

(SP-99-010, February 1999, Program, SA-101, SA-104)  
DATED: FEBRUARY 22, 1999

SIGNED BY: PAUL H. LOHAUS

ALL AGREEMENT STATES  
MINNESOTA, OHIO, OKLAHOMA, PENNSYLVANIA, AND WISCONSIN

**PROGRAM MANAGEMENT INFORMATION: DRAFT OSP PROCEDURES SA-101, "REVIEWING COMMON PERFORMANCE INDICATOR #1, STATUS OF MATERIALS INSPECTION PROGRAM," AND SA-104, "REVIEWING COMMON PERFORMANCE INDICATOR #4, TECHNICAL QUALITY OF LICENSING ACTIONS" (SP-99-010)**

Enclosed for your review and comment are the draft OSP Procedures SA-101, "Reviewing Common Performance Indicator #1, Status of Materials Inspection Program," and SA-104, "Reviewing Common Performance Indicator #4, Technical Quality of Licensing Actions." These documents have been drafted to incorporate procedures and guidance for the review conducted under the Integrated Materials Performance Evaluation Program. We would appreciate receiving you comments within one month of receipt of this letter.

This information request had been approved by OMB 3150-0029, expiration 04/30/01. The estimated burden per response to comply with this voluntary collection request is 6 hour(s). Forward any comments regarding the burden estimate to the Information and Records Management Branch (T-6F33), U.S. Nuclear Regulatory Commission, Washington D.C. 20555-0001, and to the Paperwork Reduction Project (3150-0029), Office of Management and Budget, Washington, D.C. 20503. If a document does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information.

If you have any questions regarding this correspondence, please contact me or the individual named below:

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Paul H. Lohaus, Director  
Office of State Programs

Enclosures:  
As stated



## OSP Procedure Approval

### *Reviewing Common Performance Indicator #1 Status of Materials Inspection Program - SA-101*

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Issue Date:

Expiration Date:

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Paul H. Lohaus  
*Director, OSP*

*Date:*

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*Deputy Director, OSP*

*Date:*

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Kathleen Schneider  
*Procedure Contact, OSP*

*Date:*

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#### **NOTE**

*The OSP Director's Secretary is responsible for the maintenance of this master copy document as part of the OSP Procedure Manual. Any changes to the procedure will be the responsibility of the OSP Procedure Contact. Copies of OSP procedures will be distributed for information.*

 The logo of the United States Nuclear Regulatory Commission, featuring an eagle with wings spread, holding a shield, with the text "UNITED STATES NUCLEAR REGULATORY COMMISSION" around it.	<b>Procedure Title:</b> <b><i>Reviewing Common Performance Indicator #1, Status of Materials Inspection Program</i></b> <b>Procedure Number: SA-101</b>	<b>Page: 1 of 6</b> <b>Issue Date:</b>
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## I. INTRODUCTION

This document describes the procedure for conducting reviews of a materials program inspection activities in NRC Regional offices and Agreement States using Common Performance Indicator #1, Status of Materials Inspection Program [*Management Directive 5.6, Integrated Materials Performance Evaluation Program (IMPEP)*].

## II. OBJECTIVES

- A. To verify that core licensees (those with inspection frequencies of 3 years or less), including reciprocity licensees, are inspected at regular intervals in accordance with frequencies prescribed in NRC Inspection Manual Chapters (IMC) 2800, *Materials Inspection Program*, and 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*.
- B. To confirm that deviations from inspection schedules are normally coordinated between working staff and management.
- C. To determine that there is a plan to reschedule any missed or deferred inspections on a basis established for not rescheduling.
- D. To ensure that inspections of new licensees are conducted within 6 months of license approval, or in accordance with IMC 0610, for those new licensees not possessing licensed material.
- E. To confirm that inspection findings are communicated to licensees in a timely manner (30 calendar days as specified in IMC 2800).
- F. To determine that inspections are not scheduled with any geographic bias.
- G. For NRC Regions, to ensure that resources budgeted for inspection activities have been applied to the proper categories of licensees, and that commitments and goals expressed in NRC's Five Year Plan are realized.

