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RULES AND DIRECTIVES
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General Comment

Attached are comments from the Wisconsin Radiation Protection Section.

Attachments

FSME-12-045_comments

SOWSI Review Complete
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June 28, 2012

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

RE: 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 Wisconsin, Radioactive Materials Program has reviewed the above document and submits the following comments:

- 1) Section 8.5.2 (page 24): In the first paragraph of the Discussion section, change 106 to 10^6 and 103 to 10^3 .
- 2) Section 8.8 (pages 26-27): In the Criteria section, there may be a bullet item missing. For user training, the text says "one of the following" but then gives only one option.
- 3) Section 8.10.3 (page 30): The use of the abbreviation "SSD" in this paragraph is awkward. All other uses of "SSD" pertain to the SSD Registry or registration sheet, not to the actual sealed source and device. Spell out "sealed source and device."
- 4) Section 8.10.5 (page 32): In the Criteria section, change "operations" to "material" to more clearly convey that licensees need to take gauge storage (not just gauge use) into account.
- 5) Section 8.10.6 (page 35): In the Discussion section, there is an extra hyphen in the first line of the paragraph. Change "Figure 8.-4" to "Figure 8.4".
- 6) Appendix G: Combine the second and third bullets in the Radiation Safety Officer and Licensee Management section.
- 7) Appendix G: Licensees should not be required to develop a separate security procedure. Many security elements are already addressed in the operating procedure. We have been expecting our licensees to integrate security into their existing operating procedures for a number of years, and we do not see added value in creating a distinct security procedure.

- 8) The Appendix G section “Information to Consider when Developing Security Procedures” is basically guidance on how to meet the two-barrier rule and should be more explicit about stating this. The section should also have specific guidance on what topics should be covered in a security procedure.
- 9) Appendix H: In the section “Guidance to Licensees” the font of the title does not match the rest of the text.

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

Sincerely,

Megan Shober
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State of Wisconsin
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