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Kathy Modes
Office of Nuclear Materials Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555

OPPORTUNITY TO COMMENT ON DRAFT REVISION TO OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS PROCEDURE SA-116, "PERIODIC MEETINGS BETWEEN IMPEP REVIEWS" (STC-17-033)

Dear Ms. Modes:

The Organization of Agreement States (OAS) Executive Board (Board) has reviewed the above document and respectfully submits the following comment.

OAS finds the Periodic Meetings to be useful, open discussions on the status of the Agreement State programs. However, as can be seen in SA-116, Section F, Frequency and Presentation of the Results of the Periodic Meetings to the Management Review Board (MRB) and Section G, Performance Issues Identified during a Periodic Meeting, the main purpose of the MRB is to make recommendations when issues are present. The OAS suggests that if the results of the Periodic Meeting are clear, i.e. no issues are present, that the NRC allow states to opt out of an MRB.

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

Sincerely,

Matthew W. McKinley
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