



# ALABAMA DEPARTMENT OF PUBLIC HEALTH

Scott Harris, M.D.  
Acting State Health Officer



October 3, 2017

Mr. Robert MacDougall  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

RE: Docket No. PRM-30-66, Petition for Rulemaking by the  
Organization of Agreement States (OAS)

Dear Mr. MacDougall:

On behalf of the Alabama Office of Radiation Control, I offer the following comments on the referenced petition for rulemaking.

We agree with the OAS that there is a need to amend Appendix B to 10 CFR 30, and support their statement that "...the more appropriate way to address the inconsistency in Appendix B is to amend it to include appropriate nuclides and their corresponding activities, as determined by a rulemaking working group." This will greatly reduce the man hours required to perform individual exemption reviews.

Thank you for the chance to comment on this petition for rulemaking. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "David Walter".

David Walter, Director  
Office of Radiation Control

**From:** [David.Walter@adph.state.al.us](mailto:David.Walter@adph.state.al.us)  
**To:** [RulemakingComments Resource](#); [Macdougall, Robert](#)  
**Cc:** [OasBoard](#); [oasvotingmembers@agreementstates.org](mailto:oasvotingmembers@agreementstates.org)  
**Subject:** [External\_Sender] Comments on OAS Petition for Rulemaking  
**Date:** Tuesday, October 03, 2017 7:55:59 AM  
**Attachments:** [OAS Petition for Rulemaking Support 10-2017.pdf](#)

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