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**W. Lee Cox, III, Champion, North Carolina**

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November 9, 2020

Ted Carter  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Mr. Carter:

The OAS Executive Board (Board) appreciates the opportunity to comment on the Nuclear Regulatory Commission's (NRC) Proposed Revision to Document "Consolidated Decommissioning Guidance: Decommissioning Process for Materials Licensees (NUREG 1757, Volume 1, Revision 3) (RCPD-20-007)". The Board reviewed the changes detailed in the "Summary of Changes" document. Further, the Board received comments from New Jersey relating to the use of Long Term Control (LTC) licenses and we support their position.

The NUREG states the Commission recognized that requiring absolute proof for institutional controls over long periods of time would be difficult, and the Commission did not intend to require this of licensees. Yet with a LTC license, there is a possibility to have a license in perpetuity when long-lived radionuclides are involved. For instance, source material will outlast engineered barriers, institutional controls, financial assurances, and likely our government agencies.

The Board requests the NRC to exclude long-lived radionuclides from this type of license because we do not believe that a LTC license provides a permanent institutional control, or an effective solution for decommissioning.

Sincerely,

David Crowley, Chair  
Organization of Agreement States  
Radioactive Materials Branch Manager  
Division of Health Service Regulation, Radiation Protection Section  
NC Department of Health and Human Services  
5505 Creedmoor Rd., First Floor  
Raleigh, NC 27612

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