February 5, 2003

Dora Ann Mills, M.D., M.P.H.
Director
Maine Bureau of Health
Department of Human Services
Key Plaza, 8th Floor
286 Water Street
Augusta, ME 04333-0011

Dear Dr. Mills:

On January 22, 2003, the Management Review Board (MRB) met to consider the proposed final Integrated Materials Performance Evaluation Program (IMPEP) report on the Maine Agreement State Program. The MRB found the Maine program adequate to protect public health and safety and compatible with the Nuclear Regulatory Commission's (NRC) program. No recommendations were made by the review team.

Based on the results of the current IMPEP review, the next full review will be in approximately four years.

I appreciate the courtesy and cooperation extended to the IMPEP team during the review. We appreciate your continued support for the Radiation Control Program and the excellence in program administration demonstrated by your staff as is reflected in the team's findings. I look forward to our agencies continuing to work cooperatively in the future.

Sincerely,

/RA/

Carl J. Paperiello
Deputy Executive Director
for Materials, Research and State Programs

Enclosure:
As stated

cc: Jay Hyland, PE
Division of Health Engineering

Pearce O'Kelley, SC
OAS Liaison to the MRB

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cc: Jay Hyland, PE
Division of Health Engineering

Pearce O'Kelley, SC
OAS Liaison to the MRB

bcc: Chairman Meserve
Commissioner Dicus
Commission Diaz
Commissioner McGaffigan
Commissioner Merrifield

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INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM

REVIEW OF MAINE AGREEMENT STATE PROGRAM

October 29 - November 1, 2002

FINAL REPORT

U.S. Nuclear Regulatory Commission

ATTACHMENT 1

1.0 INTRODUCTION

This report presents the results of the review of the Maine Agreement State program. The review was conducted during the period October 29 - November 1, 2002, by a review team consisting of technical staff members from the Nuclear Regulatory Commission (NRC) and the Agreement State of North Carolina. Team members are identified in Appendix A. The review was conducted in accordance with the "Implementation of the Integrated Materials Performance Evaluation Program and Rescission of a Final General Statement of Policy," published in the Federal Register on October 16, 1997, and the November 5, 1999, NRC Management Directive 5.6, "Integrated Materials Performance Evaluation Program (IMPEP)." Preliminary results of the review, which covered the period of September 18, 1998 to October 29, 2002, were discussed with Maine management on November 1, 2002.

A draft of this report was issued to Maine for factual comment on November 25, 2002. The State responded by letter dated December 30, 2002. The Management Review Board (MRB) met on January 22, 2003 to consider the proposed final report. The MRB found the Maine radiation control program was adequate to protect public health and safety and compatible with NRC's program.

The Maine Agreement State program is administered by the Division of Health Engineering (the Division), Radiation Control Program (the Program). The Program Manager reports to the Division Director. The Bureau of Health located in the State Department of Human Services (the Department), is the designated radiation control agency (See Section 3.3). Organization charts are included in Appendix B. At the time of the review, the Maine Agreement State program regulated 130 specific licenses authorizing Agreement and non-AEA materials. The review focused on the materials program as it is carried out under the Section 274b. (of the Atomic Energy Act of 1954, as amended) Agreement between the NRC and the State of Maine.

In preparation for the review, a questionnaire addressing the common and non-common performance indicators was sent to the Program on August 5, 2002. The Program provided a response to the questionnaire on October 3, 2002. During the review, the review team identified an area in the questionnaire response that needed to be modified. The State provided an amended questionnaire response on November 20, 2002. A copy of the final questionnaire response can be found on NRC's Agencywide Document Access and Management System using the Accession Number ML023250543.

The review team's general approach for conduct of this review consisted of: (1) examination of Maine's responses to the questionnaire; (2) review of applicable Maine statutes and regulations; (3) analysis of quantitative information from the radiation control program licensing and inspection data base; (4) technical review of selected licensing and inspection actions; (5) field accompaniments of one Program inspector; and (6) interviews with staff and management to answer questions or clarify issues. The review team evaluated the information that it gathered against the IMPEP performance criteria for each common and applicable non-common performance indicators and made a preliminary assessment of the Maine Agreement State program's performance.

Section 2 below discusses the State's actions in response to recommendations made following the previous IMPEP review. Results of the current review for the IMPEP common performance

indicators are presented in Section 3. Section 4 discusses results of the applicable non-common performance indicators, and Section 5 summarizes the review team's findings.

2.0 STATUS OF ITEMS IDENTIFIED IN PREVIOUS REVIEWS

During the previous IMPEP review, which concluded on September 18, 1998, five recommendations were made and transmitted to Dr. Dora A. Mills, Director, Bureau of Health and State Health Officer, on December 15, 1998. The team's review of the current status of the recommendations are as follows:

1. The review team recommends that the State perform routine inspections at required frequencies. (Section 3.1).

   Current Status: The review team found that with only a few exceptions, the Program inspected core licensees at the required frequency. This recommendation is closed.

