

Comments and Concerns of Proposed NRC Security Rules

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

CC: Peggy Hatch, Administrator, LA DEQ
Jeffrey P. Meyers, Division Administrator, LA DEQ
James Pate, Licensing, LA DEQ
Ann M. Troxler, Environmental Scientist Senior, LA DEQ

**DOCKETED
USNRC**

September 23, 2010 (11:00a.m.)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Reference: Docket ID NRC-2008-0120
Physical Protection of Byproduct Material; Proposed Rule
Comments and Concerns

To Whom It May Concern:

We are writing in accordance with the NRC request for comments on the above referenced rule that would replace the existing IC Orders.

The author and the additional co-signors wish to request that the NRC and the applicable Agreement States take serious consideration of the concerns addressed in this letter. We feel the degree of change proposed, and some of the more demanding requirements may seriously affect our ability to operate and function in the industrial radiography industry.

We are not commenting on all the requirements as many of them have been previously implemented under the IC Orders, or they may otherwise not be controversial.

We will be collecting signatures from individuals that agree with these concerns (including radiographers concerned with personal credit checks) and attach these to this document. We will also include separate comments from anyone wishing to submit their own comments in conjunction with the group in order to better express our concerns. These signatures and comments will be submitted with this document.

The areas of concern and our comments are contained on the following pages. They are organized by the item numbers used the document containing the proposed rules and requesting comments.

Comments and Concerns of Proposed NRC Security Rules

Item B5 – Questions 1-5 (Fingerprinting for T&R Official)

Our main objection is the requirement for the NRC or Agreement State to review these materials and then approve the reviewing official. We feel the approval should remain inside the company, not with the government. We also strongly disagree with having to submit or remove the background check results outside of our offices and send them to the state agency.

The proposed rule has no mention of safeguards of the privacy of this information, or of the method of review. Whether it will be in person or by submittal, or any idea of by what criteria the results would be analyzed. What type of arrest would be considered to disqualify someone? What type of credit history would be deemed unacceptable? This is a major concern if the government is assuming the authority to make this decision rather than the licensee.

In our industry many companies may have only one person in a position that may be eligible to be the reviewing official, in many cases this would be the owner or manager of the company. What if the company feels the individual is trustworthy but the government reviewer decides they are not, how is this resolved? If the state rejected T&R Official is the owner, manager, or RSO, how might that affect the operation of the company?

Item B8 – Questions 1-6 (Background investigation)

- 1) *Is a local criminal history review necessary in light of the requirement for a FBI criminal history records check?*

We feel that a local criminal history review in addition to the FBI criminal history check is completely unnecessary and will place a HUGE burden on the licensees. How will we reasonably perform these reviews and document all the locations an individual has lived? This is not a small change in procedures, it would be a huge change and cause a large increase in the amount of paperwork and add another layer of difficulty to audits without seriously improving public safety. In the current system it is fairly easy for us to comply with the FBI fingerprinting system and inspectors can easily verify that this has been completed. This is not the case with random local checks and will cause much confusion, and a high degree of uncertainty.

There is no unified or simple way to request this data and is unreasonable for us to have to do so. If this requirement is not dropped, at a minimum, a TWIC card should be an eligible exemption from both this requirement and the FBI fingerprint requirement.

- 2) *Does a credit history check provide valuable information for the determination of trustworthiness and reliability?*

We feel that a credit check does not add any significantly valuable information to the individual's trustworthy and reliable status. Many radiographers have a fairly poor credit rating but have proven to be

Comments and Concerns of Proposed NRC Security Rules

very reliable and trustworthy employees. Some people have poor credit due to medical conditions, divorce, or due to the fact that we are going through one of the worse economic periods in recent history. Why should an individual be discriminated against due to a condition that may be beyond their control?

We also are concerned that there are no clear guidelines on what in a credit score would be of a concern. Will the inspectors have the authority to look at the employee credit records? Is that legal in the various Agreement States? We strongly oppose any unnecessary intrusion into our employees' privacy by the government.

3) *Do the Agreement States have the authority to require a credit history check as part of the background investigation?*

We do not have the answer to this question. We think this issue should be seriously considered and highlights the danger of one-size fits all mandate from the federal government. It also raises the question of if the NRC has the authority to mandate this.

