



Organization of Agreement States

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February 8, 2010

Michael T. Lesar, Chief
Rulemaking and Directives Branch (RDB)
Office of Administration
Mail Stop: TWB-05-B01M
USNRC
Washington, DC 20555-0001

1/22/10
75 FR 3760
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RULES AND DIRECTIVES
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RE: Docket ID NRC-2010-0018 (DG-8037)

Dear Mr. Lesar:

The Organization of Agreement States (OAS) Executive Board has received and reviewed the above referenced document. We appreciate the opportunity to comment on the Draft Regulatory Guide-8037. The OAS, through its member States, is always ready to assist licensees in ways to attain and maintain regulatory compliance.

We find that this document is an all encompassing guidance document that will indeed assist management of medical institutions. This is a resource that management can use to keep radiation exposure to employees and the public, As Low As Reasonably Achievable (ALARA). This regulatory guide is a compilation of guidance with an array of suggestions for nuclear medicine, therapy, laboratory design, shielding, ventilation and fire control. It also addresses ways of securing sources, equipment and control of contamination. It covers those areas that fall under the control of the licensee which affect their overall ALARA mission.

One drawback that we find is that this guide addresses only radioactive materials subject to licensing by the NRC. Furthermore, the guide does not address effluents to unrestricted areas. Therefore, the Regulations and recommendations of other State and Federal Agencies should be consulted for ALARA considerations when dealing with x-ray machines, radiation emitting equipment and materials not licensed by Nuclear Regulatory Commission (NRC).

The Executive Board applauds this publication and we hope to see more of the same in other areas of radiation protection.

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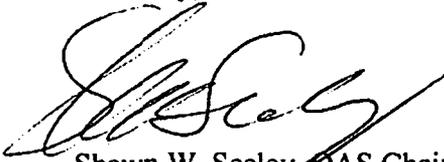
*E-REDS = ADM-03
Call = H. Karagiannis (HXK)*

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Louisiana, Maine, Maryland, Massachusetts, Minnesota, Mississippi, Nebraska, Nevada, New Hampshire,
New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania,
Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, Wisconsin

In closing, we would again thank you for the opportunity to comment on any document such as this one. We firmly believe that early and substantive involvement of the Agreement States is desirable and will serve to improve the final product.

Thank you for allowing us to comment on this proposed regulation and we look forward to the continued participation of the OAS in future NRC initiatives.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Seeley', written in a cursive style.

Shawn W. Seeley, OAS Chair
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