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STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

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George H. Ryan
Governor

Thomas W. Ortoger
Director

September 1, 2000

Chief
Rules and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

Rules and Directives Branch
7/19/00 - 5 PM 3:59
JMED

Re: Draft Regulatory Guide NUREG-1556, Vol. 18, Program-Specific Guidance About Service Provider Licenses

Dear Sir/Madam:

The Illinois Department of Nuclear Safety (the Department) hereby submits its comments on the referenced Draft Regulatory Guide. This document is an improvement over previous Regulatory Guides on this subject. We believe the NUREG 1556 series of guides that you have published will expedite the preparation and review process for radioactive materials license applications. The following comments are provided for your consideration to further improve this document:

1. As with other NUREG 1556 documents, it seems that an undue burden is being placed on the inspection staff with respect to evaluation of procedures, practices, equipment acceptability, etc. NRC is apparently allowing licensees to maintain critical procedures on file for inspector review. Our concern is that the licensee may operate under these procedures, which may not be adequate for protection of the public health and safety, for a considerable time period before inspection review occurs. In addition, inspectors do not always have time to carefully review detailed procedures in the field. Coupled with NRC's proposed reduction in the renewal frequency, it is difficult to understand how the current level of radiation safety can be maintained.
2. In Section 8.5.1, subsection "Criteria" (bullet point three), does not convey the intent of the statement due to a missing word following "containing".



TEMPLATE: ADM-013

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3. In Section 8.7.1, "Radiation Safety Officer," a discussion of the delegation of RSO duties should be included. This is particularly important for licenses where the RSO duties will include a wide variety of responsibilities. In this same section, the applicant should also submit duties and responsibilities of the RSO.
4. In Section 8.9, subsection "Response from Applicant," indicates that a response is not required if only sealed sources are possessed in registered devices designed to emit a collimated beam for the purpose of instrument calibration. The Department does not believe that possible high radiation fields in adjacent areas should be dismissed with "no response required." A thorough evaluation of shielding and distances to occupied areas should be performed. The applicant should address how these concerns are addressed at temporary job sites as well.
5. In Section 8.10.4, "Occupational Dose," the applicant should submit the evaluation performed demonstrating that individuals are not likely to receive exposures in excess of 10% of the regulatory limit.
6. In Section 8.10.10, "Mitigation of Contamination," the Department believes that this section can be omitted entirely. As you have stated in the response section, this item is covered in detail in other sections of this guide.
7. In Section 8.11, "Waste Management," a reference to the document SP-97-056 should be included here regarding solubility of sewer releases.

Thank you for the opportunity to comment. Please contact me or Mr. Gibb Vinson at (217) 785-9947 if you have any questions.

Sincerely,


Joseph G. Klinger, Chief
Division of Radioactive Materials

CGV:kjg

cc: James Lynch, State Agreements Officer