

65 FR 45116
July 20/2000
(1)

STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

1035 OUTER PARK DRIVE • SPRINGFIELD, ILLINOIS 62704
217-785-9900 • 217-782-6133 (TDD)

George H. Ryan
Governor

Thomas W. Ortziger
Director

00 DEC -6 PM 4:15

OSP

November 26, 2000

Mr. Jim Myers, Chief
Rules and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

Re: Draft Regulatory Guide NUREG 1556 Vol. 20 "Guidance About Administrative Licensing Procedures."

Dear Mr. Myers:

The Illinois Department of Nuclear Safety (the Department) hereby submits its comments on the referenced Draft Regulatory Guide. This document provides detailed insight into NRC's administrative licensing practices. Many of the tracking procedures and method of maximizing resources in this document have already been implemented in some form in Illinois. However, it is always informative to see how other programs operate. The forms, checklists and correspondence in the appendices are particularly useful. The following comments are provided for your consideration to further improve this document:

1. Although stated that the document is "intended for use by the NRC Licensing Staff," will this document be used as an evaluation tool when conducting IMPEP reviews in the states? Presumably, this document is provided as information to the states to use as they see fit.
2. The Department recommends that the NRC include instructions regarding applications received by the NRC requesting authorization to use or store NORM/NARM or by-product material regulated by Agreement States in Section 3.2.3 entitled "Processing Misdirected Materials License Applications." Illinois currently extends this courtesy to the NRC for applicants who misfile forms with our state.



Template: ADM-013

E-RIDS-ADM-03

Att: = C. Brown (CXB)

3. The Department recommends that the NRC emphasize to its reviewers that to ensure a facility is suitable for termination and release, confirmatory monitoring may be necessary. Such monitoring may have to be coordinated through the inspection staff or with additional NRC resources. Further, we recommend that the NRC establish a working policy for when such monitoring is unwarranted or inapplicable, depending on the nature of the license authorization and facility inventory.
4. The guidance directs that the reviewer determine if the request for generally licensed materials pursuant to 10 CFR 31.11 is from a physician or veterinarian, as required by regulation. However, there is no direction on how this is to be accomplished. Use of appropriate correspondence/references should be included here.
5. The use of the 10-year renewal cycle is again indicated in the NUREG. The Department has commented many times previously on possible health and safety shortcomings associated with this practice, especially in light of the current trend at NRC to limit reviews during renewals and inspections.
6. Regarding multi-site licenses, we suggest the addition of two more areas of concern: (1) multi-site licenses should not be granted unless there is a common radiation protection program for the entire entity. Individual procedures and site-specific practices should be allowed, but only within in a larger common framework; (2) multi-site licenses should only be granted where it is demonstrated that there is a common and combined management structure, particularly at the upper level where financial and personnel resources are controlled.
7. The Department would like a procedure included that provides for technical assistance requests related to generic issues to be distributed to all the states for their information.

U.S. Nuclear Regulatory Commission

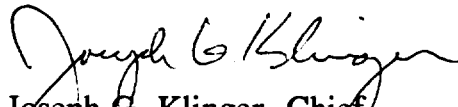
November 26, 2000

Page 3

8. The largest portions of this document are the appendices. The NRC indicates that they are included in this NUREG format for ease of updating and for establishment of a licensing handbook. This is an admirable notion provided that the appendices are truly maintained and kept up-to-date. Please indicate how these appendices will be updated (e.g., on the web, mailings, etc.)
9. The Department found the Limited Renewal checklist in Appendix C.2 very informative. We have implemented a similar checklist for our "expedited" renewals.

Thank you for the opportunity to comment. Please contact me or Mr. Gibb Vinson at (217) 785-9947 if you have any questions.

Sincerely,



Joseph G. Klinger, Chief
Division of Radioactive Materials

CGV:kjg

cc: James Lynch, State Agreements Officer



ILLINOIS
DEPARTMENT
OF NUCLEAR
SAFETY

1035 OUTER PARK DRIVE
SPRINGFIELD, ILLINOIS 62704-4462

03-
C10

Jim Myers

Jim Myers, Chief
~~Rules and Directives Branch~~
U.S. Nuclear Regulatory Commission
~~Mail Stop 10-109~~
Washington, DC 20555-0001

stet

stet

20353-0001

