



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

January 30, 2017

Tom Hogan, Director
Environmental Health Division
Department of Health
625 Robert Street North
P.O. Box 64975
St. Paul, MN 55155-0975

Dear Mr. Hogan:

On January 5, 2017, a Management Review Board (MRB), which consisted of U.S. Nuclear Regulatory Commission (NRC) senior managers and an Organization of Agreement States liaison to the MRB, met to consider the proposed final Integrated Materials Performance Evaluation Program (IMPEP) report on the Minnesota Agreement State Program. The MRB found the Minnesota program adequate to protect public health and safety, and compatible with the NRC's program.

The enclosed final report contains a summary of the IMPEP team's findings (Section 5.0). Based on the results of the current IMPEP review, the next full review of the Minnesota Agreement State Program will take place in approximately 5 years, with a periodic meeting tentatively scheduled for April 2019. The Minnesota Agreement State Program received an extension of 1 year for the next IMPEP review based on two consecutive IMPEP reviews with satisfactory findings for all performance indicators.

I appreciate the courtesy and cooperation extended to the IMPEP team during the review. I also wish to acknowledge your continued support for the Agreement State program. I look forward to our agencies continuing to work cooperatively in the future.

Sincerely,

/RA/

Marc L. Dapas, Director
Office of Nuclear Material Safety
and Safeguards

Enclosure:
Final IMPEP Report

cc: See next page

T. Hogan

-2-

cc: Mary B. Navara RN, COHN-S, MPH, Manager
Indoor Environments and Radiation

Sherrie Flaherty, MHP, DC, Supervisor
Radioactive Materials Unit

Gonzalo Perez, CA
Organization of Agreement States
Liaison to the MRB



INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM

REVIEW OF THE MINNESOTA AGREEMENT STATE PROGRAM

OCTOBER 3-7, 2016

FINAL REPORT

Enclosure

EXECUTIVE SUMMARY

This report presents the results of the Integrated Materials Performance Evaluation Program (IMPEP) review of the Minnesota Agreement State Program. The review was conducted during the period of October 3-7, 2016, by a team composed of technical staff members from the U.S. Nuclear Regulatory Commission (NRC) and the Commonwealth of Virginia.

Based on the results of this review, Minnesota's performance was found to be satisfactory for all the performance indicators reviewed. The review team did not make any recommendations for improvement regarding Minnesota's performance.

Accordingly, the review team recommended, and the Management Review Board (MRB) agreed, that the Minnesota Agreement State Program is adequate to protect public health and safety and is compatible with the NRC's program. The review team recommended, and the MRB agreed, that the next IMPEP review take place in approximately 5 years.

1.0 INTRODUCTION

This report presents the results of the review of the Minnesota Agreement State Program. The review was conducted during the period of October 3-7, 2016, by a team composed of technical staff members from the U.S. Nuclear Regulatory Commission (NRC) and the Commonwealth of Virginia. 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 Final General Statement of Policy," published in the *Federal Register* on October 16, 1997, and NRC Management Directive 5.6 (MD 5.6), "Integrated Materials Performance Evaluation Program (IMPEP)," dated February 26, 2004. Preliminary results of the review, which covered the period of November 19, 2011, through October 7, 2016, were discussed with Minnesota managers on the last day of the review.

In preparation for the review, a questionnaire addressing the common and applicable non-common performance indicators was sent to Minnesota on March 24, 2016. Minnesota provided its response to the questionnaire by electronic mail on September 14, 2016. A copy of the questionnaire response is available in the NRC's Agencywide Documents Access and Management System (ADAMS) using the Accession Number ML16258A321.

A draft of this report was issued to Minnesota on November 1, 2016, for factual comment. Minnesota responded to the findings and conclusions of the review by electronic mail dated November 29, 2016. A copy of Minnesota's response is available in ADAMS (Accession Number ML16334A370).

The Minnesota Department of Health (the Department) is designated as the State's radiation control agency. The Agreement State Program is administered by the Radioactive Materials Unit (the Unit), which is located within the Indoor Environments and Radiation Section (the Section) of the Division of Environmental Health (the Division). The Division is part of the Health Protection Bureau (the Bureau), which is one of four bureaus in the Department. The Unit's Environmental Health Supervisor reports directly to the Section's Environmental Health Manager. Organization charts for Minnesota are available in ADAMS (Accession Number ML16258A313).

