NUREG-1556, Volume 7
External Comments Resolution Table

Comment No.	Commenter	Location in the Volume	Comment	Resolution
1	OAS	Page vi, Second paragraph	Page vi: 2nd paragraph: recommend deleting “This report takes a risk-informed, performance-based approach to licensing”. Essentially the same sentence is on the previous page.	Comment not accepted. Basis: This language is standardized language that is consistent with other NUREG-1556 volumes. Standardization of language and consistency across volumes where appropriate has been deemed by NRC staff to be a high priority for the NUREG-1556 series.
2	OAS	Page vii	Page vii: recommend changing “ITEM” to “Item”, to match NUREG-1556, Vol. 11.	This volume will be formatted to be consistent with other NUREG-1556 volumes.
3	OAS	Page viii	Page viii: recommend changing Appendix titles from all capitals to standard text to match the “Figures” and “Tables” lists.	This volume will be formatted to be consistent with other NUREG-1556 volumes.
4	OAS	Page xiii	a. Recommend adding AEA (Atomic Energy Act) to the Abbreviations. “AEA” is used in the footnote	a. Comment accepted

4 (continued)			on page 7 without otherwise explaining the abbreviation. b. Recommend making “Limit” and “Intake” all lower-case. c. Recommend using “FA” in the Abbreviations list, instead of “F/A”, to match the abbreviation used in Section 8.5.2. Also don’t capitalize “Assurance”. d. Recommend correcting the spelling of “megabequerel”. e. Recommend adding “PII-Personally Identifiable Information”. This is used on page 37. f. Recommend deleting “RPO-Radiation Protection Officer”. This term and abbreviation are not used anywhere in the document. g. Recommend adding “T1/2”. This abbreviation is used on page 29. h. There is no abbreviation for FSME but there is one for OSP. Recommend updating these abbreviations.	b. This volume will be formatted to be consistent with other NUREG-1556 volumes. c. This volume will be formatted to be consistent with other NUREG-1556 volumes. d. Comment accepted e. This volume will be formatted to be consistent with other NUREG-1556 volumes. f. Comment accepted g. This volume will be formatted to be consistent with other NUREG-1556 volumes. h. This volume will be formatted to be consistent with other NUREG-1556 volumes.

5	WA	General comment	It is very difficult and time-consuming to review a document without knowing what has been changed. Side bars, underline, or track change guides would help to show the changes. Since reviewing documents is not funded, it would be appreciated if the Nuclear Regulatory Commission could assert the minimum impact on the regulatory programs and others providing review and comments.	Comment not accepted. Basis: The changes in NUREG-1556 volumes are very extensive, therefore NRC staff determined that adding side bars, underline, or tracked changes would not improve the readability of the document.
6	WA	Page 7, table 2.1	Missing the category of "Non-Federal manufacturer & distributer of product for exempt distribution". And NRC as Regulatory agency.	Comment not accepted. Basis: The NRC is the only regulator of the distribution of the products to persons who are exempt from licensing. These NRC licenses do not authorize possession. The regulator of the possession for manufacture depends on the location. No change is needed.
7	WI	Page 12 (10), item 3.2 and Appendix S	Safety culture is an important policy but not a codified regulation. No formal responses or commitments are required about a licensee's safety culture during the licensing process. **Section 3.2** and Appendix S **should be removed and replaced with basic** information on where to find the NRC Safety Culture Policy.	Comment not accepted. Basis: The Commission has directed the staff to provide education on Safety Culture. However, licensees are not required to implement Safety Culture. NRC staff made a decision to place Safety Culture information in all of the NUREG-1556 Volumes.