### **III. BACKGROUND**

Periodic inspections of licensed operations are essential to ensure that activities are conducted in compliance with regulatory requirements and consistent with good safety practices. The frequencies of these periodic inspections are dependant on the amount and kind of material, the type of operation licensed, and the results of previous inspections. Information regarding the number of overdue inspections is a significant measure of the status of a materials inspection program, and thus the capability for maintaining and retrieving statistical data on the status of an inspection program must exist.

### **IV. ROLES AND RESPONSIBILITIES**

#### **A. Team Leader**

The team leader for the Regional or State review will determine which team member(s) is assigned lead review responsibility for this performance indicator. The principal reviewer should meet the appropriate requirements specified in Management Directive (MD) 5.10, *Formal Qualifications for IMPEP Team Members*.

#### **B. Principal Reviewer**

The principal reviewer is responsible for reviewing relevant documentation, conducting staff discussions, and maintaining a summary of all statistical information received.

### **V. GUIDANCE**

#### **A. Scope**

1. This procedure applies only to review of the status of nuclear material safety program inspection activities common to NRC and Agreement States. This primarily refers to byproduct, source and special nuclear materials (non-reactor) inspections.
2. This procedure evaluates the quantitative performance of the Region or Agreement State over the period of time since the last IMPEP review.
3. This procedure specifically excludes inspections of non-Atomic Energy Act materials or licensees, and inspections conducted by NRC Headquarters personnel.

#### **B. Evaluation Procedures**

1. The principal reviewer should refer to Part III (Evaluation Criteria) of MD 5.6 for specific evaluation criteria. These criteria should be applied to the data on inspections during the entire review period, not to the status of the Regional or Agreement State inspection program at the time of the review only. The Directive's Glossary defines the terms "Materials Inspections" and "Overdue Inspections."
2. The evaluation criteria for this indicator are primarily dependent on the percentage of core licensees that are inspected at intervals that exceed the IMC 2800 frequencies by more than 25 percent. The percentage of overdue inspections is the number of overdue core inspections (as defined in IMC 2800) conducted over the review period divided by the total number of core inspections completed. Overdue core inspections include: (1) Priority 1 inspections completed greater than three months past the inspection due date; (2) Priority 2 inspections completed greater than six months past the inspection due date; (3) Priority 3 inspections completed greater than nine months past the inspection due date; and (4) initial inspections completed greater than six months after receipt of licensed material or 12 months after license issuance (note: a different set of criteria may be applied to those licensees who have received an extension on their inspections, e.g., Priority 1 licensees whose inspection frequency has been extended to once every 2 years).
3. In applying the criteria, some flexibility may be used to make the determination of the rating for this indicator. For example, if greater than 25 percent of the core inspections completed during the review period were completed as overdue inspections, yet the inspections were completed within a reasonable period of time past the due date, an unsatisfactory rating may not be appropriate. In such cases, the principal reviewer should discuss the matter with the IMPEP team leader and be prepared to give justification for the rating.
4. While this indicator focuses primarily on quantitative performance, review of this indicator should also include a qualitative evaluation that examines the justifications for a Region or State to revise its internal inspection frequencies.
5. The timing of inspection report issuance is another important aspect of this indicator. Inspection reports should be sent to licensees within 30 days of the inspection. Some flexibility may be given due to unusual circumstances.
6. It is important for the principal reviewer to use the Glossary's definitions, for the sake of consistency, in tabulating inspections and overdue inspections. If the Region or State is found to be counting inspections or overdue inspections using different definitions, a reasonable attempt should be made to calculate these figures using the definitions from the MD 5.6. If the reviewer is unable to obtain these counts using

the MD 5.6 definitions, the reviewer should use the Region's or State's figures, but should note whatever differences in terminology or definitions existed.

7. The principal reviewer should examine any printouts listing information on inspections completed by the Region or State during the review period. If such lists cannot be provided, the reviewer should examine a representative number of core, reciprocity, and initial inspections, as well as documents involving inspection findings.
8. If any significant problems or issues are identified (e.g., a preliminary finding that one or more large categories of licenses are not being inspected at the appropriate interval), the principal reviewer should discuss this preliminary finding with the team leader, who will instruct the reviewer how best to obtain additional information from the Region or State that might explain the situation. In most cases, a discussion with first-level Regional or State management would be the preferred option.

#### C. Review Guidelines.

The response generated by the Region or State to relevant questions in the IMPEP questionnaire should be used to focus the review.

