

American Association for Nuclear Cardiology, Inc.

Professionals Dedicated to Diagnostic Accuracy

31 August 2011

Mr. Terrence Reis, Acting Director
Division of Materials Safety
and State Agreements
Office of Federal and State Materials
and Environmental Management Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Reis:

Thank you for your June 9, 2011 response to my letter of 17 May 2011. The response is clear in that there is a policy to review issues that result in safety-significant impacts. There is, however, a basic safety culture implication to this position.

Once a safety-significant impact has occurred, it is too late. The safety culture approach would be to PREVENT the safety-significant event from occurring. In addition, what is significant? What method does the agency have to determine what is the impact of such a delay unless it results in an identified safety event and then it is too late?

We would propose that action on or related to the RSO should be completed, or at least addressed, in no more than a few weeks. For examples, a request to change a RSO, a request to add an alternate RSO.

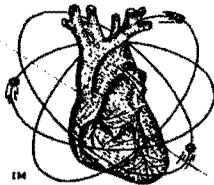
Authorized User requests should also be a priority. This is true if there is only one (1) AU and he/she is leaving, thus a replacement is needed.

Perhaps, for your consideration, you might implement a program where the licensee can request an expedited review with or without an additional fee. You are aware that some States have such a policy, with or without a fee and it seems to work well. States will evaluate the request, with the licensee, and determine the necessity of making the response a priority.

Without reasonable action, in a reasonable period of time, the chances of safety issues increase. Prompt action, reasonable action, will minimize those safety risks AND greatly enhance the image of the agency.

Sincerely,

Charles H. Rose, MA, MSPH, D(ABSNM)
Executive Director



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5660 Airport Boulevard, Suite 101 • Boulder, Colorado 80301



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