

14

GENERAL DYNAMICS

Electric Boat

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

October 7, 2005

Ms. Annette L. Vietti-Cook
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemakings and Adjudications Staff

RE: Proposed Rule: National Source Tracking of Sealed Sources. 70 Federal Register 43646.

RIN 3150-AH44

Gentlemen:

These comments concerning the proposed national source tracking of sealed sources are provided by General Dynamics – Electric Boat. Electric Boat is the premier supplier of nuclear powered submarines to the United States Navy. At Electric Boat, industrial radiography is conducted as part of the construction process requiring the use of Category 2 type radioactive sources. Tracking of Category 3 sources does not directly affect Electric Boat. The possibility that inclusion of Category 3 sources may degrade the quality of the information in the source tracking database should be sufficient enough reason for these sources to not be included.

The NRC should not require reporting of sources at the temporary field site level. Radiographers may be required to conduct operations at more than one location during any given day. If the data must be input by the close of business each day then the information received will be an indication of where the source may have been rather than an indication of where the source actually is. If less than meaningful information is collected the integrity of the whole database is compromised. The requirement to track sources at the job site location would be cumbersome even for small operators possessing only one or two sources. In these small operations only a few people perform all the functions currently required to add additional responsibility to track less than meaningful information would be a burden. This applies to all temporary field sites including those performed in another state under the same license or under reciprocity. The burden would be even greater for large companies with many sources that are sent out on a daily basis. In reference to the inclusion of a quality assurance check a similar rationale would apply.

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For a small company resources are already limited, personnel to provide the additional check may not exist. The intent is to obtain the most accurate information possible to be contained in the database. There is no reason at this time to believe that the information submitted will not be accurate. A check of the validity of the database information could be made a part of the inspection process. If at that time it is found that there is a problem additional control can be put into place.

General Dynamics – Electric Boat is fully supportive of any actions taken to enhance the security of the nuclear sector as long as efforts are focus to produce optimal results. The NRC and other agencies must ensure that they work with other agencies to consider the consequences of their mandates to avoid needless expenditure of the limited resources available to the government and private sectors.

We appreciate your attention to the issue of radioactive materials security and welcome any opportunity for further dialogue on the proposed national sealed source tracking system.

Sincerely,

Garry L. Balestracci
Radiation Safety Officer

