

**From:** [Lawrence, Craig \(DOH\)](#)  
**To:** [Herrera, Tomas](#)  
**Subject:** FW: Comments on Draft Nureg-1556 Volume 1, Revision 2  
**Date:** Monday, June 25, 2012 11:01:36 AM  
**Attachments:** [NUREG-1556 PG comments to NRC.docx](#)

---

Thomas,

I made a typo in your email address below. Please see our comments.

Craig

---

**From:** Lawrence, Craig (DOH)  
**Sent:** Monday, June 25, 2012 7:53 AM  
**To:** Foster, Jack; 'Tomas.Herrera@nrc.gov'  
**Cc:** Walsh, Pamela (DOH)  
**Subject:** Comments on Draft Nureg-1556 Volume 1, Revision 2


Gentleman,

Please see attached Washington State Department of Health's Office of Radiation Protection comments on the Draft NUREG-1556 Volume 1, Revision 2 guidance about portable gauge licensees.

<<NUREG-1556 PG comments to NRC.docx>>

Best Regards,

Craig Lawrence

*Craig Lawrence, Manager   
Radioactive Materials Section*

*Office of Radiation Protection*

*Washington State Department of Health*

PH 360.236.3221

FX 360.236.2255

[Craig.Lawrence@doh.wa.gov](mailto:Craig.Lawrence@doh.wa.gov)

Mailing Address - PO Box 47827, Olympia, WA 98504-7827  
Physical address - 111 Israel Rd SE, Tumwater 98501

Also, visit our Home Page at  
<http://www.doh.wa.gov/ehp/rp>

*"Public Health – Always Working for a Safer and Healthier Washington"*

## **Docket ID NRC–2012–0121**

### **Office of Radiation Protection Washington State Department of Health**

OPPORTUNITY TO COMMENT ON DRAFT NUREG-1556, VOLUME 1,  
REVISION 2, “CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES:  
PROGRAM-SPECIFIC GUIDANCE ABOUT PORTABLE GAUGE LICENSES” (FSME-12-045)

June 25, 2012

We have reviewed the draft NUREG-1556, Volume 1, Revision 2, Consolidated Guidance about Materials Licenses. Presently 164 portable gauge licensees in our state will be affected by these proposed changes. Please see our comments below.

#### New Sections

New section added to Appendix G – Operating, Emergency and Security Procedures addresses “Information to Consider when Developing Security Procedures”, describes in just the right level of detail how to secure gauges in vehicles, at temporary job sites, and at permanent storage locations. It is clearly written and contains very good information for licensees by clarifying the requirements and giving good examples. The accompanying photographs demonstrating the correct way to secure a gauge in a vehicle are very worthwhile. This should help licensees improve their safety programs.

New section (3.2) added to Part 3 under Management Responsibility regarding Safety Culture is not clearly written and may not be useful to our portable gauge licensees. A better effort to “plain talk” guidance to licensees should be made. This section would not fit our state’s clear writing standard. The concept of safety culture is sound and we support it, however, it must be presented in a much more clear and concise manner if it is to be of benefit to our licensees. While it is noted in the NUREG that “safety culture policy statement and traits are not incorporated into the regulations”, if it is the intention to do so in the future, they must be much more clearly articulated. We cannot hold our licensees to regulations that are subjective and difficult to measure. Table 3.1, outlining the “Traits of a Positive Nuclear Safety Culture”, is better than the discussion, because it distills several paragraphs of vague ideas into direct, single-sentence statements.

New section (6) addresses Identifying and Protecting Sensitive Information. This is sensible and we support it. It appears the responsibility to keep sensitive information on license applications is entirely that of the licensee. It states that sensitive information is to be clearly marked on applications. If the applicant fails to do so, is there a regulatory role or responsibility to make sure that information that should not be made public for security reasons (e.g., locations of radioactive material at licensee's facilities) does not find its way out onto the public website?

The various small changes made throughout the document are good. They mostly clarify or expand upon the existing guidance, or incorporate references to updated technology (such as cell phones and online training). There are a few questions/comments:

In section 8.5.1 Sealed Sources and Devices, under "Response from Applicant" (page 23), there is a requirement to "state the total quantity of each type of portable gauge". This is new from the previous version of the NUREG. What is the reason for this change? In Washington, we charge a flat license fee rather than charging per gauge. We allow a licensee to have as many of a variety of gauges as they need, up to a limit established on the license that is well below surety requirements. The quantity of and type of gauges possessed are verified at each inspection. Many times an applicant does not know exactly how many gauges they will get until their license has been issued. This change seems to add an additional unnecessary requirement to the application process.

In section 8.10.1 Audit Program, on page 28, it states "...applicants should consider performing performance based audits...". We have made this a requirement on the license. What is the reason for considering this optional rather than a required item?

In section 8.10.4 Occupational Dosimetry (page 31) in the Discussion, it states "When personnel dosimetry is needed, most licensees use either film badges or thermo-luminescent dosimeters (TLDs) that are supplied by an NVLAP-approved processor." Very few of our licensees still use film badges. Most of them use TLDs or optically stimulated luminescence (OSL) dosimeters. This part should be updated to reflect the changes in technology.

In section 8.10.9 Transportation (page 39), there is a paragraph under Discussion that addresses DOT requirements. It mentions labeling, and blocking and bracing. There is no statement here about the security requirements. While these requirements are well addressed in Appendix G, it seems it would be appropriate and helpful to the applicant to include a mention of them here.