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November 12, 2019

Aaron McCraw
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. McCraw:

The Organization of Agreement States (OAS) Executive Board (Board) has reviewed the Draft Revision to Inspection Manual Chapter (IMC) 2800, "Materials Inspection Program" (STC-19-053) and has the following comments.

1. 05 Basic Requirements: The third paragraph describes when an inspection can officially be considered to be performed. This description is potentially contradictory to the definition of a non-routine inspection, specifically item 2) of the definition.
2. 06.03 a. 2. The Board recommends that "management paragraph" be defined.
3. 09.02 Documenting Inspection Results: This section describes how and when narrative inspection reports are required, including all team inspections (more than 3 people), potential escalated enforcement actions, and reactive inspections for events. This could potentially be a compatibility issue with states that use checklists or other standard formats as the primary method for documenting inspection results.

We appreciate the opportunity to provide these comments and stand ready to answer any questions you may have.

Sincerely,

Terry Derstine
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Radiation Protection Program Manager
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