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November 20, 2020

Sarah Lopas
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Ms. Lopas:

The OAS Executive Board (Board) appreciates the opportunity to comment on the Nuclear Regulatory Commission's (NRC) draft SECY paper: "Rulemaking Plan to Codify Requirements for Rubidium-82 Generators and Emerging Medical Technologies" (RCPD-20-009).

The Board has reviewed the information provided in the draft SECY paper. The Board supports the NRC staff's recommendation for the Option 3 rulemaking for codification of the Rubidium-82 (Rb-82) generators and for emerging medical technologies (EMTs). The Option 3 rulemaking offers a solution to the known issues with Rb-82 generators, and provides the flexibility needed to address both common and novel EMTs. The performance based codification will help to streamline licensing processes and to promote compatibility throughout the National Materials Program.

Thank you for the opportunity to express our views.

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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