



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 5, 1996

Thomas E. Hill, Manager
Radioactive Materials Program
Georgia Department of Natural Resources
4244 International Parkway, Suite 114
Atlanta, GA 30354

Dear Mr. Hill:

Thank you for your letter dated August 2, 1996, which responded to the comments and recommendations from the Integrated Materials Performance Evaluation Program (IMPEP) review of the Georgia radiation program. We have reviewed the responses and, with one exception, agree that your actions are appropriate. With regard to item number five, we note that you do not agree with our suggestion to conduct second party reviews of all inspection reports and enforcement letters.

We continue to believe that this comment, as discussed in Section 3.4 of our report, is valid. Although we note that you intend to improve the application of your current Quality Assurance/Quality Control program to address this area, we encourage you to consider alternative methods which may improve the effectiveness of this approach. The IMPEP team will evaluate your efforts in this and other areas during the next review of your program.

We welcome the constructive approach that you and your staff have used throughout the program review and look forward to our continuing interactions.

Sincerely,

Hugh L. Thompson, Jr.
Deputy Executive Director for
Nuclear Materials Safety, Safeguards,
and Operations Support

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PDR STPRG ESGGA
PDR

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Original signed by
Hugh L. Thompson, Jr.

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Deputy Executive Director for
Nuclear Materials Safety, Safeguards,
and Operations Support

Thomas E. Hill

-2-

Distribution:

DIR RF (GT96606)
HLThompson, DEDS
RLBangart
PLohaus
SDroggitis
LBolling
KSchneider
Georgia File

DCD (SP01) PDR (YES ✓ NO_)
EDO RF
CPaperiello, NMSS
KCyr, OGC
ELJordan, AEOD

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*See previous concurrence.

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NAME	LBolling:gd:kk	PHLohaus	RLBangart	HLThompson	
DATE	08/16/96* 08/30/96* 09/4/96* 09/5/96	08/19/96*	08/22/96* 08/30/96* 09/4/96* 09/5/96	09/3/96* 09/5/96	

OSP FILE CODE: SP-AG-7

Thomas E. Hill

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Thomas E. Hill, Manager
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Dear Mr. Hill:

Thank you for your letter dated August 2, 1996, which responded to the comments and recommendations from the Integrated Materials Performance Evaluation Program review of the Georgia radiation program.

We appreciate the positive actions you and your staff have taken and are continuing to implement with regard to our comments. We look forward to working with you in the future.

Sincerely,

Hugh L. Thompson, Jr
Deputy Executive Director for
Nuclear Materials Safety, Safeguards,
and Operations Support

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NAME	LBolling:gd	PHLohaus	RLBangart	HThompson		
DATE	08/16/96	08/19/96	08/22/96	08/ /96		

OSP FILE CODE: SP-AG-7

(FYI)

RLB2
PHL
SLD
KXS

EXECUTIVE TASK MANAGEMENT SYSTEM

<<< PRINT SCREEN UPDATE FORM >>>

TASK # - 6E606

DATE- 08/13/96

MAIL CTRL. - 1996

TASK STARTED - 08/12/96

TASK DUE - 08/28/96

TASK COMPLETED - / /

TASK DESCRIPTION - RESPONDING TO IMPEP TEAM'S RECOMMENDATIONS PRESENTED IN
LETTER DTD 7/8/96 TO HAROLD F. REHEIS

REQUESTING OFF. - GA

REQUESTER - T. HILL

WITS -

0 FYP - N

PROG. - LAB

PERSON -

STAFF LEAD - LAB

PROG. AREA -

PROJECT STATUS -

EDO DUE DATE: 8/29/96

PLANNED ACC. - N

LEVEL CODE - 2

ACTION

EDO Principal Correspondence Control

FROM: DUE: 08/29/96 EDO CONTROL: GT96606
DOC DT: 08/02/96
FINAL REPLY:

Thomas E. Hill
Georgia Dept. of Natural Resources

TO:

Hugh Thompson

FOR SIGNATURE OF : ** GRN ** CRC NO:

DESC: ROUTING:

RESPONDING TO THE INTEGRATED MATERIALS
PERFORMANCE EVALUATION PROGRAM TEAM'S
RECOMMENDATIONS

Taylor
Milhoan
Thompson
Blaha
Paperiello, NMSS
Ebnetter, RII

DATE: 08/09/96

ASSIGNED TO: CONTACT:

SP Bangart

SPECIAL INSTRUCTIONS OR REMARKS:

SP review actions taken to verify satisfactory
completion. Advise DEDS in writing of review.

ACTION

EDO Principal Correspondence Control

FROM: DUE: / / EDO CONTROL: GT96606
DOC DT: 08/02/96
FINAL REPLY:

Thomas E. Hill
Georgia Dept. of Natural Resources

TO:

Hugh Thompson

FOR SIGNATURE OF : ** GRN **

CRC NO:

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Thompson
Blaha
Paperiello, NMSS
Ebnetter, RII

DATE: 08/09/96

ASSIGNED TO:

CONTACT:

BP

Bangart

SPECIAL INSTRUCTIONS OR REMARKS:

For Appropriate Action

OSP
96 AUG 12 PM 3:52

Georgia Department of Natural Resources

4244 International Parkway, Suite 114, Atlanta, Georgia 30354

Lonice C. Barrett, Commissioner
Environmental Protection Division
Harold F. Reheis, Director
(404) 362-2675

August 1, 1996

Mr. Hugh L. Thompson, Jr.
Deputy Executive Director for Nuclear Materials Safety,
Safeguards, and Operations Support
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Thompson:

I am writing in response to the Integrated Materials Performance Evaluation Program (IMPEP) team's recommendations presented in your letter dated July 8, 1996, to Mr. Harold F. Reheis, Director, Environmental Protection Division. Mr. Reheis has asked me to reply for him. The following, therefore, is offered in response to the recommendations presented by the IMPEP team:

1. The review team recommends that Georgia re-evaluate its procedures for scheduling initial inspections to ensure that all licensees are inspected within 12 months of license issuance, regardless of whether or not they possess material or perform licensed operations. (Section 3.1)

The procedures have been re-evaluated for scheduling initial inspections to insure that all licensees are inspected within 12 months of license issuance, whether or not they possess material or conduct licensed operations. These inspections are now being scheduled according to the recommendation.