8	WI	Page 14 (12), Table 3.1 and Appendix S	Table 3.1 is redundant to the information presented in Appendix S. If section 3.2 is not removed, table 3.1 or appendix S should be removed to reduce redundant information.	Comment not accepted. Basis: NRC staff made a decision to place Safety Culture information in all of the NUREG-1556 Volumes in the current format. Standardization of language and consistency across volumes where appropriate has been deemed by NRC staff to be a high priority for the NUREG-1556 series.
9	WA	Page 22, Section 8.2	**Notification Of Bankruptcy Proceedings:** It is very interesting that one of the first items mentioned, **for which no action is required by the applicant,** is the discussion of **notification of bankruptcy proceedings**. This is an issue which really belongs under management responsibility/control and/or under change of control, It seems like a very negative way (**expectation of failure!**) to start out an application on the subject of bankruptcy. This could be done so with more grace under the management responsibility segment and/or the financial surety section. While I understand this is important for program responsibility and control – it doesn't seem like the first issue to discuss for application. The issues that go under management control also could be more consolidated and organized.	Comment not accepted. Basis: NRC staff made a decision to keep "notification of Bankruptcy Proceedings" information in all of the NUREG-1556 volumes in the current format, and in this section of the document. The purpose of placing this section in the volume is to maintain consistency with other NUREG-1556 volumes and does not reflect the relative importance of this topic. Standardization of language and consistency across volumes where appropriate has been deemed by NRC staff to be a high priority for the NUREG-1556 series.

10	OAS	Page 23	recommend deleting the underlined space before "contains" in the fourth paragraph of Section 8.3.	Comment accepted.
11	OAS	Page 24, para 2	Page 24, second paragraph: recommend deleting "later" in first line. Recommend changing the last sentence to "For licensees with only sealed sources, acceptable records are…."	First comment accepted. Second comment not accepted. Basis: This sentence has been edited to omit the type of licensee completely.
12	OAS	Page 24, Section 8.4	Page 24, Section 8.4: recommend changing last sentence of first paragraph to "Notification of a contact change would not be considered…"	Comment not accepted. Basis: This volume will have standardized language that is consistent with other NUREG-1556 volumes. Standardization of language and consistency across volumes where appropriate has been deemed by NRC staff to be a high priority for the NUREG-1556 series.

13	WA	Page 25, first para	It would be much more helpful here to have several specific examples of how to request radioactive materials, instead of prose, such as: [I notice you provide this later in table 8.2, but not where it is needed. You could reference it if you don't want to move the table.] Sulfur-35, bound, 555 megabecquerels (15 millicuries). Radioactive material, atomic numbers 1 to 83, except source material and Special Nuclear Material, liquid and solid, bound and unbound, no single nuclide to exceed 370 megabecquerels (10 millicuries), total not to exceed 3700 megabecquerels (1 curie). Cesium 137, Electro-plated disk or sealed source (manufactured and distributed pursuant to the requirements of a specific license and approved for use identified in License Condition 9.X), No Single source to exceed X megabecquerels, (X millicuries). Total not to exceed X megabecquerels (X millicuries).	Comment accepted. Table 8.2 moved and re-numbered as Table 8.1.
14	OAS	Page 25, first para	Page 25, first paragraph: recommend deleting "(C-14)" in first sentence. Recommend changing fourth sentence to "For potentially volatile radioactive material…"	First comment partially accepted, edited to "carbon-14 or C-14." Second comment accepted.
15	WA	Page 25, box	A title for this box would be useful: Quantities Requiring an Emergency Plan.	Comment not accepted. Basis: NRC staff do not believe titles are necessary for boxed information.

16	OAS	Page 26, para under box	paragraph under box: recommend changing second sentence to “Such sources have additional security requirements under 10 CFR 37…”	Comment not accepted. Basis: The larger paragraph on the National Source Tracking System (NSTS) was edited such that this comment was no longer applicable and moved to Section 8.10.3 of Volume 7.
17	OAS	Page 27, top bullet	recommend changing “Testing” all lower case. Recommend changing the second sentence to “Eligibility for this general license is limited to physicians…”	Both comments accepted.
18	WA	Page 28, section 8.5.2	10 CFR 30.35 (G) transfer of information for decommissioning should also be mentioned under the transfer of control	Comment not accepted. Basis: NRC staff note that Section 9.1 is only a brief discussion and directs licensees to NUREG-1556 Vol. 15 for details.
19	OAS	Page 28, section 8.5.2	“Criteria”: recommend deleting “in” in second sentence.	This comment was addressed by editing the document.
20	OAS	Page 29, para 1	recommend adding a comma and space in “10 CFR 70.25all”.	This comment was addressed by editing the document.
21	WA, OAS	Page 29, para 2, line 4	Need a space between exceed 25 millirem	This comment was addressed by editing the document.
22	WA	Page 29, para 2, last sentence	Also last sentence in paragraph 2. Does this requirement need to be added to the regulations? It was my understanding that the new rag cannot wire something that is not a regulation. If it is a regulation that regulation should be identified specifically.	No change is needed. This is a relatively new regulation now in 10 CFR 30.35(c)(6).