The principal reviewer should be familiar with IMC 2800 (available on the NRC external homepage) which describes core inspections. The principal reviewer should also be familiar with IMC 1220 which describes inspection frequencies for reciprocity inspections.

When reviewing a Region, the principal reviewer should consult with Division of Industrial and Medical Nuclear Safety, Operations Branch (IMOB), Office of Nuclear Material Safety and Safeguards (NMSS), to obtain the most current statistical information regarding the Region's inspection performance. IMOB compiles such data on a monthly basis, and is capable of sorting overdue inspections by inspection priority and by State. In addition, IMOB normally maintains correspondence between NMSS and the Regions that may relate to revised inspection performance goals or other programmatic adjustments.

When reviewing a State, use inspection data provided by the State from the questionnaire. The principal reviewer should make certain not to penalize the State for failing to meet more aggressive internally-developed inspection schedules than those specified in IMC 2800. In addition, the reviewer should be sure that overdue inspections are tallied in a consistent fashion, (i.e., those more than 25% past the frequency specified in IMC 2800.) For inspection of reciprocity licensees, the priorities are specified in IMC 1220, Appendix II.

#### D. Review Details.

For the status of materials inspection, the principal reviewer should evaluate the following:

1. Number of overdue inspections.
2. The amount of time past the proper inspection date that any overdue inspections were completed.
3. Reason inspections were completed overdue.
4. Safety significance of canceling or deferring any overdue inspections.
5. Whether reports were issued in a timely fashion (30 days).
6. The inspection frequencies used by an Agreement State are at least as frequent as those listed in IMC 2800.
7. That reciprocity inspections are completed in accordance with the guidance given in IMC 1200.
8. Whether or not the Region or State is counting inspections in a manner consistent with IMC 2800. Certain visits constitute inspections, others do not. Does the Region or State count telephone or written notifications as inspections? Does it count a visit delivering a new license as the first inspection?
9. An appropriate protocol is employed by the Region or State to reduce or extend inspection frequencies.

**E. Review Information Summary**

At a minimum, the summary maintained by the principal reviewer will include a tally of:

1. Core inspections (including reciprocity inspections) that were completed late during the review period or are overdue.
2. The amount of time past the proper inspection date that the overdue inspections were completed.
3. Initial inspections that were completed late during the review period or are overdue.
4. The amount of time past the proper inspection date that the late initial inspections were completed.

5. Inspection findings that were sent late during the review period or are overdue.
6. The amount of time past the proper dispatch date that the late inspection findings were sent.
7. Any Agreement State inspection frequencies that do not match those detailed in IMC 2800.

F. Discussion of Findings with Region or State.

The reviewer should follow the guidance given in OSP Procedure SA-100, *Integrated Material Performance Evaluation Program*, for discussing technical findings with reviewers, supervisors, and management.

## **VI. APPENDICES**

Not applicable.

## **VII. REFERENCES**

1. NRC Management Directive 5.6, *Integrated Materials Performance Evaluation Program*.
2. NRC Management Directive 5.10, *Formal Qualifications for IMPEP Team Members*.
3. Inspection Manual Chapter 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*.
4. OSP Procedure SA-100, *Integrated Materials Performance Evaluation Program*.
5. Inspection Manual Chapter 2800, *Materials Inspection Program*.



## OSP Procedure Approval

### *Reviewing Common Performance Indicator #4 Technical Quality of Materials Licensing Actions - SA-104*

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Issue Date:

Expiration Date:

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Paul H. Lohaus  
*Director, OSP*

*Date:*

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*Deputy Director, OSP*

*Date:*

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Kathleen Schneider  
*Procedure Contact, OSP*

*Date:*

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**Procedure Title:**  
***Review Common Performance Indicator #4,  
Technical Quality of Materials Licensing  
Actions***  
**Procedure Number: SA-104**

**Page: 1 of 6**  
**Issue Date:**

## **I. INTRODUCTION**

This document describes the procedure for conducting reviews of NRC Regional offices and Agreement States using Common Performance Indicator #4, *Technical Quality of Materials Licensing Actions* [NRC Management Directive 5.6, *Integrated Materials Performance Evaluation Program (IMPEP)*].

