

**From:** [Katanic, Janine](#)  
**To:** [Mason Jaussi](#)  
**Cc:** [Donna Lybecker](#); [Jon Stoner](#)  
**Subject:** EA-18-153 ISU Final Effectiveness Review  
**Date:** Tuesday, February 15, 2022 11:36:00 AM

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Mason,

Thank you for sending this. I will record the ISU final effectiveness review as received on February 14, 2022, and enter it into our electronic records management system (ADAMS). ISU's implementation and completion of the items from the Confirmatory Order will be reviewed during a future NRC inspection.

Regards,  
Janine

Janine F. Katanic, PhD, CHP  
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**From:** Mason Jaussi <masonjaussi@isu.edu>  
**Sent:** Monday, February 14, 2022 10:26 AM  
**To:** Katanic, Janine <Janine.Katanic@nrc.gov>; Patricia.Silva@nrc.gov  
**Cc:** Donna Lybecker <donnalybecker@isu.edu>; Jon Stoner <stonjon@isu.edu>  
**Subject:** [External\_Sender] EA-18-153 ISU Final Effectiveness Review

Dear Dr. Katanic and Ms. Silva,

Please find attached ISU's final effectiveness review of corrective actions in accordance with Confirmatory Order EA-18-153 and the independent audit. Please let me know if you have any questions, comments, or additional requirements.

Sincerely,

Mason Jaussi

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**Mason Jaussi**  
**Radiation Safety Officer**  
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Final Effectiveness Review  
Idaho State University  
Confirmatory Order EA-18-153  
February 14, 2022

Prepared By: Mason Jaussi  
Mason Jaussi, ISU Radiation Safety Officer

Reviewed By: Jon Stoner  
Jon Stoner, ISU Radiation Safety Committee Chair

Reviewed By: Steven Snay  
Steve Snay, Ph.D, CHP, RadCompliance LLC

## Table of Contents

<b>Introduction .....</b>	<b>3</b>
<b>1. Programmatic Corrections .....</b>	<b>3</b>
1.1. Management Commitment .....	3
1.2. Insufficient Staffing .....	3
1.3. Inadequate Program Documents and Procedures .....	3
1.4. Inadequate Training .....	3
1.5. Improve Tracking of Radioactive Material .....	4
1.6. Internal Assessments .....	4
1.7. Scheduling and Tracking of Radiation Safety Tasks .....	4
<b>2. Specific Violations September 2018 Inspection .....</b>	<b>4</b>
2.1. Level III Violation .....	4
2.2. Labeling Containers .....	4
2.3. Radioactive Material Inventory not implemented for each item .....	4
2.4. Contamination Area Accessible without EH&S Supervision .....	4
2.5. Decommissioned Lab with No Postings and Had No Surveys .....	4
2.6. Transfers to INL Not Authorized by RSO .....	4
2.7. Postings for Radioactive Material Areas .....	4
2.8. No Posting of Contamination Control Area .....	5
2.9. Area Surveys and Contamination Surveys Not Conducted at Appropriate Frequency .....	5
2.10. Testing of Fume Hoods Not Conducted Annually .....	5
2.11. Radiation Safety Audit Did Not Audit the Program Content and Implementation .....	5
<b>3. Recommendations from Independent Assessment .....</b>	<b>5</b>
3.1. All Program Commitments from Licenses. ....	5
3.2. Lyris Subscription Service .....	5
3.3. Remove Radiation Workers .....	5
3.4. Radiation Safety Training .....	5
3.5. Credentialing Document .....	5
3.6. ALI Ratio .....	5
3.7. Survey Record Forms .....	5
3.8. Reduction in Dosimetry .....	6
3.9. Dosimetry Evaluation .....	6
3.10. Dosimetry Reporting Level .....	6
3.11. Distribution of Reg. Guide 8.13 .....	6
3.12. Quarterly Review of Dosimetry .....	6
3.13. Dosimetry Storage .....	6
3.14. Radioactive Waste Procedures .....	6
3.15. Fume Hood Checks .....	6
3.16. Residual Contamination List .....	6
3.17. Reactor Access List .....	6
3.18. T&R Procedure .....	6
<b>Appendix I. Completion Dates for Corrective Action Items .....</b>	<b>7</b>

## **Introduction**

Idaho State University performed the fourth assessment to evaluate the status of corrective actions specified in the corrective action plan completed in March 2020. The assessment evaluated all documentation related to corrective actions and was conducted by a team of four members Mason Jaussi, RSO, John Longley, RSO (former), Jon Stoner, Chairman of the RSC, and Steve Snay, independent reviewer from Rad Compliance LLC. Dr. Snay did not travel to ISU to minimize potential exposure to COVID-19. All items outlined in the corrective action plan have been fully completed. Items noted in the 3<sup>rd</sup> effectiveness review as complete (routine) have been fully completed and implemented into routine Radiation Safety Department operations.

The discussion for items that were fully complete in the 3<sup>rd</sup> effectiveness review was removed for clarity. However, the corrective actions items are included to provide a comprehensive view of completeness. The table at the end of the document is the milestone summary from the corrective action plan updated with current status.