23	OAS	Page 29, last para	Recommend moving the last three sentences to come before the sentence starting “However”. Recommend deleting sentence “See Table 8.2 for possession limits and guidance for submitting either a DFP or a certification of FA.”	Comment partially accepted; this content was deleted. Comment partially accepted. NRC staff edited this sentence and moved it to the following page.
24	OAS	Page 30, first para	most of the information is repeated from the last paragraph on page 29. Recommend consolidating these two paragraphs and deleting duplicated information.	Comment accepted, NRC staff consolidated some information on pages 29 and 30.
25	WA	Page 30, section 8.1?	There is no mention of the three-tiered financial surety determination. Is that currently being reconsidered?	No change is needed. This section refers to the relevant regulation and NUREG-1757, Volume 3, which explain financial assurance requirements in detail. Most ARDL licensees do not require financial assurance.
26	OAS	Page 30, section 8.5.2	it says “applicants can use Table 8.2.” It should refer to Table 8.1.	Comment partially accepted. Due to other editing, the table in this location was renamed Table 8.2.
27	WA	Page 32, table 8.2, section 8.6	This table needs to be placed on page 25 or at the very least reference there. It is out of place on page 32. Purpose for which licensed material will be used should immediately follow the requesting of the material. I did not see anything in this section about the NRC’s checklist for verifying that all RAM will be used as intended, for vetting new applicants prior to licensing. This was all the rage for a while. Is it still in effect? If so – This would seem like a reasonable place for it.	Comment accepted. NRC staff note that pre-licensing visits for new applicants are noted in section 8.1 on page 22. The checklist is for reviewer guidance only, not part of the license application.

28	OAS	Page 35, first para	recommend deleting “to demonstrate adequate training and experience,” and left-justifying the paragraph.	Comment accepted.
29	OAS	Page 37, Discussion	recommend deleting “or by other licensee designations”.	Comment not accepted. Basis: NRC staff did not change this, because there are many licensee variations although the NRC primarily uses the term “authorized user.”
30	OAS	Page 38, first para	recommend adding “restricting” before “access”.	Comment partially accepted, added “controlling” before “access.”
31	WA	Page 38, last para, bullets	An authorized user should also be well-versed in emergency procedures and for spill control.	Comment not accepted. Basis: Although NRC staff agree that authorized users should be knowledgeable of emergency response and spill procedures, this is a very specific topic and such specific training topics are discussed only in Appendix G. Section 8.7.2 provides guidance for the minimum information that should be provided. Section 8.7.2, Section 8.8, and Appendix G are intended to be guidance for developing site-specific procedures, rather than prescriptive training requirements for authorized users.

