

***OAS and CRCPD  
Comments on Proposed  
Part 37***

***David Walter, Chair  
Organization of Agreement States***

# ***Recognitions***

- ***States were engaged early and often in the development of the rule and were provided the opportunity to comment on the draft proposed rule***
- ***State Representation on the Working Groups and Steering Committee***

# ***Recognitions***

- ***Security of Category 1 and 2 sources is important for protecting U.S. citizens from improper use of RAM***
- ***Regulations are the correct method for implementing measures to increase radiation health and safety***

# ***Recognitions***

- ***Revising the table of applicable isotopes to show an additional significant figure for the curie equivalents***
- ***Addition of periodic testing of security systems***

# **Concerns**

- ***Approval of the Reviewing Official***
- ***Credit checks as part of the background investigation***
- ***Licensee notification to LLEA for temporary job sites***