At the time of the review, the Minnesota Agreement State Program regulated 160 specific licenses authorizing possession and use of radioactive materials. The review focused on the radioactive 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 Minnesota.

The review team evaluated the information gathered against the established criteria for each common and the applicable non-common performance indicators and made a preliminary assessment of the Minnesota Agreement State Program's performance.

2.0 PREVIOUS IMPEP REVIEW AND STATUS OF RECOMMENDATIONS

The previous IMPEP review concluded on November 18, 2011. The final report is available in ADAMS (Accession Number ML120520266). The results of that review were as follows:

Technical Staffing and Training: Satisfactory
Recommendation: None

Status of Materials Inspection Program: Satisfactory
Recommendation: None

Technical Quality of Inspections: Satisfactory
Recommendation: None

Technical Quality of Licensing Actions: Satisfactory
Recommendation: None

Technical Quality of Incident and Allegation Activities: Satisfactory
Recommendation: None

Compatibility Requirements: Satisfactory
Recommendation: None

Overall finding: Adequate to protect public health and safety and compatible with NRC's program.

3.0 COMMON PERFORMANCE INDICATORS

Five common performance indicators are used to review the NRC regional and Agreement State radioactive materials 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) Technical Quality of Incident and Allegation Activities.

3.1 Technical Staffing and Training

The ability to conduct effective licensing and inspection programs is largely dependent on having a sufficient number of experienced, knowledgeable, and well-trained technical personnel. Under certain conditions, staff turnover could have an adverse effect on the implementation of these programs, and could affect public health and safety. Apparent trends in staffing must be explored. Review of staffing also requires a consideration and evaluation of the levels of training and qualification. The evaluation standard measures the overall quality of training available to, and taken by, materials program personnel.

a. Scope

The review team used the guidance in State Agreements procedure SA-103, "Reviewing the Common Performance Indicator: Technical Staffing and Training," and evaluated Minnesota's performance with respect to the following performance indicator objectives:

- A well-conceived and balanced staffing strategy has been implemented throughout the review period.
- Agreement State training and qualification program is equivalent to NRC Inspection Manual Chapter (IMC) 1248, "Formal Qualifications Program for Federal and State Material and Environmental Management Programs."
- Qualification criteria for new technical staff are established and are being followed or qualification criteria will be established if new staff members are hired.
- Any vacancies, especially senior-level positions, are filled in a timely manner.
- There is a balance in staffing of the licensing and inspection programs.
- Management is committed to training and staff qualification.
- Individuals performing materials licensing and inspection activities are adequately qualified and trained to perform their duties.
- License reviewers and inspectors are trained and qualified in a reasonable period of time.

b. Discussion

The Minnesota Agreement State Program includes six full-time equivalents (FTE) in the Unit. Five of the FTE are classified as Industrial Hygienists and perform both licensing and inspection activities. The remaining FTE is associated with the Environmental Health Supervisor who serves as the Unit Supervisor. At the time of the review, there were no vacancies in the Unit. One vacancy, which existed at the time the previous review was conducted, was filled early in this review period. One additional individual left the Unit during the review period and was replaced. One new position was added during the review period. Each of the open positions were vacant for no more than four months before being filled. Minnesota has developed and is following a training and qualification program compatible with the NRC's IMC 1248.

c. Evaluation

The team determined that during the review period the Minnesota program met the performance indicator objectives listed in Section 3.1.a.

d. Results

Based on the IMPEP evaluation criteria in MD 5.6, the review team recommended, and the Management Review Board (MRB) agreed, that Minnesota's performance with respect to the indicator, Technical Staffing and Training, be found satisfactory.

