Organization of Agreement States

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January 9, 2012

US Nuclear Regulatory Commission
Brian J. McDermott, Director
Division of Materials Safety and State Agreements, FSME
Mailstop T8-E24
Washington, DC 20555-0001

Subject: NUREG-1556, Vol. 2 Draft Revision Comments

Dear Mr. McDermott:

The Organization of Agreement States (OAS) Executive Board (Board) has reviewed the above document and offers the following comments for review by the Nuclear Regulatory Commission (NRC).

1. The abbreviation for hour has been changed from "hr" to "h". It is the Board's understanding that the conventional abbreviation for hour is "hr" and that is used in all other regulatory guides. The Board recommends that the abbreviation for hour be change from "h" to "hr".

2. On page 3 it lists the Region IV address as 612 E. Lamar Blvd. The Board believes this is incorrect due to Region IV's move. The new address is 1600 East Lamar Boulevard in Arlington. The Board recommends the address on page 3 of the NUREG be updated.

3. On page 40 of the NUREG it states: "Electronic personal dosimeters may only be used in place of ion-chamber pocket dosimeters." The Board believes this is an inaccurate statement as electronic personal dosimeters may also have the alarming rate feature and thus could replace the alarming ratemeter being used. This would allow radiographic personnel to wear one device instead of two. The regulations in 10 CFR 34.47 do not include any statement that these devices must be independent of each other. The Board recommends the statement on page 40 be removed from the NUREG.

4. On page 41, Figure 8.6 is included to visualize storage of radiographic cameras. Since the inception of Increased Controls this picture is no longer valid and does not add any value to the discussion of section 8.10.7 Public Dose. The Board recommends this figure be removed from the NUREG.

5. Appendix O, Information needed for transfer of control application contains questions that are not stated in NUREG-1556 Vol. 15 which is the Guidance for change of control. In Vol. 15 section 5 has 6 specific items that must be addressed in the request and includes the 6 questions in Appendix F. This volume and several others list 15 questions to be answered. The Board recommends that the 6 questions from Appendix F of NUREG-1556 Vol. 15 be used or that Appendix O be revised so that they can all be in agreement.

6. Page 17 and throughout the document state "as low as reasonable achievable" but should be stated as "as low as **is reasonably** achievable". These should be corrected throughout the document.

7. Section 8.10.6: Occupational dose. Second paragraph states that "other personnel dosimetry device are….. must be replaced at intervals not to exceed 3 months". A Mirion Instadose dosimeter does not need to be exchanged for the dosimetry to be read. The only time the dosimeter is sent back to the manufacturer is if the device is in need of repairs. The Board recommends that the paragraph be changed to state "must be replaced at intervals provided by the supplier".

8. Appendix F 6 month audit. There is no block available to document who performed the audit. This should be added.

We appreciate the chance to comment on this subject, and stand ready to answer any questions you may have.

Sincerely,

Cheryl K Rogers

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