

ARKANSAS DEPARTMENT OF HEALTH
1815 West Markham Street
Little Rock, Ark. 72201

SECY

Robert W. Young, M.D., M.P.H.
Director

Bill Clinton
Governor

CKET NUMBER
PROPOSED RULE

PR *Misc notice*
Policy Statement
45 AR 65926

October 28, 1980

RECEIVED

Mr. John Vaden, Supervisor
Radiological Health
Division of Human Resources
505 East King Street
Carson City, Nevada 89710



Consumer Health
Protection Services

Dear John:

The following is a list of comments which my staff and I are offering in response to the revised criteria for evaluation of the Agreement State Programs, particularly those pertaining to the items which you pointed out in your letter dated October 15, 1980.

1. Item 1, page 7- Qualifications of Agreement State Staff: It is our opinion that the State Agreement Staff are as well trained, if not more so, than other technical staff members of the NRC involved in license reviews and inspections and enforcement. The staff represents several years experience in various aspects of regulatory work as well as private industry. In addition, the Agreement State Staff are more involved in the variety of NRC training courses than other NRC staff.
2. Item 1, page 8- Indicators: The total person-rem should be a good indicator but does not complete the total picture. Overexposure and the degree to which radioactive material is handled, especially in millicurie and greater amounts, should be considered.

Item 2- Availability of data: In our state, the data is not readily available and would require some research.

Item 3- Legal and regulatory restraints: None.

Item 4- Levels of effort for collection of data: Several person-years would be required for retrieval and compilation of the data.

Item 5- Other factors: Much additional time would be involved in our state and perhaps others, due to lack of data processing support in the radiation control programs.



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Comments

Item 2, page 9- Inappropriate Criteria: It is felt that the reviewers should not spend their time and the states' time investigating category II and III criteria unless deficiencies in category I indicate problems in those particular program areas.

Item 4, page 9- Reviews by outside agency: No, because the reviewers should have knowledge of the area which is being reviewed.

Item 5, page 9- Results of reviews: We feel that the Governors' Office should be made aware by representation at the exit interview and/or copies of the review report. We also feel that representatives in responsible positions (Joint Budget Committee, Legislative Council) of the State Legislature should be made aware of the review results.

If you have any questions, or would like to discuss any of these items further, do not hesitate to call.

Sincerely,

E. F. Wilson, Director
Division of Environmental Health Protection