



11/21/2011

76FR 72025

COMMONWEALTH of VIRGINIA

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Karen Remley, MD, MBA, FAAP
State Health Commissioner

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December 30, 2011

US Nuclear Regulatory Commission
Cindy Bladey (Chief RADB)
Mail Stop TWB-05-B01M
Washington, DC 20555-0001

RECEIVED

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RULES AND RECIPES

Subject: NUREG-1556, Vol. 2 Draft Revision Comments

Dear Ms. Bladey;

The Virginia Radioactive Materials Program (VRMP) has reviewed the above document and offers the following comments for review by the Nuclear Regulatory Commission (NRC).

1. The abbreviation for hour has been changed from "hr" to "h". The VRPM recommends that the abbreviation for hour be change back to "hr".
2. On page 3 it lists the Region IV address as 612 E. Lamar Blvd. The new address is 1600 East Lamar Boulevard in Arlington. The VRMP recommends the address on page 3 of the NUREG be updated.
3. On page 40 of the NUREG it states: "Electronic personal dosimeters may only be used in place of ion-chamber pocket dosimeters." The VRMP believes this is an inaccurate statement as electronic personal dosimeters may also have the alarming rate feature and thus could replace the alarming ratemeter being used. This would allow radiographic personnel to wear one device instead of two. The regulations in 10 CFR 34.47 does not include any statement that these devices must be independent of eachother. The VRMP recommends the statement on page 40 be removed from the NUREG.
4. Appendix O, Information needed for transfer of control application contains questions that are not stated in NUREG-1556 Vol. 15 which is the Guidance for change of control. In Vol. 15 section 5 has 6 specific items that must be addressed in the request and includes the 6 questions in Appendix F. This volume and several others lists 15 questions to be answered. The VRMP recommends that the 6 questions from Appendix F of NUREG-1556 Vol. 15 be used or that Appendix be revised before this Volume and others so that they can all be in agreement.

FRIDS-ADM-03

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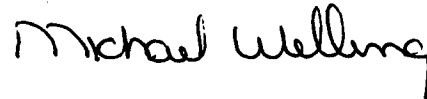
Call = T. Herrera (Txh1)

SUNSI Review Complete
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5. Delete figures 8.1-8.12 as they are outdated sometimes incorrect and not always useful.

If you have any questions I may be reached at 8004-864-8168 or
mike.welling@vdh.virginia.gov.

Sincerely,

A handwritten signature in black ink that reads "Michael Welling". The signature is written in a cursive style with a large, stylized "M" and "W".

Michael Welling
Director Radioactive Materials Program