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STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

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Thomas W. Ortziger
Director

April 4, 1997

Paul H. Lohaus, Deputy Director
Office of State Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

97 APR - 9 PM 12:11

OSP

Re: Draft Inspection Procedure 87120, Industrial Radiography Programs

Dear Mr. Lohaus:

The Illinois Department of Nuclear Safety provides the following comments in order to improve the quality of the NRC's guidance to its inspectors. This is the NRC's procedure and the NRC should refrain from attempts to have Agreement States follow the same procedure unless each of the Agreement States chooses to follow it.

- 01.01. The second through the fourth sentences in 01.01. are out of place. The sentences are not inspection objectives. Regarding the second sentence, generally it may be better to advise the licensee representative that the inspector believes a condition exists that indicates the need to interrupt activities immediately rather than the inspector doing the interrupting. Section 03.18 beginning on page 23 much more clearly states what should be done.
- 01.02. The first sentence of the second paragraph of 01.02. needs rephrased, specifically see "the period from the last to current inspections." We suggest "the period from the last inspection to the date of the inspection being performed."
- 02.08.e. The next to last line states "at least one year of hands-on experience", but Item 10.F. on page 13 of the inspector notes states "at least 6 months hands-on training." Clarify the apparent contradiction.
- 02.11.b. The fifth line states "staff are dispatched." but the true interest is "which sources of radioactive material are dispatched."

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- 03 The third paragraph on page 9 should indicate or describe the "slice of life" technique.
- 03 The fifth line of the fourth paragraph on page 9 should state "needed" instead of "need".
- 03.03. On page 12 (and other pages) the terms "radiation protection program" and "radiation safety program" are both used without indication that the terms are considered equivalent.
- 03.05. The fourth line on page 14 states "by two qualified", but should state "by at least two qualified" because continuous surveillance of the restricted area or preventing entrance into a high radiation area may require more than two individuals in some situations, for example some refinery jobs. It must be clear that this is a performance based criterion.
- 03.06.a. The sixth line of this section on page 14 states "All survey, pocket..." when it would appear to mean "All survey meters, pocket..."
- 03.07.a. The seventh and eighth lines on page 15 state "packages that radiation levels that are higher than expected." The sentence with this phrase needs to be reworded.
- 03.07.b. The last word of the first paragraph of this section on page 15 should be capitalized--"Agreement State" not "Agreement state".
- 03.07.c. The last word on the fourth line of page 16 is "authorized" rather than the appropriate word "unauthorized".
- 03.07.c. The second line of the third paragraph on page 16 should have a comma after "i.e."
- 03.08.a. The fourth line from the bottom of page 17 should state "equipment only under" rather than "equipment under".
- 03.08.b. The sixth line on the second paragraph of this section on page 18 states "a film badge indicates overexposure," but it appears that it should state "a film badge, TLD, or pocket dosimeter indicates overexposure,".

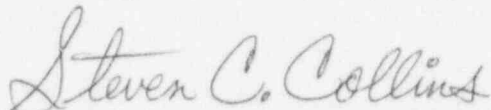
- 03.09.a. The fourth line of the second paragraph of this section on page 18 states "its shield position" rather than "its shielded position".
- 03.11. It is recommended that this section title be changed to "Spent Source(s) and Used Radioactive Material Management" and the terms "waste" and "disposal" be carefully examined and replaced where appropriate to avoid potential problems with Compact Commissions who may allow return of spent sources for evaluation for potential reuse or recycle but not return for disposal from out of compact locations.
- 03.11.f. The fourth line of the second paragraph on page 21 states "in 03.11.e." but such section does not appear to exist between 03.11.d. and 03.11.f.
- 03.11.f. The fourth paragraph on page 21 does not appear needed for industrial radiography although it may be included for completeness.
- 03.13. The next to last line of the first paragraph of this section should state "nuclide" or "radionuclide" rather than misuse the term "isotope".
- 03.18. The third paragraph of this section on page 24 should have some examples to clarify the phrase "significant safety concerns."
- App. A. Item 7.A. on page 10 of Appendix A should state "nuclide" or "radionuclide" rather than misuse the term "isotope".
- App. A. Item 10.F. on page 13 of Appendix A and 02.08.e. should be consistent. The text in 02.08.e. states "at least one year of hands-on experience", but Item 10.F. on page 13 of the inspector notes states "at least 6 months hands-on training."
- App. A. Item 15.A.(1)(a)(iii) on page 18 of Appendix A should state "meet" rather than "meets".
- App. A. Item 15.B.(2) on page 19 of Appendix A should state "every 3 years" rather than "very 2 years" because the frequency changed to 3 years on October 1, 1996.

Paul Lohaus
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- App. A. The sixth line of Item 21 on page 23 of Appendix A should replace "disposing of radioactive waste" with language consistent with the suggestion for 03.11 for return of spent sources or used radioactive material.
- App. A. The third line of Item 22.D. on page 24 of Appendix A (and all other places where units appear in the document) should specify SI units as well as the traditional units in conformance with national policy.

If you have any questions regarding these comments, you may contact me by email at "collins@idns.state.il.us" or by telephone at 217-785-9935.

Sincerely,

A handwritten signature in cursive script that reads "Steven C. Collins".

Steven C. Collins, Chief
Division of Radioactive Materials