4) *What are the appropriate elements of a background investigation and why are any of the suggested elements appropriate?*

We feel the background check requirements under the IC orders are sufficient.

5) *Are the elements of background investigation too subjective to be effective?*

We believe the elements of the background check requirements are far too subjective to be effective. We see this a lot in Agreement States during audits and inspections where there are no clear guidelines and much of what is acceptable seems to change on the whims of the inspector and from year to year. We hear phrases such as "it's not mandated, but I would prefer you do this" far too often during inspections. There are frequently a never-ending series of "what if" questions that are totally subjective and sometimes approach what would constitute a perfect storm of conditions and failures. We feel this high level of subjectivity perhaps rises to the level of "Unconstitutionally Vague". While working on this letter the FCC Indecency Rules were struck down on exactly this concern.

6) *How much time does a licensee typically spend on conducting the background investigation for an individual?*

It can take us a number of days performing background checks and are a difficult a burden on office personnel.

Comments and Concerns of Proposed NRC Security Rules

Item C15 – Questions 1-5 (LLEA Notifications)

1) *Is there any benefit in requiring that the LLEA be notified of work at a temporary jobsite?*

We do not believe there is a significant benefit to LLEA notifications at temporary jobsites. Temporary jobsites are unpredictable in nature and are therefore unlikely to be a primary target. The manner in which the notifications are proposed is chaotic and unorganized and perhaps would not increase security at all. We worry it may in fact have the opposite effect by causing confusion and resistance in law enforcement. The NRC hasn't technically mandated the LLEA to comply but they have come very close to doing so. They have instead put the very difficult responsibility of requesting compliance on the licensees. This level of notifications, requests for meetings, documentation, and commitments would make the licensee feel very intrusive and possibly not very popular with the LLEA.

By having many random people calling and contacting many police agencies in such an unorganized fashion, and requesting such a large amount of cooperation and commitment from these random officers, may breed resentment and resistance in law enforcement. This would probably not be a major concern if this were handled in an organized fashion on the state level.

The authority by which the NRC claims jurisdiction to implement these requirements, is that these sources are part of homeland security and are a major terrorist threat. If this is the case, then shouldn't this coordination be done in an organized fashion through the NRC or Agreement States in cooperation with the State Police or other security departments in the states? We would think that there must be an infrastructure in place in each state for a response to a terrorist threat. We believe that the response to a theft or attempted theft should be treated in a similar manner to be effective.

We would like to propose what we feel would be a much more workable plan that would have equal or greater security. We believe that at the state level that there should be a contact person for notifications and response to these radiation emergencies. The state organizer could identify a contact person in each county/parish of that state, which have been familiarized with the areas of concern, and the proper procedures to take in the event of an emergency.

We believe that rather than pick an arbitrary number of days that require notification that triggers independent communication with random LLEA, that a list of frequent and common places of radiography could be registered with the state liaison, and that information be made available to the contact in each county/parish. At the very least, a list of contact persons for notifications could be supplied and the meetings, request for support, etc., be performed at the state level or organized between all licensees. This would reduce the confusion and workload on both the licensees and the LLEA and help to maintain a healthy working relationship and effectiveness.

Comments and Concerns of Proposed NRC Security Rules

- 2) *Should notifications be made by licensees for work at every temporary jobsite or only those where the licensee will be working for longer periods, such as the 7 day timeframe proposed in the rule?*

We strongly believe it is nearly impossible to notify for every jobsite. The proposed rule of jobsites of a 7-day timeframe is also very restrictive we believe. The 3-day advance notification is completely impossible, since we frequently receive request for work to begin immediately. In the industrial radiography industry, especially in areas like southern Louisiana, the quantity of notifications without some kind of statewide organized system like that mentioned above would be unworkable and chaotic. We also feel it could have an opposite effect by alienating local law enforcement with the amount of calls and requests made to them in area with such a high volume of radiography. We do seriously believe this could cripple our industry if not organized better and with clear and easily understandable guidelines that everyone can understand, and easy to document for inspections.

- 3) *If notifications are required, is 7 days the appropriate threshold for notification of the LLEA, or should there be a different threshold?*

We feel the 7-day period is not the correct way to go. We also fear that it is not clear if this would include cumulative time, where the 7-days are not consecutive. This must be defined to prevent a mismatch of enforcement based on the differences of opinions of the inspectors.

