

# PUBLIC SUBMISSION

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 Portable Gauge Licenses; Draft NUREG

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RULES & REGULATIONS

## General Comment

On behalf of the State of Colorado Agreement State program, the following comments are respectfully submitted for the draft of NUREG-1556, Vol. 1, Rev. 2 (May 2012):

1. On page 27, Section 8.9 of the draft regulatory guide, there appears to be a grammatical error. The word "needed" should be replaced with the word "need". Alternately, the sentence could be revised with different wording to make it understandable.

As a general comment and in light of the specific comments below, it is our opinion that the examples and pictures provided in Appendix G provide helpful guidance to licensees.

2. Figure (photograph) G.1 of Appendix G should be modified to better demonstrate that any cables/chains used should generally be kept taut. The cables/chains clearly show "slack". Having slack in cables or chains may aid in the theft of a gauge and allow movement or prying.

3. Figure (photograph) G.2 of Appendix G is somewhat unclear in demonstrating the two lock approach requirement for security. Possibly, it is due to the angle of the image. It is somewhat difficult to see if there are two separate chains or one single chain connected at different ends. It is suggested that the image/photo be retaken at a different angle or a second photo or inset be added to clarify this. Alternately, text and arrows could be overlaid upon the image to more clearly point out or explain the lock and chain mechanisms in the Figure.

SUNSI Review Complete

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