



DEPARTMENT OF VETERANS AFFAIRS
Veterans Health Administration
National Radiation Safety Committee
National Health Physics Program
2200 Fort Roots Drive
North Little Rock, AR 72114

In Reply Refer To: 598/115HP/NLR

February 5, 2015

Kevin G. Null
Division of Nuclear Material Safety
Nuclear Regulatory Commission (NRC), Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

Re: NRC License No. 03-23853-01VA

Dear Mr. Null:

Per NRC License 03-23853-01 VA, Letter of Understanding, paragraph #11, we are notifying you of changes for the National Health Physics Program (NHPP) Director.

Effective January 9, 2015, through February 6, 2015, under our continuity of operations plan, Thomas E. Huston, Ph.D., served as interim Director of NHPP and served as the Radiation Control Program Officer and Executive Secretary, National Radiation Safety Committee.

Effective February 6, 2015, Craig L. Adams, M.P.H., is appointed as interim Director of NHPP and will serve as the Radiation Control Program Officer and Executive Secretary, National Radiation Safety Committee.

Both Dr. Huston and Mr. Adams are available at (501) 257-1571, if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Milton Gross".

Milton Gross, M.D.
Chair, National Radiation Safety Committee Program

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Nuclear Regulatory Commission (NRC), Region III
2443 Warrenville Road, Suite 210
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Re: NRC License No. 03-23853-01VA

Dear Mr. Null:

We request an amendment to the referenced license to incorporate the enclosed revision to Standard Operating Procedure (SOP) #4 for training of technical staff. The proposed revision is in response to a recommendation by NRC in its recent inspection report dated November 17, 2014, to the U.S. Department of Veterans Affairs. The revision and this amendment request were approved by the National Radiation Safety Committee at its meeting on February 4, 2015.

The revised SOP includes the following primary changes:

- Provides path, criteria, and process for VHA National Radiation Safety Committee (NRSC) to approve "equivalent training" for certain NRC courses,
- Provides for certain professional board certifications to be used as equivalent training for certain NRC courses,
- Updates reference to NRC Inspection Manual Chapter (IMC) 1248 vice 1246 throughout,
- Updates course names to match current NRC offerings,
- Removes NRC OSHA course (G-111), which has not been offered externally in many years and specifies an alternate approach,
- Removes NRC course G-304, which is no longer required in NRC IMC 1248, and
- Adds NRC material security course S-201, which is required by NRC IMC 1248.

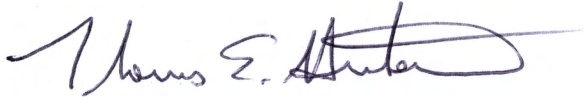
Page 2.

Kevin G. Null

We note that the enclosed SOP is provided in mark-up format. If this amendment is approved, we will remove the mark-ups and issue the procedure in a finalized format.

If you have any questions, please contact me at 501-257-1578 or Craig L. Adams, M.P.H., at 501-257-1573.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas E. Huston". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Thomas E. Huston, Ph.D., C.H.P.
Interim Director, National Health Physics Program

Enclosure

NHPP INSPECTOR/PERMIT REVIEWER QUALIFICATIONS

1. PURPOSE AND SCOPE

a. This standard operating procedure (SOP) establishes the training and qualification requirements for National Health Physics Program (NHPP) professional staff members who conduct permit reviews and/or permit inspections. These professional staff members function as permit reviewers and permit inspectors.

b. This SOP applies to all permitting and inspection actions under the Veterans Health Administration (VA) master materials license issued by the Nuclear Regulatory Commission (NRC).

2. POLICY

a. Permit reviewers and permit inspectors must understand the facilities, equipment, processes, and activities of the radiation safety programs they permit or inspect, as well as the criteria, techniques, and mechanics of permitting and inspection.

b. Permit reviewers and permit inspectors must complete the qualification process in this SOP. The process is based on NRC Inspection Manual Chapter ~~1246~~1248 and helps ensure that the individual permit reviewer or permit inspector has sufficient information and knowledge to conduct permitting and inspection actions that are technically correct and consistent with license conditions, applicable regulations, and VA policies and procedures.

