

NOTE: This Document is intended to be a communication between the MSDH Radiation Program and NRC Region 4. It is used as a "Program Improvement Plan" designed to serve as a "Working Document" that will facilitate monthly status update calls. Changes



Green is a visual indicator that the ACTION is Complete or ONGoing with no identified "Points of Friction."



Amber is a visual indicator that the Action is initiated however waiting on additional actions to navigate internal or external "Friction Points"



Red is a visual indicator that the Action desired has not been initiated due to available resources or there is a significant "Friction Point" that must be addressed

RECOMMENDATION	TASK	MILESTONE / MEASURABLE	ASSIGNED	ANTICIPATED COMPLETION DATE	FRICTION POINTS	STATUS	ACTUAL COMPLETION DATE	COMMENTS
Mississippi performs an independent evaluation to ensure all license reviewers and inspectors are appropriately qualified through initial and refresher training to perform the duties they are assigned.	Develop Database To Track Training	Currently using spreadsheet / will integrate to WBL when available	Director/ Materials Lead	April 2022	NONE	COMPLETE	April 2022	Training Files Being Updated for IMPEP. To be updated by 15 NOV
	Have Single Point for Training MGT	Duty Assignment / Training Files	Director/ Deputy	April 2022	NONE	COMPLETE	April 2022	NONE
	Develop Quarterly Training Meeting to prioritize and track training	Initial Meeting Completed 0930 28/JUNE2022	Director/ Materials Lead	June 2022	Identifying Available Training Seats	COMPLETE	1 July 2022	New Hires Completed 108 and 109, Staff rides from Florida Complete. Supervisor accompaniments 50%
	Pay for "in house" Refresher / HP related Training Annually. The desired Training will address the quality of inspection reporting and documentation	Completion and Documented	Director	December 2022	Identifying Available Internal and external Trainers	Scheduled with FEMA in DEC 2022 and JAN 2023 January Training to be rescheduled		FEMA Dose Assessment / Modeling Training for 2022-2023. New courses for 2023 not yet identified.
	Hire, Train and Position HP to better balance Qualified HPs between Licensing and Inspections	Staffing and Training of HPs (2x new HPs) as well as use of contracts to support transition	Director/ Materials Lead	June 2023	MSDH Hiring Timelines / MPBS Approval	New Hire Packet approved through MSDH HR waiting MPBS approval		This process ins ongoing with no near term closure of "Qualified" staff. Strategy will be contracts to fill void as hiring and training continues

RECOMMENDATION	TASK	MILESTONE	ASSIGNED	ANTICIPATED COMPLETION DATE	POINTS OF FRICTION	STATUS	COMPLETION DATE	COMMENTS
Mississippi develops and implements a reliable and comprehensive scheduling and tracking process to ensure completion of inspections including reciprocity inspections.	Review of inspection and reciprocity procedures	Review and Approval	Director/ Materials Lead/ Licensing Lead	APRIL 2022	NONE	Complete	May-22	Will incorporate Annual Review of RAD Health Procedures
	Appoint Materials Supervisor to Track and Schedule	Position Filled	Director/ Deputy	FEB 2022	HR permanent	Complete	Feb-22	Complete
	Incorporate Scheduling and Tracking in WBL	Migration and Training Complete "Train the Trainer" followed by In house training of all inspectors	Director/ Materials Lead	June 2023	TRAINING / AVAILABILITY	Pending Training for individual Inspectors partially done		Currently using Access managed by Materials Lead, will incorporation of WBL inspection scheduling and tracking following FEB IMPEP
	Integrate Monthly Staff Meeting to prioritize and schedule inspections	Meetings	Director/ Materials Lead	JULY 2022	NONE	ongoing		monthly to / bi monthly
Mississippi develops a method to ensure licensees are provided the results of the inspection (e.g., cover letters) in a timely manner.	Integrate Monthly Staff Meeting to prioritize and schedule inspections	Meetings	Director/ Deputy	July 2022	NONE	ongoing		monthly to / bi monthly
	Appoint Materials Supervisor to Track and Schedule	Position Filled	Director/ Deputy	JAN 2022	HR permanent	Complete	Dec-22	complete
The 2017 recommendation remains open: Mississippi should review its guidance, including licensing, incident, and allegation guidance; update this guidance, as appropriate; and provide training to all staff on the new procedures.	Use External Review of Procedures	Review and Approval	Director/ Materials Lead	FEB 2023	Limited Staff / Compatibility Review	Ongoing		Contract in place with Alabama Program and Oklahoma (currently assisting with peer review) to assist. Licensing, Inspection and Reciprocity are in final review for approval
	Provide Training as needed at team meetings	Schedule Training as Needed	Director/ Materials Lead	FEB 2023	NONE	Ongoing as required		There is a GAP in Planning to create the "white space" in schedule to evaluate and address necessary changes in procedures

