March 8, 2017

Mr. Anthony McMurtry
Office of Nuclear Materials Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555

OPPORTUNITY TO COMMENT ON DRAFT NUREG-1556, VOLUME 17, REVISION 1, “CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES: PROGRAM-SPECIFIC GUIDANCE ABOUT SPECIAL NUCLEAR MATERIAL OF LESS THAN CRITICAL MASS LICENSES” (STC-17-011)

Dear Mr. McMurtry:

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

1. Page I-1, lines 14-23. This passage is supposed to be taken from 10 CFR 150.11(a), however, the equation should be listed after line 23 with the following inserted before it: For example, the following quantities in combination would not exceed the limitation and are within the formula, as follows: [insert equation] The actual formula would have variables in the numerators for the specific quantity that a licensee may possess. Adding the formula may help clarify this passage.

2. Page I-6, line 34-35. A good air sampling program cannot always prevent the need for a bioassay program. The air sample results could indicate the need to require bioassay samples.

3. Page I-9. Elevated air monitoring results should be included in the bulleted list as a reason to do special bioassay measurements.
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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