

PRM-71-13
(72FR20962)



NUCLEAR ENERGY INSTITUTE



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July 19, 2007

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July 19, 2007 (2:17pm)

Ms. Annette L. Vietti-Cook
Secretary
Rulemakings and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Subject: Request for Comments on: Christine O. Gregoire, Governor of the State of Washington: Petition for Rulemaking, Global Positioning Satellite Tracking of Highly Radioactive Mobile Sources, 72 Fed. Reg. 20962 (April 17, 2007) (PRM-71-13)

Project Number: 689

Dear Secretary:

The Nuclear Energy Institute (NEI)¹ is pleased to comment on the Petition for Rulemaking submitted to the Nuclear Regulatory Commission by Christine O. Gregoire, Governor of the State of Washington, on Global Positioning Satellite Tracking of Highly Radioactive Mobile Sources.

NEI commends the Governor for making the suggestion. It demonstrates interest in the issue and ingenuity in suggesting a potential method for tracking high activity mobile sources when they are not under the control of the licensee. This has potential for a few highly radioactive sources in mobile devices, however for the majority of sources this proposal will not work. Global Positioning Satellite (GPS) tracking devices require power supplies as well as a means of monitoring it. A large number of mobile radioactive devices which contain highly radioactive sources are manually operated with no internal or external power supply. A GPS sending unit requires power in order to

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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Ms. Annette L. Vietti-Cook
July 19, 2007
Page 2

send the signal. Therefore, a manual unit will require a power supply in addition to the GPS unit. The power unit will need to be maintained and recharged to keep it available. Additionally, a network to pick up the signal will also be required.

This will result in additional weight and bulkiness to the unit, increase the capital cost as well as additional operation and maintenance expense. The devices are designed to be low maintenance, light weight, and simple to operate, the addition of the GPS unit will detract from all three of its principal features. This could result in a greater risk to the worker's safety in the handling and operation of the units. While we did not perform a cost benefit for this modification, our experience indicates that the additional costs for the GPS unit do not offset the benefit for the very few mobile devices which are lost each year.

Please contact me with any questions or clarifications the NRC may need on NEI's comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Felix M. Killar, Jr.", written in a cursive style.

Felix M. Killar, Jr.

From: "KILLAR, Felix" <fmk@nei.org>
To: <SECY@nrc.gov>
Date: Thu, Jul 19, 2007 10:32 AM
Subject: NEI Comments on Petition for Rulemaking on GPS Tracking of High Activity Sources in Mobile Units

July 19, 2007

Ms. Annette L. Vietti-Cook

Secretary

Rulemakings and Adjudications Staff

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

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Sincerely,

Felix M. Killar, Jr.

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Senior Director, Fuel Supply & Material Licensees

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nuclear. clean air energy.

[1] NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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