

January 27, 2006

Dr. Michael T. Ryan, Chairman
Advisory Committee on Nuclear Waste
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: PROPOSED RULE ON NATIONAL SOURCE TRACKING OF SEALED SOURCES

Dear Dr. Ryan:

I am responding to your June 21, 2005, letter, to Chairman Diaz about the proposed rule on national source tracking of sealed sources. In your letter, the Advisory Committee on Nuclear Waste (ACNW) offered three recommendations regarding the tracking system.

First, ACNW recommended that the U.S. Nuclear Regulatory Commission take care to ensure that the tracking system remains secure from unauthorized entry while still being accessible to users. We share ACNW's concern for computer security. The actual security of the system is considered sensitive information. User access to information in the system will be controlled with a user ID and password necessary for access. The National Source Tracking System will also need to receive security accreditation before it can be used.

The second ACNW recommendation concerned ensuring the quality of the information licensees enter into the system. Licensees are responsible for the accuracy of the information provided to the National Source Tracking System. Submittal of the information will be subject to inspection and enforcement. The system will have some built-in checks (e.g., an alarm will be triggered if information submitted by the transferring company and the receiving company don't match). The annual reconciliation will also serve a quality assurance function. Additionally, we specifically invited the public to comment on the quality assurance aspect when the proposed rule was published for public comment. The final decision on whether additional quality assurance requirements are necessary has not been made.

Last, ACNW stated that a continuing effort is needed to make the tracking system comprehensive, consistent, and risk informed and that Federal and State agencies, the Conference of Radiation Control Program Directors (CRCPD), and the Organization of Agreement States (OAS) should be encouraged to participate. The Federal and State agencies, the CRCPD, and the OAS have been involved from the start. We have an Interagency Coordinating Committee, with membership from other Federal agencies and OAS, that oversaw the development of requirements for the tracking system. We also have a Steering Committee and Working Groups that have representatives from the Department of Energy, CRCPD, and OAS. These Committees and Working Groups have been involved in

M. Ryan

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every aspect of the National Source Tracking System development and will continue to be involved through implementation.

In closing, we appreciate your input on the National Source Tracking System and trust that this letter adequately responds to your recommendations.

Sincerely,

/RA/

Luis A. Reyes
Executive Director
for Operations

cc: Chairman Diaz
Commissioner McGaffigan
Commissioner Merrifield
Commissioner Jaczko
Commissioner Lyons
SECY

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