We feel that if the NRC decides that there must be LLEA notifications of temporary jobsites of some duration, that there should be a statewide system of whom to notify and the means of doing so. We feel it should also be considered in areas with a large amount of radiography, if a system of registering locations with random and frequent radiography should be developed and coordinated on state level with all contractors, rather than an random and confusing mismatch of individuals trying to do this individually, which is sure to be ineffective and counterproductive.

- 4) *Will licensees be able to easily identify the LLEA with jurisdiction for the temporary jobsites or does this impose an undue burden?*

We strongly believe that licensees will not be able to adequately identify the LLEA with jurisdiction and we believe this poses an undue burden on the licensees. We believe if this is deemed necessary it should be coordinated on the state level, which should increase the effectiveness of the program in the event of an emergency.

Comments and Concerns of Proposed NRC Security Rules

5) *Are LLEAs interested in receiving these notifications?*

We do not believe that LLEA are interested in receiving these notifications. This is a major concern with the proposed unorganized plan of random notifications and meetings with multiple licensees. We feel this problem could be minimized with statewide organization with an identified method of notifications.

Prepared By:



Lance D. Henderson

Radiation Safety Officer
Welding Testing X-Ray, Inc.
Baton Rouge, LA

Co-signors signatures' are on attached pages.

Comments and Concerns of Proposed NRC Security Rules

Company Management or RSO Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc. We do this in order to add weight to the arguments and impress on the government that we feel these concerns are very serious and should be given full consideration.

Signed: CFR Printed Name: Charles F. Reinold
Tulane University
Health Sciences
Company: Center Title: Radiation Safety Officer

(Optional) You may add any additional comments in the space provided below if you have additional concerns. You may also add a separate letter if you wish them to be added to the combined submittal. (Note: When submitted to the NRC this will become public information)

Please Circle the "yes" at the end of this sentence if attaching a separate letter you wish included: YES

This proposed regulation affects
hospital blood irradiators and
research irradiators as well.

Comments and Concerns of Proposed NRC Security Rules

Industrial Radiographer Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc.

We are concerned with the now proposed requirements for a credit check that could prevent some of us from obtaining trustworthy and reliable status. We are also concerned with the new more extensive criminal history records check.

Signed: <u>[Signature]</u>	Printed Name: <u>DAVID BARN</u>
Signed: <u>[Signature]</u>	Printed Name: <u>ZAC MORRIS</u>
Signed: <u>John Green</u>	Printed Name: <u>John Green</u>
Signed: <u>[Signature]</u>	Printed Name: <u>Chris Cole</u>
Signed: <u>JEFFERY A. MOSGROVE</u>	Printed Name: <u>JEFFERY A. MOSGROVE</u>
Signed: <u>Patrick Brown</u>	Printed Name: <u>J Patrick Brown</u>
Signed: <u>Johnell Chutz</u>	Printed Name: <u>Johnell Chutz</u>
Signed: <u>Christopher Cormier</u>	Printed Name: <u>CHRISTOPHER A. CORMIER</u>
Signed: <u>Paul Burrow</u>	Printed Name: <u>Paul Burrow</u>
Signed: _____	Printed Name: _____

Comments and Concerns of Proposed NRC Security Rules

Industrial Radiographer Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc.

We are concerned with the new proposed requirements for a credit check that could prevent some of us from obtaining trustworthy and reliable status. We are also concerned with the new more extensive criminal history records check.

Signed: <u>[Signature]</u>	Printed Name: <u>JASON L. SCONE</u>
Signed: <u>[Signature]</u>	Printed Name: <u>MARK CASEY</u>
Signed: <u>[Signature]</u>	Printed Name: <u>Justin Shaw</u>
Signed: <u>[Signature]</u>	Printed Name: <u>Shane Fontenot</u>
Signed: <u>[Signature]</u>	Printed Name: <u>STEVEN BLODIN</u>
Signed: <u>[Signature]</u>	Printed Name: <u>Jeremy Hogan</u>
Signed: <u>[Signature]</u>	Printed Name: <u>Boyle Sorce</u>
Signed: <u>[Signature]</u>	Printed Name: <u>James Chaisson</u>
Signed: _____	Printed Name: _____

Comments and Concerns of Proposed NRC Security Rules

Industrial Radiographer Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc.

