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GIPA

Gamma Industry Processing Alliance

Safe. Secure. Vital.

PR 37
(73FR69590)

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January 5, 2009

Via Fax # (301) 415-1101

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

Subject: RIN 3150-AI12 Comments on Preliminary Draft Language Part 37 Physical Protection of Byproduct Material

DOCKETED
USNRC

January 5, 2009 (2:58pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

The Gamma Industry Processing Alliance (GIPA) is pleased to provide the attached comments on the proposed preliminary draft language for the physical protection of Category 1 and 2 materials while being transported to be contained in subpart D of the new Part 37. GIPA is an industry association comprised of the major cobalt -60 source producers and suppliers and the companies that use cobalt-60 sources for the sterilization of single use medical products.

GIPA member companies have been leaders in implementing and adhering to recently promulgated security regulations as well as the orders for implementing security measure enhancements and safeguarding sensitive information. GIPA understands and appreciates the need to ensure that radioactive materials are adequately secured from potential criminal or terrorist threats. Its member companies have taken necessary precautions, whether mandated by regulation or in a voluntary capacity as a result of internal risk assessment, to enhance the protections afforded to this material.

GIPA has reviewed the proposal and is of the opinion that the proposal is positive and makes sense moving forward. We would like to have the opportunity to review the proposed training in advance of it being finalized in order to assist TSA in making it most effective for users. We feel it will help to assure consistency in understanding between both shippers and carriers, thereby providing security benefits to the industry and public at large.

GIPA believes the NRC is moving in the right direction by consolidating the various security enhancement Orders in the regulations by developing a new Part 37 to Title 10 of the Code of Regulations and appreciates the opportunity to provide comments and information concerning the topics for discussion in the NRC Request for Public Comments.

Sincerely,



(for) Grant Malkoske
Chairman
Gamma Industry Processing Alliance

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SECT-02

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Subject: RIN 3150-AI12 Comments on Preliminary Draft Language Part 37 Physical Protection of Byproduct Material from Grant Malkoske, Chairman, Gamma Industry Processing Alliance