(1) Permit reviewers and permit inspectors must complete the applicable training requirements described in Appendix A, Sections I and II. The training requirements include required initial training, core training, specialized training, supplemental training, and refresher training. The applicable training requirements are in addition to the training and experience required for selection as an NHPP professional staff member.

(2) Permit reviewers and permit inspectors must document training completion as described in Appendix B.

c. The National Radiation Safety Committee (NRSC) must provide oversight for the permit reviewer and permit inspector qualification process.

d. The Radiation Control Program Officer (RCPO) must direct the qualification process and provide recommendations for consideration by the NRSC.

e. The external assessment must evaluate staff qualification and training.

3. PROCEDURES - NRSC

a. Provide oversight for the permit reviewer and permit inspector qualification process.

b. Approve or disapprove RCPO recommendations for equivalent training, interim qualification, qualification, or recertification.

c. Recertify qualification for individual permit reviewers or permit inspectors at least annually.

d. Reevaluate interim qualification for individual permit reviewers or permit inspectors at least annually.

4. PROCEDURES - RCPO

- a. Direct the permit reviewer and permit inspector qualification process.
- b. Develop specific qualification journals for individual permit reviewers and permit inspectors based on prior training and experience with radioactive materials. Use the template in Appendix B to prepare an individual qualification journal. The RCPO may add additional formal training, self-study, and/or on-the-job training as deemed necessary to prepare the permit reviewer or permit inspector to function independently within NHPP.
- c. Complete annual management accompaniments for permit inspectors.
- d. Convene qualification boards to examine permit reviewers and permit inspectors. Retain signature authority to assess/approve the qualification journal entries and qualification.
- e. Make recommendations to the NRSC for equivalent training, qualification, interim qualification, and recertification for permit reviewers and permit inspectors.

5. PROCEDURES - PERMIT REVIEWER AND PERMIT INSPECTOR

- a. Initiate the qualification process as follows.
 - (1) Begin completion of the required initial training in Appendix A, Section I or Section II.
 - (2) Prepare, in consultation with the RCPO, a qualification journal and begin completion of the training elements.
 - (3) Register for, and attend, available NRC core training courses.
 - (4) Ensure training course certificates and other training documentation are placed in NHPP training files.
- b. Complete interim qualification as follows.
 - (1) Complete required initial training through self-study and/or on-the-job training.
 - (2) Complete accompanied inspections and initial permitting actions.
 - (3) Attend, and successfully complete, available NRC core training courses.
 - (4) Complete entries on qualification journal for training elements accomplished.
 - (5) Participate in, and complete, specialized training, supplemental training, and refresher training as outlined in the qualification journal or made available for permit reviewers and permit inspectors.
 - (6) Complete an oral qualification board.
 - (7) Ensure training course certificates and other training documentation are placed in NHPP training files.
- c. Complete qualification as follows.
 - (1) Function as permit reviewer and permit inspector as approved by NRSC to include annual management accompaniment for inspections.
 - (2) Attend, and successfully complete, available NRC core training courses or equivalent training.

- (3) Complete entries on qualification journal for training elements accomplished.
- (4) Participate in, and complete, specialized training, supplemental training, and refresher training as outlined in qualification journal or made available for permit reviewers and permit inspectors.
- (5) Complete an oral qualification board.
- (6) Ensure training course certificates and other training documentation are placed in NHPP training files.
- d. Maintain qualification as follows.
 - (1) Function as permit reviewer and permit inspector as approved by NRSC to include annual management accompaniment for inspections.
 - (2) Participate in, and complete, refresher training made available for permit reviewers and permit inspectors.
 - (3) Ensure training course certificates and other training documentation are placed in NHPP training files.

6. PROCEDURES - NRC CORE TRAINING COURSES

a. Attend the following NRC core training courses designated for permit reviewers and permit inspectors.