## **II. OBJECTIVES**

- A. To ensure that decisions regarding the issuance, denial, amendment, termination, or renewal of materials licenses are made in a technically sound fashion, and in a manner consistent with approved NRC or State guidance.
- B. To verify that essential elements of license applications have been submitted and that these elements meet current regulatory guidance for describing the isotopes and quantities used, qualifications of personnel who will use material, facilities and equipment, and operating and emergency procedures sufficient to establish the basis for licensing actions.
- C. To verify that license reviews are thorough, complete, consistent, and of acceptable technical quality with health and safety issues properly addressed.
- D. To confirm that license reviewers have the proper signature authority for the cases they review independently.
- E. To determine that special license tie-down conditions are usually stated clearly and are inspectable.
- F. To verify that deficiency letters clearly state regulatory positions and are used at the proper time.
- G. To confirm that reviews of renewal applications demonstrate a thorough analysis of a licensee's inspection and enforcement history.
- H. To verify that applicable guidance documents are available to reviewers and are followed.

### **III. BACKGROUND**

This performance indicator evaluates the technical quality of the licensing program, on the basis of an in-depth, onsite review of a representative cross-section of licensing actions including new licenses, as well as license renewals, amendments, terminations, decommissioning actions, and bankruptcies. Technical quality includes not only the review of the application and completed actions, but also an examination of any actions that have been pending for a significant amount of time because the failure to act on such requests may have health and safety implications.

### **IV. ROLES AND RESPONSIBILITIES**

#### **A. Team Leader.**

The team leader for the Regional or State review will determine which team member(s) is assigned lead review responsibility for this performance indicator. The principal reviewer should meet the appropriate requirements specified in Management Directive 5.10, *Formal Qualifications for IMPEP Team Members*.

#### **B. Principal Reviewer.**

The principal reviewer is responsible for selecting licenses to be reviewed, and for maintaining a summary of all licenses reviewed.

### **V. GUIDANCE**

#### **A. Scope**

1. This procedure applies only to review (for adequacy, accuracy, completeness, clarity, specificity, and consistency) of the technical quality of completed materials licensing actions issued by the Region or Agreement State in the period since the last review.
2. This procedure excludes non-Atomic Energy Act licensees; licensing actions such as fuel cycle, waste, transportation cask, and sealed source and device reviews; and reviews issued by NRC Headquarters personnel.
3. While it is also necessary to evaluate an Agreement State's sealed source and device evaluation program, uranium recovery program, and low-level radioactive waste

program, those reviews will be conducted as non common performance indicators for Agreement State programs. This procedure is not intended to apply to these reviews.

**B. Evaluation Procedures**

1. The principal reviewer should refer to Part III (Evaluation Criteria) of Management Directive 5.6 for specific evaluation criteria. The Directive's Glossary defines the term "Materials Licensing Action."
2. All Regional or Agreement State licensing actions since the last performance review are potential candidates for review. Reviews of license terminations, bankruptcies, and complex decommissioning will be treated as a subset of this common performance indicator.
3. Depending upon the size of the Regional or State program, the principal reviewer should select between 10-25 licensing actions for review. Whenever possible, the selected licenses should represent a cross-section of the State or region's workload, including as many different license reviewers and license categories as practical. A mix of medical and academic uses (universities, community hospitals, teletherapy licenses, physicians, broad scope facilities, etc.) and industrial use licenses (radiography, irradiators, gauges, measuring devices, etc.) should be sought. Whenever possible, the selected licenses should include at least two new licenses, at least three major program amendments (including one denial) at least three license renewals, one bankruptcy, and at least one license termination. Licenses authorizing activities with potential for significant environmental impact should be included whenever possible. Complex decommissioning licensing activities should also be sought.
4. If the initial review indicates a systematic weakness on the part of one reviewer, or problems with respect to one or more type(s) of licensing action, additional similar license files should be obtained and reviewed, in order to determine the magnitude of the programmatic weakness. If previous reviews indicate a programmatic weakness in a particular area, additional files should be reviewed to assure this weakness has been addressed.
5. If the evaluation of the 10-25 licensing actions does not reveal any programmatic weaknesses, no additional casework needs to be reviewed.
6. Licensing actions pending completion for unusually long periods of time (e.g., amendments not completed for periods greater than six months or renewals not

completed for periods over one year), should be identified specifically, in order to determine whether or not there have been any safety-significant impacts on each licensee's program.

