



Nucletron

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Nucletron Corporation
8671 Robert Fulton Drive
Columbia, MD 21046
Tel 410-312-4100
Fax 410-312-4199
www.nucletron.com

16

Secretary of the Commission
U.S Nuclear Regulatory Commission
Washington, DC 20555-0001

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Attn: Rulemakings and Adjudications Staff
via facsimile (301)415-1101

Reference:

Proposed Rule: National Source Tracking of Sealed Sources
70 Federal Register 43646
RIN 3150-AH48

Date:

October 7, 2005

Dear Secretary of the Commission:

Nucletron Corporation¹ is pleased to provide comments concerning the proposed rule for national source tracking of sealed sources. Nucletron supports the Commission's efforts to enhance security. In the Federal Register, the Commission specifically asked for information from stakeholders concerning the inclusion of Category 3 sources. When considering source tracking notifications would be required at the time of manufacture, transfers, and dispositions of the Category 3 sources used in Nucletron's high dose rate remote afterloaders, over 7000 entries would be made into the source tracking system annually *just for Nucletron*.

Nucletron would also like to comment on an implementation aspect of the proposed rule. The proposed rule requires national tracking of Category 1 and Category 2 sources. It is not clear in the proposed rule as to what happens when the source activity of a *tracked source* falls below the Category 2 threshold. At this point, the source is a Category 3 source for which tracking is not indicated. As comments—how will the tracking system reconcile this transition or will the tracking system close the loop?

Nucletron would be pleased to discuss our comments and respond to any questions the Commission may have.

Sincerely,

Lisa Dimmick
Director Regulatory Affairs, RSO

¹ Nucletron Corporation is the US based sales, service, and distribution branch office for Nucletron B.V. located in The Netherlands. Nucletron's core device is the high dose rate remote afterloader that uses a 10 Ci Ir-192 source for cancer treatment.



Nucletron Corporation
8671 Robert Fulton Dr.
Columbia, MD 21046-2133

Phone: +1 410 312 4100
Fax: +1 410 312 4184
www.nucletron.com

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Fax

Fax to : Secretary of the Commission

Fax no. : 301-415-1101

Attn. :

CC :

From : Lisa Dimmick
Dial direct : 410-872-4435

Dept. : RA/QA

Your ref.

Our ref. :

Date : 10/07/2005

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Subject : RIN 3150-AH48
Proposed Rule: National Source Tracking of Sealed Sources