



**State of Louisiana**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**OFFICE OF ENVIRONMENTAL COMPLIANCE**

July 6, 2016

Paul Michalak, Acting Chief  
Agreement State Programs Branch  
Division of Material Safety, State, Tribal and  
Rulemaking Programs  
Office of Nuclear Material Safety and Safeguards  
US Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

RE: Response to IMPEP Review

Dear Mr. Michalak:

We have received the copy of the 2016 IMPEP draft report that you provided. We reviewed the report and thank you for the opportunity to comment prior to your submitting the report to the Management Review Board. We appreciate what an arduous task it was for the IMPEP team to review four years of documentation for an entire state program.

First, please correct the following errors in the report: on page 6, in section 3.3.b, the second paragraph has an incorrect date for the inspector accompaniments. Please change April 25 through 28, 2016 to March 21-24, 2016. Minor typographical errors were found on page 5, section 3.2.a, line 3 "Louisianan's" and on page 9, section 3.5.c, line 3 "makes."

We agree with and appreciate the suggestion to close the three recommendations from the 2012 IMPEP review. Over the past four years we focused on accuracy and consistency to generate higher quality licensing documents from our licensing group, and we did a comprehensive revamping of our SS&D process to properly align ourselves with the NRC. We now adhere to the document format and content guidance in the current version of NUREG-1556, Volume 3, and have all active SS&D commitments located and readily accessible.

With regard to Section 3.1 Technical Staffing and Training, we conducted a salary survey of similar positions in surrounding states and found that the starting salary for a radiation inspector or license writer in Louisiana was anywhere from 13-73% less than in nearby states. The executive staff members at LDEQ are currently exploring their available options for increasing the salary for Radiation Section employees.

We are implementing strategies to expedite the training of our radiation inspectors by training them to perform some RAM inspections before they are completely finished with all their training on the various types of x-ray inspections. This dual training track for the newer inspectors will enable us to complete more RAM inspections timely and meet our commitments to the NRC and our state legislature.

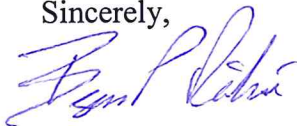
In response to the recommendation in Section 3.4 Technical Quality of Licensing Actions, we have held several meetings with our records management staff members and an attorney in our Legal Division. We are determining a means for identifying, marking, properly handling, controlling access to, transmitting, and storing documents that contain sensitive information, while at the same time remaining compliant with Louisiana's open records laws. We have a meeting scheduled with our executive staff later this week to receive their decision and begin implementing it. The Radiation Section has also acquired a stand-alone computer that is not connected to our intranet computer network. We will store sensitive documents on it for increased security and access to this computer will be limited to a minimal number of Radiation Section employees.

The recommendation in Section 3.5 Technical Quality of Incident and Allegation Activities was to develop and implement a comprehensive incident and allegation procedure, provide incident and allegations training to the staff, and ensure adequate management supervision in the incident and allegation program. This recommendation is being addressed as follows. We have developed a new comprehensive procedure for handling incidents and allegations, which incorporates augmented supervisory oversight. We have a training session on incidents and allegations scheduled during our semiannual staff meeting on July 19, 2016.

Please clarify the language in Section 3.5.d Results, "and lack of management coordination and involvement in the incidents and allegations process..." Management is very involved in this process and is apprised of and consulted on all investigations of incidents and allegations from receipt through conclusion. The senior radiation staff members who primarily receive these incidents and allegations are exceedingly conscientious about informing management of their activities and responses.

We understand the Management Review Board will make a final determination at their July 21, 2016 meeting. I look forward to attending this meeting and appreciate the NRC providing travel expenses. Please feel free to contact Judith A. Schuerman, Ph.D., at 225-219-3634 to make further arrangements for travel to the meeting or for teleconferencing.

Sincerely,



Bryan P. Riche, Administrator  
Assessment Division

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