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Radiation Control Program  
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Susan Mosier, MD, Secretary

Department of Health & Environment

Sam Brownback, Governor

October 9, 2017

Mr. Robert MacDougall  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

RE: Docket No. PRM-30-66, Petition for Rulemaking by the Organization of Agreement States (OAS)

Dear Mr. MacDougall:

On behalf of the Kansas Radiation Control Program, I offer the following comments on the referenced petition for rulemaking:

We agree with the OAS that there is a need to amend Appendix B to 10 CFR 30, and support their statement that "...the more appropriate way to address the inconsistency in Appendix B is to amend it to include appropriate nuclides and their corresponding activities, as determined by a rulemaking working group." This will greatly reduce the man hours required to perform individual exemption reviews.

Thank you for the chance to comment on this petition for rulemaking.

Sincerely,

Kimberly Steves,  
Director, Radiation Control Program  
Kansas Department of Health and Environment



Sam Brownback, Governor

Department of Health and Environment

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