



Organization of Agreement States

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March 8, 2017

Mr. Anthony McMurtray
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. McMurtray:

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.

Alabama, Arizona, Arkansas, California, Colorado, Florida, Georgia, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Minnesota, Mississippi, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, Wisconsin

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

Sincerely,



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