3.2 Status of Materials Inspection Program

Periodic inspections of licensed operations are essential to ensure that activities are being conducted in compliance with regulatory requirements and consistent with good safety practices. The frequency of inspections is specified in IMC 2800, "Materials Inspection Program" and is dependent on the amount and kind of material, the type of operation licensed, and the results of previous inspections. There must be a capability for maintaining and retrieving statistical data on the status of the inspection program.

a. Scope

The review team used the guidance in State Agreements procedure SA-101, "Reviewing the Common Performance Indicator: Status of the Materials Inspection Program," and evaluated Minnesota's performance with respect to the following performance indicator objectives:

- Initial inspections and inspections of Priority 1, 2, and 3 licensees are performed at the frequency prescribed in IMC 2800.
- Candidate licensees working under reciprocity are inspected in accordance with the criteria prescribed in IMC 1220, "Processing of NRC Form 241, Report of Proposed Activities in Non-Agreement States, Areas of Exclusive Federal Jurisdiction, and Offshore Waters, and Inspection of Agreement State Licensees Operating Under 10 CFR 150.20."
- Deviations from inspection schedules are normally coordinated between technical staff and management.
- There is a plan to perform any overdue inspections and reschedule any missed or deferred inspections; or a basis has been established for not performing any overdue inspections or rescheduling any missed or deferred inspections.
- Inspection findings are communicated to licensees in a timely manner (30 calendar days, or 45 days for a team inspection, as specified in IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports").

b. Discussion

The Unit performed 158 Priority 1, 2, 3, and initial inspections during the review period. Two Priority 1 inspections were performed overdue. One overdue inspection was the result of an isolated database error, and one inspection was scheduled beyond its due date so that it could be used for training purposes. The number of inspections performed overdue was approximately one percent of all Priority 1, 2, 3, and initial inspections performed over the review period. All initial inspections of new licenses were performed within 12 months of license issuance.

The Unit's inspection frequency is the same for similar license types found in IMC 2800, except for non-broad scope licenses possessing Category 2 sources. The Unit's inspection frequency for these licensees is every two years, as opposed to NRC's 5-year inspection interval.

The team evaluated 29 inspection reports and noted that all were communicated to the licensee within the Unit's goal of 30 days following the inspection exit.

During each year of the review period, the Unit performed inspections on more than 20 percent of candidate licensees as defined by IMC 1220.

c. Evaluation

The team determined that during the review period Minnesota met the performance indicator objectives listed in Section 3.2.a.

d. Results

Based on the IMPEP evaluation criteria in MD 5.6, the review team recommended, and the MRB agreed, that Minnesota's performance with respect to the indicator, Status of the Materials Inspection Program, be found satisfactory.

3.3 Technical Quality of Inspections

Inspections, both routine and reactive, provide assurance that licensee activities are conducted in a safe and secure manner. Accompaniments of inspectors performing inspections, and the critical evaluation of inspection records, are used to assess the technical quality of an Agreement State's inspection program.

a. Scope

The review team used the guidance in State Agreements procedure SA-102, "Reviewing the Common Performance Indicator: Technical Quality of Inspections," and evaluated Minnesota's performance with respect to the following performance indicator objectives:

- Inspections of licensed activities focus on health, safety, and security.
- Inspection findings are well-founded and properly documented in reports.
- Management promptly reviews inspection results.
- Procedures are in place and used to help identify root causes and poor licensee performance.
- Inspections address previously identified open items and violations.
- Inspection findings lead to appropriate and prompt regulatory action.
- Supervisors, or senior staff as appropriate, conduct annual accompaniments of each inspector to assess performance and assure consistent application of inspection policies.
- For programs with separate licensing and inspection staffs, procedures are established and followed to provide feedback information to license reviewers.
- For Agreement States, inspection guides are consistent with NRC guidance.
- An adequate supply of calibrated survey instruments is available to support the inspection program.

b. Discussion

The review team evaluated inspection reports, enforcement documentation, and interviewed inspectors involved in materials inspections conducted during the review period. The casework selected for review included 26 inspection files for inspections conducted by seven of the Unit's inspectors (current and former) and covered medical, industrial, commercial, academic, research, and service licenses. The review team found that inspection documents were thorough, complete, consistent, and of acceptable technical quality with health, safety, and security issues properly addressed.

The review team verified that the Unit maintains an adequate supply of appropriately calibrated survey instruments to support the inspection program, and to respond to radioactive materials incidents and emergency situations. The Unit also has multiple hand-held instruments for portable gamma spectrometry with both medical and industrial libraries of radionuclides. These instruments provide staff the ability to rapidly identify radionuclides of concern in various settings such as landfills and recycling centers. The MRB considered the Unit's use of portable gamma spectrometry to be a very efficient and effective practice in that it provides the Unit much flexibility in its response to incidents.

The Unit performs annual supervisory accompaniments for each of the materials inspectors. Each annual inspector accompaniment is performed by the Environmental Health Supervisor. In addition, the Unit implemented a peer accompaniment process.

