

PR 20 and 32
(73FR19749)

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PUBLIC SUBMISSION

As of: June 12, 2008
Received date: Not specified
Status: Pending_Post
Tracking No. 8061fbce
Comments Due: June 25, 2008
Submission Type: Web

Docket: NRC-2008-0200
 Revisions to Parts 20 and 32 - Expansion of the National Source Tracking System

DOCKETED
 USNRC

Comment On: NRC-2008-0200-0001
 Expansion of the National Source Tracking System

June 12, 2008 (2:35pm)

Document: NRC-2008-0200-DRAFT-0011
 Comment on FR Doc # E8-07756

OFFICE OF SECRETARY
 RULEMAKINGS AND
 ADJUDICATIONS STAFF

Submitter Information

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General Comment

Firstly, let me point out one math error I found. Reference the line for Cs-137 for Appendix E. The values listed for Category 3 are 0.01 TBq or 2.7 Ci and for 1/10 Category 3, 0.001 TBq or 0.27 Ci. These are incompatible. I believe the TBq values are in error by a factor of 10.

Secondly, I believe revision of the rule may be premature because there is no operating source tracking system to date. When the original rule was promulgated, licensees prepared to enter data into a tracking system that did not then exist. The NRC finally issued a "not yet" notice as it became apparent the tracking system would not be ready by the required date. It would be an embarrassment to the agency were this to happen again. Additionally, only by interfacing with this system can a reasonable estimate of impact to licensees be made.

Thirdly, while I support efforts to thwart potentially harmful illicit uses of radioactive material, I believe it unlikely that aggregation of sources to build up a significantly hazardous quantity is unlikely given the security typically associated with radioactive sources.

Template=SECY-067

SECY-02

Rulemaking Comments

From: Carol Gallagher
Sent: Thursday, June 12, 2008 8:56 AM
To: Rulemaking Comments
Subject: Comment on National Source Tracking System Proposed Rule (73FR 19749)
Attachments: earls.pdf

Attached for docketing is a comment letter on the above noted proposed rule from Leonard Earls that I received via the regulations.gov website on June 11, 2008.

Carol

Received: from HQCLSTR01.nrc.gov ([148.184.44.79]) by OWMS01.nrc.gov
([148.184.100.43]) with mapi; Thu, 12 Jun 2008 08:56:16 -0400
Content-Type: application/ms-tnef; name="winmail.dat"
Content-Transfer-Encoding: binary
From: Carol Gallagher <Carol.Gallagher@nrc.gov>
To: Rulemaking Comments <Rulemaking.Comments@nrc.gov>
Date: Thu, 12 Jun 2008 08:56:15 -0400
Subject: Comment on National Source Tracking System Proposed Rule (73FR
19749)
Thread-Topic: Comment on National Source Tracking System Proposed Rule (73FR
19749)
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X-MS-Exchange-Organization-SCL: -1
X-MS-TNEF-Correlator:
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MIME-Version: 1.0