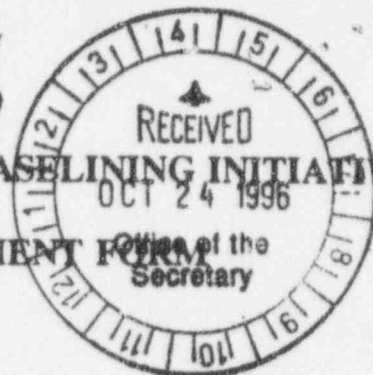




# NRC STRATEGIC ASSESSMENT AND REBASELINING INITIATIVE

## DIRECTION SETTING ISSUE COMMENT FORM



DSI-4

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### PLEASE CHECK ONLY ONE:

- ☒ DSI 2 - Oversight of the Department of Energy
- ☐ DSI 4 - NRC's Relationship with Agreement States
- ☐ DSI 5 - Low-Level Waste
- ☐ DSI 6 - High-Level Waste
- ☐ DSI 7 - Materials/Medical Oversight
- ☐ DSI 9 - Decommissioning - Non Reactor Facilities
- ☐ DSI 10 - Reactor Licensing for Future Applicants
- ☐ DSI 11 - Operating Reactor Program Oversight
- ☐ DSI 12 - Risk-Informed, Performance-Based Regulation

- ☐ DSI 13 - Role of Industry
- ☐ DSI 14 - Public Communication Initiatives
- ☐ DSI 20 - International Activities
- ☐ DSI 21 - Fees
- ☐ DSI 22 - Research
- ☐ DSI 23 - Enhancing Regulatory Excellence
- ☐ DSI 24 - Power Reactor Decommissioning
- ☐ General

### COMMENT:

1. NRC did not consider the historic relationship with Agreement States (AS) where the NRC paid for AS travel and per diem to AS courses and the Annual All Agreement states meeting, which has historically been an exchange of information meeting, in option 3.

2. NRC receives license fees from MANY AS licensees that work in Non Agreement states or manufacture radioactive sources that are sold nationally. (ie Schlumberger; Western Atlas, Halliburton (all well service companies), T.N Technologies, Nuclear Sources and Services, Gamma tron, etc (all source or device manufacturers), as well as the Nuclear power reactors (STREGS and Comanche Peak).

3. NRC - NUREG - 1311 "Funding the NRC Training Program for states" June 1988 page 2 paragraph 3 states:  
"The NRC Agreement State program has been reviewed by the General Accounting office, an internal NRC Task Force and the National Governors' Association. (cover)

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In their reports the NRC training program for states was consistently identified as a key to enabling states to prepare for such Agreements and to maintain Agreement state programs that are adequate to protect public health and safety and compatible with the Commission's program. Their reports also contained recommendations to ~~expand~~ expand the NRC state training program.

NRC should continue the current Agreement states program with the reinstatement of NRC paying for AS Training courses (tuition, Travel and per diem) as well as Travel and per diem to the Annual All Agreement States meeting.

NRC should continue to Advise Congress that some areas such as International Programs, Research, and the Agreement States program should be exempt from fee recovery and should be directly funded by U.S. Congress.