A review team member accompanied three Unit inspectors during the week of September 19, 2016, and noted that the inspectors were well-prepared, thorough, and conducted performance-based inspections. In addition, the inspections were adequate to assess radiological health, safety and security. The inspector accompaniments are identified in Appendix B.

c. Evaluation

The team determined that during the review period Minnesota met the performance indicator objectives listed in Section 3.3.a.

d. Results

Based on the IMPEP evaluation criteria in MD 5.6, the review team recommended, and the MRB agreed, that Minnesota's performance with respect to the indicator, Technical Quality of Inspections, be found satisfactory.

3.4 Technical Quality of Licensing Actions

The quality, thoroughness, and timeliness of licensing actions can have a direct bearing on public health and safety, as well as security. An assessment of licensing procedures, actual implementation of those procedures, and documentation of communications and associated actions between the Minnesota licensing staff and regulated community is a significant indicator of the overall quality of the licensing program.

a. Scope

The review team used the guidance in State Agreements procedure SA-104, "Reviewing the Common Performance Indicator: Technical Quality of Licensing Actions," and evaluated Minnesota's performance with respect to the following performance indicator objectives:

- Licensing action reviews are thorough, complete, consistent, and of acceptable technical quality with health, safety, and security issues properly addressed.
- Essential elements of license applications have been submitted and elements are consistent with current regulatory guidance (e.g., financial assurance, increased controls, pre-licensing guidance).
- License reviewers, if applicable, have the proper signature authority for the cases they review independently.
- License conditions are stated clearly and are inspectable.
- Deficiency letters clearly state regulatory positions and are used at the proper time.
- Reviews of renewal applications demonstrate a thorough analysis of a licensee's inspection and enforcement history.
- Applicable guidance documents are available to reviewers and are followed (e.g., NUREG-1556 series, pre-licensing guidance, regulatory guides, etc.).
- Licensing practices for risk-significant radioactive materials are appropriately implemented including increased controls and fingerprinting orders (Part 37 equivalent).
- Documents containing sensitive security information are properly marked, handled, controlled, and secured.

b. Discussion

Over the review period, the Unit performed 493 radioactive materials licensing actions. The review team evaluated 29 of these licensing actions which included casework for five current and former license reviewers. The licensing actions selected for review included 8 new applications, 4 amendments, 11 renewals, 4 terminations, and 2 reciprocity licensing actions. The review team evaluated casework which included the following license types and actions: broad scope medical and academic, medical diagnostic and therapy, industrial radiography, research and development, academic, nuclear pharmacy, gauges, self-shielded irradiators, well-logging, veterinary, decommissioning actions, and financial assurance casework. The review team found that licensing action reviews were thorough, complete, consistent, and of acceptable technical quality with health, safety, and security issues properly addressed.

The Unit currently has four fully qualified license reviewers: three Industrial Hygienists and the Environmental Health Supervisor. Once completed, all licensing actions are peer reviewed, approved by another qualified license reviewer, and then submitted to the Environmental Health Supervisor for final review and signature.

The review team assessed the Unit's implementation of the pre-licensing requirements. The Unit implements the "Checklist to Provide a Basis for Confidence That Radioactive Material Will Be Used as Specified on a License" and the "Checklist for Risk-Significant Radioactive Material." The team found that the Unit conducts pre-licensing visits for all new license applications as well as amendments requesting major facility changes involving the physical protection program. During each pre-licensing visit, a security evaluation is performed. Final licensing documents are then mailed to the licensee. Licensing documents reviewed were found to be handled and marked in accordance with the Unit's policy for marking and security of documents.

At the time of the review, the Unit had recently changed to Web Based Licensing (WBL) as its primary source for licensing data capture. While not fully converted at the time of the review, the Unit was in the process of entering license information into the WBL system. The Unit reported to the MRB that the data entry effort is now complete.

c. Evaluation

The team determined that during the review period Minnesota met the performance indicator objectives listed in Section 3.4.a.

d. Results

Based on the IMPEP evaluation criteria in MD 5.6, the review team recommended, and the MRB agreed, that Minnesota's performance with respect to the indicator, Technical Quality of Licensing Actions, be found satisfactory.

3.5 Technical Quality of Incident and Allegation Activities

The quality, thoroughness, and timeliness of response to incidents and allegations of safety concerns can have a direct bearing on public health and safety. An assessment of incident response and allegation investigation procedures, actual implementation of these procedures, internal and external coordination, and investigative and follow-up actions, are a significant indicator of the overall quality of the incident response and allegation programs.

a. Scope

The review team used the guidance in State Agreements procedure SA-105, "Reviewing the Common Performance Indicator: Technical Quality of Incident and Allegation Activities," and evaluated Minnesota's performance with respect to the following performance indicator objectives:

- Incident response, investigation, and allegation procedures are in place and followed.
- Response actions are appropriate, well-coordinated, and timely.
- On-site responses are performed when incidents have potential health, safety, or security significance.

- Appropriate follow-up actions are taken to ensure prompt compliance by licensees.
- Follow-up inspections are scheduled and completed, as necessary.
- Notifications are made to the NRC Headquarters Operations Center for incidents requiring a 24-hour or immediate notification to the Agreement State or NRC.
- Incidents are reported to the Nuclear Material Events Database (NMED).
- Allegations are investigated in a prompt, appropriate manner.
- Concerned individuals are notified of investigation conclusions.
- Concerned individuals' identities are protected, as allowed by law.

b. Discussion

During the review period, a total of 15 incidents were reported by the Unit to NMED. The review team examined each of the 15 event case files to evaluate the Unit's response to each event. The team found that inspectors properly evaluated each event, interviewed involved individuals, thoroughly documented their findings, and enforcement action was taken where appropriate. The casework reviewed included lost/stolen radioactive materials events, damaged equipment incidents, gauge events, medical events, a misdirected radiopharmaceutical shipment, a radiography source disconnect, an effluent release from a cyclotron, and a leaking source.

When an incident is reported to the Unit, the Environmental Health Supervisor evaluates the event to determine the appropriate response which can range from an immediate response to reviewing the event during the next inspection. For 13 of the 15 incidents, the Environmental Health Supervisor directed inspectors to respond immediately. The review team also found that the Unit responded to events in accordance with its established procedure.

During the review period, the Unit received four allegations directly, and two were referred to the Unit from the NRC. The review team evaluated all six materials allegations and found that the Unit took prompt and appropriate action in response to the concerns raised. Concerned individuals were notified of the findings in each case. All of the allegations reviewed were appropriately closed, individuals were notified of the actions taken, and allegeders' identities were protected.

c. Evaluation

The team determined that during the review period Minnesota met the performance indicator objectives listed in Section 3.5.a.

d. Results

Based on the IMPEP evaluation criteria in MD 5.6, the review team recommended, and the MRB agreed, that Minnesota's performance with respect to the indicator, Technical Quality of Incident and Allegation Activities, be found satisfactory.

4.0 NON-COMMON PERFORMANCE INDICATORS

Four non-common performance indicators are used to review Agreement State programs: (1) Compatibility Requirements, (2) Sealed Source and Device Evaluation Program, (3) Low-Level Radioactive Waste Disposal Program, and (4) Uranium Recovery Program. The NRC's Agreement with Minnesota does not relinquish regulatory authority for a sealed source and device evaluation program, low-level radioactive waste disposal program, or uranium recovery program; therefore, only the first non-common performance indicator applied to this review.

4.1 Compatibility Requirements

State statutes should authorize the State to establish a program for the regulation of agreement material and provide authority for the assumption of regulatory responsibility under the agreement. The statutes must authorize the State to promulgate regulatory requirements necessary to provide reasonable assurance of protection of public health, safety, and security. The State must be authorized through its legal authority to license, inspect, and enforce legally binding requirements, such as regulations and licenses. The NRC regulations that should be adopted by an Agreement State for purposes of compatibility or health and safety should be adopted in a time frame so that the effective date of the State requirement is not later than 3 years after the effective date of the NRC's final rule. Other program elements, as defined in Appendix A of State Agreements procedure SA-200, "Compatibility Categories and Health and Safety Identification for NRC Regulations and Other Program Elements," that have been designated as necessary for maintenance of an adequate and compatible program, should be adopted and implemented by an Agreement State within 6 months following NRC designation.

a. Scope

The review team used the guidance in State Agreements procedure SA-107, "Reviewing the Non-Common Performance Indicator: Compatibility Requirements," and evaluated Minnesota's performance with respect to the following performance indicator objectives. A complete list of regulation amendments can be found on the NRC website at the following address: <https://scp.nrc.gov/regtoolbox.html>.