32	WA	Page 40, discussion	User should also know whom to contact in the event of an emergency or spill.	Comment not accepted. Basis: NRC staff agree; however, this is addressed in Appendices G and M.
33	OAS	Page 43, Section 8.10.1	recommend changing “Generally, audits are conducted at least once every 12 months” to say “10 CFR 20.1101 requires the program to be reviewed at least annually”.	Comment not accepted. Basis: NRC staff believe the current statement is acceptable. The regulation is stated on page 42. In addition, “annually” requires that something be performed once during the calendar year, and the interval may be longer or shorter than 12 months. Audits may be only part of the annual program review.
34	OAS	Page 46, first para	recommend adding “the” between “include” and “type”.	Comment accepted.
35	OAS	Page 50, Section 8.10.3	in the first sentence recommend deleting “and easy to use” in the NSTS description.	Comment accepted.
36	OAS	Page 50, para 2	in the fourth sentence, recommend deleting comma between “Generally” and “licensed”, as the comma completely changes the meaning of the sentence. Recommend using the abbreviation GL for clarity.	Comment not accepted. Basis: NRC staff edited this sentence to remove the phrase “generally licensed material” because the general license is issued to a person, and the phrase becomes confusing in this discussion.
37	OAS	Page 50, para 3	recommend deleting comma after “(200 microcuries)”.	Comment accepted.

38	OAS	Page 54	Recommend deleting the box underneath Figure 8.7. TEDE was redefined and now includes “effective dose equivalent” instead of “deep dose”. Recommend replacing with a general sentence saying that TEDE means the sum of the effective dose equivalent for external exposures and the committed effective dose equivalent for internal exposures.	Comment accepted in part. NRC staff retained the box but revised it to use the current 10 CFR Part 20 definition.
39	OAS	Page 60, first para	recommend adding mention of Category 1 or 2 sources to last sentence.	Comment partially accepted. NRC staff added language to Section 8.5.1 and revised Section 8.10.9 regarding 10 CFR Part 37 requirements for category 1 and 2 materials.
40	WI	Page 60	The sentence “…and implementing procedures that require a radiation worker should be with ‘line of sight’ of materials” should be changed to “…and implementing procedures that require a radiation worker to be within the “line of sight” of the materials.”	Comment accepted.
41	WI	Page 60	In the last sentence, the second “may” should be removed.	Comment accepted.
42	WA	Page 60, security procedures	Where’s Part 37? Security of category One and two sources?	Comment accepted in part. NRC staff added a new Section 8.10.9 regarding 10 CFR Part 37 requirements for Category 1 and Category 2 materials.
43	WI	Page 61	The third bullet has an extra comma at the end of it.	Comment accepted.
44	OAS	Page 60	Page 62, response: recommend deleting two commas from “statement that,:,”	Comment accepted.

45	OAS	Page 60, Response	recommend ensuring that the “Response from Applicant” paragraph matches the suggested response on Page C-7. Page 62 allows applicants to commit to develop procedures “before receipt of licensed material”, but Page C-7 requires licensees to submit the procedures with the application.	Comment accepted. NRC staff revised so that Section 8.10.6 “Response” and appendix C are consistent.
46	WA	Page 63, last sentence	Surveys are also used to determine proper personal protective equipment (PPE).	Comment not accepted. Basis: NRC staff will not add this, as this is not usually needed at ARDL facilities
47	OAS	Page 65, para 2	recommend changing last sentence to “Correct use of radiation detection equipment is an important aspect…”	Comment not accepted. Basis: NRC staff believe the sentence is intended to refer to detection and measuments, so it is correct as written.
48	OAS	Page 66, first bullet	recommend adding period at end of first sentence.	Comment accepted.
49	WA	Page 68, section 8.10.9	This section belongs in the same place where you discuss other security of radioactive materials. Security should all be discussed in the same general part of the NUREG - otherwise it is two disjointed.	Comment not accepted. Basis: This volume will have standard language consistent with other NUREG-1556 volumes. In addition, the earlier security discussion applied to all licensed materials, but section 8.10.9 is applicable only to Category 1 and Category 2 materials.