7. No attempt should be made to evaluate Regional performance on a state-by-state basis for this indicator.

C. Review Guidelines.

1. The response generated by the Region or State to relevant questions in the IMPEP questionnaire should be used to focus the review.
2. For the Regions, both tallies and lists of completed licensing actions can normally be obtained from the Licensing Management System (LMS). This information can be obtained prior to the Regional visit from the Office of Nuclear Material Safety and Safeguards' (NMSS) Division of Industrial and Medical Nuclear Safety, Operations Branch. Once the appropriate license files are selected, a call to the Region can be made to have the licenses pulled and ready for review at the time of the visit.
3. For Agreement States, the team leader should consider the quantitative and qualitative responses to the questionnaire as well as general knowledge about the nature and scope of the specific program under review in determining the license files to be reviewed on site.

D. Review Details.

For the technical quality of licensing actions, the principal reviewer should evaluate the following:

1. Technical correctness with regard to license conditions, issue and expiration dates, and nomenclature in distribution licenses.
2. Applications are properly completed and signed by an authorized official.
3. Any significant errors, omissions, deficiencies or missing information in licensing action files (i.e., documents, letters, file notes, and telephone conversations). Licenses should be properly supported by information in the file. Any significant deficiencies related to health and safety should be noted.

4. Improper and/or illegal license authorizations.
5. Any pre-licensing visits completed for complex and major licensing actions.
6. Procedures for reviewing licenses prior to renewal to assure that supporting information in the file reflects the current scope of the licensed program.
7. Licensing guides, checklists, and policy memoranda consistent with current NRC practice (For the regions: the emphasis should be on proper implementation of same).
8. Appropriate use of signature authority.
9. Consideration of the present compliance status of the licensees in the licensing actions.
10. Use of standard license conditions to expedite and provide uniformity to the licensing process, whenever practicable.
11. Appendix A, IMPEP License File Reviewer Guidance, was developed to assist in reviewing certain completed licensing actions. However, the principal reviewer should not feel compelled to address every item in the guidance or to use the guidance for each type of licensing action selected for review.

E. Review Information Summary.

At a minimum, the summary maintained by the principal reviewer will include:

1. The licensee's name and address.
2. A numerical file reference (such as license number).
3. The license reviewer's initials.
4. The type of licensing action (e.g., new, amendment, renewal, termination, etc.).
5. The date the licensing action was issued.
6. The type of license operation (e.g., program code or license category).

F. Discussion of Findings with Region or State.

The reviewer should follow the guidance given in OSP Procedure SA-100, *Integrated Materials Performance Evaluation Program*, for discussing technical findings with reviewers, supervisors, and management.

**VI. APPENDIX**

A. IMPEP License File Reviewer Guidance.

**VII. REFERENCES**

1. NRC Management Directive 5.6, *Integrated Materials Performance Evaluation Program*.
2. NRC Management Directive 5.10, *Formal Qualifications for IMPEP Team Members*.
3. OSP Procedure SA-100, *Integrated Materials Performance Evaluation Program*.



TIE-DOWN DOCUMENT DESCRIPTION (LETTER, TELCON, FAX, E-MAIL, ETC.)	DATE	O.K.	OR COMMENTS
1. APPLICATION			
2. DEFICIENCY LETTER RESPONSE			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			

