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STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

OFFICE OF RADIATION PROTECTION  
111 Israel Road SE • PO Box 47827 • Olympia, Washington 98504-7827  
TDD Relay Services: 1-800-833-6388

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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**TO:** Michael T. Lesar, Chief  
Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington D.C. 20555-0001

**FROM:**  Arden C. Scroggs, Supervisor  
Radioactive Materials Section

**SUBJECT: DISCUSSIONS AT PUBLIC MEETINGS ABOUT WASHINGTON'S  
PETITION FOR NATIONAL GPS TRACKING**

Unfortunately, a Washington State representative was unable to attend the recent public meetings for seeking input on possible changes to security requirements for transporting certain radioactive materials. The meetings touched on Washington State's April 27, 2007, Rule Making Petition for National GPS Tracking. From written meeting transcripts, it is clear there were several misstatements about the intent of our petition. This was particularly evident at the Rockville meeting. We want to again state our intent is on tracking VEHICLES rather than individual devices or sources.

Feedback from a Rockville meeting attendee and our review of all three meeting transcripts brought this to our attention. The anecdotal record indicates that it is the vehicle that gets stolen despite preventative measures. We believe it is essential that GPS tracking be required for the vehicles - trucks and/or trailers - transporting highly radioactive mobile or portable radioactive devices such as those used for industrial radiography. We do not consider routine shipments of packaged radioactive materials from the manufacturer to an end user to be in the same category as mobile or portable use because such packages are a very minor component in the transportation industry. We believe the transporting vehicle, for use of any source or accumulation of sources that meets NRC's criteria for Radionuclides of Concern, should be tracked by GPS when transported by authorized users to job sites.

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The current NRC rules are focused on preventative measures – there is no consideration given for recovery efforts. As cited in our petition, prevention is not fool-proof; neither is GPS tracking. However, it does provide a tested mechanism for recovery if and when prevention fails. We believe a prescriptive approach for this is warranted because no other recover mechanism has proven to be effective.

We recognize there are many problems, economic and technical, associated with the concept of tracking individual sources. That is not true for the GPS tracking of vehicles. Therefore, we are urging NRC and the industry to implement GPS tracking of vehicles transporting Radionuclides of Concern.

cc: Interested Parties