

GEORGIA AGREEMENT STATE PROGRAM
INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM
QUESTIONNAIRE REPORT
February 11, 2014 to May 13, 2016

A. GENERAL

1. The Georgia Agreement State Program ("the Program") after undergoing a complete programmatic overhaul has during this review period has addressed the previous Integrated Materials Performance Evaluation Program (IMPEP) findings. The Program identified two additional findings throughout the review period that have been addressed and are reviewed on a quarterly basis. The Program Improvement Plan (PIP) summarizes the status of these items in Enclosure (1).

B. COMMON PERFORMANCE INDICATORS

I. Technical Staffing and Training

2. The Program's organizational structure is provided in Enclosure 2(a) & 2(b). This highlights all positions from the associates in the Program up to the Governor.
3. Management oversees both the Radioactive Materials Program (RMP) and the Environmental Radiation Program (ERP). Both Programs have a Team Leader to assist management in ensuring the proper functions of their respective Programs. ERP members assist the RMP with Incidents & Allegations reviews, conducting inspections, providing additional training, calibrations and reciprocity approvals in addition to Emergency Response duties. Dedicated RMP members are responsible for full time licensing and inspection duties. A small percentage of time is allotted for emergency response since they all are required to take part in incident or allegation response. The Program also partakes in nuclear power plant emergency planning drills. Enclosure (3) lists a breakdown of staff members' responsibilities by full-time equivalent percent.
4. The Program hired a number of new staff during the latest review period. One staff member was hired during the previous IMPEP review period and is close to becoming a fully qualified License Reviewer and Inspector. Enclosure (4) lists the requested information on each new staff member.
5. The Program hired a number of new staff during the latest review period. One staff member was hired during the previous IMPEP review period and is close to becoming a fully qualified License Reviewer and Inspector. Enclosure (4) lists those individuals, the courses they still require, and estimated dates for completing the qualification process.
6. The Program implemented a formal training and qualification process in June 2013. Any staff members hired after this date are subject to its requirements. The qualification journal and training manuals were modeled after the Nuclear Regulatory Commission's (NRC) Inspection Manual Chapter (IMC) 1248. The new policy requires extensive training and experience before

an individual becomes fully qualified. This procedure was revised in March 2015. Revisions included methods for Expedited Qualification and Interim Qualification. Clarification was added to address credit for completing certain inspections (i.e., completing a Multi-Use Medical Facility that includes an HDR while giving credit for completing HDR in its own individual modality).

7. The previous Program Manager, David Crowley left the Program on 10-11-2014. The following Specialists and their departure dates are as follows:
 Jenna Odom, 2-16-2015
 Eric Jameson, 7-31-2015
 Kit Ramdeen, 9-1-2015
 Show-Hwa Fong, 2-25-2016

8. As of April 1, 2016, the Program has no vacant positions.

9. No oversight committee or board works in association with the Program.

II. Status of Materials Inspection Program

10. The Program schedules all inspections at the periodicity specified in IMC 2800. Enclosure (5) shows the different inspection codes and frequencies utilized.

11. February 11, 2014 - December 31, 2014 Routine Inspections Completed:

Priority 1	Priority 2	Priority 3	Initial
6	15	24	15

January 1, 2015 - December 31, 2015 Routine Inspections Completed:

Priority 1	Priority 2	Priority 3	Initial
7	21	27	8

2016 Routine Inspections Completed To Date:

Priority 1	Priority 2	Priority 3	Initial
3	6	9	4

12. Enclosure (6) (a)-(c) identifies all the priority 1-3 and initial inspections conducted over the recent review period. Those conducted overdue will have a positive number of days under item "Overdue." If the inspection was conducted beyond acceptable scheduling tolerances (as outlined in IMC 2800), then the section will be highlighted in light red.
13. Currently the Program has no overdue priority 1-3 and initial inspections beyond the acceptable scheduling tolerances.

14. 2014 Reciprocity Inspections Completed:

Reciprocity Candidates	Inspections Completed
48	7

2015 Reciprocity Inspections Completed:

Reciprocity Candidates	Inspections Completed
22	2

For 2016 (as of April 8, 2016):

Reciprocity Candidates	Inspections Completed
20	1

III. Technical Quality of Inspections

15. In August 2015 the Inspection Procedures were revised. A copy of the revised procedures is included in Enclosure (10). Pages 35-36 of the enclosure details the revisions made.
16. Enclosure (7) lists all supervisory accompaniments made during the latest review period.
17. The Program inspectors primarily utilize a Bicron Surveyor 2000E pancake Geiger Muller (PGM). These are calibrated by an approved entity or by the manufacturer at the required calibration frequencies. Other devices include Ludlum NaI detectors, one Eberline RO-28 ion chamber, 16 pocket dosimeters, and 10 alarming rate meters.

