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PROPOSED RULE PART (70 FR 43646)

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Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

September 12, 2005

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Secretary, U.S. Nuclear Regulatory Commission
ATTN: Rulemaking and Adjudications Staff
Washington, D.C. 20555-0001

Gentlemen:

TENNESSEE VALLEY AUTHORITY (TVA) - COMMENTS ON NATIONAL SOURCE TRACKING OF SEALED SOURCES – PROPOSED RULEMAKING (70 FR 43646-43658, DATED JULY 28, 2005)

This letter provides TVA's comments on proposed rulemaking, "National Source Tracking of Sealed Sources." As published in the Federal Register, Volume 70, No. 144, on July 28, 2005, pages 43646-43658, NRC proposes to amend its regulations to implement a National Source Tracking System for certain sealed sources. The proposed amendment would require licensees to report certain transactions involving these sealed sources to the National Source Tracking System. TVA's comments are provided in the enclosure.

TVA appreciates the opportunity to comment on the proposed rule. If you have any questions, please contact Terry Knuettel at (423) 751-6673.

Sincerely,

Glenn W. Morris
Manager, Corporate Nuclear Licensing
and Industry Affairs

ETK:BKA
Enclosure

cc (Enclosure):

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

ENCLOSURE

**TVA COMMENTS ON NATIONAL SOURCE TRACKING OF
SEALED SOURCES- PROPOSED RULEMAKING
(70 FR 43646-43658, DATED JULY 28, 2005)**

The following comments pertain to Section II, G (1), (2), (3) of the subject proposed rulemaking:

The Federal Register Notice states:

“Specifically should the NRC require reporting of:

- (1) ***All transactions involving the use of a nationally tracked source at a temporary job site;”***

TVA Comment: No, provided the source(s) are maintained under the control of the licensee in accordance with the licensee’s program, which should include enhanced security measures for storage and transport of license material.

- (2) ***“Any transactions involving the use of a nationally tracked source at a temporary job site in another state either under the same license or a different license; or”***

TVA Comment: No, provided the source(s) are maintained under the control of the licensee in accordance with the licensee’s program, which should include enhanced security measures for storage and transport of license material.

- (3) ***“.If the NRC were to require reporting of transactions involving temporary job sites, how much additional burden would be imposed on licensees and what should the reporting timeframe be?”***

TVA Comment: Implementation of this rule would require an additional quarter man-year. Specifically, implementing this new reporting requirement would involve either adding this task to the Radiation Safety Officer’s duties or hiring additional staff.

Regarding reporting timeframes, in lieu of requiring each radiography licensee to verify, validate and update their inventory annually in addition to reporting each time a source moves from one temporary job site to another, only require the licensee to verify, validate, and update their inventory on monthly or quarterly basis.