Organization of Agreement States

Sarah Sanderlin, Chair, New Jersey
Becki Harisis, Chair-Elect, Tennessee
Beth Shelton, Past Chair, Tennessee
J. Niki Minnick, Treasurer, Pennsylvania
Shatavia Walker, Secretary, Georgia
Meghan Cromie, Director, Colorado
Phillip Peterson, Director, Colorado
David Matos, Champion, Georgia

January 28, 2026

Jennifer Dalzell
U.S. Nuclear Regulatory Commission
Washington, DC 20555–0001

Dear Ms. Dalzell,

The OAS Executive Board (Board) appreciates the opportunity to comment on draft IMC 1248, Qualification Programs for Materials, Decommissioning, and Uranium Recovery Programs in the Office of Nuclear Material Safety and Safeguards (STC-25-062). After reviewing the draft IMC 1248, and after receiving comments from our Agreement State partners, the Board has the following comments:

1. The OAS Board agrees with and supports the comments made by the State of Wisconsin in correspondence dated January 15, 2026.

2. It appears that the draft appendix J is intended to provide a standardized approach to base-level training versus having that information in every appendix (as noted in draft attachment 1, exhibit 1). It may be useful to note in appendices A, B, and D that completion of the items of appendix J is required prior to more specialized on-the-job training and individual study activities (similar to the first paragraph of draft appendix M, section Technical Proficiency-Level Program Organization on page 1).

3. Draft appendix M contains several items that may be useful in draft appendix J, such as ISA-3 (IMC, Inspection Procedures (IP), and Other References) and ISA-4 (the Federal Register).

4. For draft appendix B, OJT-3 may need to include a reference to 10 CFR Part 31 to account for the expected change to diagnostic nuclear medicine and the Standard General License framework.

5. For draft appendix B, OJT-4 should include a reference to 10 CFR Part 20.

6. For draft appendix B, OJT-5 includes a reference to Inspection Procedure 87137, “10 CFR Part 37 Materials Security Programs” but not a reference to 10 CFR Part 37. Either the reference to the Inspection Procedure should be removed or a reference to 10 CFR Part 37 should be included.

7. For draft appendix B, OJT-7 should include a reference to 10 CFR Part 37.

8. For draft appendix B, OJT-8 should include a reference to 10 CFR Part 37.

9. For draft appendix B, OJT-8 includes a reference to the Sealed Source and Device Registry. This reference should be included with other OJTs that are evaluating or inspecting licensed uses of radioactive materials that include sealed sources and devices.

10. For draft appendix B, OJT-8 evaluation criteria 1 only includes panoramic or self-contained dry storage irradiators. The evaluation criteria should be expanded to include the adjusted purpose of OJT-8 which includes panoramic dry-source-storage, panoramic wet-source-storage, and underwater irradiator programs.

11. For draft appendix B, the topic of OJT-10 is 'Limited and Broadscope Research Programs'. Within the references section of OJT-10, it includes a reference to Inspection Procedure 87134, "Medical Broad-Scope Programs" but there is no corresponding reference to 10 CFR Part 35 or NUREG-1556, Volume 9 "Program-Specific Guidance About Medical Use Licenses". It appears that the intention of the revision to OJT-10 is to include medical broadscope programs but it is not clear if this is the case and OJT-10 should be revised for clarity.

12. For draft appendix A, ISA-3 and draft appendix B, ISA-2 (both titled Reciprocity), a reference to procedure SA-500 should be included.

13. For draft appendix A, ISA-15 should include a reference to 10 CFR Part 61.

14. For draft appendix D, the required training courses should include the Sealed Source and Device Workshop. This workshop is currently referenced as "Reviewers are encouraged to participate…" in the paragraph preceding the required training courses.

15. For draft appendix D, there is no reference to 10 CFR Parts 40 or 70. These Parts should be included as part of ISA-4 to ensure reviewers are familiar with those Parts and how the regulations may vary between byproduct materials, source materials, and special nuclear materials.

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

Sincerely,

Sarah Sanderlin
Digitally signed by Sarah Sanderlin
Date: 2026.01.28 13:47:10 -05'00'

Sarah Sanderlin, Chair
Organization of Agreement States
Radiation Physicist 2 | Agreement State Program
New Jersey Bureau of Environmental Protection
Mail Code 25-01, 420, Trenton, NJ 08625
Sarah.Sanderlin@dep.nj.gov