

DOCKET NUMBER

PETITION RULE FROM 31-5  
(70FR75423)

4

MEMORANDUM

DOCKETED  
USNRC

To: Joe Klinger

March 20, 2006 (8:34am)

From: Mike Ewan

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Date: January 30, 2006

Subject: PRM-31-05 [Generally Licensed Devices(GL's)/Reciprocity] Illinois  
Emergency Management Agency's (IEMA) Position on OAS & Florida  
Petitions

Generally Licensed Devices

The Agency (IEMA) supports the Florida petition for rulemaking.

OAS seeks to eliminate the class of GL's that NRC registers and would replace them with SL's. IEMA opposes this (memo PDE > SCC 7/28/05) since we currently register and track GL devices to a very high standard.

Florida on the other hand, seeks latitude to both retain the class of GL's now registered by NRC and to also register others. Florida's program is generally the same as IEMA. NRC has published a useful synopsis of Florida's position (FR Doc 05-24250, pg 75425).

Florida's argument is:

- A state is better suited than the federal government to determine the appropriate level of oversight within that state's jurisdiction.
- It is inappropriate for the federal government to require a state to lower its standard of oversight.
- Registration of GL devices does not have significant transboundary implications. Florida and Illinois have been registering devices for years without noteworthy comment on this issue.
- Florida's program should be deemed acceptable because it meets the essential objective of NRC's effort at enhanced GL oversight.

Template = SECY-067

SECY-02

### Reciprocity for Servicing GL Devices

IEMA supports that part of the OAS petition that seeks authority for a state to track the movement of installers and service providers of GL devices. We made this argument to NRC on 9/16/05 – see document SERVICERS-TXT.DOC.

**From:** Carol Gallagher  
**To:** Evangeline Ngbea  
**Date:** Thu, Mar 16, 2006 4:33 PM  
**Subject:** Comment letter on PRM-31-5

Attached for docketing is a comment letter on the above noted PRM from Mike Ewan, Illinois Emergency Management Agency.

His address is:

Illinois Emergency Management Agency  
1035 Outer Park Drive, 5th Floor  
Springfield, IL 62704

Carol

**Mail Envelope Properties** (4419D9BC.19B : 3 : 886)

**Subject:** Comment letter on PRM-31-5  
**Creation Date:** 3/16/06 4:33PM  
**From:** Carol Gallagher  
  
**Created By:** CAG@nrc.gov

**Recipients**

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ESN (Evangeline Ngbea)

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**Files**

MESSAGE  
1658-0001.doc

**Size**

866  
30208

**Date & Time**

03/16/06 04:33PM  
03/16/06 04:28PM

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**Reply Requested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard