



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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August 25, 2014

MEMORANDUM TO: Roy P. Zimmerman, Acting
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Research, State, Tribal, and Compliance Programs
Office of the Executive Director of Operations

Bradley W. Jones, Assistant General Counsel
for Reactor and Materials Rulemaking
Office of the General Counsel

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FROM: Duncan White, Chief / **RA L. Dimmick for/**
Agreement State Programs Branch
Division of Materials Safety
and State Agreements
Office of Federal and State Materials
and Environmental Management Program

SUBJECT: INTEGRATED MATERIALS PERFORMANCE EVALUATION
PROGRAM (IMPEP) REVIEW OF THE KANSAS AGREEMENT
STATE PROGRAM

This memorandum transmits to the Management Review Board (MRB) a proposed final report (Enclosure 1) documenting the IMPEP review of the Kansas Agreement State Program. The review was conducted by an interoffice team during the period of June 9–13, 2014. The team issued a draft report to Kansas on July 17, 2014, for factual comment. Kansas responded to the findings and conclusions of the review by letter dated August 12, 2014, from Thomas Conley, Section Chief, Radiation and Asbestos Section, Kansas Department of Health and Environment. The Kansas response provided technical corrections, report commentary, and responses to the recommendation and other issues identified by the team. The IMPEP team accepted all of the comments and revised the report accordingly.

The review team is recommending that Kansas' performance be found satisfactory for four of the six performance indicators reviewed: Technical Staffing and Training, Status of Materials Inspection Program, Technical Quality of Inspections, and Compatibility Requirements. The other two performance indicators, Technical Quality of Licensing Actions and Technical Quality of Incident and Allegation Activities, were found satisfactory, but needs improvement. Accordingly, the review team is recommending that the Kansas Agreement State Program be found adequate to protect public health and safety, and compatible with the NRC's program.

The Management Review Board meeting to consider the Kansas report is scheduled for **Thursday, September 4, 2014, 1:00 p.m. - 4:00 p.m. (ET), OWFN 17-B04**. In accordance with Management Directive 5.6, the meeting is open to the public. The agenda for that meeting is enclosed (Enclosure 2).

If you have any questions prior to the meeting, please contact me at 301-415-2598 or Lisa Dimmick at 301-415-0694.

Enclosures:

- 1) Kansas Proposed Final Report
- 2) Meeting Agenda

cc: TBD

Organization of Agreement States
Liaison to the MRB

Thomas Conley, CHP, RRPT, Chief
Radiation and Asbestos Control Section

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INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM

REVIEW OF THE KANSAS AGREEMENT STATE PROGRAM

JUNE 9–13, 2014

PROPOSED FINAL REPORT

Enclosure 1

EXECUTIVE SUMMARY

This report presents the results of the Integrated Materials Performance Evaluation Program (IMPEP) review of the Kansas Agreement State Program. The review was conducted during the period of June 9–13, 2014, by a review team composed of technical staff members from the U.S. Nuclear Regulatory Commission (NRC) and the State of Ohio.

Based on the results of this review, Kansas' performance was found satisfactory for four of the six performance indicators reviewed: Technical Staffing and Training, Status of Materials Inspection Program, Technical Quality of Inspections, and Compatibility Requirements. The other two performance indicators, Technical Quality of Licensing Actions and Technical Quality of Incident and Allegation Activities, were found satisfactory, but needs improvement.

The cause of the satisfactory, but needs improvement, finding for Technical Quality of Licensing Actions was due to the number of deficiencies identified by the team during a sampling of medical licensing actions. The details of these deficiencies are described in Section 3.4 of this report. The review team made a recommendation to review all active medical licenses and develop a process that ensures authorized users on the license are adequately qualified to perform the licensed activities.

The cause of the satisfactory, but needs improvement, finding for Technical Quality of Incident and Allegation Activities was due to an insufficient response by the Program to an overexposure event at a well logging licensee facility. The details of the event and the Kansas Program's response are described in Section 3.5 of this report. The review team did not make a recommendation for this indicator because the insufficient response was isolated to this singular, albeit significant event, and the Program has previously demonstrated satisfactory performance when responding to similar types of events.

The review team determined that the two recommendations from the 2010 IMPEP review, described in Section 2.0 of this report, regarding training to increase familiarity with the regulations in 10 CFR Part 35 during inspections, and to develop a process for handling and marking sensitive documents, should be closed.

Accordingly, the review team recommends that the Kansas Agreement State Program is adequate to protect public health and safety and is compatible with the NRC's program. The review team recommends that the next IMPEP review take place in approximately 4 years.

1.0 INTRODUCTION

This report presents the results of the review of the Kansas Agreement State Program. The review was conducted during the period of June 9–13, 2014, by a review team composed of technical staff members from the U.S. Nuclear Regulatory Commission (NRC) and the State of Ohio. Team members are identified in Appendix A. The review was conducted in accordance with the “Implementation of the Integrated Materials Performance Evaluation Program and Rescission of Final General Statement of Policy,” published in the *Federal Register* on October 16, 1997, and NRC Management Directive 5.6, “Integrated Materials Performance Evaluation Program (IMPEP),” dated February 26, 2004. Preliminary results of the review, which covered the period of June 19, 2010, to June 13, 2014, were discussed with the Kansas Secretary of Health and Environment, and other managers on the last day of the review.

[A paragraph on the results of the Management Review Board (MRB) meeting will be included in the final report.]

The Kansas Agreement State Program is administered by the Radiation and Asbestos Control Section (the Section), which is located within the Bureau of Environmental Health (the Bureau). The Bureau is part of the Kansas Department of Health and Environment (the Department). Organization charts for the Department, Bureau, and Section are included as Appendix B.

At the time of the review, the Kansas Agreement State Program regulated 283 specific licenses authorizing possession and use of radioactive materials. The review focused on the radioactive materials program as it is carried out under the Section 274b. (of the Atomic Energy Act of 1954, as amended) Agreement between the NRC and the State of Kansas.