RECOMMENDATION	TASK	MILESTONE	ASSIGNED	ANTICIPATED COMPLETION DATE	STATUS	POINTS OF FRICTION	COMPLETION DATE	COMMENTS
<p>Mississippi develops and implements IPs that are consistent with the NRC's IPs and provide training on the proper method of documenting inspections. Checklists may be used, but the final inspection documentation needs to be clear, consistent, and comprehensive to ensure that the inspection covered all required safety focus areas.</p> <p>These procedures should ensure (1) inspection documentation is complete, comprehensive, focused on safety and security, as applicable, and meets the documentation requirements in IMC 2800; and (2) violations are adequately documented, licensee corrective actions reviewed for adequacy and documented, and sufficient follow-up of violations is performed and documented consistent with the safety or security significance (repeat from 2009 IMPEP review).</p>	Ensure Procedures are Inclusive and Compatible	Procedures Review	Materials Lead / Sr Inspector	FEB 2023	Ongoing	NONE		Review is in Draft awaiting final adjustments and processing and incorporating procedure for Virtual Inspections.
	Formal Training	Inspection Training Seats	Director/ Materials Lead	NOV 2022	Two new HPs have completed 108,109. Supervisor accompaniments at 50%	Available training seats	OCT 2022	108 and 109 complete. Accompaniments being conducted. Medical on-line training and portable guage radiography pending coordination
	External Refresher Training	OAS / NRC provide training to existing staff	Director	ON HOLD DUE TO STAFFING and Availability	on hold, working on agreement state assistance	Availability of NRC STAFF/ Revisit using other Agreeemn States		ON HOLD DUE TO STAFFING and Availability
	Establish Internal / External Audits of Reports	Audits Conducted	Materials Lead / Sr Inspector	FEB 2022	Materials Lead will review/ Audit as time and resources are available	None		Will use existing contracts with out of state staff to assist in external audits
	Staff Visits to other Agreement States for Inspector Accompaniments	Inspector Accompaniments	Director/ Materials Lead	SEPT 2022	Scheduled with LDEQ	Time and Inspection Coordination		Working with Florida/ LDEQ/ Alabama as schedules permit
Mississippi develops a systematic approach to ensure that annual supervisory inspector accompaniments are completed.	Incorporate Bimonthly Staff Meeting	Staff Meetings	Director/ Deputy	5 July 2022	Ongoing	NONE	July 2022	Monthly to Bi Monthly
	Accompaniments Documented in Training Records	Conduct / Documentation	Director/ Materials Lead	October 2022	Ongoing	NONE		Materials Lead at 50% on Accompaniments
Mississippi ensures staff have access to the SS&D Registry and the National Source Tracking System in order to provide inspectors with information they will need for inspection preparation.	SSDR / NSTS	SSDR / NSTS Access Granted	Director/ Materials Lead	March 2022	Complete	NONE	FEB 2022	Currently All 4 Qualified inspectors / license employees have access
	Request Access for New Hires	SSDR / NSTS Access Granted	Director/ Materials Lead	March 2023	New Hires Have Completed 108 and attending 109 26 Sept	Initial Training Availability		Will Initiate the process prior to Initial Training Completion. Existing staff can provide material as needed

