

Gallagher, Carol

Subject: FW: VRMP comments on NUREG-1556, Vol. 16
Attachments: STC-16-050 VRMP Comments.docx

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From: Welling, Mike (VDH) [mailto:Mike.Welling@vdh.virginia.gov]
Sent: Wednesday, July 27, 2016 10:26 AM
To: Cox, Vanessa <Vanessa.Cox@nrc.gov>
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Subject: [External_Sender] VRMP comments on NUREG-1556, Vol. 16

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SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM-03
Add= V. Cox (VXC3)

July 27, 2016

Vanessa Cox
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555

RE: 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."

Dear Ms. Cox,

The Virginia Radioactive Materials Program has reviewed the above document and respectfully submits the following comments:

General Comments

1. The format for bulleted items is not consistent throughout the document. These should have a semicolon for each, an "and" on the second to last item and a period on the last bulleted item.
2. This document contains extensive information regarding the SSD process and related guidance. Recommend this information be removed and references made to NUREG-1556, Vol. 3.
3. The title to this document is "Guidance about Licenses Authorizing Distribution to General Licensees" which leads to the assumption that it is written to the specific licensees who are distributing to general licensees but the document contains specific information to the general licensees possessing the devices. OAS recommends that either the title be changed to "Guidance on General Licensed Devices" or the information regarding the general licensees be removed and placed in a separate guidance document.

Specific Comments:

1. Page 2-2: Lines 4-12 are identical to the first paragraph on page 2-1. Delete on page 2-2.
2. Page 4-4: The note under Table 4-1 is not a sentence and is confusing. Either clarify or delete.
3. Page 5-2: Line 13 says "The applicants will perform an SSD safety evaluation." The applicant does not perform an SSD safety evaluation, they submit the required information such that an SSD can be reviewed and approved. Rephrase the sentence.
4. Page 5-7: Line 4 uses depleted uranium as shielding in an accelerator as an example of a "small quantity of source material." Shielding in an accelerator would likely exceed the "small quantity" limit for DU. Replace with another example (e.g., thorium used for coating optical lenses).
5. Page 5-8: Move lines 37-40 to page 5-7 in the paragraph covering lines 12-16.
6. Page 5-9, line 1: Change "personal privacy information" to "personally identifiable information".

7. The following paragraphs should be removed because this information does not pertain to the GL distribution license (it pertains to the SSD application):
 - a. Page 9-8, lines 24-28.
 - b. Page 9-18, lines 23-27.
8. Page 9-26, line 25: Delete "industrial products and devices for use".
9. Page 9-28, line 9: Delete "as approved by NRC". This is generally understood.
10. In Appendix A, include NUREG-1556, Vol. 3 as a reference document.
11. Page E-1, line 9: Change to "...jurisdiction who have a GL..."
12. Page E-1, line 35: Delete "easy-to-read".
13. Page E-3, line 10: Delete "easy-to-read".
14. In Appendix F, include weblinks to the NMMS and OAS webpage for reference
15. In Appendix G, revise the regulation reference to 31.5(c)(15).
16. In Appendix G, remove G-3 as Appendix H is for Tritium exit signs.
17. In Appendix K, the answer to #18 should be revised to remove "The preference would be for" and state that no contamination shall be left behind by licensees.
18. Appendix L should be removed from this NUREG, as it is not referenced by the document. The two places in the appendices that reference NRC Form 664 do not indicate that the form is included in Appendix L. NRC Form 664 does not directly pertain to distributors of GL devices.

If you have any questions you may reach me at 804-864-8168 or by email.

Michael Welling

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