to greater than or equal to 93% and it would be in solid form and converted to a liquid. The reviewer recognized it was HEU and defined as "strategic special nuclear material (SSNM)," per 10 CFR 70.4. The licensee had not recognized this aspect of its request and the RSO stated that he assumed that NRC would consider all U-235 to be 100% enriched by default. The reviewer discussed the matter with the licensee and corrected his understanding. In order to discern the best licensing method for the HEU, the reviewer consulted Region III management and sought guidance from the NRC headquarters staff. Several email correspondences and telephone contacts were exchanged between Region III and headquarters staff having expertise in licensing special nuclear material and SSNM. The licensee revised their request for U-235 to less than or equal to 20% enrichment, and the material was added to the broad scope license.

3M Company; 22-00057-61

The licensee uses two wet source storage pool irradiators for sterilization of its own products. The licensee requested changes to its "worst case scenario flammable products formulation" authorization for irradiation after discovering that its then currently authorized formulation had been changed without amending the

license prior to irradiating flammable products. This happened because the decision makers for the formulation had not informed the Health Physics group of the change. A new program incorporating greater specificity, structure, communications and audit accountability was developed and implemented in response, and it was added to the license. The licensee also sought to "self-approve internally" future "worst case scenario flammable materials irradiation processes" in the amendment request. This authorization was not approved because it was considered to be within NRC's jurisdiction as the regulatory authority.

<u>American Radiolabeled Chemicals (ARC); 24-21362-01</u>

There have been several amendments issued for this license including authorization to install and use new hydrogen-3 and carbon-14 air sampling systems, approval of new Standard Operating Procedures that included procedures to address spills and emergencies, liquid waste inventory, and inventory of surface contaminated objects. In addition, the Region processed amendment requests which involved the review of proposed modifications to facilities that included upgrades in equipment associated with the licensee's release of radioactive air effluent.

An amendment was issued that authorized the possession of licensed material incident to outdoor site construction and site beautification activities that involved the movement of site soils, radiological site characterization, and the collection and analysis of water and soil samples containing residual contamination.

In October 2010, the Region issued the licensee a renewal with a 1 year expiration date. The 1 year expiration date was due to the licensee's recent inspection history. Issues identified during NRC inspection activity included, but were not limited to, problems with contamination control in restricted and unrestricted areas, trends which illustrated a gradual increase in calculated public dose from air effluents, concerns over the licensee's implementation of an effective ALARA program that were identified by the Center for Nuclear Waste Regulatory Analyses (CNWRA) during a July 2010 site visit to evaluate ARC's air effluent system, and unresolved issues that included the characterization of contamination of on-site soil. The licensee submitted its renewal application on September 8, 2011, the action is pending.

<u>New Cyclotron Production Licenses</u>

As a result of the Energy Policy Act (EPA) of 2005, the NRC assumed authority over certain accelerator-produced material. Therefore, institutions that produced that material became subject to NRC jurisdiction for that material and were required to submit an application for either a new NRC license, or an amendment to an existing NRC license. As a result of the incidental radionuclides created during the production process, each of these licensees were also required to address decommissioning financial assurance, contributing to the complexity of each case. Below is a list of new licenses that Region III issued as a result of the EPA.

1. **Spectron (13-32726-02)**
2. **Essential Isotopes (24-32762-02)**
3. **PETNET Indianapolis (41-32720-01)**

4. **Mallinckrodt (24-04206-02)**
5. **Cardinal Health (34-32780-01)**
6. **PETNET St. Louis (41-32720-03)**
7. **Detroit Medical Center (21-03298-06)**
8. **Washington University in St. Louis (24-00167-14)**
9. **PETNET Detroit (41-32720-06)**
10. **University of Michigan (21-00215-07)**

Magna Chek, Inc.; 21-19111-02

This is an industrial radiography licensee that requested to terminate its license. At the time the licensee submitted the termination request, the activities authorized on the license were limited to possession only. In addition, the licensee had a poor performance history and had been cited for multiple violations. The initial violations involved the failure to implement Increased Controls.