50	OAS	Page 68, Reference	recommend replacing the 1998 revision with the 2008 revision. See http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/RAM_Regulations_Review_12-2008.pdf	Comment accepted.
51	OAS	Page 68, section 8.10.9	recommend deleting "The NSTS is a major security initiative of the NRC." and "and easy to use" in the NSTS description and recommend changing "enough to no longer be of concern" from the discussion paragraph to "below the Category 2 limits".	Comment accepted in part. Basis: This volume will have standardized language that is consistent with other NUREG-1556 volumes. Standardization of language and consistency across volumes where appropriate has been deemed by NRC staff to be a high priority for the NUREG-1556 series.
52	OAS	Page 68, section 8.10.9, discussion, para 2	recommend adding reference to the forthcoming NRC "Best Practices" guidance document for Part 37.	Comment accepted.
53	OAS	Page 68, section 8.10.9, Discussion, para 3	recommend moving third paragraph to the "Note" under "Criteria".	Comment not accepted. Basis: This volume will have standardized language that is consistent with other NUREG-1556 volumes. Standardization of language and consistency across volumes where appropriate has been deemed by NRC staff to be a high priority for the NUREG-1556 series.

54	OAS	Page 69, section 8.10.9, Response	recommend deleting “from an applicant or licensee that would become newly subject to 10 CFR Part 37”.	Comment not accepted. Basis: This volume will have standardized language that is consistent with other NUREG-1556 volumes. Standardization of language and consistency across volumes where appropriate has been deemed by NRC staff to be a high priority for the NUREG-1556 series.
55	OAS	Page 70, para under bullets	recommend deleting “because of the types and amounts of licensed materials these facilities use”.	Comment not accepted. Basis: NRC staff believe this clause explains why it is observed that most ARDL licenses use the first four methods of waste disposal, and believe this sentence is acceptable as is.
56	OAS	Page 70, Section 11	recommend not referencing a guidance document that is 20 years old.	Comment not accepted. Basis: NRC staff notes that the referenced guidance documents are the most recent on those topics.

57	WA	Page 70, DIS	NRC only specifies DIS for nuclides w/ a half life less than 120 days in Part 35, medical/human use of radioactive materials. It does not limit the half life for DIS in other parts of 10 CFR. NRC might want to address the issue of exceptions, when the half-life of decay daughter products exceeds that hundred and 20 day half-life guidance. Only part 35 has a regulatory decay in storage limit of nuclides with less than a 120 day half-life. There are 2 or 3 experimental/Research and Development and medical nuclides: such as Lu-177m is a significant contaminant in the Lu-177 that is being used for research purposes. The 160 day half life of the Lu-177m would be additional cost if it can't be given an exception for a longer decay in storage, when adequate space is available, as is recommended in NCRP 143, Management techniques For Laboratories and Other Small Institutional Generators to Minimize Off-Site Disposal of Low Level Radioactive Waste, page 113." A good **guidance** document should provide legal, good common sense alternative options for new issues that are evolving. [NRC might consider removing that restrictive decay in storage regulation in part 35, next time the rules are open, as well as correcting inconsistent leak test limits in part 36, caused by rounding off.]	Comment not accepted. NRC staff note that 120 days is in 10 CFR Part 35, and other 10 CFR Part 30 licenses are restricted by a standard license condition to DIS for radionuclides with half-lives of 120 days for consistency with Part 35 and financial assurance. NRC staff are not aware of NRC approving longer half-lives for DIS.
58	OAS	Page 71, Section 11	recommend not referencing a guidance documents that are 20 years old and 30 years old	Comment not accepted. Basis: NRC staff note that the referenced guidance documents are the most recent on those topics.

59	OAS	Page 73, Section 11	recommend not referencing a guidance document that is 20 years old.	Comment not accepted. Basis: NRC staff note that the referenced guidance documents are the most recent on those topics.
60	OAS	Page C-2	first dash under “For sealed materials”: recommend changing “R” to “r”.	Comment accepted.
61	OAS	Page C-3	first dash: recommend deleting “()” before the note.	Comment accepted.
62	OAS	Page C-4	Audit Program: recommend using consistent “no response is necessary” text for this block, as well as Page C-6 ‘Public Dose’and Page C-9 ‘Transportation’	Comment not accepted. NRC staff will leave this as is, to be consistent with the Section 8.10.1 “Response from Applicant” statements.
63	OAS	Page C-7	The suggested response to Section 8.10.6 does not match the “Response from Applicant” text on page 62. See earlier comment	Comment accepted. NRC staff revised Section 8.10.6 and the checklist to be consistent.
64	OAS	Page C-9	Security Program: recommend replacing “In accordance…” paragraph with standard “no response is necessary” text referenced for the Page C-4 comment.	Comment accepted.
65	OAS	Page D-1	in the regulations first paragraph there is an open parenthesis.	Comment accepted. NRC staff removed parenthesis.