2. The review team recommends that initial inspections of licensees be performed within 6 months of license issuance or within 6 months of the licensee's receipt of material and commencement of operations, consistent with IMC 2800. (Section 3.1).

   Current Status: The review team found that the Program inspected all new licensees within six months of license issuance or within six months of the licensee's receipt of material and commencement of operations. All 18 new licenses issued during the review period were reviewed and found to be inspected and consistent with NRC Inspection Manual Chapter (IMC) 2800 criteria. This recommendation is closed.

3. The review team recommends that the program consistently document and perform appropriate follow-up of all incidents. (Section 3.5).

   Current Status: The review team found that the Program's response to incidents was complete and comprehensive. Initial responses were prompt and well-coordinated, and the level of effort was commensurate with the health and safety significance. Documentation related to an incident is placed in the appropriate license file. This recommendation is closed.

4. The review team recommends that the Program's procedures be reviewed and updated for handling allegations and other privacy information to reflect Department of Health policy or State laws specific to Maine. (Section 3.5).

   Current Status: The review team noted that Maine's Freedom of Access law requires that all public documents be made available for inspection and copying. The State makes every effort to protect an alleger's identity, but it cannot be guaranteed. This recommendation is closed.

5. The review team recommends that the State expedite promulgation of the compatibility related regulations. (Section 4.1.2).

   Current Status: Since the last review, the Program has adopted 28 NRC amendments in three rulemaking packages. There are currently three NRC amendments that have

not been adopted by the Program. However, based on NRC policy, these amendments are not overdue. The Program plans to adopt NRC rules on an annual basis. This recommendation is closed.

During the 1998 review, two suggestions were made for the Program to consider. The review team determined that the Program considered the suggestions and took appropriate actions.

3.0 COMMON PERFORMANCE INDICATORS

IMPEP identifies five common performance indicators to be used in reviewing both NRC Regional and Agreement State programs. These indicators are: (1) Technical Staffing and Training; (2) Status of Materials Inspection Program; (3) Technical Quality of Inspections; (4) Technical Quality of Licensing Actions; and (5) Response to Incidents and Allegations.

3.1 Technical Staffing and Training

Issues central to the evaluation of this indicator include the Program's staffing level and staff turnover, as well as the technical qualifications and training histories of the staff. To evaluate these issues, the review team examined the Program's questionnaire responses relative to this indicator, interviewed Program management and staff, reviewed job descriptions and training records, and considered any possible workload backlogs.

Program staffing was stable over the review period. Due to a low turnover rate, the staff consists of experienced personnel. The radioactive materials program has three technical positions, including the Program Manager. The Program has one individual, the Low-Level Waste Inspector, assigned to the decommissioning activities at the Maine Yankee reactor site, who is also being cross trained in the radioactive materials program. In addition, the Program has two X-ray staff members and two individuals assigned to the radon program. The Program currently has no vacant positions. The review team noted that the Program had stable funding during the review period due to dedicated revenue from licensee fees.

Training and qualification requirements for Program staff are established in a procedure which sets forth essentially the same training and qualification recommendations detailed in NRC's IMC 1246. The staff are well trained and qualified from an education and experience standpoint. All have Bachelor's degrees in the sciences, and the Program Manager is also a professional engineer. Inspector requirements include NRC training courses, when available, or equivalents.

All technical staff members have taken the NRC courses deemed appropriate for their tasks. The training records demonstrate that Program management is committed to continual training for the staff. The review team concluded that the Program has a well balanced staff, and a sufficient number of trained personnel to carry out regulatory duties.

The Advisory Committee on Radiation of the State of Maine, as constituted under the law, acts in a purely advisory role for the Program. Meetings of the committee are infrequent.

Based on the IMPEP evaluation criteria, the review team recommended and the MRB agreed that Maine's performance with respect to the indicator, Technical Staffing and Training, is satisfactory.

3.2 Status of Materials Inspection Program

The review team focused on five factors in reviewing the status of the material inspection program: inspection frequency, overdue inspections, initial inspections of new licensees, timely dispatch of inspection findings to licensees, and the performance of reciprocity inspections. The review team's evaluation is based on the Program's questionnaire responses relative to this indicator, data gathered independently from the Program's licensing and inspection data tracking system, the examination of complete licensing and inspection casework, and interviews with managers and staff.

The team's review of the Program's inspection priorities verified that inspection frequencies for various types of Maine material licenses are generally the same as those listed in NRC IMC 2800. However, there are some categories of licenses that were assigned inspection priority codes that prescribe a more frequent inspection schedule than those currently prescribed in NRC IMC 2800. The Program recently implemented the revised inspection priorities that are currently part of the pilot program under a temporary instruction involving NRC IMC 2800. The team believes that these changes in priority are acceptable, yet additional changes may be necessary once NRC officially revises their inspection priorities.

In their response to the questionnaire, the Program indicated that there were currently no inspections of core licensees currently overdue by more than 25 percent of the NRC frequency. This information was verified during the inspection casework reviews and the review of the monthly generated "inspections due" list provided to the team.

The Program conducted a total of 19 inspections of its eight core licensees during the review period. The review team noted that four of these inspections were conducted overdue during the review period, ranging from four days to two months overdue. During the review period, there were no overdue inspections of non-core licenses. The review team also evaluated the Program's initial inspections. The team noted that the Program conducted initial inspections in accordance with NRC IMC 2800 guidelines.

The timeliness of the issuance of inspection findings was also evaluated during the inspection file review. The Program has an effective and efficient process which ensures that inspection findings are communicated to licensees in a timely manner. The Program's goal is to complete each inspection report and deliver the notice of violation to the licensee within 30 days. The licensee is then instructed to respond within 20 working days. Of the eight core licensee files reviewed only two inspection reports exceeded the 30 day goal.

During the review period, the Program granted 14 core reciprocity licenses. The Program exceeded the 20 percent criteria prescribed in NRC IMC 1220 by inspecting six licensees. In addition, the Program inspected 20 percent of all other categories of reciprocity licensees.

Based on the IMPEP evaluation criteria, the review team recommended and the MRB agreed that Maine's performance with respect to the indicator, Status of the Materials Inspection Program, is satisfactory.

3.3 Technical Quality of Inspections

The team evaluated the inspection reports, enforcement documentation, and inspection field notes and interviewed inspectors for a total of 13 inspections conducted during the review period, including inspections of all eight core radioactive materials licensees. The casework included both of the Program's fully trained materials inspectors, and covered inspections of various types as follows: industrial radiography, academic broad scope, medical broad scope, medical institution with QMP, nuclear pharmacy, and research & development. In addition, two inspection reports of non-core licensees performed by the newest inspector were reviewed by the team. Appendix C lists the inspection casework files reviewed for completeness and adequacy with case-specific comments.

Based on the casework file reviews, the review team found that routine inspections covered all aspects of the licensee's radiation protection program. The inspection reports were thorough, complete, consistent, and of high quality, with sufficient documentation to ensure that licensee's performance with respect to health and safety was acceptable. The documentation adequately supported the cited violations. Exit interviews were held with appropriate licensee personnel. Team inspections were performed when appropriate and for training purposes.

The review team found that routine inspections adequately cover the licensee's radiation protection program, include a written summary of the scope of the licensed activities and categorize violations into severity levels which can later be used for escalated enforcement, if necessary. Part B of the State of Maine "Rules Relating to Radiation Protection," dated August 1, 2002, explains the initiation of enforcement actions. Three reciprocity enforcement files were reviewed. The team found that this procedure has led to improved licensee performance in regard to health and safety compliance through possible civil penalty, suspension of operations, or other appropriate actions.

The Program Manager attempts to conduct supervisory accompaniments of material inspectors once a year. During this review period, there was only one recent documented accompaniment. The review team discussed this issue with the Program Manager, and he stated that he generally accompanies the inspectors on scrap yard incidents but not on routine inspections. In the State's December 30, 2002 response to the draft IMPEP report, additional information was provided on the management accompaniments performed during the review period. The review team found that the number of supervisory accompaniments was acceptable.

The review team accompanied one Program inspector on May 24, 2001 during an inspection at a medical institution licensed for diagnostic nuclear medicine and radiopharmaceutical therapy and is identified in Appendix C. During the accompaniment, the inspector demonstrated appropriate performance-based inspection techniques and knowledge of the regulations. The inspector was well prepared and thorough in his review of the licensee's radiation safety program. The inspection was adequate to assess radiological health and safety at the licensed facility.

The Program has an adequate number and types of survey meters to support the current inspection program as well as for responding to incidents and emergency conditions. The

Program has contractors who calibrate their survey instruments on an annual basis. Appropriate documentation of calibrated survey instruments such as GM meters, scintillation detectors, ion chambers, and micro-R meters was provided. Air monitoring equipment as well as prepared emergency field kits are also available for emergency use. Contamination wipes are primarily evaluated at the agency's onsite laboratory with a liquid scintillation detector. The U.S. Department of Justice, Office of Domestic Preparedness and Response, has recently approved funding through a Weapons of Mass Destruction grant, for the Program to procure sophisticated detection instruments. The Program plans to distribute the instruments to various law enforcement agencies and regional emergency response personnel, as well as maintain a sufficient quantity for the Program's use. The instruments which will remain on site include two teletectors, one Exploranium with added neutron detection capability, and six belt detectors.

Based on the IMPEP evaluation criteria, the review team recommended and the MRB agreed that Maine's performance with respect to the indicator, Technical Quality of Inspections, is satisfactory.