We are concerned with the new proposed requirements for a credit check that could prevent some of us from obtaining trustworthy and reliable status. We are also concerned with the new more extensive criminal history records check.

Signed: <u><i>Glenn Webb</i></u>	Printed Name: <u>Glenn Webb</u>
Signed: <u><i>Gene Jones</i></u>	Printed Name: <u>Gene Jones</u>
Signed: <u><i>Joshua Scott</i></u>	Printed Name: <u>Joshua Scott</u>
Signed: <u><i>Kevin Anderson</i></u>	Printed Name: <u>Kevin Anderson</u>
Signed: <u><i>Matthew Webb</i></u>	Printed Name: <u>Matthew Webb</u>
Signed: <u><i>Jeffery Montet</i></u>	Printed Name: <u>Jeffery Montet</u>
Signed: _____	Printed Name: _____

Comments and Concerns of Proposed NRC Security Rules

Industrial Radiographer Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc.

We are concerned with the new proposed requirements for a credit check that could prevent some of us from obtaining trustworthy and reliable status. We are also concerned with the new more extensive criminal history records check.

Signed: Wesley Montgomery

Printed Name: Wesley Montgomery

Signed: Greg Garcia

Printed Name: Gregory Garcia

Signed: Jason Sifuentes

Printed Name: Jason Sifuentes

Signed: Joshua Coffield

Printed Name: Joshua Coffield

Signed: Josh Meza

Printed Name: Josh Meza

Signed: Justin Brower

Printed Name: Justin Brower

Signed: _____

Printed Name: _____

Comments and Concerns of Proposed NRC Security Rules

Industrial Radiographer Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc.

We are concerned with the new proposed requirements for a credit check that could prevent some of us from obtaining trustworthy and reliable status. We are also concerned with the new more extensive criminal history records check.

Signed: <u>Matthew Pollock</u>	Printed Name: <u>Matthew Pollock</u>
Signed: <u>[Signature]</u>	Printed Name: <u>Robert Cogswell</u>
Signed: <u>Philip Ledet</u>	Printed Name: <u>Philip Ledet</u>
Signed: <u>Daniel McLain</u>	Printed Name: <u>Daniel McLain</u>
Signed: <u>Joshua Strachan</u>	Printed Name: <u>Joshua Strachan</u>
Signed: _____	Printed Name: _____

Comments and Concerns of Proposed NRC Security Rules

Industrial Radiographer Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc.

We are concerned with the new proposed requirements for a credit check that could prevent some of us from obtaining trustworthy and reliable status. We are also concerned with the new more extensive criminal history records check.

Signed: <u>Brent J. Marcel</u>	Printed Name: <u>Brent J. Marcel</u>
Signed: <u>Eric P. Sange</u>	Printed Name: <u>Eric P. Sange</u>
Signed: <u>Freeman Bertrand</u>	Printed Name: <u>Freeman Bertrand</u>
Signed: <u>Jerry Powell</u>	Printed Name: <u>Jerry Powell</u>
Signed: <u>James I. Sheridan</u>	Printed Name: <u>James I. Sheridan</u>
Signed: <u>John Porom</u>	Printed Name: <u>John Porom</u>
Signed: <u>Kevin Tanner</u>	Printed Name: <u>Kevin Tanner</u>
Signed: <u>Larry Robichaux</u>	Printed Name: <u>Larry Robichaux</u>
Signed: <u>Eric Timbadeaux</u>	Printed Name: <u>Eric Timbadeaux</u>
Signed: <u>Herbert Griffin</u>	Printed Name: <u>Herbert Griffin</u>
Signed: <u>Eric Pallais</u>	Printed Name: <u>Eric Pallais</u>
Signed: <u>Shelton Jackson</u>	Printed Name: <u>Shelton Jackson</u>
Signed: <u>Scott Hadden</u>	Printed Name: <u>Scott Hadden</u>
Signed: <u>Benjamin Deroche</u>	Printed Name: <u>Benjamin Deroche</u>
Signed: <u>Joshua Griffin</u>	Printed Name: <u>Joshua Griffin</u>
Signed: <u>Robert Moyers</u>	Printed Name: <u>Robert Moyers</u>
Signed: <u>Brad Remison</u>	Printed Name: <u>Brad Remison</u>

Comments and Concerns of Proposed NRC Security Rules

Industrial Radiographer Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc.

