Gallagher, Carol

Subject: Attachments: FW: State of Washinton Comments on NuReg-1556, Vol. 16, Rev. 1 STC-16-050 Comments on NUREG 1556 Vol. 16 Rev. 1.docx

81 FR 46928 6/23/2016

From: Lawrence, Craig (DOH) [mailto:Craig.Lawrence@DOH.WA.GOV]
Sent: Friday, July 22, 2016 6:07 PM
To: Mcmurtray, Anthony <<u>Anthony.McMurtray@nrc.gov</u>>
Cc: Halloran, Andrew M (DOH) <<u>andrew.halloran@doh.wa.gov</u>>; Matthews, Steve (DOH)
<<u>Steve.Matthews@DOH.WA.GOV</u>>
Subject: [External_Sender] State of Washinton Comments on NuReg-1556, Vol. 16, Rev. 1

Please accept the attached comments from the State of Washington on NUREG-1556, Volume 16, Revision 1.

Regards,

Craig Lawrence, Manager Radioactive Materials Section Office of Radiation Protection Washington State Department of Health PH 360.236.3221	7016 JUL 26	ULES AND DIFICTIVES
FX 360.236.2255 <u>Craig.Lawrence@doh.wa.gov</u> Mailing Address - PO Box 47827, Olympia, WA 98504-7827 Physical address - 111 Israel Rd SE, Turnwater 98501	84 : Nd	

1

Also, visit our Home Page at http://www.doh.wa.gov/CommunityandEnvironment/Radiation/RadioactiveMaterials.aspx

"Public Health - Always Working for a Safer and Healthier Washington"

SUNSI Review Complete Template = ADM - 013 E-RIDS= ADM-03 Add= $\bigvee_{c} \mathcal{O}_{X} (\bigvee X c.3)$

COMMENTS FROM STATE OF WASHINGTON RE: NUREG-1556, VOL. 16, REV. 1

OPPORTUNITY TO COMMENT ON DRAFT NUREG-1556, VOLUME 16, REVISION 1, "CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES: PROGRAM-SPECIFIC GUIDANCE ABOUT LICENSES AUTHORIZING DISTRIBUTION TO GENERAL LICENSEES" (STC-16-050)

We have only two comments:

Pg. 9-2 of Section 9.1 - No mention of lock-out tag-out procedures for generally licensed fixed gauges. This information should be included in the licensee's application to be able to service generally licensed fixed gauges in their possession.

Section 11 – Why not apply the thirty day notification timeline to amendment requests for change of control or bankruptcy? Specifying a time frame would help prevent loss of control of generally licensed devices during changes in control or administration of licensees.