



STATE OF NEW YORK - DEPARTMENT OF LABOR
DIVISION OF SAFETY AND HEALTH
Radiological Health Unit
STATE OFFICE BUILDING CAMPUS
ALBANY, N.Y. 12240

August 23, 1994

Richard L. Bangart, Director
Office of State Programs
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Bangart:

We recently received a copy of a document entitled "Basic SSD Review Procedures" with a cover letter (SP-94-082) describing the document as "being designed to serve as a Standard Review Plan (SRP)" for evaluating sealed sources and devices. It was also stated in the letter that the contained procedures have been, and will continue to be, used by NRC in the conduct of Agreement State Program reviews.

I subsequently had copies made for staff use and asked one staff member to report back to me on the document's utility. His comments are attached, and indicate that we may not have received a complete copy of this package. I have reviewed it myself, and while many of the individual components are useful, it does not resemble any other SRP I have seen.

If further information was to have been included we would appreciate receiving it.

Sincerely,

Rita Aldrich
Principal Radiophysicist
Radiological Health Unit

RA/fdh
Attachment

cc: Maria Colavito
Clayton Bradt
Donna Ross
Lloyd Bolling
Robert Kulikowski
Charles Hardin

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OSP

STATE OF NEW YORK

DEPARTMENT OF LABOR

INTER-OFFICE MEMORANDUM

August 16, 1994

TO: Rita Aldrich
FROM: Clayton Bradt 
SUBJECT: Standard Review Plan for SS&D Evaluations

I have reviewed the "Basic SS&D Review Procedures" which the NRC recently provided and conclude that it is of no use to us. Although presented as a "Standard Review Plan", it is little more than an office procedures manual for NRC reviewers and clerical staff containing such information as: "The registration certificates are in the black binders on the bookshelf in the hall between 6D21 and 6D17." In addition, the document contains a copy of a journal article on hydrogen embrittlement in engineering materials, a table showing the degree of corrosion at various bimetallic contacts, copies of NRC Reg. Guides 10.10 and 10.11, Draft Reg. Guide DG-6002, ANSI standard for gamma radiography N43.9, and a list of standard license conditions. How a reviewer is to use any of this information is not explained.

A standard review plan for SS&D evaluations should contain a conceptual frame work for evaluating the material submitted by applicants. It should contain criteria for determining whether a source or device is appropriate for the purposes and conditions of use indicated. It should provide a basis for disapproving an application for a source or device which is unsafe. Unfortunately none of these are to be found in this document.