



Alan Jacobson, Chair, Maryland
Melanie Rasmusson, Chair-Elect, Iowa
Cheryl Rogers, Past-Chair, Wisconsin
Bridget Stephens, Treasurer, Texas
Pat Gardner, Secretary, New Jersey
Mike Welling, Director, Virginia
Stephen James, Director, Ohio

July 5, 2013

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

Subject: FSME-13-054 (NUREG-1556, Vol 3 Rev. 2)

Dear Mr. McDermott;

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

1. On Page 3, there is an extra comma in the paragraph which should be removed and Figure 2.1 is missing the Region I Header.
2. Section 4 "Applicable Regulations" includes subsections for select types of devices. The section does not include verbiage for portable gauges or XRF devices. The Board recommends verbiage for these devices be included.
3. On Page 35 Section 6.1 states that all documents should be printed on standard 8-1/2 inch x 11 inch paper and then Section 6.2 states that drawings should be no larger than about 4 inches by 6 inches. The Board recommends deleting the statement from Section 6.2.
4. On Page 43, the third paragraph in Section 9.1 states "an acceptance review may be performed". The Board recommends changing "may" to "will" as it our belief that an acceptance review must be performed when the application is received.
5. On Page 54, the Board recommends including regulation 32.74 into Table 10.2 for medical use design requirements.
6. On Page 57, the Board recommends including regulation 32.74 into Table 10.3 for the labeling requirements of medical sources.
7. On Page 60, the Board recommends including regulation 32.74 into Table 10.4 for the prototype testing of medical sources.
8. On Page 62, the Board recommends including regulations 32.74 and 36.39 for the radiation levels of medical and irradiator sources/devices.
9. On Page 64, the Board recommends including regulations 34.20 and 36.41 for the QA/QC requirements of radiography and irradiator sources/devices.

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 signature is written in black ink and is positioned above the typed name and contact information.

Alan Jacobson, OAS Chair
Health Physicist Supervisor
Maryland Department of the Environment
410-537-4422 office
410-979-0642 cell
alan.jacobson@maryland.gov