We are concerned with the new proposed requirements for a credit check that could prevent some of us from obtaining trustworthy and reliable status. We are also concerned with the new more extensive criminal history records check.

Signed: <u>Ross Boudreau</u>	Printed Name: <u>Ross Boudreau</u>
Signed: <u>Jordan A. LeBlanc</u>	Printed Name: <u>Jordan A. LeBlanc</u>
Signed: <u>Donny Carbo</u>	Printed Name: <u>Donny Carbo</u>
Signed: <u>Truvin Thomas</u>	Printed Name: <u>Truvin Thomas</u>
Signed: <u>Robert D. Darnell</u>	Printed Name: <u>Robert Darnell</u>
Signed: <u>Wyatt P. Pederesca</u>	Printed Name: <u>WYATT PEDERESCALZI</u>
Signed: <u>Jason Brochard</u>	Printed Name: <u>Jason Brochard</u>
Signed: _____	Printed Name: _____

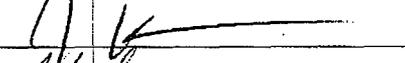
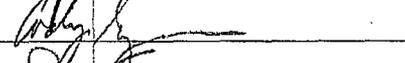
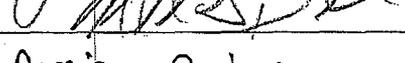
Comments and Concerns of Proposed NRC Security Rules

Industrial Radiographer Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc.

We are concerned with the new proposed requirements for a credit check that could prevent some of us from obtaining trustworthy and reliable status. We are also concerned with the new more extensive criminal history records check.

Signed: 	Printed Name: <u>Chris Bourque</u>
Signed: 	Printed Name: <u>Jason Hebert</u>
Signed: 	Printed Name: <u>Cody Segura</u>
Signed: 	Printed Name: <u>Jeremy Hotard</u>
Signed: 	Printed Name: <u>NICK DEROUEN</u>
Signed: <u>Damion Domingue</u>	Printed Name: <u>Damion Domingue</u>
Signed: <u>Durston Nelson</u>	Printed Name: <u>Durston Nelson</u>
Signed: _____	Printed Name: _____

Comments and Concerns of Proposed NRC Security Rules

Company Management or RSO Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc. We do this in order to add weight to the arguments and impress on the government that we feel these concerns are very serious and should be given full consideration.

Signed: Philip Ledet Printed Name: Philip Ledet

Company: Global X Ray Title: MANAGER

(Optional) You may add any additional comments in the space provided below if you have additional concerns. You may also add a separate letter if you wish them to be added to the combined submittal. (Note: When submitted to the NRC this will become public information).

Please Circle the "yes" at the end of this sentence if attaching a separate letter you wish included: YES

I feel that the NRC should not be able to do credit checks on Radiographers. This does not have any bearing on a technicians ability to perform his or her work properly. This is a serious matter and I totally disagree with the "credit check."

Comments and Concerns of Proposed NRC Security Rules

Industrial Radiographer Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc.

We are concerned with the new proposed requirements for a credit check that could prevent some of us from obtaining trustworthy and reliable status. We are also concerned with the new more extensive criminal history records check.

Signed: <u>Stephen Bergeron</u>	Printed Name: <u>Stephen Bergeron</u>
Signed: <u>Trampus Foret</u>	Printed Name: <u>Trampus Foret</u>
Signed: <u>Kimberly Bellard</u>	Printed Name: <u>KIMBERLY BELLARD</u>
Signed: <u>Matt Bellard</u>	Printed Name: <u>MATT BELLARD</u>
Signed: <u>Steve Foster</u>	Printed Name: <u>Steve Foster</u>
Signed: <u>John C Coverly</u>	Printed Name: <u>John C Coverly</u>
Signed: <u>Rusty D Bishop</u>	Printed Name: <u>Rusty D Bishop</u>
Signed: <u>Douglas B Craess</u>	Printed Name: <u>Douglas B Craess</u>
Signed: <u>Ernie L. Cozzer Sr.</u>	Printed Name: <u>Ernie L. Cozzer Sr.</u>
Signed: <u>Barry T. Cozzer</u>	Printed Name: <u>Barry T. Cozzer</u>
Signed: <u>Samuel K. Knowlton</u>	Printed Name: <u>Samuel K. Knowlton</u>
Signed: <u>Brandon D. Crawford</u>	Printed Name: <u>BRANDON D. CRAWFORD</u>
Signed: <u>Christian Crawford</u>	Printed Name: <u>CHRISTIAN CRAWFORD</u>
Signed: <u>Jake Crawford</u>	Printed Name: <u>JAKE C CRAWFORD</u>
Signed: <u>David Downey</u>	Printed Name: <u>DAVID Downey</u>
Signed: <u>Russell LeBlond</u>	Printed Name: <u>Russell LeBlond</u>
Signed: <u>Lyttis E. Fontenot</u>	Printed Name: <u>Lyttis E. Fontenot</u>

