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**Phillip Peterson, Director, Colorado**  
**Santiago Rodriguez, Champion, New Mexico**

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May 17, 2024

Duncan White  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Mr. White,

The OAS Executive Board (Board) appreciates the opportunity to comment on the Interim Procedure SA-500, Jurisdictional Determinations (STC-23-076). After reviewing the interim procedure, and after receiving comments from our Agreement State partners, the Board has the following comments:

1. Several sections need a closing parenthesis, including Section III.A.d and III.A.f.
2. The footer at the end of page 12 has a duplicated 'submitting For 241.' that should be removed.
3. The page numbering of the document needs clarification. In the header, the procedure indicates it is 10 pages long. The procedure goes through page 8 and appendix A are pages 9 and 10. Appendix B are pages 11 and 12, and then the next page is page 14.
4. Several hyperlinks appear to be non-functional, include the link in footnote 4 and the link in Section V.C.1.a.
5. Section III.F.9 (page 5) uses the term 'AEA Radioactive Material'. This term is also used in Section III.D.1.a and in appendix B, but is not used consistently through the procedure.

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

Sincerely,

Keisha Cornelius, Chair  
Organization of Agreement States  
Oklahoma Department of Environmental Quality, Radiation Management Section  
707 N Robinson  
Oklahoma City, OK, 73102

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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*