

Gallagher, Carol

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

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Subject: [External_Sender] State of Washinton Comments on NuReg-1556, Vol. 16, Rev. 1

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

Regards,

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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.