3.4 Technical Quality of Licensing Actions

The review team interviewed license reviewers, evaluated the licensing process, and examined licensing casework for 17 specific licenses. Licensing actions were reviewed for completeness, consistency, proper radioisotopes and quantities, qualifications of authorized users, adequate facilities and equipment, adherence to good health physics practices, financial assurance, operating and emergency procedures, appropriateness of the license conditions, and overall technical quality. The casework files were also reviewed for timeliness, use of appropriate deficiency letters and cover letters, reference to appropriate regulations, product certifications, supporting documentation, consideration of enforcement history, pre-licensing visits, supervisory review as indicated, and proper signatures. The files were checked for retention of necessary documents and supporting data.

The licensing casework was selected to provide a representative sample of licensing actions which were completed during the review period. The cross-section sampling focused on the new licenses, amendments, renewals, and licenses terminated during the review period. The sampling included the following types: broad scope research and development, general license distribution, manufacturing and distribution, medical institution - QMP required, medical broad scope, private practice, research and development, nuclear pharmacy, industrial radiography, portable gauge, self-shielded irradiator and veterinary. Licensing actions reviewed included five new, three renewals, six amendments and three termination files. A listing of the casework licenses evaluated with case specific comments can be found in Appendix D.

Overall, the review team found that the licensing actions were thorough, complete, consistent, and of high quality with health and safety issues properly addressed. License tie-down conditions were stated clearly, backed by information contained in the file, and inspectable. The licensee's compliance history was taken into account when reviewing renewal applications and amendments. The exemptions noted in the questionnaire responses were determined to be appropriate and well documented by license conditions.

Licensing actions are assigned to one of two license reviewers along with a priority based on the type of action. Once the reviewer completes the action, the other reviewer or the Program Manager does a second review of the action. An internally developed checklist specific to the type of license is completed by the initial reviewer and signed by the second reviewer for new, renewal and termination licensing actions. The status of all licensing actions are tracked on a database. The Program generates licenses and correspondence with standardized conditions and formats. As of September 2000, both license reviewers were given full signature authority by the Program Manager. The Program Manager continues to review approximately 10% of all licensing actions. The Program issues licenses for a five-year period under a timely renewal system, utilizes licensing guides based on NRC licensing guides (NUREG 1556 series) as appropriate, uses standard licensing conditions, and issues a complete license for each licensing action. During the review period, the Program streamlined their licensing process to make it more risk informed and performance based, and reduce the amount of information needed to support an application. The streamlined process has significantly reduced the amount of time required by Program staff to review an application.

Since July 2000, the Program has been certifying radiographers in accordance with Part E of the State's regulations. The Program administers the radiographer certification examination developed by the Texas Department of Health. Since the inception of the certification process, the Program has certified a total of 36 individuals including radiographers from Canada.

A review of termination actions taken over the review period showed that most terminations were for licensees possessing only sealed sources. A notable exception was the termination of a licensee authorized to use thorium for the manufacturing of tungsten wire and rods. The review team found that terminated licensing actions were well documented, showing appropriate transfer records or appropriate disposal methods and records, confirmatory surveys, and survey records. In discussions with Program staff, the review team noted that there were no major decommissioning efforts underway with regard to Agreement material in Maine.

Based on the IMPEP evaluation criteria, the review team recommended and the MRB agreed that Maine's performance with respect to the indicator, Technical Quality of Licensing Actions, is satisfactory.

3.5 Response to Incidents and Allegations

In evaluating the effectiveness of the Program's actions in responding to incidents, the review team examined the Program's responses to the questionnaire relative to this indicator, reviewed the incident reports for Maine in NMED against those contained in the Program's files, and evaluated reports and supporting documentation for five incidents. A list of the incident casework examined with case-specific comments is included in Appendix E. The review team also reviewed the Program's response to two allegations involving radioactive material. One allegation was referred to the State by the NRC during the review period.

The incidents selected for review included the following event categories: medical event, radiation overexposure, contamination event, leaking sealed sources, and equipment problems. The review team found that the Program's response to incidents was complete and

comprehensive. Initial responses were prompt and well-coordinated, and the level of effort was commensurate with the health and safety significance. The Program dispatched inspectors for onsite investigations when appropriate, and took suitable enforcement and follow-up actions.

The responsibility for initial response and follow-up actions to materials incidents may be assigned to one of two materials inspectors. Upon receipt, staff reviews the report, decides on the appropriate response, and gives the report a unique number. Documentation related to an incident is placed in the appropriate license file.

