

NUREG-1556, Volume 19, Revision 1 - External Comments

Comment No.	Commenter	Location in the Volume	Comment	Resolution
	Virginia	Page iv	Brian McDermott's name is listed as the Director. The RMP recommends updating this to the interim director, Pamela Henderson.	Brian McDermott's name has been replaced with Josephine Piccone – current Director for MSTR.
	Virginia	Page 6	The RMP recommends placing a period (.) after "States" and begin the next sentence with "To". The sentence seems to run on and it is important to distinguish that the licensee is required to ensure they are in compliance.	Comment accepted; revision made.
	Virginia	Table 2.1, Page 8	On Page 8 in Table 2.1, the information for radiographers working at nuclear power plants seems to be in contrast to what SA-500 states. In SA-500 it states: "The State will exercise regulatory jurisdiction over: Radiographers on reactor sites in Agreement States (determined by interpretation, see Reference #5)." Reference 5 is Radiography operations at reactor sites – Memorandum from R.E. Cunningham to Regional Administrators and Branch Chiefs dated September 16, 1983. The RMP recommends amending Table. 2.1 to state that the Agreement State has jurisdiction for radiographers working at a reactor site. Also "reactor" is spelled "rector" in the table.	Section 2.8 of document was revised to clarify jurisdiction over radiography activities at nuclear reactor facilities.
	Wisconsin	Table 2.1, Page 8	In each of the last two rows, add a "a" to "rector" to spell "reactor".	Comment accepted; revision made.

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	Wisconsin	Table 2.1, Page 8	Industrial radiography performed at nuclear power plants in Agreement States is under the jurisdiction of the Agreement State; see NRC procedure SA-500. The last two rows of Table 2.1 should be replaced with the following (See Wisconsin's recommendation placed on the Volume 19 SharePoint site).	State comment comparable to that of Virginia. See NRC response above.
	Virginia	Section 2.8, Page 12	"Nuclear Reactor Facilities," needs to be amended to include verbiage regarding the Agreement State responsibility for radiographers as stated in in #3 above (Refers to Virginia's comment in Table 2.1, Page).	Comment accepted Clarification provided in Section 2.8.
	Wisconsin	Section 2.8, Page 12	Revise this section to explicitly state that radiography performed at reactor facilities in Agreement States is under the jurisdiction of the Agreement State.	Comment accepted Clarification provided in Section 2.8.
	Wisconsin	Page 35	The sentence "The information has been held in confidence by its owner;" should have a bullet before it.	Comment accepted; revision made.
	Wisconsin	Page 35	Add "not" before "available" in "The information is available in public sources;" to align with the expected answers for the other bullets.	Comment accepted; revision made.
	ADDM	Table 2.1 Page 8	Expand table to include the following list of activities which require: performing a source exchange, repairing or replacing a shutter, performing a shutter test, collecting leak test samples to send for analysis, performing software upgrade, servicing non-radiological components.	Comment not accepted. The table should be used after it has been determined whether these activities are specifically licensed and the

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				regulatory authority has been identified.
	ADDM	Section 2.4	Commenter indicates that an exempt distribution had condition added to license which stated that they were required to file for reciprocity to service exempt devices.	Comment not accepted. Language in Section 2.4 is clear with regard to 10 CFR 31.6 requirements. That is, there is no requirement to file reciprocity for GL or exempt devices.