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Organization: Organization of Agreement States, Executive Board

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RULES AND EXECUTIVES
FEDERAL

General Comment

See attached file(s)

Attachments

FSME_12_045_6_29_12

*SO NSI Review Complete
Recompile = ADM-013*

*FRIDS = ADM-03
Add = P. Herrera (xh1)
F. McDaniel (KKM)*



Cheryl Rogers, Chair, Wisconsin
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June 29, 2012

Brian J. McDermott (Director Division of Materials Safety and State Agreements, FSME)
Mailstop T8-E24
Washington, DC 20555-0001

Subject: FSME-12-045 (NUREG-1556, Vol 1)

Dear Mr. McDermott;

The Organization of Agreement States (OAS) Executive Board (Board) has reviewed the above document and offers the following comments for review by the Nuclear Regulatory Commission (NRC).


1. Page xiii, we recommend including FSME into the abbreviations page
2. Page 4, we recommend spelling out FSME in the first paragraph as this is the first time it is mentioned
3. Page 5, we recommend using the abbreviation FSME in the reference paragraph
4. Page 22, Item 3: we recommend the NRC request that licensees submit detailed diagrams of the storage locations and surrounding areas for review during the licensing process to ensure security and ALARA are being considered.
5. Page 31, Item 8.10.4: we recommend that the sentence be changed to read "When personnel monitoring is needed applicants must ensure that the processor is NVLAP approved and consult the processor for its recommendations for exchange frequency and proper use of the dosimeter."
6. Page 35, Item 8.10.6: we recommend removing the dash listed in "Figure 8.-4".
7. Page 35, Item 8.10.6: we disagree with the requirement that an applicant "will develop, implement and maintain security procedures using information in Appendix G." The two barrier rule is already a regulation requirement listed in 10 CFR 30.34(i) and thus the licensee should not be required to submit a procedure to state how they will meet this regulation. In the past, licensees have not been required to submit procedures on how to meet the storage criteria listed in 10 CFR 20.1801 or 1802, these are verified

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during the inspections. During inspections verification of how the licensee is meeting the 10 CFR 30.34(i) requirement is also performed. The Board recommends this requirement be removed from this document or Appendix G be rewritten to incorporate statements regarding the security requirements that would allow the licensee to implement and maintain Appendix G as their procedure.

We appreciate the chance to comment on this subject, and stand ready to answer any questions you may have.

Sincerely,

A handwritten signature in cursive script that reads "Cheryl K Rogers".

Cheryl K Rogers, OAS Chair
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