- (1) Advanced Health Physics ~~Technology~~ Course (H-201)
- (2) Diagnostic and Therapeutic Nuclear Medicine Course (H-304)
- (3) ~~Teletherapy and~~ Brachytherapy, Gamma Knife, and Emerging Technologies Course (H-313)
- (4) Licensing Practices and Procedures Course (G-109)
- (5) Transportation of Radioactive Materials Course (H-308)
- (6) Fundamentals of Inspection Course (G-101) or Inspection Procedures Course (G-108)
- (7) Root Cause/Incident Investigation Workshop (G-205)
- ~~(8) Inspecting for Performance Course, Materials Version (G-304)~~
- ~~(98) Effective Communications for Inspectors (OP)~~
- ~~(10) OSHA Indoctrination Course (G-111)~~
- (9) NRC Materials Control, Security Systems, & Principles (S-201)

b. Note that the following NRC core training courses are not required for permit reviewers and permit inspectors.

- (1) Safety Aspects of Industrial Radiography Course (H-305)
- (2) NMSS Radiation Worker Training (H-102) and Site Access Training (H-100)

7. PROCEDURES – EQUIVALENT TRAINING

a. Accept approval of an individual by a master materials licensee as an inspector or permit reviewer as a basis to have completed equivalent training of the NRC core training courses in paragraph 6. Such approval must include supporting documentation for the individual demonstrating the individual completed training equivalent to that outlined in Appendix B to this SOP.

b. For NRC core training course H-201 (Health Physics Technology Course), accept certification by the American Board of Health Physics; American Board of Science in Nuclear Medicine for Nuclear Medicine Physics and Instrumentation Specialty and the Radiation Protection Specialty; American Board of Medical Physics with special competence in Medical Health Physics; or American Board of Radiology for the Diagnostic Radiologic Physics, Nuclear Medical Physics, or Therapeutic Medical Physics Specialty as a basis to have completed equivalent training.

c. For NRC core training course H-304 (Diagnostic and Therapeutic Nuclear Medicine Course), accept certification by the American Board of Science in Nuclear Medicine for Nuclear Medicine Physics and Instrumentation Specialty; American Board of Radiology for the Diagnostic Radiologic Physics, Nuclear Medical Physics, or Therapeutic Medical Physics Specialty; or Nuclear Medicine Technology Certification Board as a basis to have completed equivalent training.

d. For NRC core training course H-313 (Brachytherapy and Gamma Knife Course), accept certification by the American Board of Radiology for the Diagnostic Radiologic Physics, Nuclear Medical Physics, or Therapeutic Medical Physics Specialty as a basis to have completed equivalent training.

e. Except as excluded in paragraph 7.f. below, NRSC may review and approve other equivalent training for NRC core training courses based on a review of the proposed course content as compared to the NRC course content to ensure the essential technical concepts are covered in adequate detail by the proposed equivalent course. Essential concepts not covered by the proposed alternate course must be supplemented by other documented training methods specifically approved by the NRSC. As examples of approaches for gaps in content, qualified inspectors or permit reviewers may provide supplemental training to the trainee through one-on-one documented instruction or mentoring, or the trainee may document gap training through self-study of specifically identified resources. In any case, the NRSC must approve the gap training, and such training must be documented.

f. Approval for equivalent training by NRSC will be excluded for the following NRC core training courses: G-101 (Fundamentals of Inspection Course), G-108 (Inspection Procedures Course), and G-109 (Licensing Practices and Procedures Course).

78. PROCEDURES - QUALIFICATION BOARDS

a. Ensure the qualification board has at least two members, one of whom is the RCPO.

b. Evaluate the completed entries on the qualification journal.

c. Determine the status of completing any pending NRC core training courses or equivalent training.

d. Interview the permit reviewer or permit inspector by asking questions related to all training elements in the qualification journal with emphasis on open-ended questions that allow the professional staff member to demonstrate a depth of knowledge and understanding of situations that require evaluation and interpretation of regulations, policies, and procedures. Avoid close-ended questions. Limit technical questions as a significant aspect of the qualification board.

e. Review the results of the qualification board with the permit reviewer or permit inspector.

f. Complete the recommendations section on the qualification journal for either qualification or interim qualification. State limitations or additional training elements, if interim qualification is recommended.

g. Provide a recommendation to the NRSC for qualification or interim qualification.