In preparation for the review, a questionnaire addressing the common and applicable non-common performance indicators was sent to the Section on March 8, 2014. The Section provided its response to the questionnaire on May 14, 2014. A copy of the questionnaire response can be found in NRC’s Agencywide Documents Access and Management System (ADAMS) using Accession Number ML14136A370.

The review team’s general approach for conduct of this review consisted of (1) examination of the Section’s response to the questionnaire, (2) review of applicable Kansas statutes and regulations, (3) analysis of quantitative information from the Section’s database, (4) technical review of selected regulatory actions, (5) field accompaniments of four inspectors, and (6) interviews with staff and managers. The review team evaluated the information gathered against the established criteria for each common and the applicable non-common performance indicator and made a preliminary assessment of the Kansas Agreement State Program’s performance.

Section 2.0 of this report covers the State’s actions in response to recommendations made during previous reviews.

Results of the current review of the common performance indicators are presented in Section 3.0. Section 4.0 details the results of the review of the applicable non-common performance indicators, and Section 5.0 summarizes the review team’s findings.

2.0 STATUS OF ITEMS IDENTIFIED IN PREVIOUS REVIEWS

During the previous IMPEP review, which concluded on June 18, 2010, the review team made two recommendations regarding the Kansas Agreement State Program's performance. The statuses of the recommendations are as follows:

1. "The review team recommends that the State ensure that inspectors gain increased familiarity with the regulations in 10 CFR Part 35, as well as be provided appropriate formal training in addition to mentoring and/or on-the-job training to ensure familiarity with various therapeutic modalities involving byproduct materials such that these areas will be appropriately reviewed during inspections. (Section 3.1)"

Status: During the review period, the State has completed a number of actions to address this recommendation. The State completed formal training of all radioactive materials inspection staff by attending the NRC brachytherapy course with the exception of one staff member who is scheduled to take the course in August 2014. The State implemented a policy to have at least a two-person team inspect complex medical licenses to further enhance on-the-job training and mentoring of newer staff. The State developed training material on brachytherapy requirements which was presented at the 2011 Kansas Regulatory Conference; staff observed the NRC brachytherapy webinar in 2012, and conducted in-house refresher training on 10 CFR Part 35 in 2014. The review team determined the actions taken by the State addressed the recommendation. This recommendation is closed.

2. "The review team recommends that the State further develop the policy that was instituted during the onsite review and provide additional guidance for identifying, marking, handling, transmitting, and storing documents containing sensitive information. (Section 3.3)"

Status: The State developed and has guidance for identifying, marking, handling, transmitting, and storing documents containing sensitive information. Documents containing sensitive material are clearly marked and safeguarded as appropriate. These documents are stored in a locked storage area and have folders that are conspicuously marked "Controlled File." The review team determined the actions taken by the State addressed the recommendation. This recommendation is closed.

3.0 COMMON PERFORMANCE INDICATORS

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

3.1 Technical Staffing and Training

Considerations central to the evaluation of this indicator include the Section's staffing level and staff turnover, as well as the technical qualifications and training histories of the staff. To evaluate these issues, the review team examined the Section's questionnaire response relative

to this indicator, interviewed managers and staff, reviewed job descriptions and training records, and considered workload backlogs.

The Section is responsible for materials inspection, licensing and compliance activities, and emergency response activities. The Section is composed of one manager, one radioactive materials supervisor, one program support staff member, and five technical staff members.

At the time of the review, five technical staff members, plus the supervisor, totaling 5.5 full-time equivalents (FTE) had direct involvement in the daily operations of the radioactive materials program. All of the technical staff members are allocated 5 percent of their FTE for nuclear power plant emergency response with one staff member allocated an additional 20 percent of their FTE to perform asbestos program activities. No positions were vacant at the time of the review. One technical staff person resigned at the end of 2011 for personal reasons. The position was filled within three months by an internal candidate from the Bureau. The review team determined that staffing levels were adequate for the Kansas Agreement State program.

The Section has a documented training plan for technical staff that is consistent with the requirements of the NRC/Organization of Agreement States Training Working Group Report and NRC Inspection Manual Chapter (IMC) 1248, "Qualification Programs for Federal and State Materials and Environmental Programs." Staff members are assigned increasingly complex duties as they progress through the qualification process. The review team concluded that the Section's training program is adequate to carry out its regulatory duties and noted that Kansas management supports the Section's training program.

Based on the IMPEP evaluation criteria, the review team recommends that Kansas' performance with respect to the indicator, Technical Staffing and Training, be found satisfactory.

3.2 Status of Materials Inspection Program

The review team focused on five factors while reviewing this indicator: inspection frequency, overdue inspections, initial inspections of new licenses, timely dispatch of inspection findings to licensees, and performance of reciprocity inspections. The review team's evaluation was based on the Section's questionnaire response relative to this indicator, data gathered from the Section's database, examination of completed inspection casework, and interviews with management and staff.

The review team verified that Kansas' inspection frequencies for all types of radioactive material licenses are usually more frequent than the NRC's frequency for similar license types listed in NRC IMC 2800, "Materials Inspection Program." The only exception is industrial radiography which is routinely inspected annually at the same frequency as the NRC. However, the Section does increase the inspection frequency if there are performance issues with any of its licensees, including radiography licensees. Frequencies have been adjusted to quarterly inspections in some instances where poor performance has warranted this additional oversight.

The Section conducted 145 Priority 1, 2, and 3 inspections during the review period. One of these Priority 1 inspections was conducted overdue by more than 25 percent of the inspection frequency prescribed in IMC 2800. In addition, the Section performed 33 initial inspections

during the review period, one of which was conducted overdue by 105 days. Section procedures, in agreement with IMC 2800, state initial inspections should be conducted within 12 months of license issuance. The initial inspection was conducted late due to scheduling conflicts for the inspector. Overall, the review team calculated that the Section performed 1.1 percent of its inspections overdue during the review period.

