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Sent: Wednesday, August 24, 2016 2:19 PM
To: INFOCOLLECTS Resource <INFOCOLLECTS.Resource@nrc.gov>
Cc: Jenkins, Susan <jenkinse@dhec.sc.gov>
Subject: [External_Sender] Docket ID NRC-2015-0283, NRC Forms 541 and 541A, Uniform Low-Level Radioactive Waste Manifest, Container and Waste Description, and Continuation Page

In response to an opportunity to review and comment on ***NRC Forms 541 and 541A, Uniform Low-Level Radioactive Waste Manifest, Container and Waste Description, and Continuation Page*** to an NRC information collection for the Office of Management and Budget (OMB), the SC Department of Health & Environmental Control offers the following comment.

The radionuclides are typically listed on each respective manifest in alphabetical order however, the instructions do not require that. Please consider revising the instructions so that the radionuclides be put in an order that is relative to risk. A risk informed approach to the listing of radioactive constituents on each respective manifest should be considered. For example - If the low-level radioactive waste shipment contains mixed radionuclides the first 90% of the individual radionuclides should be listed in descending order based on specific activity. Shipments containing multiple packages of individual radionuclides should be listed to factor both safety and security considerations.

The SC Department of Health & Environmental Control understands the deadline was Monday, August 22, however, we would appreciate your consideration of our comment.

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