98. PROCEDURES - INTERIM QUALIFICATION

a. Use the following definition for interim qualification.

“Qualification of a permit reviewer or permit inspector to conduct independent permitting and inspection actions in specified areas pending completion of NRC core training courses or equivalent training. Requires successful completion of a qualification journal, qualification board, RCPO recommendation, and NRSC approval.”

b. Limit interim qualification for permit reviewers and permit inspectors to a period not to exceed 12 months without reevaluation and approval by NRSC. Ensure specific limitations are listed on the qualification journal.

c. Use the following requirements for permit reviewers.

(1) Complete all training elements on qualification journal, other than the NRC core training courses or equivalent training not available for attendance.

(2) Complete initial permit reviews with quality control checks by other permit reviewers.

(3) Evaluate permit reviewer's previous experience with radioactive materials and permitting activities.

(4) Complete qualification board.

(5) Provide for the following RCPO oversight: restrict reviews based on specific limitations, approve specific permit review assignments, and approve technical reviews, permits, and associated documentation.

d. Use the following requirements for permit inspectors.

(1) Complete all training elements on qualification journal, other than the NRC core training courses or equivalent training not available for attendance.

(2) Complete three accompanied inspections with at least one management accompaniment.

(3) Evaluate permit inspector's previous experience with radioactive materials and inspection activities.

(4) Complete qualification board.

(5) Provide for the following RCPO oversight: restrict inspections based on specific limitations, approve specific inspection assignments, review permit files with the inspector, approve inspection plan, and approve inspection reports, enforcement actions, and inspection records.

APPENDIX A

TRAINING ACTIVITIES

This appendix has two sections. Section I establishes the training and qualification requirements for professional staff members who complete permit reviews. This is the section for permit reviewers. Section II establishes the training and qualification requirements for professional staff members who conduct inspections. This is the section for permit inspectors.

The following acronyms are used in this appendix.

<u>FAQs</u>	<u>Frequently Asked Questions</u>
MML	Master Materials License
NHPP	National Health Physics Program
NRC	Nuclear Regulatory Commission
NRSC	National Radiation Safety Committee
RCPO	Radiation Control Protection Officer
SOP	Standard Operating Procedure
VA	Department of Veterans Affairs
VHA	Veterans Health Administration

SECTION I

TRAINING REQUIREMENTS - PERMIT REVIEWER

1. APPLICABILITY: The training described below is required for permit reviewers. Permit reviewers review, evaluate, and recommend appropriate actions or approvals for VA amendment requests or inquiries related to a permit issued under the VA MML ~~license~~.

2. TRAINING ACTIVITIES

a. Required Initial Training

(1) Self-study

(a) VA MML (including items incorporated into the MML by reference such as VA license application and supplements, NRSC charter and delegation of authority, VHA-NRC Letter of Understanding, and SOPs), NHPP procedural guidelines, lessons learned, frequently asked questions (FAQs), NHPP Web site,

(b) VHA ~~De~~irective 1105.01 or current number (Management of Radioactive Materials) and handbook,

(c) Applicable parts and sections of the Code of Federal Regulations, Titles 10, 21, and 49,

(d) Applicable NRC Web sites, Regulatory Guides, and other NRC documents,

(e) NRC licensing course handouts,

(f) Industry codes and standards,

(g) OSHA General Industry Training

(gh) Core performance indicators, NRSC files, and program assessment reports,

(hi) Permit control tracking systems, records repository, and other NHPP files and databases, and

(ij) Directed review of prior permitting actions.