The review team evaluated the Section's timeliness in providing inspection findings to licensees. A sampling of 15 inspection letters indicated that 6 of the inspection findings letters were transmitted to the licensees beyond the Section's goal of 30 days after the inspection. Out of the 178 initial and higher priority inspections conducted during the review period, the review team determined that approximately 26 percent (47) of the inspection findings letters were transmitted to licensees between 31 and 105 days after the inspection. The review team noted that the majority of the delayed inspection findings letters did not have violations. The primary reason for the delay in issuing the letters was due to the Section staff addressing other issues when returning to the office after the inspection. The Section does inform the licensee of the preliminary results of the inspection at the exit interview with the licensee and the delay in transmitting inspection findings letters did not appear to impact the licensee's ability to implement corrective actions to address any violations that may have been identified during the inspection. The review team discussed this issue with the Section manager and supervisor. Section management determined that computer generated reports used by the Section to monitor the timeliness of inspection activities were not providing sufficient detail to monitor the transmittal of inspection findings. Section management has addressed this issue by modifying the computer generated reports and more closely monitoring the timely transmittal of inspection findings.

During the review period, the Section granted 303 reciprocity permits, of which, 118 were candidate licensees based upon the criteria in IMC 1220, "Processing of NRC Form 241 and Inspection of Agreement State Licensees Operating Under 10 CFR 150.20." The review team determined that the Section did not meet the NRC's criteria of inspecting 20 percent of candidate licensees operating under reciprocity in each of the four years covered by the review period. In 2010, the Section inspected 20 percent of candidates, but for the other years during the review period the reciprocity inspection rate has been 10 - 13 percent. Prior to the onsite IMPEP review, the Section had identified this declining trend, which appears to be due to the geographical challenges associated with the size of Kansas and the location of reciprocity activities. The number of reciprocity candidates has increased due to the increased radiography and well logging activities in western Kansas. The large geographical area of western Kansas poses a challenge to Section inspectors because when inspectors travel to western Kansas to perform a reciprocity inspection, they usually find the licensee has either completed work and moved on, or has yet to arrive at the site. To resolve these challenges, the Section implemented new requirements for each inspector to identify and track reciprocity candidates at the beginning of each year. The Section determined that it becomes aware of approximately 15 to 20 candidates licensees by the end of January each year, and the rest of the candidates come in throughout the remainder of the year. The Section plans to require each inspector select two candidates to inspect each year to ensure the Section meets the criteria of inspecting 20 percent of the candidates.

Based on the IMPEP evaluation criteria, the review team recommends that Kansas' performance with respect to the indicator, Status of Materials Inspection Program, be found satisfactory.

3.3 Technical Quality of Inspections

The review team evaluated the inspection reports, enforcement documentation, inspection field notes, and interviewed inspectors for 25 radioactive materials inspections conducted during the review period. The casework reviewed included inspections conducted by one former and five current Section inspectors and covered inspections of various license types: academic and medical broad scope; diagnostic nuclear medicine; medical license distribution; high dose-rate remote afterloaders; industrial radiography; veterinary; nuclear pharmacy; and well logging licensees. The review also included both initial and follow-up Increased Controls inspections. Appendix C lists the inspection casework files reviewed; as well as the results of the inspector accompaniments.

Based on the evaluation of casework, the review team noted that inspections covered all aspects of the licensee's radiation safety programs. The review team found that inspection reports were thorough, complete, consistent, and of high quality, with sufficient documentation to ensure that a licensee's performance with respect to health and safety was acceptable. The documentation supported violations, recommendations made to licensees, unresolved safety issues, the effectiveness of corrective actions taken to resolve previous violations and discussions held with licensees during exit interviews. In addition, all inspection documentation is entered into the Section's database, which is accessible to all staff members.

The review team determined that documents involving Increased Controls inspections were protected, segregated from other files, and maintained in a manner to limit access. Inspection report files for Increased Controls were in color coded folders and kept separate from the routine inspection reports. Documents that were released to the public in information requests were sufficiently marked as sensitive information, as appropriate.

The inspection procedures utilized by the Section are consistent with the inspection guidance outlined in IMC 2800. The Section has a policy to accompany all staff performing radioactive materials inspections on an annual basis. Supervisory accompaniments were conducted annually for all inspectors.

The review team determined that the inspection findings were appropriate and prompt regulatory actions were taken, as necessary. Inspection findings were clearly stated and documented in the reports and sent to the licensees with the appropriate letter detailing the results of the inspection. The review team noted that the computer generated inspection reports provided a good format for a narrative of the inspectors' observations and findings. Examples of these reports were taken by the review team for future training and demonstration purposes.

The review team verified that the Section maintains an adequate supply of appropriately calibrated survey instruments to support the inspection program, as well as to respond to radioactive materials incidents and emergency conditions. Instruments used to support the radioactive materials inspection program are calibrated by the manufacturer.

Accompaniments of four Section inspectors were conducted by an IMPEP team member during the week of May 5, 2014. The inspectors were accompanied during health, safety and security inspections of two industrial radiography licensees and a medical therapy licensee. The accompaniments are identified in Appendix C. During the accompaniments, the inspectors demonstrated appropriate inspection techniques, knowledge of the regulations, and conducted performance-based inspections. The inspectors were trained, well-prepared for the inspection, and thorough in their audits of the licensees' radiation safety programs. The inspectors conducted interviews with appropriate personnel, observed licensed operations, conducted confirmatory measurements, and utilized good health physics practices. The inspections were adequate to assess radiological health and safety and security at the licensed facilities.

Based on the IMPEP evaluation criteria, the review team recommends that Kansas' performance with respect to the indicator, Technical Quality of Inspections, be found satisfactory.

3.4 Technical Quality of Licensing Actions

The review team examined completed licensing casework and interviewed license reviewers for licensing actions covering specific licenses. A total of 20 licensing actions were reviewed for completeness, consistency, proper radioisotopes and quantities, qualifications of authorized users, adequacy of facilities and equipment, adherence to good health physics practices, financial assurance, security requirements, operating and emergency procedures, appropriateness of license conditions, and overall technical quality. The casework was also reviewed for timeliness, use of appropriate correspondence, reference to appropriate regulations, supporting documentation, consideration of enforcement history, pre-licensing visits, peer and supervisory review, and proper signatures.

The casework was selected to provide a representative sample of licensing actions completed during the review period. Licensing actions selected for evaluation included 2 new licenses, 5 renewals, 11 amendments, and 2 license terminations. Casework reviewed included a cross-section of license types such as industrial, broad scope medical and academic, nuclear medicine diagnostic and therapeutic, research and development, portable gauge, fixed gauge, nuclear pharmacy, and veterinary. A listing of the licensing casework reviewed, with case specific comments, can be found in Appendix D.

The review team concluded that actions taken in terminating licenses were appropriately documented, which included suitable material survey records, and contained documentation of proper disposal or transfer of radioactive material.

Licenses are created and tracked using a local database. Once completed, all licensing actions are reviewed by the Section Supervisor, and then reviewed and signed by the Section Manager. The Section has Kansas specific guidance documents for the common types of licenses issued but also uses the NRC's NUREG-1556 series for additional licensing guidance.

Kansas adopts 10 CFR Part 35 – "Medical Use of Byproduct Material," by reference. The equivalent Part 35 regulations are found in Kansas Administrative Regulations (KAR) 28-35-264. The review team identified five licenses where authorized users were added to radioactive material licenses for medical use without the proper documentation to verify the

training, experience, and preceptor attestation. In four cases, the Section approved users who were neither qualified for, nor who applied for, all of the authorized uses in 10 CFR 35.300. However, the authorized users were granted full authorization to use 10 CFR 35.300 materials. The review team brought these issues to the attention of the Section supervisor, who immediately contacted the licensees and determined these physicians had not used the radioactive materials for applications that they were not qualified to administer. The Section will re-issue these licenses with appropriate authorizations for these physicians. In one amended license issued for a facility, the Section included an authorized physician who was added to the license without proper documentation to verify the training, experience, and preceptor attestation. Specifically, the documentation submitted only contained continuing education certificates. The review team brought this to the attention of the Section supervisor, who contacted the licensee and reviewed all previously archived submissions of the user's qualification documents. The Section determined this specific authorized user was approved in 1992; and had inadvertently been removed from a recent amendment to the license. The Section added the appropriate documentation to the file for this amendment to show the authorized user meets the requirements.

The review team identified repeated examples of problems authorizing physician users for 10 CFR 35.300 (KAR 28-35-264) uses with respect to thoroughness, completeness, consistency, and adherence to existing guidance for medical licensing actions. The review team recommends that the State review all active medical licenses and verify that previously approved authorized physician users have the proper board certification or training requirements, and preceptor attestation; and develop and implement a process that will ensure proper verification and documentation of user qualifications for 10 CFR 35.300 (KAR 28-35-264) uses of byproduct material. While no problems were identified by the review team with respect to authorized medical physicists, radiation safety officers, and authorized nuclear pharmacists, as a result of subsequent discussions, Section management decided to review a sampling of the training and experience of these individuals, in addition to the team's recommendation.

Based on the IMPEP evaluation criteria, the review team recommended that Kansas' performance, with respect to the indicator Technical Quality of Licensing Actions, be found satisfactory, but needs improvement.

3.5 Technical Quality of Incident and Allegation Activities

In evaluating the effectiveness of the Section's actions in responding to incidents and allegations, the review team examined the Section's response to the questionnaire relative to this indicator, evaluated selected incidents reported for Kansas in the Nuclear Material Events Database (NMED) against those contained in the Section's files, and evaluated the casework for 14 radioactive materials incidents. A list of the incident casework examined, with a case specific comment, may be found in Appendix E. The review team also evaluated the Section's response to three allegations involving radioactive materials received by the State during the review period.

The incidents selected for review included the following categories: lost radioactive material, overexposures, damaged equipment, equipment failure and transportation. The review team determined that the Section's response to incidents was adequate for 13 of the 14 evaluated incidents. The Section performed a complex investigation for one of the incidents, a licensee

employee radiation overexposure case. That investigation was thorough and comprehensive and suitable enforcement and follow-up actions were taken. Section staff employ a procedure entitled, "Investigation of Accidents, Incidents or Overexposures" when responding to an incident. The procedure has a good discussion of considerations for inspectors to think about during their investigation. The Section supervisor stated that, based on feedback from the review team, the procedure would be enhanced to provide more specific direction with respect to on-site investigation of incidents.

One incident, in particular, with the potential for significant health and safety consequences to licensee personnel, as well as the public, was not sufficiently responded to by the Section. A well logging licensee reported in March 2014 that a licensee employee received a whole body overexposure for calendar year 2013. The licensee stated that the individual, a well logging assistant, was overexposed because he handled gamma (Cs-137) and neutron-emitting (Am-Be) well logging sources with his bare hands, instead of the standard industry practice of using remote handling tools. The Section responded to the licensee via email with a significant number of questions regarding the overexposure, including a request for the results of the licensee's incident reenactment and the training history of the employee. In early April 2014, the licensee responded to the Section with the results of its reenactment showing a whole body overexposure and a considerable extremity exposure, without sufficient discussion of the potential neutron dose. The licensee also indicated that the employee had not received formal training prior to handling the radioactive sources. The licensee's response did not address possible radiation exposures to other workers at the well site who could be considered members of the public, nor did the licensee adequately discuss how it failed to exercise proper supervision of this untrained worker.

A Section senior inspector was assigned to the case, but routine inspections and licensing actions took priority so that quarterly assignments would not come overdue. Section managers were aware of the incident but did not prioritize an investigation. After the review team's discussion with Section and Bureau managers during this review, the managers agreed that an aggressive response was warranted in this case and stated that such an on-site investigation would be launched promptly, including its own reenactment of the incident.

Section managers were aware of incident reportability thresholds, as established in the Office of Federal and State Materials and Environmental Management Programs (FSME) Procedure SA-300 "Reporting Material Events." All applicable incidents were reported to the NRC Headquarters Operations Center and entered into NMED, in a timely manner. It should be noted that the well logging incident discussed above was also reported to NMED in a timely manner. The Section was not required to report the well logging incident to the NRC Headquarters Operations Center based on the event description and dose information received from the licensee. The Section's reenactment may result in different dose assignments to the well logging assistant or other workers (members of the public) which may require additional notifications. On August 12, 2014, the Section provided an update to the investigation of the well logging incident described above and indicated that no members of the public were exposed to radiation from this incident. Two radiation workers received doses in excess of regulatory limits. No other individuals received doses which exceeded regulatory limits.

