



David Turberville, Chair, Alabama
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July 16, 2018

Irene Wu
Office of Nuclear Materials Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555

OPPORTUNITY TO COMMENT ON DRAFT U.S. NUCLEAR REGULATORY
COMMISSION'S STAFF EVALUATION OF TRAINING AND EXPERIENCE
REQUIREMENTS FOR ADMINISTERING RADIOPHARMACEUTICALS (RCPD-18-003)

Dear Ms. Wu:

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

1. It is not clear to the Board if the NRC verified ACMUI's claim that there may be a shortage of Authorized Users. What evidence was given that there is going to be a problem? Were Agreement States consulted on this assertion?
2. The Board does not understand how this avenue of proposed rule changes reconciles with a petition for rulemaking. Will the NRC require the same level of justification for changes as in a petition for rulemaking?
3. There did not seem to be a clear consensus for proceeding with a limited AU or even if a limited AU was necessary from the stakeholders.
4. The Board agrees with comments provided by Colorado.

In conclusion, the Board believes that there should be further justification provided for considering a limited AU. There is not enough information presented for Agreement States to make that determination.

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

Sincerely,

A handwritten signature in blue ink that reads "David Turberville". The signature is written in a cursive style with a large initial "D".

David Turberville
OAS Chair
Office of Radiation Control
Alabama Department of Public Health
The RSA Tower, Suite 1250
P. O. Box 303017
Montgomery, AL 36130