The Program's incident procedure references the NRC's "Handbook on Nuclear Material Event Reporting in the Agreement States" reporting requirements for incidents. In addition, events not meeting the reporting criteria in the NMED handbook are entered into the database for tracking purposes. The review team identified four incidents in NMED for Maine during the review period. The review team noted that all events (requiring 24 hour notification) and routine and/or event updates (requiring 30-day notification) were reported to the NMED. However, it was noted that the NMED data reports were missing information, (e.g., the device manufacturer's name, the device model and source serial number, etc.); although, in most cases the information was included in the NMED abstract. During the review, the individual responsible for entering the information into NMED contacted INEEL to resolve the issue, and to add the missing information and close the events. It was determined that the new NMED software is not compatible with the computers that are on the State's LAN system. After installing the software on a stand-alone computer, the Program was able to complete the NMED required fields.

In evaluating the effectiveness of Maine's actions responding to allegations, the review team examined the Program's questionnaire responses relative to this indicator, and the Program's allegation procedure. The casework for two allegations were reviewed. One allegation was referred to the State by the NRC and one was reported directly to the State. The Program evaluates each allegation and determines the proper level of response. The review of the casework and the files indicated that the Program took prompt and appropriate action in response to the concerns raised. Each of the allegations reviewed were appropriately closed, and the allegers were informed of the results when possible. There were no performance issues identified from the review of the casework documentation.

The review team noted that Maine's Freedom of Access law requires that all public documents be made available for inspection and copying. The State makes every effort to protect an alleger's identity, but it cannot be guaranteed.

Based on the IMPEP evaluation criteria, the review team recommended and the MRB agreed that Maine's performance with respect to the indicator, Response to Incidents and Allegations, is satisfactory.

4.0 NON-COMMON PERFORMANCE INDICATORS

IMPEP identifies four non-common performance indicators to be used in reviewing Agreement State programs: (1) Legislation and Program Elements Required for Compatibility; (2) Sealed

Source and Device Evaluation Program; (3) Low-Level Radioactive Waste Disposal Program; and (4) Uranium Recovery Program. Maine's Agreement does not authorize uranium recovery or low-level radioactive waste disposal activities, so only the first two non-common performance indicators were applicable to this review.

4.1 Legislation and Program Elements Required for Compatibility

4.1.1 Legislation

In addition to their response to the questionnaire, the Program provided the review team with the opportunity to review copies of legislation that effect the radiation control program. The current effective statutory authority for the Program is contained in the Maine Radiation Protection Statutes in 22 MRSA § 661-690. The Radiation Control Program is designated as the State's radiation control agency. The review team noted that no legislation affecting the Program was passed during the review period.

4.1.2 Program Elements Required for Compatibility

The Maine Regulations for Control of Radiation, found in Maine Administrative Rules 10-144A CMR 220, apply to all ionizing radiation. Maine requires a license for possession and use of all radioactive material including naturally occurring materials, such as radium, and accelerator-produced radionuclides. Maine also requires registration of all equipment designed to produce x-rays or other ionizing radiation.

The review team examined the State's administrative rulemaking process and found that the process takes approximately four months after filing the draft rule with the Secretary of State. Prior to filing with the Secretary of State, the draft rule is reviewed by Department of Human Services (the Department) management, the Attorney General's Office, and the Governor's Office. When an acceptable draft proposed revision to a rule has been prepared, it is sent to the Secretary of State, the public, the NRC, other agencies, and all potentially impacted licensees and registrants for comment. The Secretary of State announces a public meeting/hearing period for the proposed revision to the rule. Comments are considered and incorporated as appropriate before the regulations are finalized. After responding to comments, the Program forwards the proposed revision to the rule with the addressed comments to the Commissioner, the Department, and Attorney General's Office for final approval. The Commissioner and the Attorney General sign the final regulations. The State can adopt other agency's regulations by reference and has the authority to issue legally binding requirements (e.g., license conditions) in lieu of regulations until compatible regulations become effective.

The review team evaluated the Program's responses to the questionnaire, reviewed the status of regulations required to be adopted by the State under the Commission's adequacy and compatibility policy and verified the adoption of regulations with data obtained from the Office of State and Tribal Program's (STP) State Regulation Status Data Sheet. Since the previous IMPEP review, the Program adopted 28 amendments in three rule packages that became effective in August 1999, August 2001, and August 2002. The program plans to adopt NRC amendments on an annual basis.

Current NRC policy requires that Agreement States adopt certain equivalent regulations or legally binding requirements no later than three years after they become effective. The review team found that the Program currently has no overdue NRC amendments.

The Program will need to address the following three regulations in upcoming rulemakings or by adopting alternate legally binding requirements:

- "Requirements for Certain Generally Licensed Industrial Devices Containing Byproduct Material," 10 CFR Parts 30, 31, and 32 amendments (65 FR 79162) that became effective February 16, 2001. The Program has requested that NRC review the State's regulations for compatibility with this amendment.

- "Revision of the Skin Dose Limit," 10 CFR Part 20 amendment (67 FR 16298) that became effective April 5, 2002. The Program has drafted regulations for this amendment and submitted them to NRC for review.

- "Medical Use of Byproduct Material," 10 CFR 20, 32, and 35 amendments (67 FR 20249) that became effective October 24, 2002. The Program has drafted regulations for this amendment and submitted them to the NRC for review.

Based on IMPEP evaluation criteria, the review team recommended and the MRB agreed that Maine's performance with respect to the indicator, Legislation and Program Elements Required for Compatibility, is satisfactory.

4.2 Sealed Source and Device (SS&D) Evaluation Program

During the review period, no SS&D certificates were issued by the program and there are currently no manufacturers of sealed sources or devices in the State. The State, however, does not wish to relinquish the authority to regulate SS&D manufacturers in the future. The State has committed to have a program in place prior to performing evaluations. Accordingly, the review team did not review this indicator.

5.0 SUMMARY

As noted in Sections 3 and 4 above, Maine's performance was found to be satisfactory for all six performance indicators. Accordingly, the review team recommended and the MRB agreed in finding the Maine Agreement State program to be adequate to protect public health and safety and compatible with NRC's program. Based on the results of the current IMPEP review, the review team recommended and the MRB concurred that the next full review should be in approximately four years. No recommendations were made by the review team.

LIST OF APPENDICES AND ATTACHMENTS

APPENDIX A

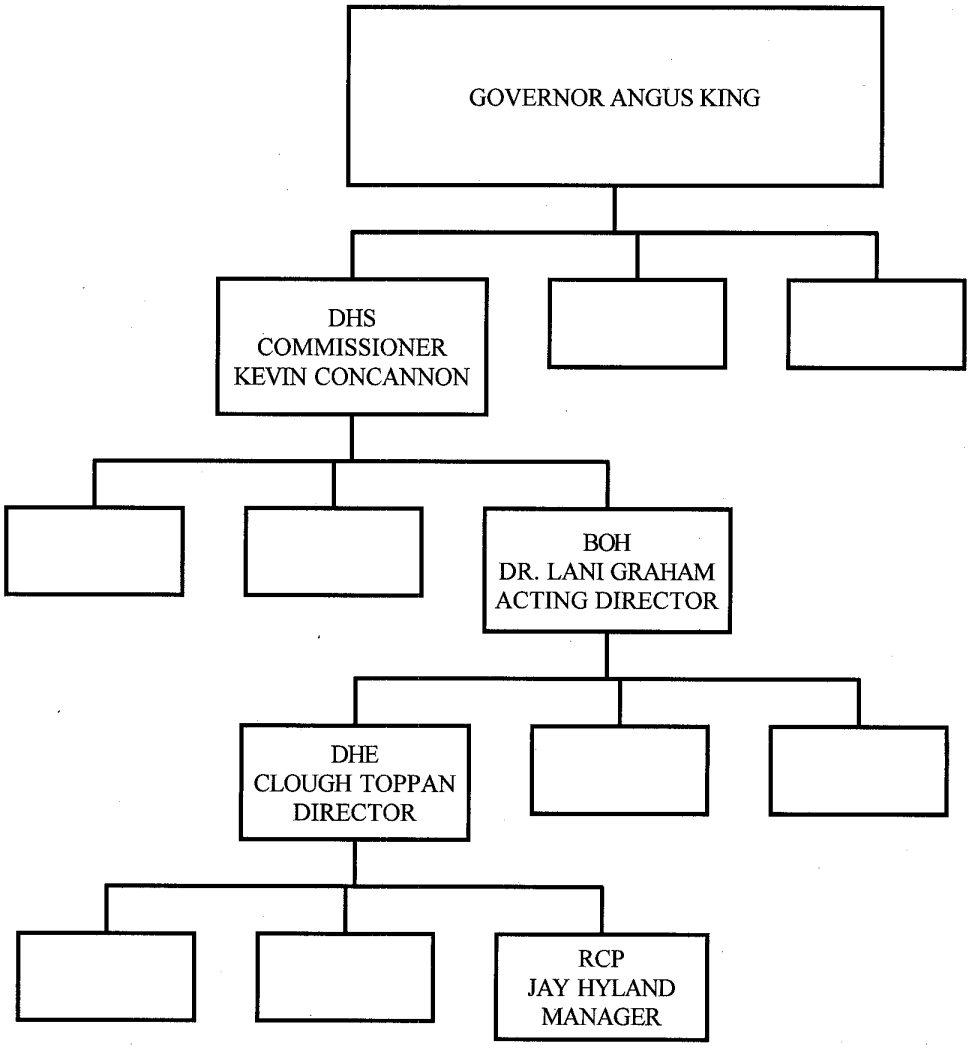
IMPEP REVIEW TEAM MEMBERS

Name	**Area of Responsibility**
Linda McLean, Region IV	Team Leader Technical Staffing and Training Response to Incidents and Allegations
Duncan White, Region I	Technical Quality of Licensing Actions Legislation and Program Elements Required for Compatibility Inspector Accompaniment
Lee Cox, North Carolina	Status of Materials Inspection Program Technical Quality of Inspections

