

PRM-71-13
(72FR20962)

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USNRC

QSA Global Inc
40 North Avenue
Burlington MA 01803
781-505-8210

July 12, 2007 (10:19am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

11 July 2007

Secretary, US Nuclear Regulatory Commission
Washington DC 20555-0001
Attn: Rulemaking and Adjudications Staff

Re: PRM-71-13

Dear Secretary:

QSA Global Inc. is a worldwide manufacturer and distributor of industrial radiography equipment and oil well logging sources. Due to the potential negative impact on ourselves and our customers, from this petition, we present the following comments on the petition for rulemaking submitted by the governor of the state of Washington.

- 1) The petition is unclear as to what is being asked for –
 - is the intent for the vehicle or the device to be equipped with GPS technology?
 - the definition of “highly radioactive source” is not clear, is this intended to cover NRC Category 1 and 2 sources, or does it include Category 3?Any further serious review of this petition for rulemaking can not accurately be made until these points are clarified. Our comments are based on, assuming only Category 2 sources as Category 1 already have specific requirements and that the device be equipped with GPS.
- 2) There is no current technology that can successfully track a source or device reliably. This equipment is subject to very harsh environments and usage and any additional external feature would not hold up to being thrown around in a truck and/or jobsite.
- 3) Any additional feature put on a device would require research and development, design, testing and licensing to assure the device continues to meet ANSI, ISO, NRC and DoT requirements for devices and transport packages. This is an expensive and time consuming process and will significantly add to the cost of the

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equipment. End users will be unwilling to pay for this. A cost benefit analysis would need to be performed to determine if it is worth pursuing.

- 4) There are already numerous other effective controls in place for device security and tracking:
 - a. Industrial radiography and oil well logging licensees are already subject to the Increased Controls for security and as such are already required to secure their equipment and vehicles (both in use and when not in use) and have immediate communication capability when transporting the devices.
 - b. The NRC national source tracking database will provide information if a source is not received at its destination when expected.

- 5) States should not be allowed to impose more stringent requirements than the NRC. The industrial radiography and oil well logging industry are both very mobile and need to provide their services all across the US. Without a set of uniform standards the requirements could be quite different in each state and would significantly restrict interstate commerce.

Thank you for the opportunity to provide comments on this petition. If you would like any additional information or clarification, please contact me.

Sincerely,

Cathleen Roughan
Director, Regulatory Affairs and Quality Assurance

From: "Roughan, Kate" <Kate.Roughan@qsa-global.com>
To: <secy@nrc.gov>
Date: Wed, Jul 11, 2007 4:59 PM
Subject: PRM-71-13

Comments attached. Thank you!

Kate Roughan

QSA Global Inc

781-505-8210

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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For more information about QSA Global Inc., formerly AEA Technology QSA, Inc., please visit our website at <http://www.qsa-global.com>

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

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