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February 3, 2023

Jennifer Fisher
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Ms. Fisher,

The OAS Executive Board (Board) appreciates the opportunity to comment on STC-22-033, Interim Procedure SA-300, Reporting Material Events, and the Interim Handbook on Nuclear Material Event Reporting for the Agreement States. The Board also reviewed STC-22-065, Revised Interim Handbook on Nuclear Material Event Reporting for the Agreement States.

The Board has two comments for the Nuclear Regulatory Commission to consider:

1. In the Handbook, section 5.6.3 is included for Landfill Radiation Monitor Alarms. This section should be expanded to consider nuclear material identified at unlicensed scrap metal recycling facilities and unlicensed incinerator facilities. Alternatively, an additional section could be added after section 5.6.3 to address these locations.
2. In the Handbook, Appendix A, Table A.1, the reporting requirements for 10 CFR 37.81(e) and (f) are combined as one item. However, the reporting requirements for 37.81(e) and 37.81(f) have minor differences. 10 CFR 37.81(e) requires notification to the NRC's Operations Center and the LLEA upon recovery of lost or missing category 1 quantities of radioactive materials, while 37.81(f) only requires notification to the NRC's Operations Center upon recovery of lost or missing category 2 quantities of radioactive materials. These reporting requirements should be separated in the Handbook for clarity.

Once again, the Board appreciates this opportunity to comment. We are available should you have any questions or need clarifications to our responses.

Sincerely,

Steve Seeger

Steve Seeger, Chair
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