66	OAS	Page D-2	For Item 7 recommend that a manufacturers training class be required for the RSO. The guidance states no training is necessary.	Comment not accepted. Basis: NRC staff believe manufacturer training is not required for routine use of ECD, XRF or similar devices. No change is needed to Appendix D, Item 7.
67	OAS	Page D-3, Section 10.3	recommend deleting "(see sample license, condition no. 16)".	Comment accepted.
68	OAS	Page D-7, Item 9	recommend changing the bold type in the "Describe the facilities…" paragraph to standard type.	Comment accepted.
69	OAS	Page E-1, Vet para	Veterinary paragraph: delete comma from end of fifth line. Add period to end of sentence in eighth line. Delete "[NEW PARAGRAPH]" and split paragraphs.	Comment accepted.
70	OAS	Page E-1, Staff para	Staff training paragraph: delete comma after "(AU)".	Comment accepted.
71	OAS	Page E-1 or E-3	Page E-1 or Page E-3: Recommend adding a comment about how even though Part 35 allows human patients to be released when the dose to the maximally exposed member of the public is <500 mrem, the Part 35 release limit does not apply to veterinary patients. Licensees may not release veterinary patients until the dose to the maximally exposed member of the public is <100 mrem (public dose limit in 10 CFR 20.1301)	Comment not accepted. NRC staff notes that Page E-1 states that 10 CFR Part 35 is not applicable for veterinary use, and page E-3 has a separate section discussion criteria for release of animals. NRC staff does not see need to add more discussion.
72	OAS	Page E-2, first sentence	recommending adding period to end of first sentence.	Comment accepted.
73	OAS	Page E-2, last para	in the last paragraph it says "eliminated", it should be "emitted".	Comment not accepted. Basis: NRC staff notes that "eliminated" is correct, as a biological pathway out of the body.

74	OAS	Page E-2, page E-8	last paragraph: This paragraph is identical to a paragraph on page E-8. Recommend deleting one of these paragraphs.	Comment accepted.
75	OAS	Page E-3, first para; page E-9	first paragraph: this paragraph is identical to a paragraph on page E-9. Recommend deleting one of these paragraphs.	Comment accepted.
76	OAS	Page E-4, first para	In the first paragraph there is a standalone “r”, recommend deleting	Comment accepted.
77	OAS	Page e-4	in the “Instructions to Animals Caretaker Upon Release” first paragraph, there is a period after minimum, which should be a : as it leads to the 3 items.	Comment accepted.
78	OAS	Page E-8	In the first paragraph it says “eliminated”, it should be “emitted”.	Comment not accepted. Basis: NRC staff notes that “eliminated” is correct, as a biological pathway out of the body. In addition, NRC staff moved this paragraph in editing redundant paragraphs.

79	WA	App E, page E 1-8, animals	Not as complete guidance as I would like for cage processing, washing, etc. The release criteria for Vets is excellent and straight forward. More information geared to R&D vivariums and animal labs would be helpful. Also there is no mention/reference of the Institutional Animal Care and Use Committee (IACUC) .and the laws, regulations, guidelines, and standards that MUST/SHALL be adhered to when experimenting on animals.	Comment not accepted. Basis: NRC staff believes that there are large variations in cage and other animal housing needs and care, so flexibility is required and more specific procedures are not discussed. Comment accepted in part. NRC staff notes that IACUC and other regulations for animal research and treatment are outside the scope of Volume 7. A statement in Section 8.6 was also inserted into Appendix E that notes other applicable regulatory requirements must be followed.
80	WA	App G, G-1, annual Refresher Training	Where in the federal regs is Annual Refresher training required? I do not believe it is. If it is – then please identify the citation. This is always a pushback from our licensees.	NRC staff notes that this is guidance for an acceptable training program. 10 CFR 19.12 requires training only for persons likely to receive more than 100 millirem in a year. No other NRC regulation addresses training for the typical ARDL licensee.
81	WA	App G, G-4, L.	You forgot the application of cosmetics.	Comment accepted.
82	WA	App H, H-1, fume hoods	Housekeeping – clutter and storage in the hood changes the air flow.	Comment accepted. NRC staff added a revised version of the statement to the section.

