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February 22, 2013

Brian J. McDermott (Director Division of Materials Safety and State Agreements, FSME)
Mailstop T8-E24
Washington, DC 20555-0001

Subject: FSME-13-009 (AD-800)

Dear Mr. McDermott;

The Organization of Agreement States (OAS) Executive Board (Board) has reviewed the above document and offers the following comments for review by the Nuclear Regulatory Commission (NRC).

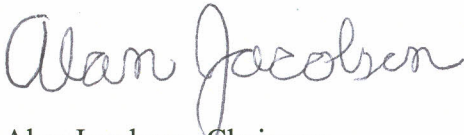
1. Page 1, Title Block - Change title to read as follows: "Procedure Title: *Communications Between FSME/Regional Offices and the Agreement-States*"
2. In section IV, sub-sections C and F are identical. The Board recommends deleting one of these sub-sections.
3. Section IV, subsection E - Change to read as follows: "The RSAO Project Manager is responsible for providing the MSSA Subject Matter Expert List to the RSAOs for up-to-date contact information within MSSA on a quarterly basis."
4. Section V, Subsection A.1, the second sentence should be changed to read as follows: "The date and time of the next Quarterly Conference Call will usually be decided at the end of each Quarterly Conference Call."
5. In sub-section V.B it states that if the Subject Matter Expert is unavailable then the Branch Chief, ASPB will provide the answer to the Subject Matter Expert who will then share it with the RSAO. The Board does not understand why the Branch Chief would provide a technical subject response to the expert for forwarding to the RSAO. The Board recommends that this be changed to allow the Branch Chief, ASPB to find another Subject Matter Expert to be assigned to the Agreement State question for response.
6. Section V, Subsection E, introductory paragraph - Change third sentence to read as follows: "It's important that information be provided in a reliable and uniform manner to all Agreement States."
7. Section V, Subsection E.1 – The Board recommends that the paragraph be changed to read: "Agreement States may request through their RSAO that the NRC provide a specific training class to its staff. The RSAO will work with the Agreement State in determining if the requested training is available to be provided and forward to the ASPB Branch Chief for review."
8. Section V, Subsection E.4 - Change the first sentence to read as follows: "The ASPB Branch Chief will communicate the decision (either granting or denial of training request), via email, to the requesting

Agreement State, the Chair of the Organization of Agreement States, all the RSAOs and the RSAO Project Manager.”

9. The Board recommends that a new sub-section be added to section V regarding the monthly NRC/OAS conference call (SA-1101) and how this item should be used to provide information to the Agreement States.

We appreciate the chance to comment on this subject, and stand ready to answer any questions you may have.

Sincerely,

A handwritten signature in cursive script that reads "Alan Jacobson".

Alan Jacobson, Chairman
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