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**Facsimile Cover Sheet**

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From: George Marshall

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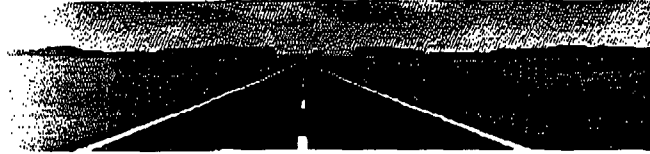
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January 12, 2012

Carol Gallagher

Nuclear Regulatory Commission

Re: Docket ID NRC-2011-0265

Dear Ms. Gallagher

Thank you for the opportunity to comment on Docket ID NRC-2011-0265, NUREG-1556, Volume 2, Revision 1 "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Industrial Radiography Licenses;" Draft Guidance.

I have been a stakeholder panelist on the Safety Culture Initiative and am preparing training and website materials in support of the rollout of safety culture for the portable nuclear gauge industry. Stakeholders will be discussing their efforts during the February 9, 2012 report to the Commission. I believe the inclusion of safety culture materials into NUREG revisions and refresher training will be significant in bringing about effective implementation.

Three key components of instituting safety culture stand out:

- Embedding safety culture into NUREG revisions
- Continuous Learning (Trait #5)
- Industry Support

Embedding Safety Culture into the NUREG series: I noted that safety culture was addressed in Section 3.1, page 8, under Management Responsibility and in Appendix P but not specifically into materials associated with developing a Radiation Safety Program and in the Annual Audit as well as some other key places as noted below. Since the NUREG series is commonly accessed by the licensee primarily during the application process I wonder how much they will return to view aspects of safety culture. Implementation of safety culture terminology directly into the Radiation Safety Program and Annual Audit will provide the primary ongoing focus of the initiative. I think coverage of Safety Culture in the following sections would better serve to advance the concepts of the initiative:

Inclusion in "Section 8 ~ Contents of an Application" that requires acknowledgement of Safety Culture

Inclusion on page 24, Radiation Safety Program/RSO

**Inclusion, Page 26 – Figure 8.2 – Typical Duties and Responsibilities of RSO's**

**Inclusion Section 8, Item 8 – Training (also page C-4 – especially “Describe the annual refresher training program, including topics to be covered and how the training will be conducted” and inclusion in Radiation Safety Program/Audit Program on C-7). Also page E-1 – E3.**

**Inclusion Section 8, Item 10 – Radiation Safety Program**

**Inclusion Section 8, Item 10.1 – Audit Program (including Appendix G, Page G-1)**

**Inclusion Section 8, Item 10.9 – Operating and Emergency Procedures (List the SC traits)**

**Trait #5: NUREG Volume 2 Revision states (page 8): “the annual refresher training required for radiographers and radiographer assistants may correspond with the continuous learning safety culture trait in that the training provides an opportunity to learn about ways to ensure that safety is sought out and implemented”.**

**This acknowledgement of the importance of annual refresher training in implementing safety culture should be considered to revisions in NUREG Volume 1. I think that annual refresher training should be a vital addition for the portable nuclear gauge industry. I bring it up now because of the need to discuss portable nuclear gauge annual refresher training at the Feb 9th Commission meeting. This is probably the least trained industry sector and inclusion of an annual refresher class would likewise serve the continuous learning trait.**

**I have had discussions with portable nuclear gauge RSO's and all of them have struggled with the concepts of safety culture as it applies to the gauge industry. I have committed to providing a no cost online annual refresher class (through the American Portable Nuclear Gauge Association – APNGA) that will provide examples of the 9 safety culture traits as they apply to gauges. RSO's can perform the annual refresher training in-house and, if they find it beneficial, can utilize the online materials.**

**While the NRC and Agreement States represent the primary role in implementing safety culture the various industries can represent an important supporting role by promoting safety culture in their training offerings, websites and newsletters. Brochures and posters can serve as an introduction to safety culture and intermittent inspections can help RSO's refine safety culture efforts but the sheer number of licensees and end users will always be a challenge for regulatory agencies. Industry should and can be relied upon to provide annual refresher training assistance and website/newsletter coverage of the safety culture initiative.**

**Thank you for your consideration.**

**George Marshall - Director**

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