

Title: Staff Evaluation Lessons Learned from the Fukushima Dai-ichi Accident to Facilities Other Than Operating Power Reactors

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Organization of Agreement States and Virginia Radioactive Materials Program Country/Organization: USA				Date: March 2015			
Comment No.	Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Not accepted	Reason for modification/rejection
VRMP & OAS		Recommend that either the phrase “and Agreement States” be added to these statements throughout the white paper.	Several sections only describe what actions the NRC is performing regarding the use of radioactive materials and actions taken to protect public health and safety.	X			
VRMP & OAS	Pg 1, para 1, sent 4	Change to either “radioactive materials” or “by-product materials”	Phrase “nuclear materials” is used to indicate what the Agreement States regulate.	X	This paragraph is not included in the SECY paper or attachment, but the comment is relevant to several other paragraphs in the document and is modified as suggested.		
VRMP & OAS	Page 1, para 2	2nd paragraph should be removed and suggests that the purpose of the white paper is not to support public outreach but to show how the NRC and the Agreement States are ensuring the safe storage and use of radioactive materials in the US				X	This paragraph is not included in the SECY paper or attachment.
VRMP	Page 4, para 3	Recommend this sentence be revised to say all devices have some engineering features (shielding,	Paragraph only mentions self-shielded irradiators as having engineering	X			

		connectors, switches, etc) that prevent unnecessary exposure, not just self-shielded irradiators.	features to prevent unnecessary exposure. Many other devices (Gamma Knife, radiography cameras, gauges, etc.) have similar features				
VRMP	Page 4, para 3	Revise to say all devices have some engineering features (shielding, connectors, switches, etc) that prevent unnecessary exposure.	Paragraph only mentions self-shielded irradiators as having engineering features to prevent unnecessary exposure. Many other devices (Gamma Knife, radiography cameras, gauges, etc.) have similar features.	X			
VRMP & OAS	Page 4, last sentence	Revise to either include other devices covered under Part 37 or just say devices containing Category 1 and 2 sources	Failure to identify other devices covered by Part 37.	X			
VRMP	Page 6	Move the footnote to paragraph 2 and include a statement that the footnote is the IAEA definition			Footnote moved to first mention of category 1 material. IAEA-TECDOC-1344 is referenced in footnote 1.		
VRMP	Page 7, para 3	Remove the types of licensees included.	All licensees are required to develop and follow procedures.	X			
VRMP	Page 7, para 4	Revise sentence to say that sources of larger activities may cause a substantial hazard	Most gauges contain low activity sources that do not pose a substantial hazard.	X			
VRMP	Page 8,	Revise sentence to say “at varying	Several sources are	X	Paragraph		

	para 1	intervals, 6 months, annually and every three (3) years.”	approved on an annual leak test frequency and some are approved for a three (3) year frequency		deleted.		
VRMP	Page 8, para 1 & 2	Delete	Don't add value.			X	Paragraphs attest to the ruggedness and durability of many devices and instruments.
VRMP	Page 9, para 3	Move this information to the pre-Fukushima section.	This was in place in 2009, before Fukushima occurred.	X			
VRMP	Page 10, column 3	Remove the sentence about a gauge being lost or stolen in the assessment column and add text that licensees are required to meet any city, county or state requirements/regulations regarding building construction		X			
VRMP	Page 12	Move the footnote on Page 12 to page 6.			Footnote moved to first mention of category 2 material.		
OAS	Page 4, para 1	Conclusion that no further study or regulatory action is warranted should be moved to the beginning of the paper and made more prominent.		X	Agree, but this text is only introductory for OAS review and will not be in the SECY paper.		
OAS	Page 1	Why are nonreactor facilities regulated by NRC not included in this paper?		X	Agree, texts is poorly worded, but this text is only introductory for OAS review and will not be in the SECY paper.		

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