



# THE CITY OF NEW YORK DEPARTMENT OF HEALTH

Rudolph W. Giuliani  
Mayor

Neal L. Cohen, M.D.  
Commissioner

January 26, 1999

Richard L. Bangart, Director  
Office of State Programs  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dear Mr. Bangart:

The following responses are being made by the New York City Bureau of Radiological Health to the IMPEP Revised Final Report.

(Section 3.1.1)

1. The Bureau's RAD database can be queried to provide license inspections due on a weekly, monthly and yearly basis. This system also provides a listing of what licenses have been inspected.
2. The database has been modified to automatically set a six month inspection date from the month and date of issuance of all new licenses. These licenses then appear on the due list when the system is queried for the appropriate period.

(Section 3.2.1)

3. As indicated in our response of July 15, 1998, in order to facilitate violation documentation, the Bureau has developed a log, appended to the inspection forms, that requires the inspector to fill in information that includes the Notice of Violation number, date of hearing and result of the hearing.
4. The Bureau has conducted training in-house on performance-based inspection techniques versus compliance-based techniques, using the "Inspecting for Performance" student manual obtained from the NRC.

(Section 3.3.1)

5. Again, as stated in our response of July 15, 1998, overall policy and minimum training requirements for the technical staff is and has been documented. The Bureau's Policy and Procedures Manual contains this information.

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January 26, 1999

(Section 3.3.1)

6. The Bureau maintains an on-going Training Log for each Assistant Scientist, Scientist, and Senior Scientist. These logs contain all NRC, DOT, and FEMA courses, seminars, and in-house training received by these individuals.

(Section 3.5.1)

7. The Bureau continues to Notify NRC of significant reportable events including providing documentation of such events as necessary.

(Section 4.1.1.2)

8. The Bureau is currently on target to incorporate the revisions of 10 CFR 71- NRC's regulations governing transportation of radioactive material- into Article 175 of the New York City Health Code. The Office of General Counsel is aware of pending regulatory changes and the Bureau, where appropriate, employs license condition language for those NRC regulatory changes not yet incorporated into the Health Code.

We hope we have addressed all the issues brought up by the review team's recommendations. If you or any of the team members have any questions, please contact Mr. Gene Miskin, Director, at (212) 676-1556.

Sincerely,



Neal L. Cohen, M.D.  
Commissioner

cc: B. Mojica, M.D.  
A. Goldberg  
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