In addition to instruments maintained by the Program, the Environmental Radiation Program maintains additional devices and capabilities. They have a mobile laboratory that contains a liquid scintillator counter, high purity germanium detectors, and gas proportional alpha/beta counters. With these they provide technical and laboratory assistance to the Program's inspectors when samples require further analysis as well as accompany the inspector when needed and provide assistance in decommissioning activities.

Enclosure (8) provides a list of all instrumentation and calibration dates. There were no issues throughout the review period with maintaining a sufficient amount of calibrated instruments. At this time, instrumentation for both the Environmental Radiation Program and Radioactive Materials Program are scheduled for calibration. Both Programs maintain calibrated instrumentation to fulfill their respective job duties while the instrumentation requiring calibration is being sent for re-calibrations. The Environmental Radiation Program maintains instrument calibrations.

IV. Technical Quality of Licensing Actions

18. The Program currently regulates 445 specific licensees.

19. One complex decommissioning was completed during this review period. This was actually an item that was initiated in 2003, Imerys Kaolin, Inc. (GA 903-1) and was noted on the previous IMPEP Report for Georgia. The licensee is authorized for naturally occurring radioactive material (NORM) that concentrates during the filtration of kaolin on certain devices. During this review period this license action was reviewed, peer reviewed and the decommissioning of the site was approved.
20. No exemptions from policies, procedures or regulations were granted during the review period.
21. Licensing Procedures were revised in September of 2015 and again in October of 2015. These revisions are included in Enclosures (11) & (12). Pages 33-34 of Enclosure (11) details the changes made in September and Pages 32-33 of Enclosure (12) details the changes made in October.
22. There is one renewal that has been in-house for more than one year. Enclosure (9) provides additional details.

V. Technical Quality of Incident and Allegation Activities

23. The Program submitted all reportable events known to the NRC. There are no additional reportable events not previously submitted.
24. The Program revised its incident and allegation procedures in July 2013. The new version parallels the NRC's procedure, SA-300, for reporting material events. The procedure highlights the responsibilities for all staff members from collecting initial details, to responding to incidents, and reporting requirements.

An event tracking system used within the department was configured in early 2013 to accommodate the Program's needs, and staff members utilize this complaint tracking system (CTS) for recording all details pertaining to incidents and allegations.

No revision to this Procedure has been made since its implementation. A review and revision is planned for mid-2016 to detail: Team Leader, Management reviews and approvals of investigations of Incidents and Allegations, New NMED Template Form for NMED/HOO submissions, Quality Control process and documentation of the Incident/Allegation in the licensee physical file.

C. **NON-COMMON PERFORMANCE INDICATORS**

I. Compatibility Requirements

25. Legislation affecting the Program includes the Official Code of Georgia (O.C.G.A) 31 -13 which is the Georgia Radiation Control Act; this has not been amended in reference to the materials program since 1990.
26. The Program regulations are not subject to "Sunset" laws and are not set to expire at any given date.

27. Georgia Board of Natural Resources is scheduled to approve Chapter 391-3-17 for its latest version in April 2016; these were forwarded to the NRC for final compatibility review on July 28, 2015 and again on November 30, 2015. The changes addressed the following regulation amendments (RATS IDs): 2011-1 & 2013-1.

Regulation changes pertaining to RATS ID: 2013-2 is targeted to be addressed in the next set of rule changes scheduled to be submitted to the NRC for review in June-July 2016. The Program will incorporate newer RATS ID items in subsequent revisions.

Georgia's State Regulation Status (SRS) spreadsheet appears up to date and in order (copy received, December 15, 2015 and as referenced at: https://scp.nrc.gov/special/regs/ga_srschart.pdf)

28. As stated in question 27 RATS ID: 2013-2 will be sent to the NRC for review in June – July 2016, at the time of this IMPEP, Georgia will have adopted all rule revisions within three years from the date of NRC rule promulgation. The rulemaking process in Georgia requires an allotted time for Board review and public comment. This can delay things, but it usually only adds six to eight months from when the Program staff finish rule preparation. From start to finish, a rule change should take less than a year by current Georgia rulemaking processes.

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

29. Not applicable.

30. Not applicable.

III. Low-level Radioactive Waste Disposal Program

31. Not applicable.

IV. Uranium Recovery Program

32. Not applicable.

List of Enclosures (As of 10 January 2014):

- Enclosure (1) – Performance Improvement Plan (PIP)
- Enclosure (2) (a) – Organizational Chart
- Enclosure (2) (b) – Organizational Chart
- Enclosure (3) – Staffing Plan
- Enclosure (4) – New Hires and Qualification Status
- Enclosure (5) – Inspection Priorities
- Enclosure (6) (a) – Inspection Statistics
- Enclosure (6) (b) – Inspection Statistics
- Enclosure (6) (c) – Inspection Statistics
- Enclosure (7) – Supervised Inspections
- Enclosure (8) – Instrumentation List
- Enclosure (9) – Outstanding Renewals
- Enclosure (10) – Revised Inspection Procedures 8/2015
- Enclosure (11) – Revised Inspection Procedures 9/2015
- Enclosure (12) – Revised Inspection Procedures 10/2015