ITEM	O.K.	COMMENTS OR QUESTIONS
<b>APPLICATION DEFICIENCIES IDENTIFIED BY REVIEWER:</b>		
CORPORATE OFFICER SIGNATURE, DATE		
ISOTOPE, FORM, QUANTITY, AUTHORIZED USE		
PLACES OF USE (INCLUDING TEMP JOB SITE, FIELD, ETC)		
DESCRIPTION OF FACILITY (HOODS, SHIELDING, ETC.)		
ID & DUTIES OF AUTHORIZED USERS, RSO, RSC		
USER QUALIFICATIONS, TRAINING, SUPERVISION		
INSTRUMENTS & CALIBRATION		
SS&D IDENTIFICATION; LEAK TEST PROCEDURES		
SERVICE PROCEDURES (DOSE CALIBRATOR TESTS, IR, ETC.)		
PERSONNEL MONITORING, BIOASSAYS		
OPERATING PROCEDURES		
EMERGENCY PROCEDURES OR PLAN		
SECURITY, POSTING REQUIREMENTS		
PROCUREMENT, RECEIPT PROCEDURES		
INVENTORY, RECORD KEEPING REQUIREMENTS		
TRANSPORTATION OF RAM		
WASTE DISPOSAL (INCINERATION, COMPACTING, ETC.)		
EFFLUENT RELEASE & RECORDS		
SPECIAL AUTHORIZATION		
MONITORING AND SURVEY PROGRAM		
INTERNAL AUDITS		
FINANCIAL SECURITY REQUIREMENT IF NEEDED		
QA/QC/QM		
ALARA, ACTION LEVELS		
<b>ITEM</b>	<b>O.K.</b>	<b>COMMENTS OR QUESTIONS</b>

LICENSE FILE		
FILE ORDERLY; COMPLETE WITH APPLICATION, DEFICIENCY LETTERS, ALL AMENDMENTS, ETC.		
TELCONS, CHECKLISTS INCLUDED		
PEER REVIEW DOCUMENTED		
LICENSING PROCESS		
DEFICIENCIES CLEARLY STATED IN LETTER		
APPLICANT RESPONSE ADEQUATE OR FOLLOWED-UP		
PRE-LICENSING VISIT CONDUCTED AND DOCUMENTED		
LICENSEE'S COMPLIANCE HISTORY CONSIDERED		
SUPERVISORY REVIEW CORRECTED ALL PROBLEMS		
LICENSE		
LICENSE CORRECTLY LISTS MATERIALS TO BE POSSESSED AND AUTHORIZED USE		
NORMAL CONDITIONS FOR LICENSE TYPE INCLUDED		
SPECIAL OR MODIFIED CONDITIONS PROPER		
TIE-DOWN CONDITION COMPLETE		
REGULATIONS CITED		
EXPIRATION DATE CORRECT		
SIGNATURE LINE DATE O.K.		

TERMINATED LICENSES		
ITEM	O.K.	COMMENTS OR QUESTIONS
<b>APPLICATION FOR TERMINATION</b>		
ACCEPTABLE METHOD OF RAM DISPOSAL		
TRANSFER TO ANOTHER STATE LICENSEE	<input type="checkbox"/>	
TRANSFER TO OUT-OF-STATE LICENSEE	<input type="checkbox"/>	
RETURN TO MANUFACTURER	<input type="checkbox"/>	
SHIPMENT TO BURIAL SITE OR OTHER	<input type="checkbox"/>	
<b>SUPPORTING DOCUMENTS</b>		
SS&D LEAK TESTS		
CURRENT COPY OF RECIPIENT'S LICENSE		
LICENSEE'S CLOSE-OUT SURVEY		
MAKE, MODEL, S/N OF INSTRUMENT	<input type="checkbox"/>	
DATES OF SURVEY AND CALIBRATION	<input type="checkbox"/>	
IDENTIFICATION OF PERSON MAKING SURVEY	<input type="checkbox"/>	
ALL READINGS, INCLUDING BACKGROUND	<input type="checkbox"/>	
VERIFICATION OF RECEIPT BY RECIPIENT FOR TRANSFER		
<b>STATE'S ACTIONS</b>		
LICENSEE'S STATEMENTS VERIFIED		
NEW JURISDICTIONAL AGENCY NOTIFIED		
NECESSARY ACTION TAKEN PROMPTLY TO PREVENT ABANDONMENT OF RAM		
TERMINATION INSPECTION CONDUCTED AND PROPERLY DOCUMENTED IF REQUIRED		
REVIEW OF RECEIPTS		
TRANSFER AND/OR DISPOSAL RECORDS		
VERIFICATION OF TRANSFER AND DISPOSAL		
FACILITY SURVEY DOCUMENTATION		
MAKE, MODEL, S/N OF INSTRUMENT	<input type="checkbox"/>	
DATES OF SURVEY AND CALIBRATION	<input type="checkbox"/>	
IDENTIFICATION OF PERSON MAKING SURVEY	<input type="checkbox"/>	
ALL READINGS, INCLUDING BACKGROUND	<input type="checkbox"/>	