Comments and Concerns of Proposed NRC Security Rules

Industrial Radiographer Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc.

We are concerned with the new proposed requirements for a credit check that could prevent some of us from obtaining trustworthy and reliable status. We are also concerned with the new more extensive criminal history records check.

Signed: <u>Daniel Lawless</u>	Printed Name: <u>Daniel J. Lawless</u>
Signed: <u>James Jackson</u>	Printed Name: <u>JAMES JACKSON</u>
Signed: <u>Timothy Ford</u>	Printed Name: <u>TIMOTHY FORD</u>
Signed: <u>Thomas Hardy</u>	Printed Name: <u>THOMAS HARDY</u>
Signed: <u>Greg Hardy</u>	Printed Name: <u>Greg P. Hardy</u>
Signed: <u>Michael D. Hardy</u>	Printed Name: <u>Michael D. Hardy</u>
Signed: <u>Graff W. Wilde</u>	Printed Name: <u>Graff W. Wilde</u>
Signed: <u>Tyrone Leteyt</u>	Printed Name: <u>Tyrone Leteyt</u>
Signed: <u>Debra Henderson</u>	Printed Name: <u>DEBRA C HENDERSON</u>
Signed: <u>Chad W. Wyble</u>	Printed Name: <u>CHAD W. WYBLE</u>
Signed: <u>James D. Maeles</u>	Printed Name: <u>JAMES D. MAELES</u>
Signed: <u>Jamie Maeles</u>	Printed Name: <u>JAMIE MAELES</u>
Signed: <u>Smith</u>	Printed Name: <u>SMITH, KOSETH LO</u>
Signed: <u>Ronald Williams J</u>	Printed Name: <u>Ronald L. Williams J</u>
Signed: <u>Julie Miller</u>	Printed Name: <u>JULIE R. MILLER</u>
Signed: <u>Burt Tynes</u>	Printed Name: <u>BURT TYNES</u>
Signed: <u>Michael Smith</u>	Printed Name: <u>Michael Smith</u>

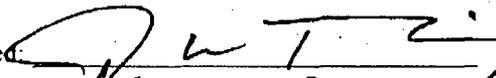
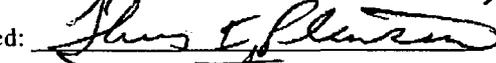
Comments and Concerns of Proposed NRC Security Rules

Global X-Ray Belle Chasse
Industrial Radiographer
Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc.

We are concerned with the new proposed requirements for a credit check that could prevent some of us from obtaining trustworthy and reliable status. We are also concerned with the new more extensive criminal history records check.

Signed: 	Printed Name: <u>Jason W. Tierney</u>
Signed: 	Printed Name: <u>Thomas Plaisance</u>
Signed: 	Printed Name: <u>JASON Theriot</u>
Signed: 	Printed Name: <u>Brian Hebert.</u>
Signed: _____	Printed Name: _____

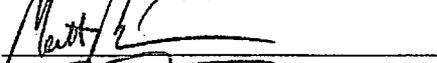
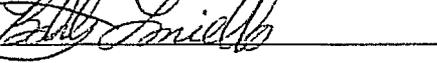
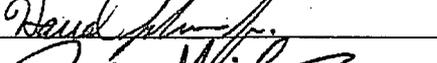
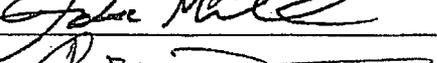
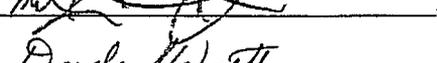
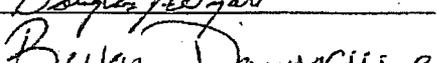
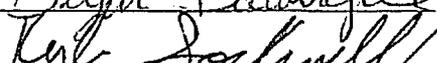
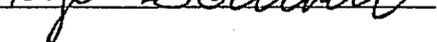
Comments and Concerns of Proposed NRC Security Rules

Industrial Radiographer Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc.