(2) On-the-job training by completion of initial permitting actions with quality control review.

b. Core Training

Attendance and successful completion of NRC core training courses listed in SOP 4, paragraph 6a or equivalent training per SOP 4, paragraph 7.

c. Specialized Training

Additional required training beyond, and in addition to, required initial and core training that is based on evaluation of a permit reviewer's prior training and experience. Determined by RCPO on individual basis. Selected from courses in the NRC Inspection Manual, Chapter 12481246, and/or other available courses.

d. Supplemental Training

Additional required training beyond, and in addition to, required initial and core training that is based on evaluation of a permit reviewer's prior training and experience, possible permitting assignments,

and results of quality control evaluation of initial permitting actions. Determined by RCPO on individual basis.

e. Refresher Training

(1) Periodic training provided during NHPP professional staff meetings to address and review permitting actions with emphasis on the following:

- (a) Lessons learned and frequently asked questions,
- (b) Significant permitting actions,
- (c) Benchmarking to industry codes and standards and professional standards of practice, and,
- (d) Benchmarking to NRC updates or program changes.

(2) Attendance at NRC refresher courses such as H-401 or other courses identified in MC NRC Inspection Manual Chapter 1248, Appendix A, 1246 for permit reviewers.

SECTION II

TRAINING REQUIREMENTS - PERMIT INSPECTOR

1. APPLICABILITY: The training described below is required for permit inspectors. Permit inspectors conduct routine, reactive, and other inspections at VA medical facilities that hold permits issued under the MML.

2. TRAINING ACTIVITIES

a. Required Initial Training

(1) Self-study

(a) VA MML (including items incorporated into the MML by reference such as VA license application and supplements, NRSC charter and delegation of authority, VHA-NRC Letter of Understanding, and SOPs), NHPP procedural guidelines, lessons learned, frequently asked questions (FAQs), NHPP Web site,

(b) VHA dDirective 1105.01 or current number (Management of Radioactive Materials) and handbook,

(c) Applicable parts and sections of the Code of Federal Regulations, Titles 10, 21, and 49, and 261,

(d) Applicable NRC Web sites, Regulatory Guides, and other NRC documents,

(e) NRC inspection course handouts,

(f) Industry codes and standards,

(g) Core performance indicators, NRSC files, and program assessment reports,

(h) Permit control tracking systems, records repository, and other NHPP files and databases, and

(i) Directed review of prior inspection actions.

(2) On-the-job training by completion of three accompanied inspections with at least one management accompaniment.

b. Core Training

Attendance and successful completion of, NRC core training courses listed in SOP 4, paragraph 6a.

c. Specialized Training

Additional required training beyond, and in addition to, required initial and core training that is based on evaluation of a permit inspector's prior training and experience. Determined by RCPO on individual basis. Selected from courses in the NRC Inspection Manual, Chapter 1246, and/or other available courses.

d. Supplemental Training

Additional required training beyond, and in addition to, required initial and core training that is based on evaluation of a permit inspector's prior training and experience, possible inspection assignments, and results of accompanied inspection. Determined by RCPO on individual basis.

e. Refresher Training

(1) Periodic training provided during NHPP professional staff meetings to address and review inspection actions with emphasis on the following.

- (a) Lessons learned and frequently asked questions,
- (b) Significant inspection and enforcement actions,
- (c) Benchmarking to industry codes and standards and professional standards of practice, and
- (d) Benchmarking to NRC updates or program changes.

(2) Attendance at NRC refresher courses such as H-401 or other courses identified in MC NRC Inspection Manual Chapter 1248, Appendix B, 1246 for permit inspectors.

APPENDIX B

QUALIFICATION JOURNALS

This appendix has two qualification journals. The first qualification journal is for professional staff members who complete permit reviews. The second qualification journal is for professional staff members who conduct permit inspections.

The following acronyms are used in this appendix.

NHPP	National Health Physics Program
NRC	Nuclear Regulatory Commission
NRSC	National Radiation Safety Committee
RCPO	Radiation Control Protection Officer
SOP	Standard Operating Procedure
VA	Department of Veterans Affairs
VHA	Veterans Health Administration

The permit reviewer or permit inspector completes the column “completion date initials” to document completion of the individual training elements. The RCPO completes the column “assessment date initials” to document assessment of the training element. The RCPO completes the recommendation section below the table.

The qualification journal must be completed for initial or interim qualification. A new journal must be completed to document qualification for a permit reviewer or permit inspector who was previously in the interim qualification status.