In evaluating the effectiveness of the Section's response to allegations, the review team evaluated the completed casework for three allegations received by the State during the review

period. The review team concluded that the Section took prompt and appropriate actions in response to concerns raised. The review team noted that the Section documented the investigations of concerns and retained all necessary documentation to appropriately close the allegations. The Section notified the concerned individuals of the conclusion of its investigations. The review team determined that the Section adequately protected the identity of concerned individuals.

The review team considered recommending a finding of “unsatisfactory” for this indicator. However, the review team concluded that, despite the Section’s failure to properly respond to the potentially significant health and safety consequences from the well logging incident, the Section had responded to another overexposure incident and to allegations in a prompt, comprehensive manner. Therefore, the Section’s performance was not indicative of frequent examples of incomplete or inappropriate responses to incidents.

Based on the IMPEP evaluation criteria, the review team recommends that Kansas’ performance with respect to the indicator, Technical Quality of Incident and Allegation Activities, be found satisfactory, but needs improvement.

4.0 NON-COMMON PERFORMANCE INDICATORS

Four non-common performance indicators are used to review Agreement State programs: (1) Compatibility Requirements, (2) Sealed Source and Device Evaluation Program, (3) Low-Level Radioactive Waste Disposal Program, and (4) Uranium Recovery Program. NRC’s Agreement with Kansas does not relinquish regulatory authority for a uranium recovery program; therefore, only the first three non-common performance indicators applied to this review.

4.1 Compatibility Requirements

4.1.1 Legislation

Kansas became an Agreement State on January 1, 1965. Legislative authority to create an agency and enter into an Agreement with the NRC is granted in Article 16 - Nuclear Energy Development and Radiation Control Act, Kansas Statutes, K.S.A. 48-1601 to 48-1619. The Department Secretary is responsible by law for radiation control. The Department is designated as the State’s radiation control agency. There were no legislative changes affecting the program during the review period.

4.1.2 Program Elements Required for Compatibility

The Kansas regulations governing radiation protection requirements are found in KAR 28-35-133 through KAR 28-35-505, apply to all ionizing radiation, whether emitted from radionuclides or produced by machines. Kansas requires a license for the possession and use of all radioactive material, including naturally occurring materials and accelerator-produced radionuclides. Kansas also requires registration of all machines designed to produce x-rays or other ionizing radiation. Kansas’ regulations are not subject to sunset laws. The State has the ability to adopt certain rules by license condition.

The review team verified that the State's rulemaking process offers the public and other interested parties an opportunity to comment on proposed regulation changes. Proposed rulemaking packages are initially reviewed by the Secretary of Administration and then by the Attorney General for legality. The Department then offers the public and other interested parties an opportunity to comment on the proposed regulation changes when it is published in the *Kansas Register*. The Department sends the proposed regulation changes to NRC for a compatibility review during the public comment period. The Joint Committee on Administrative Rules and Regulations is responsible for legislative oversight of regulations and also reviews the proposed regulatory package during the public comment period. Once the proposed regulation is adopted, it is then published in the *Kansas Register* and typically takes effect within 15 days. The review team determined that the regulation promulgation process takes approximately 6-10 months.

Current NRC policy requires that Agreement States adopt certain equivalent regulations or legally binding requirements no later than 3 years after the effective date of NRC's regulations. Kansas is up to date on the adoption of regulation packages, which the review team noted was a strength of the Kansas program. At the time of this review, the following three previously submitted regulation packages had outstanding comments, from the NRC, which need to be resolved:

- "Requirements for Certain Generally Licensed Industrial Devices Containing Byproduct Material," 10 CFR Parts 30, 31, and 32 amendment (65 FR 79162), that was due for Agreement State adoption by February 16, 2004.
- "Exemptions from Licensing, General Licenses, and Distribution of Byproduct Material; Licensing and Reporting Requirements," 10 CFR Parts 30, 31, 32, and 150 amendment (72 FR 58473), that was due for Agreement State adoption by December 17, 2010.
- "Requirements for Expanded Definition of Byproduct Material," 10 CFR Parts 20, 30, 31, 32, 33, 35, 61, and 150 amendment (72 FR 55864), that was due for Agreement State adoption by November 30, 2010.

A complete list of regulation amendments may be found on the NRC website at the following address: http://nrc-stp.ornl.gov/rss_regamendments.html.

Based on the IMPEP evaluation criteria, the review team recommends that Kansas' performance with respect to the indicator, Compatibility Requirements, be found satisfactory.

4.2 Sealed Source and Device Evaluation Program

The Kansas Agreement State Program has authority to conduct sealed source and device (SS&D) evaluations for byproduct, source, and certain special nuclear materials; however, the Section did not conduct any SS&D evaluations during the review period. Accordingly, the review team did not review this indicator.

4.3 Low-Level Radioactive Waste Disposal Program

In 1981, the NRC amended its Policy Statement, "Criteria for Guidance of States and NRC in Discontinuance of NRC Regulatory Authority and Assumption Thereof by States Through Agreement," to allow a State to seek an amendment for the regulation of Low-Level Radioactive Waste (LLRW) as a separate category. Although the Kansas Agreement State Program has LLRW disposal authority, NRC has not required States to have a program for licensing a LLRW disposal facility until such time as the State has been designated as a host State for a LLRW disposal facility. When an Agreement State has been notified or becomes aware of the need to regulate a LLRW disposal facility, they are expected to put in place a regulatory program which will meet the criteria for an adequate and compatible LLRW disposal program. There are no plans for a LLRW disposal facility in Kansas. Accordingly, the review team did not review this indicator.

5.0 SUMMARY

As noted in Sections 3.0 and 4.0 above, Kansas' performance was found satisfactory for four of the six performance indicators reviewed and satisfactory, but needs improvement, for the indicators: Technical Quality of Licensing Actions and Technical Quality of Incident and Allegation Activities. The review team made one recommendation regarding program performance by the State and determined that the two recommendations from the 2010 IMPEP review should be closed.

