



Sherrie Flaherty, Chair, Minnesota
Matthew McKinley, Chair-Elect, Kentucky
Michael Welling, Past-Chair, Virginia
Debra Shults, Treasurer, Tennessee
Megan Shober, Secretary, Wisconsin
David Crowley, Director, North Carolina
Jennifer Opila, Director, Colorado

March 23, 2016

Sophie Holiday
Division of Material Safety, State, Tribal and Rulemaking Programs
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555

RE: Opportunity to Comment on Draft Leksell Gamma Knife Perfexion and Leksell Gamma Knife Icon Licensing Guidance (RCPD-16-003)

Dear Ms. Holiday,

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Executive Board (Board) has reviewed the above document and respectfully submits the following comments on the proposed draft guidance.

1. On page 4, the AMP requirements for the Icon indicate that before July 1, 2016 an AMP has to demonstrate training, but after July 1, 2019 a preceptor attestation can be used. The Board recommends correcting the first date to July 1, 2019.
2. The written directive commitment and “high confidence” commitment for the Icon are currently on page 14 of the guidance. The Board recommends they be moved to page 6 alongside the corresponding commitments for Perfexion devices.

Additionally, the Board would like to thank the working group on the expeditious work in completing this guidance document as the Icon Gamma Knife is currently being installed in several licensees at this time.

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

Sincerely,

Sherrie Flaherty
OAS Chair
Radioactive Materials Unit Supervisor
Minnesota Dept of Health
625 Robert Street N.
PO Box 64975
St. Paul, MN 55164-0975

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