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April 28, 2015

Richard Dudley
Office of Nuclear Reactor Regulation
Division of Policy and Rulemaking
Mail Stop 12 D20
U. S. Nuclear Regulatory Commission
Washington, DC 20555

5/18/2015
OFR 27191
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RE: Opportunity to Comment on Draft NRC Staff White Paper - Summary of Options and Alternatives for Responding to Risk Management Regulatory Framework Recommendations (RCPD-15-004)

Dear Mr. Dudley,

The Virginia Radioactive Materials Program (VRMP) has reviewed the subject document and offers the following comments for the NRC's consideration:

1. On page 2 of Attachment 2, the Example Policy Statement states "A risk management approach would be used to ensure adequate protection of public health and safety ...". That is already being performed within the framework of our current regulatory system and IMPEP process. The Policy Statement should be changed to read "A risk management approach would review the risks associated with the use of radioactive material and provide recommendations for any new methods to enhance those currently being used to protect public health and safety."
2. On page 3 of Attachment 2, the second bullet under Risk Management Approach states "Ensure regulatory controls and oversight are in place recognizing the variety of risks associated with different uses of radioactive materials." This is also being performed using the existing IMPEP process. This statement should be changed to read "Review current practices to ensure that regulatory controls and oversight are in place, and provide recommendations for enhancement."

We appreciate the opportunity to comment on this subject and stand ready to answer any questions you may have. I may be reached at (804) 864-8168 should you wish to discuss these recommendations further.

Sincerely,

Michael Welling

Michael Welling
Director, Radioactive Materials Program

SUNSI Review Complete

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Add= R. Dudley (RFD)