The review team considered additional NRC oversight including a period of monitoring and decreasing the time until the next periodic meeting because two performance indicators were less than fully satisfactory. However, given that the deficiencies identified by the review team were limited to a specific area of licensing, and the response to a singular, albeit significant, event, for which past performance to a similar event was sufficient, the review team determined additional NRC oversight was not necessary.

Accordingly, the review team recommends that the Kansas Agreement State Program be found adequate to protect public health and safety and compatible with the NRC's program. Based on the results of the current IMPEP review, the review team recommends that the next full IMPEP review take place in approximately four years.

Below is the review team's recommendation, as mentioned in the report, for evaluation and implementation by the State:

RECOMMENDATION

The review team recommends that the State review all active medical licenses and verify that previously approved authorized physician users have the proper board certification or training requirements, and preceptor attestation; and develop and implement a process that will ensure proper verification and documentation of user qualifications for 10 CFR 35.300 (KAR 28-35-264) uses of byproduct material.

LIST OF APPENDICES

Appendix A	IMPEP Review Team Members
Appendix B	KANSAS Organization Charts
Appendix C	Inspection Casework Reviews
Appendix D	License Casework Reviews
Appendix E	Incident Casework Reviews

APPENDIX A

IMPEP REVIEW TEAM MEMBERS

Name	Area of Responsibility
Jim Lynch, Region III	Team Leader Technical Quality of Incident and Allegation Activities Inspector Accompaniments Compatibility Requirements
Binesh Tharakan, Region IV	Team Leader in Training Technical Staffing and Training Status of Materials Inspection Program
Shirley Xu, FSME	Technical Quality of Licensing Actions
Mark Light, Ohio	Technical Quality of Inspections

APPENDIX B

KANSAS ORGANIZATION CHARTS

ADAMS ACCESSION NO.: ML14141A348

APPENDIX C

INSPECTION CASEWORK REVIEWS

NOTE: CASEWORK LISTED WITHOUT COMMENT IS INCLUDED FOR COMPLETENESS.

File No.: 1

Licensee: Cardinal Health, LLC

Inspection Type: Initial, Announced

Inspection Date: 12/9/11

License No.: 10-C956

Priority: 5

Inspectors: TC/JB

File No.: 2

Licensee: VCA Mission Animal Referral

Inspection Type: Initial, Announced

Inspection Date: 2/19/13

License No.: 33-B965

Priority: 5

Inspector: JW

File No.: 3

Licensee: IRIS NDT, Inc.

Inspection Type: Initial, Announced

Inspection Date: 4/2/14

License No.: 21-B982

Priority: 1

Inspector: DL

File No.: 4

Licensee: Coffey County Hospital

Inspection Type: Initial, Announced

Inspection Date: 7/11/13

License No.: 12-B970

Priority: 5

Inspector: JW

File No.: 5

Licensee: XCEL NDT, Inc.

Inspection Type: Initial, Announced

Inspection Date: 12/19/13

License No.: 21-B982

Priority: 1

Inspector: AS

File No.: 6

Licensee: West Central Kansas Association DBA Russell Regional Hosp. License No.: 12-B975

Inspection Type: Initial, Announced

Inspection Date: 2/12/14

Priority: 1

Inspector: JB

File No.: 7

Licensee: Menorah Medical Center.

Inspection Type: Routine, Announced

Inspection Date: 8/9/11

License No.: 19-B703-01

Priority: 2

Inspector: JH

File No.: 8

Licensee: Chanute Manufacturing Company

Inspection Type: Routine, Announced

Inspection Date: 8/1/11

License No.: 21-B189-01

Priority: 1

Inspector: JS

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File No.: 9

Licensee: Bradken, Atchison/St. Joseph, Inc.
Inspection Type: Routine, Announced
Inspection Date: 5/5/14

License No.: 21-B092-01
Priority: 1
Inspector: DL

File No.: 10

Licensee: Anderson County Hospital
Inspection Type: Routine, Announced
Inspection Date: 1/28/14

License No.: 19-B466-01
Priority: 3
Inspector: JW

File No.: 11

Licensee: Coder X-ray Service
Inspection Type: Routine, Announced
Inspection Date: 1/28/14

License No.: 21-B165-01
Priority: 1
Inspector: AS

File No.: 12

Licensee: Kansas State University
Inspection Type: Routine, Announced
Inspection Date: 1/28/14

License No.: 38-C011-01
Priority: 1
Inspector: JB

File No.: 13

Licensee: Sauder Custom Fabrication, Inc.
Inspection Type: Routine, Announced
Inspection Date: 1/10/14

License No.: 21-B149-01
Priority: 2
Inspector: JH

File No.: 14

Licensee: Quality Nuclear Services
Inspection Type: Routine, Announced
Inspection Date: 1/28/14

License No.: 34-C925-01
Priority: 2
Inspector: AS

File No.: 15

Licensee: Nuclear Enterprises, LLC
Inspection Type: Routine, Announced
Inspection Date: 5/14/13

License No.: 20-B892
Priority: 2
Inspector: JB

File No.: 16

Licensee: Great Bend Regional Hospital
Inspection Type: Routine, Announced
Inspection Date: 3/25/13

License No.: 19-B936
Priority: 3
Inspector: AS

File No.: 17

Licensee: Dodge City Healthcare Group, LLC
Inspection Type: Routine, Announced
Inspection Date: 3/26/13

License No.: 19-B343-01
Priority: 3
Inspector: AS

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File No.: 18

Licensee: Cornish Wireline Services
Inspection Type: Routine, Announced
Inspection Date: 1/28/14

License No.: 27-B128-01
Priority: 3
Inspector: JW

File No.: 19

Licensee: DBI, Inc.
Inspection Type: Routine, Announced
Inspection Date: 5/8/14

License No.: 21-B805
Priority: 1
Inspector: AS

File No.: 20

Licensee: Via Christi Hospitals Wichita, Inc.
Inspection Type: Routine, Announced
Inspection Date: 12/3/13

