



COMMONWEALTH of VIRGINIA

Department of Health

CYNTHIA C. ROMERO, MD, FAAFP
STATE HEALTH COMMISSIONER

PO BOX 2448
RICHMOND, VA 23218

TTY 7-1-1 OR
1-800-828-1120

September 27, 2013

Tomas Herrera
Mailstop 8-E24, TWFN
Washington, DC 20555-0001

Subject: FSME-13-085 (NUREG-1556 Vol. 6)

Dear Mr. Herrera:

The Virginia Radioactive Materials Program (RMP) has reviewed the above document and offers the following comments for consideration by the Nuclear Regulatory Commission (NRC).

1. On Page 8, Brian McDermott's name is listed as the Director. The RMP recommends updating this to the interim director, Pamela Henderson.
2. In Section 10.13 "Security Program", the RMP recommends that the guidance have documentation that states "A new license will not be issued until a pre-licensing inspection has occurred to ensure the security requirements of Part 37 have been implemented. An applicant is required to notify the NRC when they are prepared to have the security program inspected." This statement aids the licensing process and should cause the applicant to ask questions regarding this process.
3. In Appendix I "Suggested Audit Checklist", the RMP recommends a section be added for the Part 37 security requirements to ensure the licensee is performing the new requirements. The items could include: T&R verifications completed and documentation is maintained; T&R list is updated and previous lists are being maintained; security plan is being maintained; LLEA has been contacted and provided training; and documentation of alarm system testing is maintained.

We appreciate the chance to comment on this subject, and stand ready to answer any questions you may have.

Sincerely,

A handwritten signature in blue ink that reads "Michael Welling".

Michael Welling
Director Radioactive Materials Program
Virginia Department of Health