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(9)

PR 2,30,40,50,52,60,63,70,71,72,73,76 and 150 (71FR64003)

DOCKETED
USNRC

January 10, 2007 (2:45pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary U. S. Nuclear Regulatory Commission
Washington DC 20555-0001
Attn: Rulemakings and Adjudications Staff

RIN 3150-AH57

10 January 2007

QSA Global Inc appreciates the opportunity to provide comments on the proposed regulations regarding Safeguards Information, specifically 10 CFR 73.21 and 73.23.

General comments

Although not referenced, information about the types and quantities of material listed on a license in some cases should be considered Safeguards Information when the license contains nuclides and quantities of concern. However, for licensees to transfer material they must obtain a copy of the recipient's license so this information is easily available and in many cases publicly available. This need to be reviewed by NRC and state agencies to assure the appropriate level of security is given to standard licensing documents.

Specific comments

10 CFR 73.21(a)(1)(ii) and 10 CFR 73.23

This requires SGI-M for transportation of Cat 2 sources, this was not the original intent of the rule. The original intent was to only cover transportation of Cat 1 sources as described in the discussion in the Federal Register Vol 71, no 210 page 64024. Transportation of Cat 1 sources is covered under Order number EA-05-006 and requires protection of SGI-M.

The increased controls issued to industrial radiography and oil well logging facilities do not require SGI-M control of documentation. These licensees routinely ship above Cat 2 quantities as a daily part of business. As the regulatory decision was made to issue the additional security controls to these licensees as non SGI-M, it does not make sense for them to have to implement an SGI-M program to cover their daily shipments.

Template=SECY-067

SECY-02

Most radiography sources in use exceed the 20 Ci Ir-192 or 8 Ci Co-60 and are shipped to temporary job sites on a daily basis. To require an SGI-M program for the routine transport of these sources would be unwieldy and almost impossible to administer.

In keeping with the previous regulatory decision to issue non SGI-M security controls to these types of licensees we strongly recommend that the requirement for an SGI-M program be limited to the original regulatory intent for the transportation of Cat 1 sources.

We appreciate the chance to comment on this rule, if you would like more information, please contact me at 781-505-8210.

Sincerely,

Cathleen Roughan
Regulatory Affairs and Quality Assurance Manager

From: "Roughan, Kate" <Kate.Roughan@qsa-global.com>
To: <secy@nrc.gov>
Date: Wed, Jan 10, 2007 1:41 PM
Subject: FW:

Comments on RIN 3150-AH57

Thank you.

-----Original Message-----
From: Scans@qsa-global.com [mailto:Scans@qsa-global.com]
Sent: Wednesday, January 10, 2007 9:35 AM
To: Roughan, Kate
Subject:

This is a scan sent from a generic user.

On October 10th 2005, we changed our name to QSA Global Inc.
As QSA Global Inc., we remain committed to providing you with the same level of world class service you have come to expect from AEA Technology QSA, Inc.

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Subject: FW:
Creation Date Wed, Jan 10, 2007 1:41 PM
From: "Roughan, Kate" <Kate.Roughan@qsa-global.com>

Created By: Kate.Roughan@qsa-global.com

Recipients
nrc.gov
TWGWPO02.HQGWDO01
SECY (SECY)

Post Office	Route
TWGWPO02.HQGWDO01	nrc.gov

Files	Size	Date & Time
MESSAGE	1141	Wednesday, January 10, 2007 1:41 PM
SCAN4191_000.pdf	70353	
Mime.822	99150	

Options
Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results
Message is eligible for Junk Mail handling
This message was not classified as Junk Mail

Junk Mail settings when this message was delivered
Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled