

Gallagher, Carol

Subject:

FW: Part 37

7/14/2010
75 FR 40754

From: Kelley Richardt [mailto:kelley@spec150.com]

Sent: Wednesday, September 29, 2010 3:14 PM

To: Horn, Merri

Subject: Part 37

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Merri,

I was reading through the comments from the Austin Part 37 meeting, and ran across this on page 171:

MS. HORN: All I can really say is we

16 don't regulate the general carriers. We really don't

17 have the authority to do that. That is something the

18 DOT, TSA, DHS regulates, and just a heads up to you,

19 TSA is beginning to look at regulations in some of

20 these areas. So there may be more coming. I don't

21 know.

I appreciate the heads up, but don't know for sure how to direct this comment, so I'll start with you and ask that you route it to whomever is taking an overall look at what is happening. If TSA, or anyone else, tightens security to the point that FedEx decides it is not profitable to move radioactive material, they will quit doing so, and much of this industry will shut down altogether. There is no alternative for timely and economical transport of radioactive material in this country.

Industrial radiography is essential to the safety of our country's pipeline infrastructure, not to mention building structure, bridges, etc. If industrial radiography becomes cost prohibitive, it might be replaced by some other technology such as ultrasonic testing (UT). However, UT is not as accurate as industrial radiography in many applications. As a country, we need to consider from a high level what it is we are trying to accomplish, and how to do it. If we go too much further down this path, we will make the use of radioactive sources cost prohibitive.

Thanks for your time, Kelley

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