



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION IV
1600 E. LAMAR BLVD.
ARLINGTON, TX 76011-4511

July 2, 2014

MEMORANDUM TO: Duncan White, Branch Chief
Agreement State Programs Branch
Division of Materials Safety and State Agreements
Office of Federal and State Materials and Environmental
Management programs

FROM: Marc L. Dapas, Regional Administrator */RA/*
Region IV

SUBJECT: DRAFT REPORT OF THE INTERGRATED MATERIALS
PERFORMANCE EVALUATION PROGRAM REVIEW OF THE
REGION IV RADIOACTIVE MATERIALS PROGRAM

Thank you for the opportunity to review the subject draft report you provided us on June 11, 2014. We believe the draft report provides an accurate assessment of the implementation of the nuclear materials program in Region IV during the subject review period. We appreciated the exchange of information between the team members and regional staff and commend the team on their professionalism and dedication to obtaining accurate information during the course of their review.

Our comments on the draft report are identified in the enclosure. Should you have any questions concerning our comments, please contact Linda Howell, Acting Director, Division of Nuclear Materials Safety.

Enclosure:
As stated

CONTACT: Linda L. Howell, DNMS
817-200-1287

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OFFICE	DNMS:AD	RA		
NAME	LLHowell/amt	MLDapas		
SIGNATURE	/RA/	/RA/		
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COMMENTS ON DRAFT REGION IV INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM REPORT

General:

We suggest that a consistent reference for the Repository and Spent Fuel Safety Branch (RSFSB) be used throughout the report.

Materials Licensing:

The IMPEP team commented on one complex renewal of a broad scope license. No deficiencies in the license conditions were noted. However, the team noted that the license reviewer used NUREG-1556 Vol. 18 for reviewing the renewal submittal and stated that additional volumes in the NUREG-1556 series should also have been used for this complex licensing review. We will further evaluate whether we need to change our current practice of using a single volume in the NUREG-1556 series for review of complex applications coupled with use of additional volumes in the series as deemed necessary by the licensing branch chief, to one where use of multiple volumes is routinely required. The team also raised a question concerning the fee codes assigned to this license. Region IV is reviewing this licensing action to ensure that the correct fee codes are assigned.

Uranium Recovery:

The review team noted that Region IV's staffing level for uranium recovery inspections needed to be enhanced based on workload at the time of the review. The team also noted their discussion with Region IV management about the expected increase in uranium recovery budgeted resources for FY2015 and beyond. At the time of the review, Region IV staffing for uranium recovery inspections was consistent with the FY2014 budgeted resources. As the team noted, work load in uranium recovery inspections increased as we entered FY2014 with new uranium recovery facilities coming into production. Region IV is currently taking action to increase staffing in this area with an additional FTE, consistent with the FY2015 budgeted resources.