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Source Production and Equipment Company, Inc
113 Teal Street
St. Rose, LA 70087

DOCKETED
USNRC

October 11, 2005 (3:30pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Comments on proposed rule, RIN 3150-AH48
Emailed to SECY@nrc.gov by Kelley Richardt 10/11/2005

Specific Comments Requested by NRC

Item 1: The NRC specifically invited comment on whether licensees should be required to report as a transaction the use of a nationally tracked source at temporary job sites. Specifically should the NRC require reporting of:

- (1) All transactions involving the use of a nationally tracked source at a temporary job site;
- (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
- (3) No transactions involving the use of a nationally tracked source at a temporary job site (as proposed in the rule)? 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 time frame be?

Comments on Item 1: We believe that the current proposed rule adequately tracks sources. Adding all uses of sources at temporary job sites would increase tracking requirements for radiographers dramatically and add a huge additional notification requirement. There is not a time frame that would make this requirement practicable.

Item 2: The NRC specifically invited comment on whether a waste broker or disposal facility should be required to inspect the waste container for an indication of tampering to provide additional assurance the source is still in the container.

Comments on Item 2: We believe that tamper proof seals currently required on transport containers provide sufficient indication that the source is still in the container. An additional inspection could subject licensees to additional radiation exposure.

Item 3: The NRC was considering adding a requirement that would require licensees to double-check the accuracy of the data by using two independent checkers before submission of the transaction report. The NRC specifically invited comment on the inclusion of a requirement for a quality assurance check of the data before submission, and in information concerning:

- (1) Whether these are the appropriate requirements for quality assurance;
- (2) What are the appropriate requirements for quality assurance; and
- (3) The additional burden such a requirement would impose on licensees.

Comments on Item 3: We do not believe that there are appropriate requirements for quality assurance. The department that would probably be responsible for the notifications routinely completes detailed shipping documentation, and are used to operating in an extremely detailed

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oriented fashion. In addition, quality assurance would be auditing the transaction reports, and the source tracking database as required by the proposed rule. The additional burden for licensees would be double that of the proposed burden.

Additional Comments:

The pending import / export rules (70 FR 37985; July 1, 2005) will already require that NRC be notified of Category I and Category II shipments. We urge the NRC to combine these two rules with regard to non-domestic source transfers. It is redundant for a licensee to notify the NRC twice of every international shipment. The redundant requirements add an undue and unnecessary paperwork burden.

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From: "" <kelley@spec150.com>
To: <SECY@nrc.gov>
Date: Tue, Oct 11, 2005 2:42 PM
Subject: RIN 3150-AH48

Please find the attached comments to proposed rule RIM 3150-AH48.

Kelley Richardt
Regulatory and Quality Manager
Source Production and Equipment Co., Inc.

Mail Envelope Properties (434C079E.46F : 15 : 13423)

Subject: RIN 3150-AH48
Creation Date: Tue, Oct 11, 2005 2:41 PM
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MESSAGE	162	Tuesday, October 11, 2005 2:41 PM
NRComments.pdf	23771	
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