During a follow- up inspection, the NRC determined that the licensee was not in compliance with all of the Increased Controls, which resulted in a Confirmatory Order issued to the licensee. The license was ultimately terminated after the licensee transferred all radioactive materials to authorized recipients.

University of Michigan; 21-00215-04

In 2010, the licensee requested that a modification be made to the Mark 1 JL Shepherd irradiator to change the unit from a manual to a pneumatic operating system. The modification was made without using the appropriate JL Shepherd equipment (tower). An allegation was received by Headquarters in early 2012 regarding use of a tower on the Mark 1 irradiator at the University of Michigan that was produced by another vendor. The licensee used the modified irradiator for over one year without incident. Subsequent to the review and investigation of the allegation, the NRC required the licensee to develop and implement emergency procedures to address potential failures of the modified unit. The licensee provided the requested procedures with a letter dated February 27, 2012. The procedures were reviewed by NRC Region III and by Headquarters and found to be adequate. During an inspection conducted in February 2012, observations were noted which resulted in NRC requesting an additional procedure/checklist to address these matters. The licensee provided the additional procedure and it was added to the license.

Mercy Hospital Joplin (Formally St. John's Regional Medical Center); 24-01090-03

The licensee's facility in Joplin, Missouri, was destroyed by a tornado in 2011. The Region worked with the licensee to ensure that they could account for their radioactive material and make appropriate arrangements to transfer material to another hospital. After the tornado destroyed the hospital, the licensee established a field hospital in the parking lot of the damaged hospital. The licensee requested an expedited amendment to confirm that the Part 20 limits for members of the public would not be exceeded and to add a portable building to their license which would temporarily house the nuclear medicine department. The licensee's engineers later discovered that due to the weight of the building, it could not be safely placed on the parking lot asphalt as originally planned. The

licensee quickly revised their plans and the building housing the temporary nuclear medicine department was ultimately placed on soil, in a slightly different location, and not on the parking lot asphalt. In the fall of 2011 the licensee moved into the Phase 2 semi-permanent collection of buildings to house the hospital which was more substantial and could weather the winter months. The licensee is currently in a Phase 3 facility which is a more permanent structure and will be used until a new hospital is built at a different location in 3 to 5 years. Overall, the entire licensing process included: close-out surveys of the field hospital and the Phase 2 facilities; demolition of the original hospital and office structures; changing authorizations of materials and personnel; address changes; and relocation of certain brachytherapy materials.

Oakwood Hospital & Medical Center; 21-04515-01

The licensee requested an amendment to add iodine-125 Low Dose Rate Brachytherapy Seeds for Localization of Non-Palpable Lesions, under 10 CFR 35.1000, using guidance posted on the NRC website. This was the first license to receive the authorization in Region III.

Spectrum Health Hospitals; 21-00243-06

The licensee requested an amendment to add iodine-125 Low Dose Rate Brachytherapy Seeds for Localization of Non-Palpable Lesions, under 10 CFR 35.1000, using guidance posted on the NRC website. This was the second license to receive the authorization in Region III. The authorization was added in conjunction with a license renewal.

Covenant Medical Center, Inc.; 21-01492-02

The licensee requested an amendment to add iodine-125 Low Dose Rate Brachytherapy Seeds for Localization of Non-Palpable Lesions, under 10 CFR 35.1000, using guidance posted on the NRC website. This was the third license to receive the authorization in Region III. The review included a deficiency phone conversation with the licensee.

b. **Decommissioning**

Major, unusual or complex decommissioning activities conducted during the IMPEP review period include the following:

Zion Nuclear Power Station Decommissioning Project

The Zion Nuclear Power Station commercially operated from 1973 until it was permanently shutdown in 1998 due to economic reasons. The facility consisted of two 1085 MWe pressurized water reactors and support buildings on a 260 acre site located midway between Chicago and Milwaukee metropolitan areas. The site remained in a SAFSTOR condition following shutdown with all spent fuel maintained in wet storage. Active decommissioning commenced in late 2010, following transfer of the 10 CFR 50 license from Exelon Generation Company to ZionSolutions LLC, a subsidiary of Energy Solutions. This was the first time a non-electric utility obtained an NRC license for completing decommissioning of a

commercial nuclear reactor. The ten year decommissioning project includes placement of all spent fuel into dry cask storage at an onsite ISFSI followed by full site restoration. Region III has performed multi-discipline routine inspections on at least a monthly basis since commencement of the decommissioning project in late 2010. The expanded inspection program will continue throughout the decommissioning project until completion of site final status surveys.

