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January 15, 2021

Lizette Roldan-Otero  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Ms. Roldan-Otero:

The OAS Executive Board (Board) appreciates the opportunity to comment on the Nuclear Regulatory Commission's (NRC) revised State Agreement Procedure (SA), *Periodic Meetings Between IMPEP Reviews* (STC-20-077).

The Board offers the following comments based on our review of the information provided and the comments of our state members:

Section III. Background:

This section states "These meetings are not evaluations but are open, interactive discussions of a Program's performance." Any discussion of performance leads to an inherent evaluation component regarding the status of the Program. A more appropriate description would be, "These meetings are not meant to be formal evaluations but rather open and interactive discussions surrounding a Program's performance."

Section IV. Roles and Responsibilities:

- B.1.a. on page 2 of 12, identifies frequency defined in Section V.A, it should be VI.;
- B.1.d on page 3 of 12 states "...reviews the agencies progress..." is the word "agencies" intended to be in the possessive form? If so it should read "agency's" or "agencies";
- B.1.f on page 3 of 12 states "...and DNMS Directors..." that should be singular, i.e., "...and DNMS Director..." as it is stated elsewhere in the document;
- B.1.g on page 3 of 12 states "...provides a path forward for actions items..." "actions" should be singular;
- C.1.A on page 3 of 12 "Section V.A" should read "Section VI.A".

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*Alabama, Arizona, Arkansas, California, Colorado, Florida, Georgia, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Minnesota, Mississippi, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Vermont, Virginia, Washington, Wisconsin, Wyoming*

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Section V. MRB:

1.c. on page 5 of 12 ends with "...in MD 5.6;" The definition of "MD" is not yet identified at this point; later in the document it is defined as "Management Directive 5.6".

Section VI. Guidance:

- E.1.B on page 7 of 12 references "Idaho National Laboratories", should "Laboratories" be singular, "Laboratory"?
- The second footnote at the bottom of page 10 of 12, third sentence starts with "Another example would a situation..." leaves out "be;" it should read "Another example would be a situation..."

Section VII. Appendices:

Appendices are integral parts of the SA procedures. Removal of them raises the concern that by incorporating them elsewhere, i.e. in the state communication portal, users may not be able to locate them easily or neglect them entirely.

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

Sincerely,



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NC Department of Health and Human Services  
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