## **1. Programmatic Corrections**

### **1.1. Management Commitment**

**Status:** Complete

### **1.2 Insufficient Staffing**

**Status:** Complete

### **1.3. Inadequate Program Documents and Procedures**

In addition to the documents listed as revised in the corrective action plan, the Radiation Safety Department has updated and or developed the following procedures and posted them on the Radiation Safety Website.

Documents reviewed:

- RS-25, Emergency Response, Rev. 0 - 9/1/21 (website)
- RS-26, Radiation Safety General Procedure, Rev. 0 - 8/1/21 (website)
- RS-27, Procedure for Developing Radiation Safety Procedures, Rev. 0 - 12/6/21 (website)
- RS-28, SNM Physical Inventory, Rev. 0 - 12/6/21 (website)
- RS-29, General Radioactive Material Handling, Rev. 0 – 11/30/21 (website)

**Status:** Complete

### **1.4. Inadequate Training**

**Status:** Complete

### **1.5. Improve Tracking of Radioactive Material**

**Status:** Complete

### **1.6. Internal Assessments**

**Status:** Complete

### **1.7. Scheduling and Tracking of Radiation Safety Tasks**

**Status:** Complete

## **2. Specific Violations September 2018 Inspection**

### **2.1. Level III Violation**

**Status:** Complete

### **2.2. Labeling Containers**

**Status:** Complete

### **2.3. Radioactive Material Inventory not implemented for each item**

**Status:** Complete

### **2.4. Contamination Area Accessible without EH&S Supervision**

**Status:** Complete

### **2.5. Decommissioned Lab with No Postings and Had No Surveys**

**Status:** Complete

### **2.6. Transfers to INL Not Authorized by RSO**

**Status:** Complete

### **2.7. Postings for Radioactive Material Areas**

**Status:** Complete

**2.8. No Posting of Contamination Control Area**

**Status:** Complete

**2.9. Area Surveys and Contamination Surveys Not Conducted at Appropriate Frequency**

**Status:** Complete

**2.10. Testing of Fume Hoods Not Conducted Annually**

**Status:** Complete

**2.11. Radiation Safety Audit Did Not Audit the Program Content and Implementation**

**Status:** Complete

**3. Recommendations from Independent Assessment**

**3.1. All Program Commitments from Licenses.**

**Status:** Complete

**3.2. Lyris Subscription Service**

**Status:** Complete

**3.3. Remove Radiation Workers**

**Status:** Complete

**3.4. Radiation Safety Training**

**Status:** Complete

**3.5. Credentialing Document**

**Status:** Complete

**3.6. ALI Ratio**

**Status:** Complete

**3.7. Survey Record Forms**

**Status:** Complete

**3.8. Reduction in Dosimetry**

**Status:** Complete

**3.9. Dosimetry Evaluation**

**Status:** Complete

**3.10. Dosimetry Reporting Level**

**Status:** Complete

**3.11. Distribution of Reg. Guide 8.13**

**Status:** Complete

**3.12. Quarterly Review of Dosimetry**

**Status:** Complete

**3.13. Dosimetry Storage**

**Status:** Complete

**3.14. Radioactive Waste Procedures**

**Status:** Complete

**3.15. Fume Hood Checks**

**Status:** Complete

**3.16. Residual Contamination List**

**Status:** Complete

**3.17. Reactor Access List**

**Status:** Complete

**3.18. T&R Procedure**

**Status:** Complete

## Appendix I. Completion Dates for Corrective Action Items

Action	Expected Completion Date*	Status
<b>Hiring</b>		
Hire Radiation Safety Specialist for Pocatello	April 2020	Complete
Radiation safety/industrial hygiene specialist for CAES	April 2021	Complete
Two half-time safety interns for CAES.	May 31, 2020	Complete
<b>Update Procedures</b>		
RS-02 Dosimetry	June 2020	Complete
RS-04 Sealed Source Leak Tests	December 2020	Complete
RS-05 NMMSS Report	December 2020	Complete
RSC Meeting Minutes	December 2020	Complete
RS-03 Radiological Surveys	September 2020	Complete
RS-06 Radioactive Material Laboratory Inspections	June 2020	Complete
RS-09 Radioactive Waste Management	June 2020	Complete
RS-13 100 mrem Report (includes NESHAPs)	December 2020	Complete
RS-11 Internal Dosimetry	September 2020	Complete
RS-15 Operational Procedure for Shepherd Irradiators	December 2020	Complete
RS-20 Radiation Use Application	December 2020	Complete
RS-21 Radiation Safety Technician Qualifications	June 2020	Complete
<b>Corrections from Independent Assessment</b>		
Update On-line training and refresher training	December 2020	Complete
Update list of decommissioned laboratories on a two year basis	June 2020	Complete
Contaminated equipment forms CAES	March 2020	Complete
RSO Verify survey frequency against permit requirements	Start March 2020	Complete
Create better storage area for dosimeters	June 2020	Complete

\*Dates are approval by the Radiation Safety Committee