PERMIT REVIEWER QUALIFICATION JOURNAL

Permit reviewer: *(list name)*

Training Element	Completion Date Initials	Assessment Date Initials
Required Initial Training		
VA <u>MML (including items incorporated by reference)</u> <u>license application, SOPs, NHPP procedural</u> <u>guidelines, lessons learned, FAQs, Web site</u>		
VHA <u>Directive 1105.01 (or current number) and</u> <u>handbook</u>		
Code of Federal Regulations		
NRC information and licensing course handouts		
Industry codes and standards		
<u>OSHA General Industry Training</u>		
Core performance indicators, NRSC files		
Tracking systems, records repository, and databases		
Review of permitting actions		
On-the-job training with quality control reviews		
Core Training		
G-109 licensing		
<u>G-111 OSHA</u>		
G-205 root cause/ <u>incident investigation</u>		
H-201 <u>advanced</u> health physics		
H-304 nuclear medicine		
H-308 transportation		
H-313 <u>teletherapy and</u> brachytherapy <u>and gamma knife</u>		
<u>S-201 materials control and security</u>		
Specialized Training		
<i>(determined by RCPO)</i>		
Supplemental Training		
<i>(determined by RCPO)</i>		
Refresher Training		
<i>(determined by RCPO)</i>		
Qualification Board		
<i>(determined by RCPO)</i>		

Recommendation:

☐ Qualified

☐

Interim qualification with limitations listed below

RCPO (printed name, signature, and date)

PERMIT INSPECTOR QUALIFICATION JOURNAL

Permit reviewer: *(list name)*

Training Element	Completion Date Initials	Assessment Date Initials
Required Initial Training		
VA <u>MML (including items incorporated by reference), license application, SOPs, NHPP procedural guidelines, lessons learned, FAQs, Web site</u>		
VHA <u>Directive 1105.01 (or current number) and handbook</u>		
Code of Federal Regulations		
NRC information and inspection course handouts		
Industry codes and standards		
<u>OSHA general Industry Training</u>		
Core performance indicators, NRSC files		
Tracking systems, records repository, and databases		
Review of inspections and enforcement actions		
Accompanied inspections - 3		
Core Training		
G-101 or 108 inspections		
<u>G-111 OSHA</u>		
G-205 root cause/ <u>incident investigation</u>		
<u>G-304 inspecting for performance</u>		
H-201 health physics		
H-304 nuclear medicine		
H-308 transportation		
H-313 brachytherapy <u>and gamma knife</u>		
<u>S-201 materials control and security</u>		
OP <u>effective communication for inspectors</u>		
Specialized Training		
<i>(determined by RCPO)</i>		
Supplemental Training		
<i>(determined by RCPO)</i>		
Refresher Training		
<i>(determined by RCPO)</i>		
Qualification Board		
<i>(determined by RCPO)</i>		

Recommendation:

☐ Qualified

☐

Interim qualification with limitations listed below

RCPO (printed name, signature, and date)

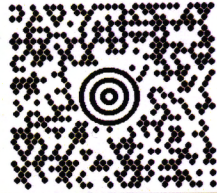
CALVIN KIDWELL
501-257-1571
VHA NATIONAL HEALTH PHYSICS PR
2200 FT ROOTS DR B101 R208D
NORTH LITTLE ROCK AR 72114

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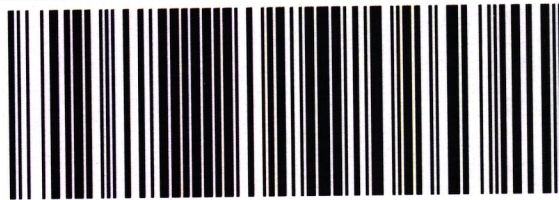
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SHIP TO:

KEVIN G. NULL
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LISLE IL 60532-4352

**IL 603 9-03****UPS NEXT DAY AIR**

TRACKING #: 1Z A47 7F5 24 9645 9375

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BILLING: P/P
SIGNATURE REQUIRED

Reference # 1: CK

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