

NRCREP Resource

RULES AND DIRECTIVES
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From: Sean Chapel [schapel@irsc-inc.com]
Sent: Friday, June 29, 2012 7:22 PM
To: NRCREP Resource
Subject: Response from "Comment on NRC Documents" 2012 JUL 11 AM 2:41

Below is the result of your feedback form. It was submitted by

Sean Chapel (schapel@irsc-inc.com) on Friday, June 29, 2012 at 19:21:33

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Document Title: NRC NUREG 1556, Volume ¹/~~2~~, Revision 2, Program Specific Guidance About Portable Gauge Licenses (DRAFT)

Comments: Enclosed please find ADDM's comments on the draft NRC NUREG 1556, Volume 2, Revision 2, Program Specific Guidance About Portable Gauge Licenses.

Regarding the sentence on p. 22 "Being granted an NRC license does not relieve a licensee from complying with other applicable Federal, State, or local regulations (e.g., local zoning requirements)," Please clarify what this statement means. Can a municipality issue an ordinance banning the use of devices containing radioactive sources in their city or town?

Regarding the sentence on p. 35, Figure 8.4 "Gauges are often damaged by heavy equipment at job sites; therefore, emergency procedures need to be followed to minimize radiation safety risk." What is the basis of this statement? Please provide a reference for an information notice or NMED reference which discusses individual cases of devices being damaged by heavy equipment. Is the frequency of these documented occurrences sufficient enough to be called "often damaged?"

We suggest the following alternate text "In the unlikely event that gauges are damaged, emergency procedures need to be followed to minimize radiation safety risk."

The rest of the document is well written, especially section G-9 which describes the requirements for two physical controls. Some licensees have been unclear as to what the criteria of this requirement is.

Sincerely,

Sean C. Chapel President
Association of Device Distributors and Manufacturers (ADDM)

5/30/2012
77 FR 31894

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