2. The review team recommends that the State's "announced" inspection policy be revised to provide for more unannounced routine inspections and reciprocity inspections. More consistency with the policy in IMC 2800 would result. (Section 3.4)

The Program goals and objectives have been modified so that 10% to 15% of routine inspections will be conducted as unannounced inspections. The percentage of unannounced inspections is projected to increase 5% - 10% annually to a maximum of 50%.

3. The review team recommends that the State consider for adoption a policy of annual accompaniments of all inspectors, and that these accompaniments be performed by a supervisor or another senior inspector and the results documented. (Section 3.4)

Management will improve the application of the QA/QC program. Management or senior inspectors will accompany each inspector at least once each year and document the results.

4. The review team suggests that the State complete their adoption of standardized inspection forms and that all topics on the form be addressed in the written inspection report. (Section 3.4)

The Program is adopting standardized inspection forms. This activity is scheduled to be completed by December 31, 1996. Inspectors have been briefed that all items will be addressed on the inspection report and not deleted if they were not applicable.

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Mr. Hugh L. Thompson, Jr.

August 2, 1996

Page Two

5. The review team suggests that the State reassess its quality assurance policy of having only spot checks on letters and inspection reports, and the team suggests that all reports and enforcement letters receive a second party review. (Section 3.4)

Management will improve the application of the QA/QC program. Management has implemented a plan where approximately 10% to 15% of associate's work is reviewed monthly to ensure that quality control and quality assurance of all work is being maintained.

Management within the Department of Natural Resources and the Environmental Protection Division does not agree with this recommendation and feels that a second party review on all reports and enforcement letters is not in keeping with the total quality management concept and the team approach within which we have chosen to operate. The second party review of all reports and enforcement letters is considered unnecessary to ensure that a high quality of work is maintained by the staff. Management provides guidance as needed on enforcement issues.

6. The review team suggests that the State develop additional inspector guidance for the review of licensee medical QM programs and how the reviews are to be documented in inspection reports. (Section 3.4)

Inspection of QM programs will be incorporated into the new nuclear medicine standardized inspection forms. Inspector guidance will be issued with the inspection forms. The projected completion date is December 31, 1996. In the interim, inspectors have been instructed to inspect directly against the rule and document findings in the inspection report.

7. The review team recommends that the State's current system for tracking enforcement actions and correspondence be re-evaluated and revised as appropriate to assure that enforcement actions are closed out in a consistent and timely manner. (Section 3.4)

The Program's current system for tracking enforcement actions and correspondence has been reevaluated and revised to assure that enforcement actions are closed in a timely manner.

8. The review team recommends that the program's internal administrative procedures for reporting Misadministrations, Complaints and Incidents be revised to reflect the most recent NRC guidance regarding the primary contact, event reporting criteria and the event report format. (Section 3.5)

The program's internal administrative procedures for Event reporting have been revised to reflect the most recent NRC guidance regarding the primary contact, event reporting criteria and the event report format.

Mr. Hugh L. Thompson, Jr.

August 2, 1996

Page Three

9. The review team recommends that associates document their reviews of each reportable event in the licensee's radioactive materials file. (Section 3.5)

All associates have been reminded that all events are to be documented in the events file and the licensee's file, if applicable. The documentation is also required by written policy and procedure.

10. The review team suggests that the State document the resolution and closeout of two incidents noted in the casework file review. (Section 3.5)

The two incidents have been closed out and the documentation is in each casework file.

11. The review team recommends that manufacturers and distributors of sealed sources or devices be required to establish and implement a manufacturing Quality Assurance/Quality Control (QA/QC) Program. (Section 4.2)

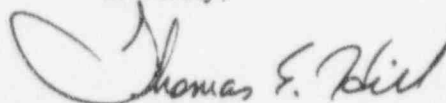
The Program is establishing a manufacturing/distribution QA/QC program. The projected completion date is November 30, 1996.

12. The review team recommends that Georgia adopt regulations compatible with 10 CFR 30.32 (g) and 10 CFR 32.210 in order to maintain an effective SS&D evaluation program. (Section 4.2)

Georgia has written regulations compatible with 10 CFR 30.32 (g) and 10 CFR 32.210. These regulations are scheduled for adoption by January 1997.

I am genuinely pleased with and supportive of the IMPEP process. I found the team approach to the review to be very helpful to me and to program associates. Many more of our associates were able to be involved in the review and their interaction with the team members was beneficial to them and to the program. That we were found to have an adequate and compatible program during the review was very satisfying. If you should have any questions concerning this response, please call me at (404)362-2675.

Sincerely,



Thomas E. Hill, Manager
Radioactive Materials Program

TEH:ELD:klc

c: Harold F. Reheis
James L. Setser