

Merri Horn - Comment on STP-06-002

From: "Scroggs, Arden (DOH)" <Arden.Scroggs@DOH.WA.GOV>
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Date: 02/07/2006 7:43 PM
Subject: Comment on STP-06-002
CC: "Lawrence, Craig (DOH)" <Craig.Lawrence@DOH.WA.GOV>, "Frazee, Terry (DOH)" <Terry.Frazee@DOH.WA.GOV>

Merri L. Horn,

Sorry for the untimely response from Washington State for comment on Final Rule: National Source Tracking (STP-06-002). Please accept our comments as you can. Thank you.

<<Opportunity to Comment on Final Rule STP-06-002.doc>>

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From: "Scroggs, Arden (DOH)" <Arden.Scroggs@DOH.WA.GOV>

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Opportunity to Comment on Final Rule: National Source Tracking
(STP-06-002)

Review of Draft Federal Register notice (FRN)

NUCLEAR REGULATORY COMMISSION
RIN: 3150-AH48

The Washington State Office of Radiation Protection would like to offer the following three comments:

- We strongly agree with the position the NRC has taken in this final rule not to add Category 3 sources. Many states commenting on the proposed draft supported adding Category 3 sources to the final draft. The addition of this category to the rule would subsequently mean many licensees not presently affected would be included in this program. We believe adding this source category will be burdensome to the licensees and to our program with little real benefit. Since NRC is still considering adding them in the future, we hope they reconsider taking this action.
- We would like to see this rulemaking changed to Compatibility Category "B" for Agreement States. This would permit the Agreement States to regulate the National Source Tracking System consistent with the existing framework to implement Increased Controls. Compatibility Category "B" will afford the Agreement States some operational flexibility for source tracking while implementing increased controls. We like that NRC will keep the function of tracking these sources. We recognize the benefit in having the NRC maintain a central database for tracking sources nationally.
- We applaud the NRC for seeking authority to regulate Radium under separate rulemaking. Washington State ORP has authority to regulate radium and this will benefit having NRC obtain authority for radium as well. With regulatory reforms enacted in Washington, it is extremely difficult to make a rule stricter than existing in federal rule. Should we need to undertake rulemaking to incorporate source tracking, our rule would include radium.

Thank you for giving Washington ORP the opportunity to provide comment on this Final Rule.