Battelle West Jefferson Decommissioning Project

In 2000, Battelle commenced decommissioning activities at the West Jefferson site in Ohio. The site consisted of four major buildings JN-1 (former hot cell facility), JN-2 (former sub-critical assembly and plutonium storage), JN-3 (former research reactor), and JN-4, JN-6 (former site guardhouse), and several smaller structures on a bluff overlooking Darby Creek and Battelle Lake. Buildings JN-1, JN-2 and JN-3 and their support structures were the focus of the final phase of the licensee's decommissioning project. Outside of the fenced area, several active and abandoned filter beds, and part of the site sanitary sewer systems were also included in the project. Several inspections were completed and they were coordinated with the Headquarters program office and the Ohio Department of Health. By letter dated August 3, 2006, Battelle submitted an amendment request to terminate the license. Battelle completed the decommissioning activities in 2007 and submitted the dose assessment in January 2008 to demonstrate the site met the release criteria. The NRC issued the Safety Evaluation Report on April 30, 2008 and the license was terminated on May 8, 2008.

Big Rock Point Nuclear Power Plant

The Big Rock Point Nuclear Power Plant began operation in 1962 and permanently shut down in 1997 after 35 years of electric power generation. The site was completely decommissioned to green field status with the only remaining structure being an ISFSI. In 2007, the owner of the decommissioned plant, Consumers Energy Company, sold it to Entergy Corporation and the current staff at Big Rock Point report to management at the Palisades nuclear plant. The MCID Branch inspectors conduct annual inspections of the ISFSI to ensure both the safety and security of the stored spent nuclear fuel. The site's current activities are performing proper monitoring and securing of the ISFSI facility. The site currently stores 7 FuelSolutions designed storage and shipping casks of spent nuclear fuel and 1 cask of greater than Class C (GTCC) waste.

La Crosse Boiling Water Reactor

The La Crosse Boiling Water Reactor was a 50 MWe reactor that began commercial electrical output in 1968. In 1987, the plant ceased operations and was placed in a SAFSTOR mode and a possession only license was issued. The licensee removed its reactor vessel in May 2007, which was placed into a steel canister and shipped by rail to Barnwell, South Carolina, for disposal. The licensee is performing their initial ISFSI loading campaign of their 333 stored spent nuclear fuel assemblies. Since 2009, the MCID Branch inspectors have performed over 3 years of inspections at the site to review the licensee's activities related to the ISFSI project to ensure the licensee demonstrated they were ready to load the spent fuel casks safely and securely. These included design reviews of the storage pad, single failure proof crane, cask loading pool and gate, Reactor Building modifications,

and seismic restraint systems. In addition, the inspectors observed storage pad construction activities and pre-operational practice dry runs of the entire spent fuel loading and storage process. Starting in late June 2012, the licensee loaded the first of 5 planned casks and moved it to the on-site ISFSI facility. As of August 20, 2012, three more casks have been loaded and placed on the pad.

University of Michigan Ford Research Reactor

The Ford Nuclear Reactor was operated by the Michigan Memorial Phoenix Project of the University of Michigan. The reactor began operating in 1957 and ceased operations in 2005. The reactor was a non-power generating reactor with an open pool, and was used for research, experiments, and classes. It was licensed to operate at a power level of 2 megawatts. The fuel and the reactor vessel were shipped for disposal and the reactor pool was drained and demolished. Nearly all required demolition has already occurred, which generated a large amount of concrete and debris that was shipped to the EnergySolutions Clive, UT radwaste disposal site. Since 2007, MCID Branch inspectors have conducted several inspections of the ongoing decommissioning activities, which include confirmatory surveys and sampling of remediated areas, a review of the licensee's radiation protection program and processes, and compliance with the Technical Specifications. The inspectors perform at minimum, annual inspections of the licensee's decommissioning activities. The licensee is currently completing the remaining necessary input to its Final Status Survey Plan and will perform final status surveys once the plan is approved by the NRC.

NASA Plum Brook

The Plum Brook Reactor Facility operated from 1961 to 1973. The facility consisted of two reactors and a complex of buildings on 27 acres. The reactors were a 60-megawatt research test reactor, constructed for testing materials for use in space program applications, and a 100 kilowatt swimming-pool type mock-up reactor. The reactors were defueled in 1973, and all special nuclear and source material was removed from the site and preliminary decontamination was performed. The fuel assemblies were transferred and reprocessed offsite. In 1980, NASA requested authorization from the NRC to decommission the facilities and terminate the licenses. In 1981, NRC authorized the decommissioning, but budget constraints prevented NASA from proceeding. In 1997 and 1998, NASA renewed its decision to decontaminate and decommission the facilities and terminate the licenses. Physical decontamination and dismantlement began in 2002.

The decommissioning strategy is to remove all contaminated soils, materials and equipment, demolish buildings and structures to below grade level, and backfill with clean fill. The Pentolite Ditch (which is on the NASA site) and the Plum Brook (which runs out to Sandusky Bay) were identified to contain cesium-137 contamination and have been completely remediated. Since 2007, MCID Branch inspectors have performed several inspections per year to evaluate the licensee's survey methodology, survey practices and instrumentation, and survey results. The inspectors have also performed confirmatory final status surveys in all land areas and site structures based on the risk significance of the potential for residual contamination to remain. Currently, the licensee has completed all soil remediation and building demolition activities and has backfilled all required areas

with clean fill. Only a small amount of potentially low level radioactive demolition debris remains that the licensee is surveying for disposition as clean or radioactive waste.

Mallinckrodt

The Mallinckrodt St. Louis site has been in operation since 1867 and has produced a wide range of products. In addition to the extraction of columbium and tantalum, various uranium compounds were extracted under contract to the Manhattan Engineering District and the former AEC. Decommissioning at the Mallinckrodt site was set up in two phases. Phase I covered the decommissioning of the buildings and equipment to the extent that whatever remains on-site will be released for unrestricted use. Phase II covers the decommissioning of the building slabs and foundations, paved surfaces, and all subsurface materials to the extent that these areas can be released for unrestricted use.

Phase I DP was approved on May 3, 2002. The remediation was performed from July 2002 to December 2004 and the related buildings were demolished. Final Status Surveys for these buildings were submitted to the NRC Program Office for review in 2004. Region III, in coordination with the program office, conducted independent confirmatory surveys and reviewed the final status surveys, ultimately making a determination that the buildings were adequate for unrestricted use.

Phase II DP was approved in July 2010 and the remediation began in 2011. Since then, NRC inspectors completed several on-site inspections, including confirmatory surveys and independent soil analyses. The licensee has a new decommissioning contractor since June 2012 named EnergySolutions. Mobilization and resumption of remediation activities started in August 2012.

Fermi 1

Fermi 1 is a permanently shutdown experimental sodium cooled breeder reactor, which last operated in 1972. It is in a SAFSTOR status and its possession only license expires in 2025. There is no spent fuel from Fermi 1 operations remaining on site. In March 2012, Fermi 1 returned the facility to a passive monitoring SAFSTOR from the active final decontamination phase of SAFSTOR. The reactor vessel and its associated components have been removed and shipped for disposal. Routine safety inspections were performed by the region to assess the licensee's decommissioning performance during vessel segmentation and subsequent shipping activities. At a later time, decommissioning will be continued for the purpose of removing the remaining residual radioactive material and terminating the license.

