



Research Reactor Center

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**PR 2,30,40,50,52,60,63,70,71,73,76 and 150
(71FR64003)**

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January 4, 2007 (11:29am)

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemaking and Adjudications Staff

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Reference: Docket No. 50-186
University of Missouri-Columbia Research Reactor
Facility License R-103

Subject: Comments regarding Federal Register notice dated October 31, 2006
"Protection of Safeguards Information" (RIN 3150-AH57)

The University of Missouri Research Reactor (MURR) management understands and supports the continuing efforts to assure the safety and security for Radioactive Materials (RAM) both at locations of use and during transportation. Our comments will focus specifically on the potential problems the NRC may wish to consider with respect to implementation of Safeguards Information-Modified requirements for the "new" Category 2 RAMQC from Table I-1, Quantities of Concern Thresholds.

Category 2 RAMQC thresholds are a factor of 100 lower than Category 1 RAMQC and most likely will introduce the requirements for SGI security to a wide set of organizations that have little experience with these requirements. The introduction of SGI requirements may unintentionally result in the disruption of treatment for patients, as shippers of these materials may be intimidated by the new security regulations.

The preparation, packaging and shipping of RAM is a complex process which is highly regulated to assure safety during transportation. Documentation of the preparation and packaging for a RAM shipment consists of a number of sheets which become part of the shipping documents. If we interpret the regulations correctly, some of these sheets would need to be segregated from the package (e.g., page 2 and 5 of a 12 page shipping document) and assigned a cover page indicating that they include SGI-M information. This would add confusion to the shipping documentation and could be counter productive to security as it will highlight information that may otherwise be dispersed throughout the shipping documents.

Shipment of RAM often requires the coordination of multiple carriers and modes of transportation to provide timely delivery. It is unclear how the originator of a RAMQC Category 2 will be able to assure that each carrier meets the requirements to handle SGI-M. That determination must be made at each step of the custody of such RAMQC shipments, with the possible result being a shipment being delayed or stopped from its intended destination.

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We understand that schedules and itineraries of a shipment (which combine route and quantity information with specific timing and security of a shipment) constitute information that, if disclosed, could reduce the security of spent fuel shipments or other high radioactivity shipments (e.g., Category 1 RAMQC). These shipments are not routine and require special communications, coordination and monitoring. For the more routine RAM shipments for Category 2 RAMQC, it is not clear that relevant security information will accompany these shipments.

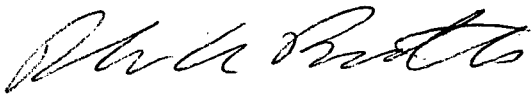
Particularly confusing is the statement in Section 73.23, Protection of Safeguards Information-Modified Handling: Specific Requirements at page 64063 of Federal Register, Vol. 71, No.210, third column, last paragraph is the statement that

“Scheduling and itinerary information used for the purpose of preplanning, coordination and advance notification may be shared with others on a “need to know” basis and need not be designated as Safeguards Information-Modified Handling”

Perhaps the subject of extending SGI-M requirements to new Category 2 RAMQC should await more discussions and understanding of the impact this may have on commerce and specifically medical RAM shipments. The ability for shippers to meet these requirements would certainly be benefited by DHS initiatives in progress, such as the Transportation Worker Identification Credential (TWIC) Program before implementing these new security requirements for RAMQC Category 2 shipments.

If you have any questions regarding these comments, please contact me at (573)882-4211 or Walt Meyer at (573)882-5203.

Sincerely,



Ralph A. Butler, P.E.
Director, MURR

RAB:dcs

cc: Al Adams, NRC