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September 14, 2016

Kim Lukes
Office of Nuclear Materials Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555

RE: Opportunity to comment on Applicability of 10 CFR Part 37 to non-manufacturing and distribution service provider licensees (RCPD-16-010)

Dear Ms. Lukes:

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

The OAS agrees with the NRC's position that non-manufacturing and distribution service provider licensees should be able to adhere to the trustworthy and reliability determinations as prescribed in 10 CFR Part 37. The OAS recommends an expedited process to rescind the orders and allow the agreement states to assume responsibility of these licensees.

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

Sincerely,

Matthew W. McKinley
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