- The Agreement State program does not create conflicts, duplications, gaps, or other conditions that jeopardize an orderly pattern in the regulation of radioactive materials under the Atomic Energy Act, as amended.
- Regulations adopted by the Agreement State for purposes of compatibility or health and safety were adopted no later than 3 years after the effective date of the NRC regulation.
- Other program elements, as defined in SA-200 that have been designated as necessary for maintenance of an adequate and compatible program, have been adopted and implemented within 6 months of NRC designation.

- The State statutes authorize the State to establish a program for the regulation of agreement material and provide authority for the assumption of regulatory responsibility under the agreement.
- The State is authorized through its legal authority to license, inspect, and enforce legally binding requirements such as regulations and licenses.
- Impact of sunset requirements, if any, on the State's regulations.

b. Discussion

Minnesota became an Agreement State on March 31, 2006. The Minnesota Agreement State Program's statutory authority is contained in the Minnesota Statutes, Sections 144.12 through 144.1205. The Department is designated as the State's radiation control agency. No legislation affecting the radiation control program was passed during the review period. The State implemented Part 37 requirements by rule on August 17, 2015.

The State's administrative rule making process takes approximately 18 months from drafting to finalizing a rule. The public, NRC, other agencies, and potentially impacted licensees and registrants, are offered an opportunity to comment during the process. Comments are considered and incorporated, as appropriate, before the regulations are finalized. The review team noted that the State's rules and regulations are not subject to "sunset" laws.

During the review period, the Unit submitted eight proposed and nine final regulation amendments to the NRC for a compatibility review. Two of the final amendments were adopted overdue. At the time of the review, no amendments were overdue for adoption.

c. Evaluation

The team determined that during the review period Minnesota met the performance indicator objectives listed in Section 4.1.a.

d. Results

Based on the IMPEP evaluation criteria in MD 5.6, the review team recommended, and the MRB agreed, that Minnesota's performance with respect to the indicator, Compatibility Requirements, be found satisfactory.

5.0 SUMMARY

As noted in Sections 3.0 and 4.0 above, Minnesota's performance was found to be satisfactory for all performance indicators reviewed. The review team did not make any recommendations regarding program performance by the State.

Accordingly, the review team recommended, and the MRB agreed, that the Minnesota Agreement State Program be found adequate to protect public health and safety and compatible with the NRC's program. Based on the results of the current IMPEP review, the review team recommended, and the MRB agreed, that the next full IMPEP review be

conducted in approximately 5 years (receiving a 1-year extension based on two consecutive IMPEP reviews with satisfactory findings for all performance indicators reviewed).

LIST OF APPENDICES

| | |
|------------|---------------------------|
| Appendix A | IMPEP Review Team Members |
| Appendix B | Inspection Accompaniments |

APPENDIX A

IMPEP REVIEW TEAM MEMBERS

| Name | Area of Responsibility |
|--|--|
| Randy Erickson, Region IV | Team Leader Technical Quality of Incident and Allegation Activities Compatibility Requirements |
| Jim Lynch, Region III | Status of Materials Inspection Program Technical Quality of Inspections Inspector Accompaniments |
| Henry Lynn, NRC Technical Training Center | Technical Staffing and Training |
| Asfaw Fenta, Commonwealth of Virginia | Technical Quality of Licensing Actions |

APPENDIX B

INSPECTION ACCOMPANIMENTS

The following inspection accompaniments were performed prior to the on-site IMPEP review:

| | |
|------------------------------|----------------------|
| Accompaniment No.: 1 | License No.: 1015-27 |
| License Type: Portable Gauge | Priority: 5 |
| Inspection Date: 9/20/16 | Inspector: MS |

| | |
|--------------------------------------|----------------------|
| Accompaniment No.: 2 | License No.: 1082-27 |
| License Type: Industrial Radiography | Priority: 1 |
| Inspection Date: 9/21/16 | Inspector: TK |

| | |
|-----------------------------|----------------------|
| Accompaniment No.: 3 | License No.: 1052-27 |
| License Type: Medical – HDR | Priority: 2 |
| Inspection Date: 9/22/16 | Inspector: LF |