



***RADIATION PROTECTION SECTION
RADIOACTIVE MATERIALS BRANCH***

INFORMATION NOTICE 07-01

TO: N. C. Radioactive Materials Licensees

FROM: W. Lee Cox, III, Manager
Radioactive Materials Branch

DATE: October 15, 2007

SUBJECT: The Status of the NC Increased Security Control Program

Since the fall of 2005 the North Carolina Radiation Protection Section, Radioactive Materials Branch (NC RMB) has been working to implement the nationally mandated program known as the *Increased Controls For Licensees That Possess Sources Containing Radioactive Material Quantities Of Concern* (the "ICs"). This work has included:

- Identification of NC licensees qualifying for required compliance with the ICs.
- Notification of these identified NC licensees (including notification of IC compliance expectations)
- Tracking of qualifying licensee's responses and commitments for compliance to the IC requirements.
- Merging IC compliance requirements into existing licensing requirements.
- Conducting a series of announced "first round" on-site inspections of qualifying licensee's actions to achieve compliance.
- Developing a "web-tool" for licensee use in implementation of IC requirements.
- Developing an in-house template for the review and approval of new IC qualifying license applications.
- Determining a frequency and method for continual on-site inspection of qualifying licensee's actions to achieve and maintain IC compliance.

For the foreseeable future the requirements for implementation, compliance demonstration, and auditing for compliance of the ICs will remain a dynamic venture. The NC RMB is positioned to react to these dynamics by conducting the following on-going activities;

- Staying apprised of nationally mandated and pending revisions to the IC requirements for demonstrating compliance, implementing revisions, and auditing practices.
- Appropriately informing licensees of revisions and required actions to the IC requirements for demonstrating compliance, implementing revisions, and auditing practices.
- While meeting the intent of the IC requirements, continue to revise existing licensing practices to best accommodate operational licensee needs.
- Conducting a second round of IC compliance inspections of qualifying licensees.



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The practice methods for these second round inspections are intended to be as follows,

- Conducted throughout the 2007 / 2008 time frame.
- Separate and independent of the traditional health & safety inspections.
- Within the same authority as the traditional health & safety inspections (ref. 15A NCAC 11 .0107 & .0108).
 - Any questions or concerns about the authority or scope of inspections should be directed to;
 - Walter Lee Cox III, Manager, NC Radioactive Materials Branch at 919-571-4141 ext. 250, or
 - Beverly O. Hall, Section Chief, NC Radiation Protection Section at 919- 571-4141 ext. 201
- Potentially unannounced (typically a short term courtesy notification will be provided).
- To include inspection of “field” work.
- The licensee’s Radiation Safety Officer will remain the NC RMB’s primary point of contact for all inspection activities.
 - The Radiation Safety Officer should be prepared to facilitate physical access to equipment and areas as need to determine all aspects of compliance, and facilitate interactions with additional persons as needed to determine compliance.
- The scope and duration of inspections will be conditional on the licensee’s program sophistication and breadth of potential compliance issues.
- Inspection reporting and compliance findings will follow the traditional agency format (each inspection will be followed by a timely report of the findings and any required compliance corrective actions by the licensee will require timely implementation with documentation). All inspection findings are subject to review and approval by the NC RMB management.
- Repeat inspections or an increased inspection frequency are possible due to critical or chronic compliance issues, undetermined compliance status, or as determined needed by the NC RMB management.

As a best practice, licensees are encouraged to implement a *Continuous Improvement* strategy in the implementation of their comprehensive IC compliance program. Prior to releasing Sensitive Information, licensees are reminded to challenge, confirm, and verify the requests are being made with proper authority.