Sarah Sanderlin, Chair, New Jersey
Becki Harisis, Chair-Elect, Tennessee
Beth Shelton, Past Chair, Tennessee
J. Niki Minnick, Treasurer, Pennsylvania
Shatavia Walker, Secretary, Georgia
Meghan Cromie, Director, Colorado
Phillip Peterson, Director, Colorado
David Matos, Champion, Georgia

August 3, 2026

Andy Imboden
U.S. Nuclear Regulatory Commission
Washington, DC 20555–0001

Dear Mr. Imboden,

The OAS Executive Board (Board) appreciates the opportunity to comment on the proposed rule titled "Modernizing Materials Licensing" amending 10 CFR Parts 30, 37, 40, 51, 70, 72, and 140 (Docket ID NRC-2025-1370; STC-26-036). The Board is only providing comments on proposed changes to 10 CFR 30, 37, 40, and 70 as the other proposed changes to 10 CFR 51, 72, and 140 do not fall under the regulatory authority of Agreement States. After reviewing the proposed amended rules, and after receiving comments from our Agreement State partners, the Board has the following comment(s):

1. The Board supports the changes to 10 CFR Part 37.5 with the inclusion of the definitions of Large Component and Robust Structure. The Board suggests that the examples included with the definition of Large Component include parts of fusion machines that likely become activated and would exceed the 2,000 kg threshold specified in the proposed definition.

2. The Board supports the changes to 10 CFR Part 37.11.

3. The Board supports the revised reporting requirements found in Appendix A to Part 70.

Once again, the Board appreciates this opportunity to comment. We are available should you have any questions or need clarifications to our responses.

Sincerely,

Sarah Sanderlin

Digitally signed by Sarah Sanderlin
Date: 2026.08.03 14:26:54 -04'00'

Sarah Sanderlin, Chair
Organization of Agreement States
Radiation Physicist 2 | Agreement State Program
New Jersey Bureau of Environmental Protection
Mail Code 25-01, 420, Trenton, NJ 08625
Sarah.Sanderlin@dep.nj.gov