RECOMMENDATION	TASK	MILESTONE	ASSIGNED	ANTICIPATED COMPLETION DATE	POINTS OF FRICTION	STATUS	COMPLETION DATE	COMMENTS
Mississippi performs an extent of condition review of all their medical licenses issued since April 28, 2017, to ensure that all Radiation Safety Officers, Authorized Users, Authorized Nuclear Pharmacists, and Authorized Medical Physicists are appropriately qualified in accordance with applicable licensing guidance (e.g., equivalent 10 CFR Part 35 regulations and NUREG-1556, Volume 9, Revision 3).	Internal Audit of Medical Licenses 2017 - Current	Complete Through Current	Materials Lead / Licensing Lead	On Hold pending completion of external Audits	Qualified Personnel to Complete Audit and Balance Inspections	2017-2018 Complete / Internal Audit Suspended	Peer reviews are being utilized currently and Audits are being conducted by external Audit team	Ongoing Due to number of qualified licensing personnel
	External Audit of Medical Licenses 2017 - Current	Contract Initiation	Director / Deputy	November 2022	Location of Qualified and Available Personnel	65 Licenses digitized w/ 65 of 80 Audits Completed		Alabama Program will scheduled and complete audit (currently ahead of Schedule)
	Incorporate External PEER Reviews	Initiate Peer Review of current licensing actions	Licensing Lead	March 2023	NONE	Contract Awarded, access has been granted. AL contract to become "full time" FEB 23	March 2022	Oklahoma and Alabama are assisting with this review
Mississippi develops a licensing review process that follows the NUREG-1556 series. The licensing review process should use standard or approved license conditions on Mississippi radioactive material licenses to ensure that they do not cause conflicts, duplications, gaps, or other conditions that would jeopardize an orderly pattern in the regulation of agreement material on a nationwide basis. In addition, Mississippi should perform an extent of condition review of licenses renewed since April 28, 2017, to determine if the licensee's compliance history/enforcement history at the time would have made Mississippi not renew the license based on this additional information in accordance with NUREG-1556, Volume 20, Revision 1.	Refresher Training	WBL Integration	Licensing Lead	March 2023	NONE	Complete	March 2022	Oklahoma and Region IV assisted in refresher training
	Incorporate Internal PEER Reviews	Initiate Peer Review of current licensing actions	Materials Lead / Licensing Lead	March 2023	NONE	ONGOING	Marh 2022	Materials and Licensing Leads PEER Review all Licensing Actions. Discussions with AL for permanent contract for Licensing
	Incorporate External PEER reviews	External Peer Review of current licensing actions	Licensing Lead	March 2023	NONE	Contract Awarded, access has been granted. AL contract to become "full time" FEB 23		Oklahoma and Alabama are assisting with this review

RECOMMENDATION	TASK	MILESTONE	ASSIGNED	ANTICIPATED COMPLETION DATE	POINTS OF FRICTION	STATUS	COMPLETION DATE	COMMENTS
Mississippi assesses their incident and allegation casework completed for the review period to ensure proper closure of cases.	Review of Procedures	Ensure Procedures are Compatible	Materials Lead	March 2022	Interpretation of Inspector vs NRC	Complete	March 2023	Procedures are Compatible pending review of new SA-300
	Internal Retraining	Training	Materials Lead	March 2022	NONE	Complete	March 2023	Ongoing with new hires / no identified needs pending the new SA300 publication and feed-back
	Internal Audit of Incidents and Allegations 2017 - Current	Review	Materials Lead / Deputy	April 2022	Interpretation of Inspector vs NRC	Complete	April 2022	Complete
	External Audit of Incidents and Allegations 2017 - Current	Contract Initiation	Director / Deputy	JAN 2023	Location of Qualified and Available Personnel	No Change		Pending completion of License / AU audits
	Integrate Bi-monthly Staff Meeting to prioritize and schedule inspections	Meetings	Director / Deputy	5 JULY 2022	NONE	Ongoing	Ongoing	Monthly and Bi Monthly