We are concerned with the new proposed requirements for a credit check that could prevent some of us from obtaining trustworthy and reliable status. We are also concerned with the new more extensive criminal history records check.

Signed: 	Printed Name: <u>W. R. BERTRAM</u>
Signed: 	Printed Name: <u>Matt Reeves</u>
Signed: 	Printed Name: <u>C. J. Chisso</u>
Signed: 	Printed Name: <u>Brad Chisson</u>
Signed: 	Printed Name: <u>Bobby Loniello</u>
Signed: 	Printed Name: <u>Terance P. Pickett</u>
Signed: 	Printed Name: <u>Harrel Johnson Jr.</u>
Signed: 	Printed Name: <u>Jake Miller</u>
Signed: 	Printed Name: <u>Casey B. Fricks</u>
Signed: 	Printed Name: <u>Sean Bruce</u>
Signed: 	Printed Name: <u>JOSHUA MARSHALL</u>
Signed: 	Printed Name: <u>Brett Hargrader</u>
Signed: 	Printed Name: <u>Brian Sweeney</u>
Signed: 	Printed Name: <u>Mark J. W. Lusk Sr.</u>
Signed: 	Printed Name: <u>Douglas J. Wyatt</u>
Signed: 	Printed Name: <u>Bryan Dunningue</u>
Signed: 	Printed Name: <u>Kyle Sockwell</u>

Comments and Concerns of Proposed NRC Security Rules

Industrial Radiographer Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc.

We are concerned with the new proposed requirements for a credit check that could prevent some of us from obtaining trustworthy and reliable status. We are also concerned with the new more extensive criminal history records check.

Signed: <u>John P Vincent</u>	Printed Name: <u>John P Vincent</u>
Signed: <u>David L Vincent</u>	Printed Name: <u>David L Vincent</u>
Signed: <u>David E Savoy</u>	Printed Name: <u>DAVID E SAVOY</u>
Signed: <u>Russell Kedge</u>	Printed Name: <u>Russell Kedge</u>
Signed: <u>Dannan Doucet</u>	Printed Name: <u>Dannan Doucet</u>
Signed: <u>Jeremy Pelouin</u>	Printed Name: <u>JEREMY PELOUIN</u>
Signed: <u>Daryl Thatcher</u>	Printed Name: <u>DARYL THATCHER</u>
Signed: <u>Darrell Stanley</u>	Printed Name: <u>Darrell Stanley</u>
Signed: <u>Demond Fontenot</u>	Printed Name: <u>DEMOND FONTENOT</u>
Signed: <u>Shannon Bertrand</u>	Printed Name: <u>Shannon Bertrand</u>
Signed: _____	Printed Name: _____

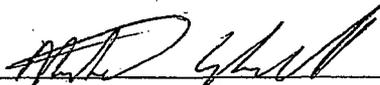
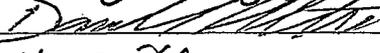
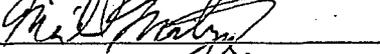
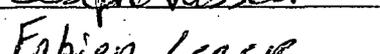
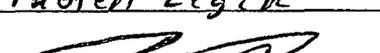
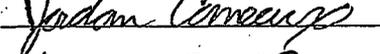
Comments and Concerns of Proposed NRC Security Rules

Industrial Radiographer Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc.

We are concerned with the new proposed requirements for a credit check that could prevent some of us from obtaining trustworthy and reliable status. We are also concerned with the new more extensive criminal history records check.