University of Illinois Nuclear Research Laboratory

The University of Illinois' Nuclear Research Laboratory (NRL) contained the University's TRIGA Mark 11 nuclear research reactor. The NRL was completed in the summer of 1960 and the reactor first went critical on August 16, 1960. The reactor operating limit was increased to 250 kW by 1967. The reactor ceased operations in 1998, was put into SAFSTOR in 1999, and the reactor fuel was shipped offsite to DOE in 2004. Decommissioning activities began in 2011 in order to remediate the entire site and return it to green field conditions. The MCID

Branch inspectors inspected the decommissioning activities since 2011, on a monthly basis. The inspections consisted of evaluations of the licensee's radiation protection, remediation, radwaste transportation, and free release programs and associated activities. In July 2012, the licensee demolished the NRL building and performed final status surveys of the remaining soils in the site footprint. Upon receipt of all soil sample results, the licensee plans to fill in the excavation and request termination of their license. The inspectors performed confirmatory final status surveys of the entire site footprint and are awaiting the results of offsite analysis of soil samples and the licensee's final report before the site is released for unrestricted use.

Breckenridge

After remediation and completion of final status surveys, the Michigan Chemical Company Breckenridge Disposal Site (BDS) (also known as NWI Breckenridge), a legacy Complex Decommissioning Site, near Breckenridge, MI has met the criteria for unrestricted use (i.e., 10 CFR Part 20.1402). This site had operated under the authority of a U.S. Atomic Energy Commission license, which was terminated in 1971. Region III had extensive involvement in the successful decommissioning of the site, including frequent interactions with the Michigan EPA, the site trustee and the decommissioning contractor. Site inspections were performed throughout the decommissioning project to assess the implementation of the remediation effort, which culminated with independent samples to verify the site met release criteria. This decommissioning project is now closed. (FRN - ML12052A081, and SER - ML12052A066)

20. Discuss any variances in licensing policies and procedures or exemptions from the regulations granted during the review period.

Note: The information below was current as of 8/29/12.

Licenses without Possession Limits on the License

As a result of the revised SUNSI guidance and the Increased Controls Order for certain quantities of radioactive material, Region III reviewed all of the materials licenses and identified those licenses that required possession limits. However, there were several licensees where including the possession limits on the license was not pertinent. These licensees include the Department of Veterans Affairs Master Materials license (03-23853-01VA), General Dynamics Land Systems (SUB-1564), and the Department of the Army (SUB-1536).

The licenses issued to General Dynamics Land Systems and the Department of the Army authorize Depleted Uranium (DU) for use in M1 Abrams tanks and tank parts. Based on discussions with the licensees, it was determined that the number of M1 tanks and tank parts in their possession at one time changes frequently and specific information on the quantity of DU in the tanks and tank parts was considered classified information. Based on discussions with staff from headquarters, it was determined that identifying the DU possession limits on the license could impact the security of the licensed material.

The Department of Veterans Affairs holds a Master Materials License (MML). Based on discussions with headquarters staff, it was determined that MMLs are not required to have maximum possession limits specified on their licenses.

Department of Energy

An exemption to 10 CFR 30.12 was issued on April 4, 2011, to the Battelle Energy Alliance LLC (BEA), the prime contractor for the U.S. Department of Energy (DOE) operated Idaho National Laboratory (INL) to use radioactive sealed sources during a joint training exercise with the Federal Bureau of Investigation (FBI) Chicago Field Office, Chicago Fire Department, Chicago Police Department, Cook County Sheriff's Office, DuPage County Sheriff's Office and the Waukegan Fire Department in Chicago, Illinois. The training event included the transport, storage and use of radioactive sealed sources owned and controlled by INL. The portion of the training involving the use of radioactive sources was conducted in Chicago, Illinois.

The NRC regulations exempts DOE and its prime contractors from NRC licensing requirements for the possession, use, transfer and receipt of byproduct material for the performance of work for DOE at a U.S. Government-owned or controlled site. In this case, DOE requested that work activities be conducted at an Agreement State of Illinois facility which was not a government-owned or controlled site. Therefore, in accordance with the regulations, NRC needed to determine whether the exemption was authorized by law with joint approval by the Agreement State.