License No.: 18-C753-01
Priority: 2
Inspector: JH

File No.: 21

Licensee: University of Kansas Medical Center
Inspection Type: Routine, Announced
Inspection Date: 3/14/13

License No.: 18-C800
Priority: 2
Inspector: JH

File No.: 22

Licensee: University of Kansas Hospital Authority
Inspection Type: Routine, Announced
Inspection Date: 3/11/13

License No.: 18-C801
Priority: 2
Inspector: JW

File No.: 23

Licensee: Perf-Tech Wireline Services
Inspection Type: Routine, Announced
Inspection Date: 11/21/13

License No.: 27-B779
Priority: 3
Inspector: DL

File No.: 24

Licensee: Gemini Wireline, LLC
Inspection Type: Routine, Announced
Inspection Date: 11/20/13

License No.: 27-B928
Priority: 3
Inspector: DL

File No.: 25

Licensee: L-K Wireline, Inc.
Inspection Type: Routine, Announced
Inspection Date: 2/6/14

License No.: 27-C339-01
Priority: 3
Inspector: DL

INSPECTOR ACCOMPANIMENTS

The following inspector accompaniments were performed prior to the on-site IMPEP review:

Accompaniment No.: 1

Licensee: Bradken, Atchison/St. Joseph, Inc.

Inspection Type: Routine, Announced

Inspection Date: 5/5/14

License No.: 21-B092-01

Priority: 1

Inspector: DL

Accompaniment No.: 2

Licensee: DBI, Inc.

Inspection Type: Routine, Announced

Inspection Date: 5/6/14

License No.: 21-B805

Priority: 1

Inspector: AS

Accompaniment No.: 3

Licensee: Shawnee Mission Medical Center

Inspection Type: Routine, Announced

Inspection Date: 5/7/14

License No.: 19-C264-01

Priority: 2

Inspectors: JB, JW

APPENDIX D

LICENSE CASEWORK REVIEWS

NOTE: CASEWORK LISTED WITHOUT COMMENT IS INCLUDED FOR COMPLETENESS.

File No.: 1	
Licensee: Cardinal Health 414 LLC	License No.: 10-C956
Type of Action: New	Amendment No.: 0
Date Issued: 12/5/11	License Reviewer: JH

File No.: 2	
Licensee: Acuren Inspection Inc.	License No: 21-B126-01
Type of Action: Renewal	Amendment No.: 45
Date Issued: 4/22/14	License Reviewer: JW

File No.: 3	
Licensee: Cushing Memorial hospital St Luke's Health System	License No.: 19-B374-01
Type of Action: Amendment	Amendment No.: 29
Date Issued: 11/7/13	License Reviewer: AS

Comment: An authorized radiologist was added to the license without proper documentation regarding training, experience, and preceptor attestation.

File No.: 4	
Licensee: Coffeyville Resources Refining	License No.: 22-B097-01
Type of Action: Amendment	Amendment No.: 33
Date Issued: 5/15/12	License Reviewer: JH

File No.: 5	
Licensee: Como Tech Inspection Inc.	License No.: 21-B629-01
Type of Action: Renewal	Amendment No.: 19
Date Issued: 2/19/13	License Reviewer: JW

File No.: 6	
Licensee: Cotton O'Neil Clinic	License No.: 19-B550-01
Type of Action: Termination	Amendment No.: NA
Date Issued: 11/22/12	License Reviewer: JW

File No.: 7	
Licensee: Hays Medical Center St Anthony Campus	License No.: 19-B261-01
Type of Action: Amendment	Amendment No.: 62
Date Issued: 7/5/11	License Reviewer: JS

File No.: 8	
Licensee: Kansas State University	License No.: 38-C011-01
Type of Action: Amendment	Amendment No.: 76
Date Issued: 1/21/14	License Reviewer: JB

File No.: 9

Licensee: Lawrence Memorial Hospital

Type of Action: Amendment

Date Issued: 8/28/13

License No.: 12-B161-01

Amendment No.: 54

License Reviewer: JW

Comment: An authorized radiologist was added to the license without proper documentation regarding training, experience, and preceptor attestation.

File No.: 10

Licensee: Lead Testers, LLC

Type of Action: Amendment

Date Issued: 7/5/11

License No.: 22-B948

Amendment No.: 1

License Reviewer: JB

File No.: 11

Licensee: Mercy Regional Health Center, Inc.

Type of Action: Amendment

Date Issued: 2/8/13

License No.: 19-B528-01

Amendment No.: 1

License Reviewer: JW

Comment: An authorized radiologist was added to the license without proper documentation regarding training, experience, and preceptor attestation.

File No.: 12

Licensee: Mission Medvet

Type of Action: Termination

Date Issued: 1/29/13

License No.: 33-B729-01

Amendment No.: NA

License Reviewer: JB

File No.: 13

Licensee: Mitchell County Hospital

Type of Action: Renewal

Date Issued: 9/5/13

License No.: 19-B355-01

Amendment No.: 28

License Reviewer: JB

File No.: 14

Licensee: Quintiles Phase I Service, Inc.

Type of Action: Renewal

Date Issued: 6/20/11

License No.: 16-B678-01

Amendment No.: 13

License Reviewer: JB

File No.: 15

Licensee: Saint Luke's South Hospital

Type of Action: Amendment

Date Issued: 7/12/13

License No.: 19-B775

Amendment No.: 24

License Reviewer: JW

Comment: An authorized radiologist was added to the license without proper documentation regarding training, experience, and preceptor attestation.