Signed: <u></u>	Printed Name: <u>Michael Campbell</u>
Signed: <u></u>	Printed Name: <u>Rickie J. Nebert Jr.</u>
Signed: <u></u>	Printed Name: <u>Darrell Atkinson</u>
Signed: <u></u>	Printed Name: <u>Kevin Diaville</u>
Signed: <u></u>	Printed Name: <u>Clyde Diaville</u>
Signed: <u></u>	Printed Name: <u>Michael Montgomery</u>
Signed: <u></u>	Printed Name: <u>Kenny Saltzman</u>
Signed: <u></u>	Printed Name: <u>Ryan Smith</u>
Signed: <u></u>	Printed Name: <u>Kerayon Nezat</u>
Signed: <u></u>	Printed Name: <u>Joseph Vasseur</u>
Signed: <u></u>	Printed Name: <u>Fabien Legere</u>
Signed: <u></u>	Printed Name: <u>JASON L. HALL</u>
Signed: <u></u>	Printed Name: <u>Josh Roberson</u>
Signed: <u></u>	Printed Name: <u>Jason Costley</u>
Signed: <u></u>	Printed Name: <u>Jordan Comeau</u>
Signed: <u></u>	Printed Name: <u>Derrick Carriere</u>
Signed: <u></u>	Printed Name: <u>Michael Sylvester</u>

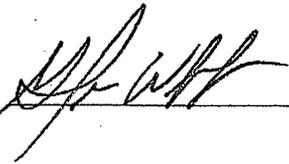
Comments and Concerns of Proposed NRC Security Rules

Company Management or RSO Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc. We do this in order to add weight to the arguments and impress on the government that we feel these concerns are very serious and should be given full consideration.

Signed:



Printed Name:

Glenn Webb

Company:

Turner Industries

Title:

R. S. O.

(Optional) You may add any additional comments in the space provided below if you have additional concerns. You may attach a separate letter if you wish them to be added to the combined submittal. (Note: When submitted to the NRC this will become public information).

Please Circle the "yes" at the end of this sentence if attaching a separate letter you wish included: YES

① Working with LLEA for each temporary jobsite is very objectionable in my opinion based on the work that was involved just to get them aware of storage. They, LLEA, do not share the concern of radioactive materials and storage as is being exhibited by the proposed regulation changes.

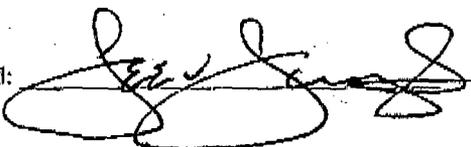
② Credit checks will not tell of a persons character, many outside influences dictate credit scores, economic climate, divorce, medical issues of family members or simply a big ticket item purchase they simply shouldn't have purchased.

Comments and Concerns of Proposed NRC Security Rules

Company Management or RSO Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc. We do this in order to add weight to the arguments and impress on the government that we feel these concerns are very serious and should be given full consideration.

Signed:  Printed Name: LEE J FANG SA

Company: GLOBAL X-RAY TESTING Title: CORPORATE HSE MANAGER

(Optional) You may add any additional comments in the space provided below if you have additional concerns. You may also add a separate letter if you wish them to be added to the combined submittal. (Note: When submitted to the NRC this will become public information).

Please Circle the "yes" at the end of this sentence if attaching a separate letter you wish included: YES

Comments and Concerns of Proposed NRC Security Rules

Company Management or RSO Signature Form

To Whom It May Concern:

We would like to add our signature to agree with the objections raised in the document titled "Comments and Concerns of Proposed NRC Security Rules" authored By Lance Henderson of Welding Testing X-Ray, Inc. We do this in order to add weight to the arguments and impress on the government that we feel these concerns are very serious and should be given full consideration.

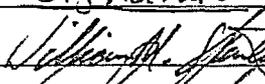
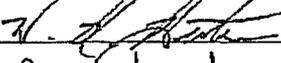
Signed:  Printed Name: Clay L. Savoy

Company: Savoy Technical Services Title: VP-Operations / RSO

(Optional) You may add any additional comments in the space provided below if you have additional concerns. You may also add a separate letter if you wish them to be added to the combined submittal. (Note: When submitted to the NRC this will become public information).

Please Circle the "yes" at the end of this sentence if attaching a separate letter you wish included: YES

Under signed:

Name (Print)	Signature	Title
William Stanley		Operations Manager
William Bertram		ACCOUNTS MANAGER
David Savoy	President	