NRC conducted a safety evaluation report (SAR) for the proposed use of sealed sources, a licensing site visit and a review of relevant documents from DOE and its prime contractor and the State of Illinois and determined that the exemption under 10 CFR 30.12 was authorized by law. In addition, the NRC and the State of Illinois determined that there was adequate assurance that the activity could be accomplished without undue risk to public health and safety.

Franciscan St. Anthony Health-Crown Point; 13-15933-01

An exemption to the requirements of 10 CFR 30.32(g), 35.49 and 35.400, pursuant to 10 CFR 30.11 and 35.19 was issued to Franciscan St. Anthony Health-Crown Point to continue the use of brachytherapy sealed sources previously authorized by NRC, but that have not been approved in the Sealed Source and Device (SSD) Registry. The current requirement of 10 CFR 35.400 limits the use of brachytherapy sources for therapeutic medical uses to sources which are approved in the SSD Registry.

A Technical Assistance Request was submitted to FSME to determine whether the licensee's exemption request should be granted for the use of old brachytherapy sources which have been in use since 1986, but do not have sealed source/device (SSD) registration certificates because the sources were manufactured at a time pre-dating the current SSD registration system. It was concluded that an exemption may be granted and the license may be renewed with a condition authorizing the continued use of the sources.

21. What, if any, changes were made in your written licensing procedures (new procedures, updates, policy memoranda, etc.) during the reporting period?

Note: The information below was current as of 8/29/12.

License reviews were conducted in accordance with current NRC policy and the guidance provided in Volumes 1 through 20 of NUREG-1556. Supplemental guidance in the form of Regional Procedures and Divisional Instructions was discussed in Item 15. The following revisions to NRC licensing policies were implemented by the Materials Licensing Branch during this review period:

Possession Limits

As a result of the revised SUNSI guidance and the Increased Controls requirements for certain quantities of radioactive material, reviewers were directed to obtain additional information for possession limits of radioactive materials. Region III began modifying all licenses in January 2010 to include the activity per source along with the total maximum possession limit for the sources for all licensees (excluding medical licenses for 10 CFR 35.100 and 10 CFR 35.200.)

Naturally Occurring and Accelerator-Produced Radioactive Materials

Prior to the enactment of the Energy Policy Act of 2005 (EPAct), on August 8, 2005, naturally occurring and accelerator-produced radioactive materials (NARM) were not covered under the Atomic Energy Act of 1954, and therefore, were not regulated by the NRC. The NRC published notification of its plan for the transition of regulatory authority resulting from the expanded definition of byproduct material in the Federal Register on October 1, 2007 (72 FR 55864). The NRC granted waivers to licensees, beginning November 30, 2007, and ending August 7, 2009. Licensees were required to obtain an NRC license before their waiver expired.

Reviewer Licensing Checklist

In May 2012, the Materials Licensing Branch developed and implemented the use of a consolidated reviewer licensing checklist to assure that all aspects of licensing reviews were conducted uniformly and in conformance with NRC and Region III requirements and policies. The checklist includes licensing information from several resources consolidated into one document. The checklist is used by license reviewers to verify and document that reviews include the appropriate information. Examples of information on the checklist include: determining whether there were any escalated enforcement actions taken against the licensee or individuals associated with the licensee; removing or updating, as appropriate, superseded license conditions; ensuring appropriate SUNSI markings on the license and related documents, ensuring up-to-date requirements for Increased Controls are incorporated into the license; and completion of all pre-licensing review checklists for new licenses. Overall, the checklist provides a comprehensive quality assurance check for materials licensing reviewers.

Increased Controls and SUNSI calculators

A Sensitive Unclassified Non-Safeguards Information (SUNSI) calculator and Increased Controls calculator were developed and placed on the Region III, Materials Licensing Branch internal website to assist the reviewers in determining whether or not SUNSI markings are needed on a license or Increased Controls are required for the licensee. The calculators are "user friendly" and a quick and accurate asset to the licensing process.