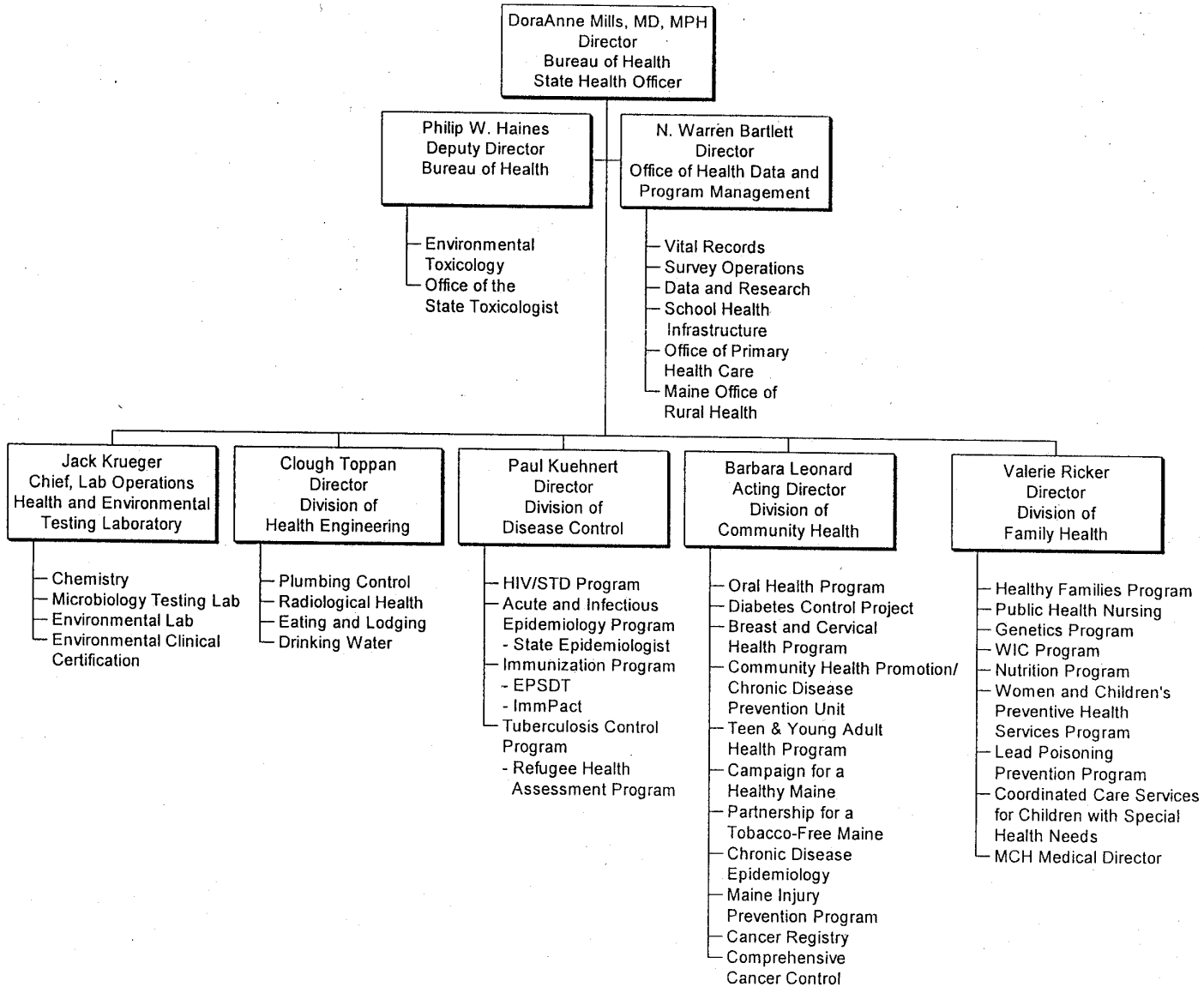
APPENDIX B

MAINE ORGANIZATION CHARTS
ML023290193

APPENDIX B
MAINE ORGANIZATION CHARTS

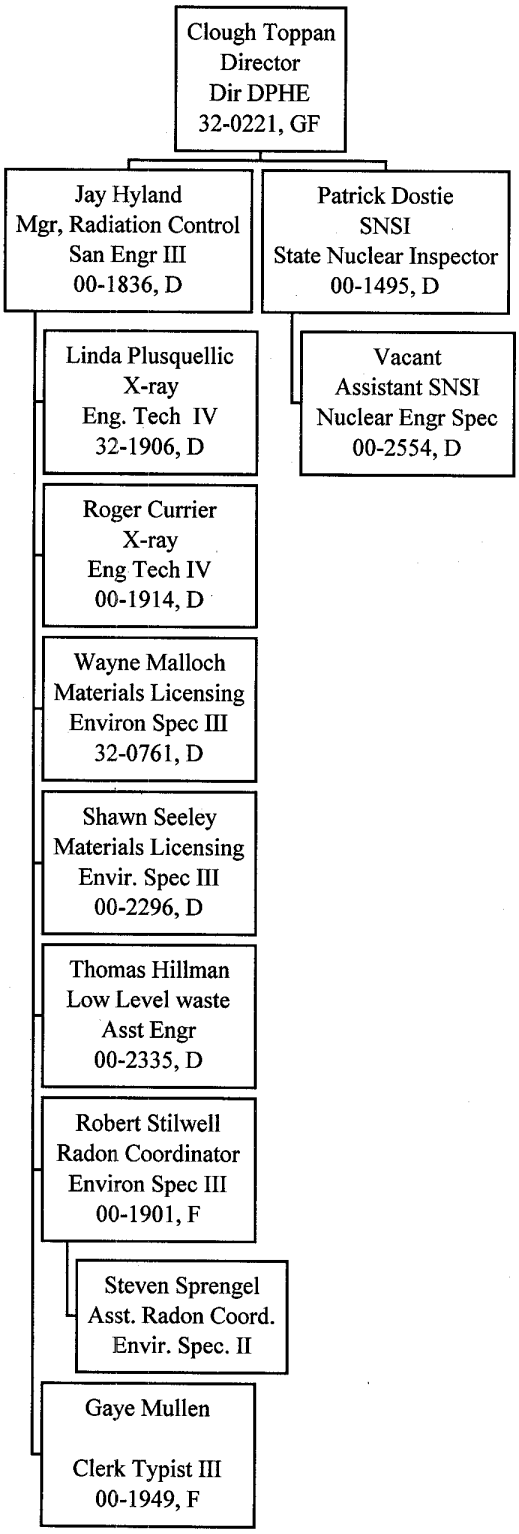

GOVERNOR ANGUS KING
DHS
COMMISSIONER
KEVIN CONCANNON
BOH
DR. LANI GRAHAM
ACTING DIRECTOR
DHE
CLOUGH TOPPAN
DIRECTOR
RCP
JAY HYLAND
MANAGER

Organizational Chart - Bureau of Health



December 2000

RADIATION CONTROL PROGRAM, DIVISION OF HEALTH ENGINEERING
BUREAU OF HEALTH
Line List and Funding Source
10/30/02



Attachment

December 30, 2002 Letter from Dora Ann Mills
Maine's Response to Draft IMPEP Report
(ML030100367)

STATE OF MAINE
DEPARTMENT OF HUMAN SERVICES

ANGUS S. KING, JR.
GOVERNOR

KEVIN W. CONCANNON
COMMISSIONER

JAN 09 2003

December 30, 2002

Linda McLean, ASO
Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Dear Ms. McLean:

This letter is in response to the Integrated Materials Performance Evaluation Program (IMPEP) draft report submitted to me and dated November 25, 2002.

I would like to submit comments on the draft report to add to its obvious quality and clarify items from the IMPEP review of October 29 – November 1, 2002. My comments will be specific and editorial in nature and I will address the specific items first.

1. Page one, 2nd paragraph, "130 specific licenses authorizing Agreement materials" should be changed to "Agreement and non AEA materials" because some of the licensees are only authorized to use accelerator-produced materials.
