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**To:** RADB **From:** Patricia L. Gardner

**Fax:** (301) 492-3446 **Date:** June 28, 2012

**Pages:** 3 (INCLUDING COVER)

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**•Comments:**

Enclosed are comments on Docket ID NRC-2012-0121 Request for Comments on NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses" (FSME-12-045).

Regards,  
Patricia Gardner, Manager  
Bureau of Environmental Radiation

*SONSI Review Complete*  
*Template = ADM-013*

*F-RIDS = ADM-03*  
*Call = T. Herrera (txh1)*  
*K. McDaniel (KKM)*



## State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
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Commissioner

June 28, 2012

Cindy Bladey  
Chief, Rules, Announcements, and Directives Branch  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

RE: Docket ID NRC-2012-0121  
Request for Comments on NUREG-1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses" (FSME-12-045)

Dear Ms. Bladey:

The State of New Jersey, Radioactive Materials Program has reviewed the above document and submits the following comments:

The examples for two independent physical controls do provide helpful guidance to licensees. However, we have the following suggestions:

A section on what does not constitute two physical controls with a picture – such as a locked transportation case with one cable through the handle and looped around part of the truck bed. Strengthen the statement on Page G-6, top paragraph to read: "Licensees commonly use a chain and a padlock to secure a portable gauge in its transportation case to the open bed of a pickup truck while using the vehicle for storage. This is not considered to be adequate security because there is only one physical control. The transportation case is portable and a theft could occur if the chain is cut and the transportation case with the portable gauge is taken. Similarly, if a licensee simply loops the chain through the handles of the transportation case, a thief..."

Label Figure G.2 with arrows pointing out the two locks on the box. If not familiar with that type of locking system, it appears that there is just one padlocked chain.

We strongly agree with the statement on Page 39 that "some DOT requirements are overlooked by portable gauge licensees" – specifically, the regulations for hazmat training. It may be a good

idea to point licensees to Section "8.10.9 Transportation" from Section "8.8 Item 8: Training for Individuals Working in or Frequenting Restricted Areas."

We suggest adding a line in the Section "8.10.2 Instruments" to alert licensees that they need to consider the availability of a borrowed or rented survey meter during non-business hours. If an incident occurs on weekends or after 5 p.m., there may be no way to retrieve a meter.

*Or*

***Require Portable gauge licensee's to possess their own survey meter.***

Miscellaneous

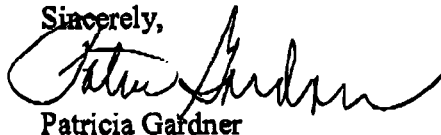
Page G-3: last word in the footnote needs a space before it.

Page H-1: 4<sup>th</sup> bullet, end of sentence, should read "or 0.15 mSv/minute (15 mrem/minute)).

Page H-11: Sentence above the second box should read "is equal to less than 0.0005 microsievert (0.05 mrem) per hour".

Thank you for the opportunity to provide this information. Contact me if you have any questions.

Sincerely,



Patricia Gardner

c: Jenny Goodman, NJDEP