



**State of Connecticut Department of Energy and Environmental Protection**  
**Radioactive Materials Program**

## RCP-901.6

## Tracking Inspections

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## ATTACHMENTS

None

## 1.0 PURPOSE

### 1.1 Applicability

- 1.1.1 This procedure applies to tracking inspections that are performed, completion of the inspection report, and transmittal of correspondence, if any.
- 1.1.2 Tracking shall begin upon notification from the inspector that an inspection has become due and ends with completion of an inspection report and:
  - 1.1.2.1 Transmittal of a Department letter or other form designating a clear inspection such as an RCP 901.4 Attachment 1 **Department Form 591M Safety Inspection Report and Compliance Inspection**, RCP 901.4 Attachment 4 **Clear Inspection Report** (or other documentation of “no response required” by the licensee due to action already taken), or
  - 1.1.2.2 The final letter documenting acceptance of the proposed corrective actions in response to a Notice of Violation or Warning.

## 2.0 SCOPE

### 2.1 Applicability

- 2.1.1 This procedure applies to qualified inspectors and department leadership as it relates to tracking inspections under the radioactive materials program.
- 2.1.2 This procedure describes the process for completing inspections, transmitting results, and inspection closing.

## 3.0 REFERENCES

- 3.1 Sections 22a-153-1 to 22a-153-150, inclusive, of the Regulations of Connecticut State Agencies
- 3.2 Sections 22a-148 through 22a-165(h) of Chapter 446a – Radiation and Radioactive Materials of the Connecticut General Statutes

#### 4.0 DEFINITIONS & ABBREVIATIONS

- 4.1 NOV – Notice of Violation
- 4.2 NOW – Notice of Warning
- 4.3 SCRP - Supervising Radiation Control Physicist
- 4.4 RCPD – Radiation Control Program Director
- 4.5 RMP – Radioactive Materials Program
- 4.6 WBL - Web-Based Licensing

#### 5.0 GENERAL

- 5.1 EQUIPMENT
- 5.2 PRECAUTIONS AND LIMITATIONS
- 5.3 RESPONSIBILITIES

- 5.3.1 Inspector
    - 5.3.1.1 Prepares a list from Web-Based Licensing (WBL) on a monthly basis for the Supervising Radiation Control Physicist of inspections due for the next 6 months in accordance with the Priority Codes in Attachment 6, **Program Codes for each License Type** in RCP-900.1 *Review of Initial Application for License or an Amendment Request*.
    - 5.3.1.2 Maintains files in WBL related to the inspections conducted.

### 5.3.2 Supervising Radiation Control Physicist (SRCP)

#### 5.3.2.1 Responsible for tracking dates of performance for:

- the inspection;
- correspondence sent to the licensee;
- issuance of clear inspection form;
- reply due dates for licensee requests for information
- reply from licensee; and
- final acceptance and inspection closure

#### 5.3.2.2 Ensuring the overall tracking activities of inspection staff.

#### 5.3.2.3 Maintaining the *Inspections Due for the Next 6 Months-By Priority Report* and ensuring inspections are completed when due.

### 5.3.3 Radiation Control Program Director (RCPD)

#### 5.3.3.1 RCPD or designee provides guidance to the Radioactive Materials Program staff relative to inspection tracking.

#### 5.3.3.2 May assume the duties of the SRCP or assign to others as necessary.

## 5.4 PREREQUISITES

## 5.5 RECORDS

#### 5.5.1 Clear inspection form or Notice of Violation-filed in Department inspection file.

#### 5.5.2 Licensee Corrective Actions/Reply, if applicable, filed in Department license file.

#### 5.5.3 RMP letter accepting Corrective Actions/Reply-filed in Department license file.

#### 5.5.4 Inspection Report(s) - filed in Department license file.

5.5.5 Records are filed electronically using Web-based Licensing (WBL).

5.6 ATTACHMENTS

5.6.1 None

6.0 PROCEDURE

6.1 Assignment of Inspection

6.1.1.1 Inspections will be performed by qualified inspectors on workloads, experience levels, and the priority assigned to the inspection. Qualified inspectors should review the *Inspections Due for the Next 6 Months-By Priority Report* and RCP 901.1 *Scheduling of Inspections* to determine inspection options.

6.2 Performance of Inspection and Initiation of Tracking

6.2.1 Once the inspection has been performed, the inspector informs the Supervising Radiation Control Physicist of the licensee name, license number, the date of the inspection, and the name(s) of all inspectors. The exit meeting date may be used for inspections longer than one day. The inspector enters this information into Web-Based Licensing.

6.3 Tracking Inspection Report Completion and Transmittal of Correspondence

6.3.1.1 For routine inspections, the time period for completion of the inspection checklist/report and transmittal of correspondence to the licensee, if any, is 30 days (see note below).

6.3.1.2 The inspector will enter the date the inspection report was completed and the date the inspection letter was sent.

6.3.1.3 The date the inspection reply is due should be obtained from the letter and entered into the Radioactive Materials Program WBL database for those licensees who must respond to a Notice of Warning or Notice of Violation.

NOTE: Escalated enforcement actions may require a faster turn-around time (i.e.; within 10 days).

#### 6.4 Receipt of Corrective Action(s) and Negative Evaluation or Missed Deadline

- 6.4.1.1 Receipt of Corrective Action(s): Once the corrective actions are received, the receipt date should be logged into the Radioactive Materials Program WBL database. Each inspector shall be responsible for checking the pending inspection completions report to determine the current status of received correspondence. An evaluation should be performed as soon as possible by the inspector, but no longer than 30 days, from receipt of the information. Violations and Warnings must also be closed in appropriate DEEP Enforcement Tracking Systems.
- 6.4.1.2 Negative Evaluation: If the corrective action(s) are not satisfactory or the information is incomplete, then a telephone conference call should be conducted. Subsequently, a follow-up letter or email should be sent to the licensee requesting additional information by a specified date and documenting the results of the conference call. The inspector should enter the specified due date into the Radioactive Materials Program WBL database.
- 6.4.1.3 Missed Deadline: If a deadline is missed, the inspector shall, as soon as possible, follow up with the licensee to request submittal of the corrective action information. A new due date for the requested information should be established. The inspector should modify the 'Inspection Reply Due' date upon request of the Supervising Radiation Control Physicist. If deadlines are missed more than twice, the SRCP and RCPD may consider responses including enforcement actions, reduced inspection frequency or escalated enforcement.

#### 6.5 Receipt of Acceptable Information and Close-out of Inspection Tracking

- 6.5.1.1 Receipt of Acceptable Information: Once the licensee provides the corrective actions, the receipt date should be logged into the Radioactive Materials Program WBL database. Each inspector shall be responsible for checking the pending inspection completions report to determine the current status of received correspondence.
- 6.5.1.2 Close-out of Inspection Tracking: If the corrective action(s) are satisfactory, then a 'Close Out' letter should be sent to the licensee, normally within 30 days, stating that the effectiveness of the corrective action(s) will be evaluated on the next inspection. Once this final reply acknowledgement letter is sent and the date logged in the Radioactive Materials Program WBL database by the inspector, the tracking is closed out for the licensee. The inspector should file the inspection report and related correspondence in the Department license file and WBL. If warranted, a follow-up visit may be conducted before the next inspection due date to review corrective actions and closeout the inspection.