83	OAS	Page I-7	In number 5.B, there is an extra “5”, recommend deleting.	Comment accepted.
84	OAS	Page J-1	it should reference Table J.1, not K.1.	Comment accepted.
85	OAS	Page J-1	recommend deleting extra white space at top of page	This volume will be formatted to be consistent with other NUREG-1556 volumes.
86	OAS	Page J-2, J-3 and J-8	recommend using Math Editor function of word processing program to display the equations.	Comment accepted.
87	WA	App J, J-3, Training	Use the term video instead of videotape. Videotape is antiquated terminology.	Comment accepted.
88	WA	App J, J 4-6, Model Procedure for …	Model procedure for calibrating survey instruments Any instrument used to survey is a survey instrument. Instead of “survey instruments” which is not specific enough, should specify “exposure-rate instruments”. Surveys are also performed for contamination with “count-rate instruments”. The model procedures are not adequate. I would not allow my licensees to calibrate their instruments based on this procedure. Model procedure does not make it clear that the NIST source used for calibration should be of the approximate energy (and adjusted for) of the specific nuclide(s) instrument will be used to detect. (only to “measure”.) This distinction is especially important for count rate instruments, liquid scintillation counters, and other counting equipment used for decommissioning and release surveys. The licensee must know the efficiencies of the nuclides they are detecting. Will will pay	Comment accepted in part. This volume will be formatted to be consistent with other NUREG-1556 volumes. Please see bases below. NRC staff believes “survey instrument” is a common and acceptable term. NRC staff notes that NIST traceability is described, and that energy and type of radiation also is discussed. NRC staff notes that discussion of LSC and other analytical instruments is later in this appendix.

89	OAS	Page K-2	recommend deleting the image of “Sample Instructions to Personnel Involved in Material Receipt” and inserting the same information as regular text so it looks like the Sample Memorandum on the previous page.	Comment accepted.
90	WA	App K, K 2-3, shipping and Receiving	The licensee must also meet and maintain current U.S. DOT training requirements for shipping and receiving radioactive materials as stated in 49 CFR Part 172, Subpart H – Training; 172.700 through 172.704.	Comment not accepted. Basis: NRC staff notes that this appendix addresses Receipt and Accountability, not Transportation, and the Sample Instructions describe receiving packages.
91	OAS	Page K-3	next-to-last bullet: recommend spelling out the abbreviations “TLC” and “HPLC”. These abbreviations are not otherwise defined.	Comment accepted.
92	OAS	Page K-3	there is an open parenthesis in the 6th bullet.	Comment accepted.
93	OAS	Page L-1	first bullet under boxes: recommend adding a period to the end of the sentence.	Comment accepted.
94	WA	App N, N-4, table N.2	Table N.2 Acceptable Surface Contamination Levels This table appears to be missing both transuranics and alpha emitters.	Comment accepted, in part. NRC staff revised the table to use the complete table from the reference document.

95	WA	App N, N-5, N-3?	How does the D&D, screening code, version 1, compare with RESRAD, another accepted code used for decommissioning by MARSSIM? Congruency is very important.	NRC staff notes that the codes have different default values and different flexibility. NRC licensees may use values derived from the DandD code. However, NRC licensees who wish to use site-specific derived concentration guideline level (DCGL) values derived from RESRAD codes must submit a request for approval.
96	WA	App O, Model procedure for leak testing	This is an awesome addition to the model procedure for leak testing. "Check the counting efficiency of the instrument using a standard source of the same radionuclide as that of the source being tested or one with similar energy characteristic."	No response required,