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(70FR 43646)

September 21, 2005 (3:15pm)

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Secretary
United States Nuclear Regulatory Commission

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Re: RIN 3150-AH48 Comments

The following comments are in regard to the proposed rules for a National Source Tracking System, (RIN 3150-AH48) and specifically in reference to reporting the location of nationally tracked sealed sources at temporary job sites, and the inclusion of Category 3 radioactive sources in the tracking database.

I am against the proposed requirement to nationally track sources when used at temporary job sites for a number of reasons.

1. This would be an extremely burdensome, useless, and costly requirement for all industrial radiography companies that perform radiography at remote field locations. To fully comply with this requirement will require the addition of one full time person who's time would be dedicated to tracking and reporting the locations of all nationally tracked sources. The estimated cost that is associated with this requirement is \$41,600.00 annually to each company. (This estimate is based on an average gross wage of \$20.00 / hr. at 2,080 hours yearly)
2. Due to the enormous volume of reports that would be filed daily, additional manpower would be required at the NRC or Agreement State in order to maintain the database.
3. Source tracking at temporary job sites is already being done at the company level through the use of utilization logs. These logs are available for review by NRC or Agreement State inspectors.
4. This is not a practical requirement. Most radiography that is conducted at temporary job sites is for a short duration, ranging from a few hours to a few days. There are some instances where one radiography crew will go to as many as three or four temporary job sites on the same day. By the time that the NRC has been notified of a source's location, the source may already be at a different location.
5. A large volume of the radiography that is conducted at temporary job sites is scheduled on a "call out" basis. Often very little, or in some instances, no advance notice is given by a customer when requesting a radiography crew.

I am also against including category 3 sources in the National Source Tracking database at this time. In my opinion, this would bog down the development process, and hinder the timely implementation of the system. This is something that can be revisited, and if deemed necessary, included in the future

Regards,

Lloyd Anderson / RSO
HI-Tech Testing Service, Inc.

From: Carol Gallagher
To: Adria Byrdsong
Date: Wed, Sep 21, 2005 2:51 PM
Subject: Comment letter on National Source Tracking of Sealed Sources Proposed Rule

Attached for docketing is a comment letter on the above noted proposed rule from Lloyd Anderson that I received via the Rulemaking website on 9/21/05.

His address is:

Lloyd Anderson
35 FRJ Drive
Longview TX 75602
lloyd@hitechtesting.com

Carol

Mail Envelope Properties (4331ABA9.84E : 3 : 886)

Subject: Comment letter on National Source Tracking of Sealed Sources
Proposed Rule
Creation Date: Wed, Sep 21, 2005 2:51 PM
From: Carol Gallagher
Created By: CAG@nrc.gov

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