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MIKE JOHANNIS, GOVERNOR

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OFFICE OF THE ATTORNEY GENERAL  
RULEMAKING DIVISION  
ADJUTANT GENERAL

April 24, 2000

DOCKET NUMBER  
PROPOSED RULE **PR** 30,31,32,170+171  
(64FR40295)Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-001

RE: Comments on Requirements for Certain Generally Licensed Industrial Devices Containing Byproduct Material (RIN3150-AG03)

Dear Secretary:

Thank you for the opportunity to comment on the proposed changes to the above rulemaking.

¶ Comment on: 31.5(c) (8) (I) Manufacturers notify us of replacement devices. We add these devices to our database but are not notified when a device is returned. We then discover that we have a list of 10 devices for one facility but they really only have one or two devices as the other ones have been returned. It is important that we have a list of serial numbers of devices sent to a facility. Currently we do not have a way of knowing when an item is returned. It would be helpful if a manufacturer would indicate that a device is a replacement and then notify us when the device is returned so that we have an accurate inventory.

¶ Comment – When reading through the proposed changes it is hard to interpret which items refer to all GL's and which areas refer to the GL's that are registered and have a fee.

Thank you for the opportunity to comment. If you have any questions please contact myself at (402)471-6430 E-mail [crogers@hhs.state.ne.us](mailto:crogers@hhs.state.ne.us) or Trudy Hill at (402)471-0560 E-mail [thill@hhs.state.ne.us](mailto:thill@hhs.state.ne.us).

Sincerely,

*Cheryl K Rogers*  
Cheryl K. Rogers  
Radioactive Material Program Manager  
Public Health Assurance