22. Identify by licensee name and license number any renewal applications that have been pending for one year or more. Please indicate why these reviews have been delayed and describe your action plan to reduce the backlog.

Note: The information below was current as of 8/29/12.

We have one renewal application that has been pending for one year or more.

American Radiolabeled Chemicals (ARC) 24-21362-01:

ARC's license was renewed in October 2010 and it included a 1 year expiration date of October 31, 2011. A 1 year expiration date was included because of air effluent, public dose, and ALARA issues that were identified by the Center for Nuclear Waste Regulatory Analyses (CNWRA) during a July 2010 site visit to evaluate ARC's air effluent system. The results of CNWRA's review were described in a report dated September 16, 2010. The licensee committed to address the issues in its application for license renewal. The licensee submitted its renewal application on September 8, 2011, and the action is pending.

In addition to the issues identified by CNWRA, the NRC also determined that a 1 year expiration date was appropriate based on the licensee's recent inspection history. Specifically, NRC inspectors identified issues that included, but were not limited to, problems with contamination control in restricted and unrestricted areas, concerns about implementation of an effective ALARA program, and concerns about the characterization of on-site soil contamination.

V. Technical Quality of Incident and Allegation Activities

23. For Agreement States, please provide a list of any reportable incidents not previously submitted to NRC (See Procedure SA-300, *Reporting Material Events*, for additional guidance, OMB clearance number 3150-0178). The list should be in the following format:

Licensee Name	License #	Date of Incident/Report	Type of Incident

Not applicable.

24. Identify any changes to your procedures for responding to incidents and allegations that occurred during the period of this review.

Note: The information below was current as of 8/29/12.

We did not make any changes to incident and allegation response procedures during the review period.

C. NON-COMMON PERFORMANCE INDICATORS

I. Compatibility Requirements

25. Please list all currently effective legislation that affects the radiation control program. Denote any legislation that was enacted or amended during the review period.

Not applicable.

26. Are your regulations subject to a "Sunset" or equivalent law? If so, explain and include the next expiration date for your regulations.

Not applicable.

27. Please review and verify that the information in the enclosed State Regulation Status (SRS) sheet is correct. For those regulations that have not been adopted by the State, explain why they were not adopted, and discuss actions being taken to adopt them. If legally binding requirements were used in lieu of regulations and they have not been reviewed by NRC for compatibility, please describe their use.

Not applicable.

28. If you have not adopted all amendments within three years from the date of NRC rule promulgation, briefly describe your State's procedures for amending regulations in order to maintain compatibility with the NRC, showing the normal length of time anticipated to complete each step.

Not applicable.

II. Sealed Source and Device (SS&D) Evaluation Program

29. Prepare a table listing new and amended (including transfers to inactive status) SS&D registrations of sources and devices issued during the review period. The table heading should be:

SS&D Registry Number	Manufacturer, Distributor or Custom User	Product Type or Use	Date Issued	Type of Action

Not applicable.

30. Please include information on the following questions in Section A, as they apply to the SS&D Program:

Technical Staffing and Training - Questions 2-9
Technical Quality of Licensing Actions - Questions 18-22
Technical Quality of Incident and Allegation Activities - Questions 23-24

Not applicable.

III. Low-level Radioactive Waste Disposal Program

31. Please include information on the following questions in Section A, as they apply to the Low-Level Radioactive Waste Disposal Program:

Technical Staffing and Training - Questions 2-9
Status of Materials Inspection Program - Questions 10-14
Technical Quality of Inspections - Questions 15-17
Technical Quality of Licensing Actions - Questions 18-22
Technical Quality of Incident and Allegation Activities - Questions 23-24

Not applicable.

IV. Uranium Recovery Program

32. Please include information on the following questions in Section A, as they apply to the Uranium Recovery Program:

Technical Staffing and Training - Questions 2-9
Status of Materials Inspection Program - Questions 10-14
Technical Quality of Inspections - Questions 15-17
Technical Quality of Licensing Actions - Questions 18-22
Technical Quality of Incident and Allegation Activities - Questions 23-24

Not applicable.