

MONITORING CALL SUMMARY FOR THE ARKANSAS DEPARTMENT OF HEALTH

U.S. Nuclear Regulatory Commission (NRC) Attendees	Arkansas Radiation Control Program Attendees
Randy Erickson, RSAO, Region IV	Bernard Bevill, Chief Radiation Control Section
Jackie Cook, RSAO, Region IV	Jared Thompson, Manager Radiation Control Program
Robert Johnson, NMSS	Angie Hall, Health Physicist
Lizette Roldan-Otero, NMSS	David Stephens, Health Physicist
Michelle Beardsley, NMSS	Christopher Talley, Health Physicist

Background:

On June 27, 2018, NRC held the first Monitoring call with the Arkansas Radiation Control Program (the Program) following the 2017 IMPEP review (ML18054A662). The review was held the week of November 27 to December 1, 2017 in Little Rock, Arkansas.

The team recommended and the Management Review Board (MRB) agreed that Arkansas's performance was satisfactory for five indicators, Technical Staffing and Training, Status of Materials Inspection Program, Technical Quality of Inspections, Technical Quality of Incident and Allegation Activities, and Compatibility Requirements, and unsatisfactory for the indicator Technical Quality of Licensing Actions. Four recommendations were made for the Program and three recommendations from the 2013 IMPEP review were closed. The team also recommended, and the MRB agreed, that the Arkansas Agreement State Program be considered adequate to protect public health and safety, but needs improvement, and compatible with the NRC's program; and, that a period of Monitoring be initiated.

On September 25, 2018, NRC held the second Monitoring call with the Arkansas Program. The purpose of this call was to receive updated information from the Program regarding their progress in completing the recommendations identified during the 2017 IMPEP review; and, to show the Program's sustained performance in each of these areas.

On January 31, 2019, NRC held the third and final Monitoring call with the Arkansas Program. The purpose of this call was to receive final updated information from the Program regarding their progress in completing the recommendations identified during the 2017 IMPEP review; and, to show the Program's sustained performance in each of these areas.

Recommendation 1:

Arkansas should provide additional training with regard to the implementation of the Pre-Licensing guidance to ensure that staff understand how to properly identify unknown applicants and transfer of control requests, when completing the evaluation of the basis for confidence.

Status on June 27, 2018: The Program reported that in January 2018, they conducted training for all staff on the pre-licensing guidance to include the checklist, and made certain that all staff had a common understanding about each of the checklist items and what was expected when filling it out. The Program Manager then reviews all completed pre-licensing checklists to ensure they were used correctly.

Status on September 25, 2018: The Program reported that since the last call, the staff attended the latest webinar on the new pre-licensing guidance. They are also in the process of updating their procedure to include the requirements for the updated pre-licensing guidance. As of the date of the call, the procedure had not yet been updated, although they are using the new guidance.

Status on January 31, 2019: The Program reported that since the last call, the staff continues to work on updating their procedures to incorporate the requirements of the latest updated pre-licensing guidance. As of the date of the call, the procedure had not yet been updated. While the revised procedures have not been completed, they continue to use the new guidance.

Recommendation 2:

Arkansas should revise its procedures to ensure that the qualifications of preceptors are properly verified to attest to the training for new authorized users, authorized medical physicists, or radiation safety officers that are to be added to the licenses.

Status on June 27, 2018: The Program reported that in January 2018, they revised their procedures to ensure that the qualifications of preceptors are properly verified to attest to the training for new authorized users, authorized medical physicists, or radiation safety officers that are to be added to the licenses. A reviewer's form was developed to aid in ensuring that all qualifications are reviewed, including the preceptor, when amending a license. Lastly, the Program Manager reviews and confirms preceptor verifications when signing amended licenses.

Status on September 25, 2018: The Program reported there have been no changes since the June call. They continue to demonstrate sustained performance in this area as they continue to follow the process and procedures they established to meet the requirements of the recommendation.

Status on January 31, 2019: The Program reported there have been no changes since the September call. They continue to demonstrate sustained performance in this area as they continue to follow the process and procedures they established to meet the requirements of the recommendation.

Recommendation 3:

Arkansas should verify that all previously approved authorized users, authorized medical physicists, and radiation safety officers, where the preceptor is not listed on an Arkansas license, and were properly qualified to act as a preceptor.

Status on June 27, 2018: The Program reported that they began this review immediately following the 2017 IMPEP. They identified 86 medical licenses and completed a 100 percent review of those. The review identified 13 licenses where the Program had not previously verified that out-of-state preceptors were qualified to act as a preceptors. The Program then verified that the preceptors of the 13 licenses were qualified at the time they were acting as a preceptor. The Program completed their review on February 2, 2018.

Status on September 25, 2018: The Program reported there have been no changes since the June call. They continue to demonstrate sustained performance in this area as the review noted in the recommendation has been completed. No additional licensees have been identified.

Status on January 31, 2019: The Program reported there have been no changes since the September call. They continue to demonstrate sustained performance in this area as the review noted in the recommendation has been completed. No additional licensees have been identified.

Recommendation 4:

Arkansas should establish a quality control/quality assurance process or similar tool to help improve the thoroughness, completeness, and consistency of the license reviews, as well as to ensure license reviews are of acceptable technical quality with health, safety, and security properly addressed, and that licensing requests are properly signed before taking any action on a proposed request.

Status on June 27, 2018: The Program reported they developed a quality improvement program to smart sample all future licensing actions. They developed their audit program using the NRC Region IV licensing audit program as a template. They will use a checklist to audit a minimum of two actions by each reviewer quarterly. Selections are based on risk significant licensing actions performed. The first quarterly audit began in April 2018 with the next one scheduled for July 2018.

Status on September 25, 2018: The Program reported they completed their second quarterly audit. They identified a few typos and small wording problems, but nothing significant. They found the issues identified were random. They found no consistent problems. One issue they noted involved licensee to licensee materials transfers. They reported they were going to follow up and ensure that all are properly authorized. Otherwise, they continue to perform audits quarterly and demonstrate sustained performance in this area.

Status on January 31, 2019: The Program reported they continue to complete quarterly audits. One was completed in July 2018, October 2018 and January 2019. They identified minor inconsistencies and also some typos, but nothing significant. They found the issues identified were random. They found no consistent problems. They continue to perform audits quarterly and demonstrate sustained performance in this area.

Additional Items Discussed:

As of the date of the June 27, 2018 call, the Program had not been able to hire a qualified individual to fill the vacant position noted during the 2017 IMPEP review. Subsequent to the call, the Program has been able to hire a new staff member who will start with the Program on July 30, 2018.

As of the September 25, 2018 call, the individual hired remains with the program and is working his way through the training program.

During the January 31, 2019 call, the Program reported that senior management directed them to reassign and realign primary work duties. Instead of every person conducting inspections

and licensing actions, they now have one individual primarily assigned to licensing, two primarily assigned to inspections, and one individual in training. While these individuals now have a primary job assignment, they are able to be used as needed across the program.

The Program remains fully staffed.

This was the last scheduled Monitoring call prior to the follow-up IMPEP review scheduled for May 21-23, 2019.

/RA/

Randy Erickson
Regional State Agreements Officer
Region IV

SUBJECT: Arkansas Monitoring Conference Call Summary, September 25, 2018

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