



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 E LAMAR BLVD
ARLINGTON, TX 76011-4511

January 23, 2020

Ashley Forbes, MC 233
Director, Radioactive Materials Division
Office of Waste
Texas Commission on Environmental Quality (TCEQ)
P.O. Box 13087
Austin, TX 78711-3087

Dear Ms. Forbes:

In order to help the Agreement States and the U.S. Nuclear Regulatory Commission (NRC) remain knowledgeable of each other's program, the NRC conducts one-day periodic meetings with Agreement States between IMPEP reviews. This letter confirms that, through previous coordination, the meeting has been scheduled for February 20, 2020, and will be held in your offices. The meeting will be conducted in accordance with Office of Federal and State Materials and Environmental Management Programs Procedure SA-116, *Periodic Meetings Between IMPEP Reviews*. Please note that a separate meeting will be held with the Texas Department of State Health Services (DHS) on February 21, 2020.

The likely topics for discussion at this meeting are listed in the enclosed agenda. If there are any additional specific topics you would like to cover, or if you would like to focus on a specific area, please let me know. If you have any questions, please contact me at (817) 200-1132 or via e-mail at jackie.cook@nrc.gov.

Sincerely,

/RA/

Jacqueline D. Cook
Regional State Agreements Officer
Division of Nuclear Materials Safety

Enclosure:
Agenda for February 20, 2020
Periodic Meeting with Texas (TCEQ)

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ML20024D657***Signed Via E-mail**

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OFFICE	RIV:RSAO							
NAME	JCook							
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DATE	01/23/2020							

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Agenda for Periodic Meeting with the Texas Commission on Environmental Quality February 20, 2020

Topic areas for discussion during the meeting may include:

1. Program challenges.
2. Program reorganizations.
3. Changes in program budget/funding.
4. Status of the State's program, including:
 - a. Low-Level Radioactive Waste Disposal Program (LLRW) Technical Staffing and Training (2018 IMPEP Rating: Satisfactory)
 - Number of staff in the program and status of their training and qualifications.
 - Any program vacancies.
 - Staff turnover since the last IMPEP review.
 - Adequacy of FTEs for the LLRW program.
 - Status of implementation of IMC 1248.

Recommendation 3: *Texas should review and update the recently developed formal training and qualification program to identify the training needs of the LLRW program and ensure it meets the essential objectives of IMC 1248 and apply it to staff currently going through the qualification process.*

- b. LLRW Status of the Materials Inspection Program (2018 IMPEP Rating: Satisfactory)
 - Number of inspections performed overdue since the last IMPEP review.
 - Number of inspections currently overdue.
 - Number of initial inspections completed on time and overdue since the last IMPEP review.

Recommendation 4: *Texas should revise its LLRW program inspection procedures to specify that inspection results will be communicated to licensees within 30 days of the completion of an inspection. Additionally,*

Texas should ensure that future inspection results are sent to licensees within 30 days of the completion of an inspection.

c. LLRW Technical Quality of Inspections (2018 IMPEP Rating: Satisfactory)

- Status of inspector accompaniments.
- Management review process.
- Significant inspection activities/challenges.

d. LLRW Technical Quality of Licensing (2018 IMPEP Rating: Satisfactory)

- Number of licensing actions and types performed since the last IMPEP review.

Recommendation 5: *Texas should provide training to its staff on the newly revised licensing standard operating procedures to ensure consistency in LLRW licensing actions.*

e. LLRW Technical Quality of Incidents and Allegations (2018 IMPEP Rating: Satisfactory)

- Status of allegations and concerns referred by the NRC for action.
- Significant events and generic implications.
- Event reporting, including follow-up and closure information in NMED.

f. Uranium Recovery Program (UR) Technical Staffing and Training (2018 IMPEP Rating: Satisfactory, but needs improvement)

- Number of staff in the program and status of their training and qualifications.
- Any program vacancies.
- Staff turnover since the last IMPEP review.
- Adequacy of FTEs for the UR program.
- Status of implementation of IMC 1248.

Recommendation 3: *Texas should review and update the recently developed formal training and qualification program to identify the training needs of the UR program and ensure it meets the essential objectives of*

IMC 1248 and apply it to staff currently going through the qualification process.

- g. UR Status of the Inspection Program (2018 IMPEP Rating: Satisfactory, but needs improvement)
- Number of inspections performed overdue since the last IMPEP review.
 - Number of inspections currently overdue.
 - Number of initial inspections completed on time and overdue since the last IMPEP review.

Recommendation 4: *Texas should revise its UR program inspection procedures to specify that inspection results will be communicated to licensees within 30 days of the completion of an inspection. Additionally, Texas should ensure that future inspection results are sent to licensees within 30 days of the completion of an inspection.*

- h. UR Technical Quality of Inspections (2018 IMPEP Rating: Satisfactory, but needs improvement)
- Status of inspector accompaniments.
 - Management review process.
 - Significant inspection activities/challenges.
- i. UR Technical Quality of Licensing (2018 IMPEP Rating: Satisfactory, but needs improvement)
- Number of licensing actions and types performed since the last IMPEP review.

Recommendation 5: *Texas should provide training to its staff on the newly revised licensing standard operating procedures to ensure consistency in UR licensing actions.*

- j. UR Technical Quality of Incidents and Allegations (2018 IMPEP Rating: Satisfactory, but needs improvement)
- Status of allegations and concerns referred by the NRC for action.
 - Significant events and generic implications.
 - Event reporting, including follow-up and closure information in NMED.

5. Information exchange and discussion:
 - a. Current State initiatives.
 - b. Emerging technologies.
 - c. Large, complicated, or unusual authorizations for use of radioactive materials.
 - d. State's mechanisms to evaluate performance.
 - e. NRC current initiatives.
6. Additional Topics