

Briefing on Radioactive Source Security Experience with NSTS

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Implementation of NSTS

QSA Global Inc

- Worldwide manufacturer and distributor of radioactive sources for use in industrial, medical and research applications
- Ship approximately 10,000 Cat 2 radioactive sources annually

Implementation of NSTS

- History
 - No industry involvement – even after repeated offers and requests by industry since 2006
 - No batch upload capability
 - No pilot program testing with users
 - No access to online NSTS when system went live

Implementation of NSTS

- Experience
 - Credentialing lengthy, difficult process (photos, notary required)
 - Credentialing not covered under rule making
 - What is its enforceability?
 - Regulatory burden not estimated
 - Private personal information required

Implementation of NSTS

- Experience
 - Very time consuming, due to large number of daily transactions (100-150) QSA generates automatic faxes for NRC data entry (100 faxes daily)
 - No advantage for licensee to access NSTS web interface, using the fax, phone, mail or email is easier
 - NSTS not up to date, not real time

Implementation of NSTS

- Experience
 - Inventory reconciliation will be difficult as NSTS not up to date and unclear if all licensees entering data
 - Due to a loosely defined NSTS when the comments for Cat 1 and 2 were made, cost estimates for implementation could not be and were not accurate
 - To date QSA > \$100,000

Implementation of NSTS

- Recommendations
 - Determine regulatory status of credentialing requirement
 - Remove duplicative requirements, import/export notifications (10 CFR 110) and verification of receipt at end user by shipper (M&D ASM Order)
 - Determine logical plan to retrofit the large amount of transactions not currently in NSTS or have potential errors

Implementation of NSTS

- Recommendations
 - Implement batch upload capability
 - Consider tiered access to NSTS, ie M&D licensees have ability for direct “data dump” into NSTS without any manual intervention
 - NSTS immediately populated
 - Minimum involvement of NRC/licensee

Implementation of NSTS

- Recommendations
 - Involve actual users/licensees in process – need real world input for any rule to be effective
 - Industry on Change Control Board
 - Run pilot programs with users
 - WBL and LVS – must understand actual process and involve licensees early in proposals and development to get accurate inputs

Implementation of NSTS

- Recommendations
 - Complete a full re-evaluation for inclusion of Cat 3 and 1/10 Cat 3
 - perform accurate regulatory burden analysis based on real information from implementation for Cat 1 and Cat 2
 - many potential users not aware of requirement, results in more unreported transactions and erroneous results
 - QSA – 15,000 to 20,000 additional transactions annually

Implementation of NSTS

Beginning to see NRC involving industry

Positive support of NRC help desk personnel

Thank You

? Questions ?