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January 11, 2013

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

Subject: FSME-12-094 (SA-121)

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. The Issue Dates used throughout the document all have 2012 as the year. The Board recommends that be changed to 2013.
2. The words “liaison” and “liaisons” are used throughout the procedure. The Board recommends that “liaison” be used consistently as this procedure is referencing a single OAS liaison to the MRB.
3. In item IV.A.1., revise the sentence to read “Designates an OAS Board member to be responsible for the coordination and participation of the...”
4. What is the meaning of IV.A.2? The Board does not understand this statement and recommends this either be revised to provide clarification or delete.
5. In item IV.B, revise to read “The OAS Board Designee”
6. In item IV.B.4, revise to read “NRC regional”
7. In item IV.B., item 6 was added to this procedure but discusses IMPEP conduct. The Board recommends that SA-100 and SA-120 be revised to include this item instead of this procedure (SA-121).
8. In item IV.C.1., revise to read “OAS Board Designee”
9. In item IV.D.1., revise to read “OAS Board Designee”
10. In item V.A.2., revise to read “NRC regional” and “OAS Board Designee”
11. Item V.B. was added to this procedure but discusses IMPEP. The Board recommends that SA-100 and SA-120 be revised to include this item instead of this procedure (SA-121).

Alabama, Arizona, Arkansas, California, Colorado, Florida, Georgia, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Minnesota, Mississippi, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, Wisconsin

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 "Alan Jacobson". The ink is a reddish-brown color.

Alan Jacobson, Chairman
Organization of Agreement States
Health Physicist Supervisor
Maryland Department of the Environment
410-537-4422 office
410-979-0642 cell