



Iowa Department of Public Health
Promoting and Protecting the Health of Iowans

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

Subject: FSME-13-009 (AD-800)

Dear Mr. McDermott,

In addition to the comments from the Organization of Agreement States (OAS) Executive Board (Board), the Iowa Radioactive Materials Program has reviewed the above document and offers the following comments for review by the Nuclear Regulatory Commission (NRC).

Section IV, subsection G. – The word State at the end of the sentence should be plural to read “States”.

Section V, subsection A.3. – A period (.) is missing at the end of the last sentence.

Section V, subsection A.4. – We propose that the last sentence read “The RSAO Project Manager will develop the agenda based upon input from the participants and electronically distribute the...”. Adding the word “electronically” makes it more consistent with subsection A.5.

Section V, subsection C., second paragraph – The word “thru” appears twice. We suggest changing the spelling to “through” in both instances.

Section V, subsection D., first paragraph – We suggest changing the first sentence to read “....to facilitate timely notification of to and/or gathering of information...”

Section V, subsection E., first paragraph – We suggest that the third sentence read “~~It~~ It is important that information...”

Section V, subsection E., first paragraph – We suggest deleting the last sentence. We do not think that this sentence is fair to the RSAO’s or the Agreement States. If the RSAOs are communicating with each other and provided consistent training as RSAOs, there shouldn’t be confusion or non-consistent regulatory approaches. It is noted that the section begins with acknowledgement that the Agreement States occasionally request “informal” training. From experience, we can say that some of the “informal” training that we personally received from RSAOs was the most informative and beneficial, particularly when we first started in our positions. The informal training that the RSAO provided was invaluable and greatly improved the learning curve.

Section V, subsection E.1. – We suggest E. 1. be deleted in its entirety. Section V begins with the statement and theory that “Sharing of information between FSME and the RSAOs, so that the RSAOs can convey information to, or request information from the Agreement States is a vital part of effective and reliable communication with

the Agreement States.” This statement indicates that two way communication is also valuable and vital. If the NRC is serious about improving communication between Agreement States and RSAOs, they should be encouraging the RSAOs to approach the Agreement States and not deterring it. We consider this particular statement as detrimental to the relationship building and trust that can be established when the RSAO approaches the Agreement State to ask what type of training they would like. Variations or inconsistent interpretations of NRC policy, guidance or regulations should be dealt with at the source; the source being the RSAO training and tools for communication. RSAOs approaching the Agreement States is NOT the cause of inconsistency.

Overall, we feel that the intent of this document is not concise. The title implies that it is guidance for communication. The addition of training, whether formal or informal, and how that is handled, in our opinion does not belong in a guidance document dealing with communication.

We appreciate the opportunity to comment on this subject.

Respectfully,

A handwritten signature in black ink that reads "Melanie Rasmusson". The signature is fluid and cursive, with a long horizontal stroke at the end.

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