

Association of Device Distributors and Manufacturers (ADDM)
17 Norfolk Rd., Holbrook, MA 02343
www.addm.us

Advocates for Fair and Consistent Regulation

ABB Inc.

Baker Hughes, Inc.

*Berthold
Technologies USA
LLC*

*Honeywell
International, Inc.*

*Industrial
Maintenance
Services, Inc. (IMS
Corp)*

*Industrial Nuclear
Company, Inc.*

IRSC, Inc.

*Metso Automation
USA, Inc.*

*Morpho Detection,
Inc.*

QSA Global, Inc.

Rapiscan Systems

*Source Production
and
Equipment
Company, Inc.*

September 13, 2013

Secretary, U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff.

Re: Policy Statement on Adequacy and Compatibility of Agreement State Programs; Statement of Principles and Policy for the Agreement State Program
Docket ID NRC-2013-0081

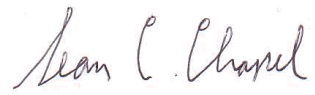
Dear Secretary:

Enclosed please find the ADDM's comments about the NRC IMPEP process for evaluating Agreement State Programs. The ADDM requests that the IMPEP program be modifying to include the determination of the processing time for applications for new licenses and device registrations, and for the processing of amendments to existing licenses and registrations. We request that these statistics be summarized in IMPEP reports as the average time to complete actions, and the longest processing time for any individual action during the time period the report covers.

In personal communications with IMPEP review team members they have informed us that processing time is a factor they evaluated, however we have never seen it referred to in a written report.

If you have any questions about the group please call me at 781.767.2176 or email me at schapel@irsc-inc.com.

Sincerely,

A handwritten signature in cursive script that reads "Sean C. Chapel".

Sean C. Chapel,
President, ADDM

President, IRSC, Inc.

cc: Duncan White, US NRC
Tomas Herrera, US NRC

RulemakingComments Resource

From: Sean Chapel <schapel@irsc-inc.com>
Sent: Sunday, September 15, 2013 4:25 PM
To: RulemakingComments Resource
Subject: Docket ID NRC-2013-0081
Attachments: ADDM letter to NRC about IMPEP Final.pdf

Dear Secretary,

Enclosed are the ADDM's comments on the IMPEP process.

Please confirm receipt.

Sincerely,

Sean Chapel, President
ADDM