

## SUMMARY OF COMMENTS ON SA-117, "Agreement State Project Officers (ASPOs)"

### I. Sent to the Agreement States for Comment: October 2, 2003 (STP-03-075)

**Comments / Dated:** Iowa - 10/8/03 (e-mail)  
Ohio - 11/3/03 (e-mail - no comments)  
Colorado - 11/10/03 (email)

#### Response to/Resolution of Comments:

##### Iowa

###### Comment:

V. GUIDANCE; Subsection A., 2. In this subsection part , reference is made to the statement that the ASPO would accompany the RSAO on a one day visit between IMPEP reviews. Iowa opposes the statement because we believe that the one day visit is no more than a visit. We believe that NRC over site of our Agreement State Program is not well served with a major review once in four years and a one day visit in between. The one day simply is a visit which does not afford sufficient time for the RSAO & ASPO to do a limited review. We believe that a limited review is necessary so that if problems are starting they can be address early. As I remember, the one day visit was established a few years back, impart to address budget issues. The major expense is already taken care of in the travel and the day before and after the visit regardless if the visit is one our multiple days. For one more day you just have the cost of meals and lodging. We believe that the little cost for one more day is minor when one considers what we believe to be a major benefit. What we would like to see is subsection A., 2 revised so that if OSTP's ever changed there mind regarding the in-between visit to something other than one day, these guidelines would not need to be revised.

###### Response:

The draft revision to SA-116, Periodic Meetings with Agreement State Between IMPEP Reviews, allows for meetings of more than one day if necessary. We agree with this comment and the procedure will be revised accordingly.

##### Colorado

###### Comment 1

III. Background, last sentence: the "their" reference is a little confusing to read (State or ASPO, singular vs. plural) Might you prefer "the ASPO's assigned" instead of "their respective"?

###### Response

We agree that the sentence is unclear. The sentence will be revised as follows:

The purpose is to provide further backup and support to the Regional State Agreements Officer (RSAO), and to provide a specific point of contact in STP for each State to handle inquiries from that State, and to be knowledgeable about their respective State programs. STP staff knowledge about their assigned State programs.

Comment 2

IV.A. should read "The STP Director assures that each Agreement State has ..."

Response

We agree with this comment and the procedure will be revised accordingly.

Comment 3

IV.D. rather than "i.e."="that is" (equivalency, therefore limiting), do you really mean "e.g."="for example", to read "(e.g., staffing changes and requests for information)"

Response

We agree with this comment and the procedure will be revised accordingly.

**II. Sent to the NRC Offices for Comment: October, 2003**

**Comments Dated:** Region IV - 10/21/03 (e-mail - no comments)  
Region III - 10/21/03 (email - no comments)  
Region I - 10/22/03 (email - no comments)  
NMSS - 10/22/03 (mark-up)  
OGC - 10/03 (mark-up)

**NMSS**

Comment

II. Objective, B and C should read:

- B. Ensure that the ASPO maintains a high level of awareness of each assigned Agreement State, including current activities and issues.
- C. Provide an headquarters point-of-contact for coordination of each Agreement State's activities and issues.

Response

We agree with this comment and the procedure will be revised accordingly.

**OGC**

Comment

Under V. Guidance, A. ASPO Duties, the ASPO should also assume lead responsibility for negotiaion activities for an Agreement State having an interest in expanding an existing Agreement.

Response

We agree with this comment and the procedure will be revised accordingly.