



Conference of Radiation Control Program Directors, Inc. *Amended Copy*

Office of Executive Director ♦ 205 Capital Avenue ♦ Frankfort, KY 40601
Phone: 502/227-4543 ♦ Fax: 502/227-7862 ♦ Web Site: www.crcpd.org
Central E-mail: staff@crcpd.org

August 23, 2001

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OSP

Frederick C. Combs, Deputy Director
Office of State and Tribal Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555

RE: CRCPD Comments on NRC Draft Procedures: Commission Briefings and Monthly Conference Calls (Ref: STP-01-054)

Dear Fred:

On behalf of the CRCPD Board of Directors, I appreciate the opportunity you have given our organization to provide comments on NRC's procedures dealing with Commission briefings and monthly conference calls as referenced in STP-01-054.

In general, the CRCPD Board believes that it is important for CRCPD to maximize our effectiveness through a continued and enhanced partnership effort with OAS and NRC for the good of ALL state radiation control programs (RCP), which includes Agreement and Non-Agreement States. We believe it is important that CRCPD, which represents all state RCPs, be perceived as an equal partner by NRC and OAS.

In the spirit of this partnership effort, we offer the following comments on behalf of the Board of Directors.

Annual OAS/CRCPD Commission Briefings

- ♦ Section III -- We believe it is important that the Chairperson-Elect be invited to participate, and if possible be funded to attend. The Commission and CRCPD will benefit from his/her attendance and their participation offers a great opportunity for continuity as they transition into the Chair position.
- ♦ Section V.
 - ♦ A.1 -- It would be helpful to note the timeframe in which OAS and CRCPD are to notify STP of their desire to brief the Commission. In the spirit of IV.C, clarification is needed relative to how this should be done.
 - ♦ B.2
 - ♦ Editorial -- Need to change reference to D.2.
 - ♦ Need clarification if notification is sent to "all" Non-Agreement States or just those who are in the process of becoming an Agreement State.

STP-006 Template

R105 DIST: SP02

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Fred Combs
August 23, 2001
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Monthly NRC/OAS/CRCPD Monthly Teleconference

- ◆ Section II -- To reduce the perception of "inferiority," I would suggest that A and B be reworded as follows: To provide guidance to STP, OAS, CRCPD, NRC offices, and other interested Agreement States on the coordination, notification and administration of the Monthly Teleconference. (Note: I included "other interested Agreement States" as referenced in IV.1.A.)
- ◆ Section III (Editorial) -- The word "Performance" has been omitted in the fourth line as related to spelling out of IMPEP.
- ◆ Section IV.
 - ◆ A.1 -- Why is the CRCPD Board limited only to three members and not the full Board which is seven state persons. I would also think that the CRCPD Executive Director should be included.
 - ◆ A.3 -- To reduce the perception of "inferiority," I would suggest that reference to the CRCPD Board of Directors be moved and inserted following the OAS Executive Board
 - ◆ B -- CRCPD responsibilities on the call have been omitted. In the spirit of partnership, I would either suggest that a "C" be added for CRCPD, or amend B. by saying that "OAS, after consultation with CRCPD, ..."
- ◆ Section V
 - ◆ 1. STP Preparations for the Monthly Teleconference (Editorial) -- The "1." should be an "A."
 - ◆ V.A.4 -- CRCPD should be listed following OAS.

In closing, let me again reiterate our appreciation for allowing us to comment on your procedures. Please contact me should you wish to discuss any of these comments.

Sincerely,



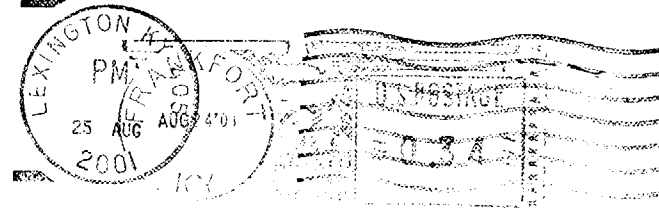
Patricia C. Gorman
Deputy Director

PCG/ms

cc: CRCPD Board of Directors
Paul Lohaus/Kathy Schneider
Charles Hardin, CRCPD Executive Director
Kathy Allen, OAS Chairperson



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Program Directors, Inc.**
205 Capital Avenue
Frankfort, KY 40601



Frederick C. Combs
Office of State and Tribal Programs
NRC
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

20852X273A 13

