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February 20, 2017

Celimar Valentin-Rodriguez
Office of Nuclear Materials Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555

RE: OPPORTUNITY TO COMMENT ON DRAFT RISK-SIGNIFICANT RADIOACTIVE
MATERIAL CHECKLIST AND GUIDANCE (RCPD-16-016)

Dear Ms. Valentin-Rodriguez:

The Organization of Agreement States (OAS) Executive Board (Board) has reviewed the
above document and respectfully submits the following comments.

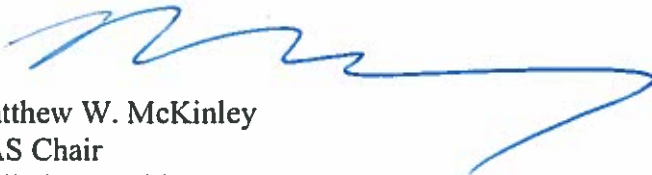
1. Step 1-E: The RSRM checklist should only be concerned with service providers who want unescorted access to RSRM at client locations.
2. Page 11: OAS recommends performing an on-site security review for all new RSRM storage addresses, even for existing, compliant licensees. OAS does not believe a licensee can commit to install an "equivalent" system because security systems are custom-designed for each building. If NRC wishes to retain the "equivalent commitment" provision, the guidance should specify what is meant by "equivalent". Can this include different security providers? Different equipment? Different LLEA jurisdictions?
3. Page 11: Escalated enforcement should not trigger an on-site security review for renewal applications of existing Part 37 licensees. OAS believes inspection issues should be handled through the inspection, not licensing.
4. Attachment 6: Granting a license authorizing possession of RSRM to an applicant who is not prepared to secure the material is a major security vulnerability, even if the applicant indicates they will not possess RSRM for at least 90 days. OAS believes that neither the NRC nor an Agreement State should authorize possession of RSRM until it is verified that the applicant has systems in place to protect the RSRM by conducting an on-site inspection. Applicants who want a

*Alabama, Arizona, Arkansas, California, Colorado, Florida, Georgia, Illinois, Iowa, Kansas, Kentucky,
Louisiana, Maine, Maryland, Massachusetts, Minnesota, Mississippi, Nebraska, Nevada, New Hampshire,
New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania,
Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, Wisconsin*

license for "bidding purposes" but who are not ready to enact Part 37 should be offered a license which prohibits possession of RSRM quantities.

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

Sincerely,



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