2. Page two, Section 2.0, item one, if this recommendation is closed please provide an explanation of why, particularly in light of the additional comments regarding file 2 and 7 in Appendix C.
3. Page five, Section 3.2, paragraph two. The Program Manager has reviewed his own records and agrees with the second sentence of this paragraph. While documentation is certainly something we need to work on we don't wish to give the impression that we are not doing the work. Attachment 1 has a listing of inspection accompaniments.

Editorially:

1. Page 1, 3rd paragraph, the sentence "During the review, the review team..." is written twice, one of them should probably be deleted.
2. Page 4, 3rd paragraph, "The licensee is then instructed to respond within 20 working days." Please add the word "working".

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(DEAF/HARD OF HEARING)

We would like to thank you for the opportunity to be part of the IMPEP review. We found the experience to be educational and rewarding, and the reviewers to be extremely knowledgeable and professional.

Sincerely,

Dora Ann Mills, M.D. M.P.H.
Director, Bureau of Health
Department of Human Services

cc: Philip Haines, Deputy Director, Bureau of Health
Jay Hyland, Program Manager, Division of Health Engineering

ATTACHMENT 1

Date	Inspectors	Licensee
5/16/02	Malloch/Hyland	MDS Nordion source change TAMC
4/18/02	Seeley/Malloch/Hyland	MMC (only documented review)
4/13/01	Seeley/Malloch	MMC
3/15/01	Malloch/Hyland	Rumford Hospital
12/01/99	Malloch/Seeley	BIW
1999	Seeley/Malloch	>50% of all inspections