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File No.: 16

Licensee: VCA Mission Animal Referral

Type of Action: Amendment

Date Issued: 4/11/14

License No.: 33-B965

Amendment No.: 1

License Reviewer: JH

File No.: 17

Licensee: West Central Kansas Association

Type of Action: New

Date Issued: 7/1/13

License No.: 12-B975

Amendment No.: 0

License Reviewer: JB

File No.: 18

Licensee: XCEL NDT LLC

Type of Action: Amendment

Date Issued: 5/15/14

License No.: 21-B980

Amendment No.: 2

License Reviewer: DL

File No.: 19

Licensee: Fort Hays State University

Type of Action: Amendment

Date Issued: 9/5/13

License No.: 31-B049-01

Amendment No.: 30

License Reviewer: JB

File No.: 20

Licensee: Wesley Medical Center LLC

Type of Action: Renewal

Date Issued: 8/8/13

License No.: 19-C041

Amendment No.: 76

License Reviewer: JH

APPENDIX E

INCIDENT CASEWORK REVIEWS

NOTE: CASEWORK LISTED WITHOUT COMMENT IS INCLUDED FOR COMPLETENESS.

File No.: 1

Licensee: Kansas Department of Transportation

Date of Incident: 9/23/10

Investigation Date: 10/12/10

License No.: 22-B315-01

NMED No.: 100509

Type of Incident: Lost RAM

Type of Investigation: Telephone

File No.: 2

Licensee: Frontier El Dorado Refining, LLC

Date of Incident: 2/25/11

Investigation Date: 2/25/11

License No.: 22-B145-01

NMED No.: 110161

Type of Incident: Equipment Failure

Type of Investigation: Telephone

File No.: 3

Licensee: Frontier El Dorado Refining, LLC

Date of Incident: 10/4/11

Investigation Date: 10/5/11

License No.: 22-B145-01

NMED No.: 110529

Type of Incident: Equipment Failure

Type of Investigation: Telephone

File No.: 4

Licensee: PFI, LLC

Date of Incident: 9/30/11

Investigation Date: 12/9/11

License No.: 10-C842-01

NMED No.: 110616

Type of Incident: Overexposure

Type of Investigation: Site

File No.: 5

Licensee: PETNET Solutions

Date of Incident: 2/22/12

Investigation Date: 3/21/12

License No.: 10-C814-01

NMED No.: N/A

Type of Incident: Equipment Failure

Type of Investigation: Telephone

File No.: 6

Licensee: St. Francis Health Center

Date of Incident: 1/23/13

Investigation Date: 1/23/13

License No.: 19-B272-04

NMED No.: 130067

Type of Incident: Transportation

Type of Investigation: Telephone

File No.: 7

Licensee: Frontier El Dorado Refining, LLC

Date of Incident: 4/3/13

Investigation Date: 4/3/13

License No.: 22-B145-01

NMED No.: 130167

Type of Incident: Equipment Failure

Type of Investigation: Telephone

File No.: 8

Licensee: Frontier El Dorado Refining, LLC

Date of Incident: 4/20/13

Investigation Date: 4/22/13

License No.: 22-B145-01

NMED No.: 130184

Type of Incident: Equipment Failure

Type of Investigation: Telephone

File No.: 9

Licensee: Coder X-ray Service

Date of Incident: 4/23/13

Investigation Date: 6/9/13

License No.: 21-B165-01

NMED No.: 130275

Type of Incident: Overexposure

Type of Investigation: Telephone

File No.: 10

Licensee: Coder X-ray Service

Date of Incident: 8/5/13

Investigation Date: 9/4/13

License No.: 21-B165-01

NMED No.: 130400

Type of Incident: Equipment Failure

Type of Investigation: Telephone

File No.: 11

Licensee: J and R Sand Company, Inc.

Date of Incident: 9/30/13

Investigation Date: 10/21/13

License No.: 22-B623-01

NMED No.: 130494

Type of Incident: Damaged Equipment

Type of Investigation: Telephone

File No.: 12

Licensee: St. Francis Health Center

Date of Incident: 10/31/13

Investigation Date: 11/1/13

License No.: 19-B272-04

NMED No.: 130521

Type of Incident: Overexposure

Type of Investigation: Telephone

File No.: 13

Licensee: DBI, Inc.

Date of Incident: 2/17/14

Investigation Date: 2/17/14

License No.: 21-B805-01

NMED No.: 140110

Type of Incident: Equipment Failure

Type of Investigation: Telephone

File No.: 14

Licensee: Pioneer Wireline Services

Date of Incident: 12/31/13

Investigation Date: 3/26/14

License No.: 27-B565-01

NMED No.: 140225

Type of Incident: Overexposure

Type of Investigation: Email

Comment: At the time of the review, an on-site investigation had not yet been performed by the State, in spite of evidence of a significant exposure to an untrained individual, and potential overexposures to members of the public.

ATTACHMENT

August 12, 2014 Letter from Thomas Conley
Kansas Response to the Draft Report
ADAMS Accession No.: ML14230A753

**Agenda for Management Review Board Meeting
September 4, 2014, 1:00 p.m. – 4:00 p.m. (ET), OWFN-17-B04**

1. Announcement of public meeting. Request for members of the public to indicate they are participating and their affiliation.
2. MRB Chair convenes meeting. Introduction of MRB members, review team members, State representatives and other participants.
3. Consideration of the Kansas IMPEP Report.
 - A. Presentation of Findings Regarding Kansas's Program and Discussion.
 - Technical Staffing and Training
 - Status of Materials Inspection Program
 - Technical Quality of Inspections
 - Technical Quality of Licensing Actions
 - Technical Quality of Incident and Allegation Activities
 - Compatibility Requirements
 - B. IMPEP Team Recommendations.
 - Recommendation for Adequacy and Compatibility Ratings
 - Recommendation for Next IMPEP Review
 - C. MRB Consultation/Comments on Issuance of Report.
4. Request for comments from Kansas representatives, OAS Liaison, and State IMPEP team members.
5. Adjournment.

Invitees: Michael Weber, DEDMRT
Bradley Jones, OGC
Brian Holian, FSME
Darrell Roberts, RIII
OAS Rep
Jim Lynch, RIII
Binesh Tharakan, RIV/RSOA
Scott Wilson, RI
Mark Light, OH

Laura Dudes, FSME
Pamela Henderson, FSME
Duncan White, FSME
Lisa Dimmick, FSME
Michelle Beardsley, FSME
Karen Meyer, FSME
Jack Foster, OEDO
Thomas Conley, KS
Thomas Langer, KS