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April 4, 2023

Celimar Valentin-Rodriguez
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Ms. Valentin-Rodriguez,

The OAS Executive Board (Board) appreciates the opportunity to comment on the Nuclear Regulatory Commission (NRC) interim state agreement (SA) procedure, SA-802, Standing Committee for Reviewing Emerging Medical Technologies (STC-22-059).

After receiving comments from our agreement state partners, the Board has the following comments on the interim procedure SA-802:

- 1.) It appears that the NRC staff participation is rotated among the regions, whereas the Agreement State participation is consistent for 3 years. This allows NRC to spread out the time spent, but the Agreement States are not afforded that opportunity, it is always the same 2 representatives (unless they can't attend a meeting in which case an alternate is allowed). Will switching NRC participation detract from the consistency of the group's work? For a standing committee, participants shouldn't be constantly changing.
- 2.) On page 2, the first paragraph reads "Under this process, licensing guidance for emerging technologies took approximately 14 months year or more to complete." This sentence should be revised.

Once again, the Board appreciates this opportunity to comment. We are available should you have any questions or need clarifications to our responses.

Sincerely,

Steve Seeger

Steve Seeger, Chair
Organization of Agreement States
TN Division of Radiological Health
1301 Riverfront Parkway, Suite 206
Chattanooga, TN 37402

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, Vermont, Virginia, Washington, Wisconsin, Wyoming