



**INTERNATIONAL SOURCE SUPPLIERS
AND PRODUCERS ASSOCIATION**

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SAFE AND SECURE AT THE SOURCE



September 30, 2011

**DOCKETED
USNRC**

**Grant R. Malkoske
CHAIRMAN**

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

September 30, 2011 (3:50 pm)

**John J. Miller
SECRETARY**

**OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF**

**Wolfgang R. Fasten
TREASURER**

Attention: Rulemaking and Adjudications

Docket No. 110-05957

**Subject: CORAR Comments to NRC on Request for a License to Import Radioactive Waste
Docket ID NRC-2011-22102**

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These comments are submitted on behalf of the International Source Suppliers and Producers Association (ISSPA). ISSPA is an association founded by companies that are engaged in the manufacture, production and supply of sealed radioactive sources and/or equipment that contain sealed radioactive sources as an integral component of the radiation processing or treatment system, device, gauge or camera. GE Hitachi is a member of ISSPA.

ISSPA understands that, depending on the final use, the fact that the content of the sources may not be of U.S. origin subjects their import to the licensing requirements of 10 CFR 110. Unfortunately, the phrase "of U.S. origin" in reference to sealed radioactive sources was introduced into 10 CFR 110.2 final rule without having been mentioned in the proposed rule. As such, industry was unable to provide input to the NRC during the comment period on the unintended consequences of and burdens from this restriction, including significant hardship on U.S. companies who conduct business globally and have legal obligations to accept return source shipments. Given the lack of notice and comment, we would recommend that NRC not rely on the phrase "of U.S. origin" to deny this application, and when issuing the import license, provide clarification within the license that recognizes that sources imported for recycling may be imported under the general license §110.27. In addition, we ask that NRC recognize that the intentions of GE Hitachi are consistent with the objectives of the NNSA Global Threat Reduction Initiative, and consider the application in that context.

ISSPA supports the approval of this import license application.

We appreciate the opportunity to comment on this license request. Please contact me should you have any questions or require additional information.

Sincerely,

Grant Malkoske
Chairman, ISSPA

Template = SECY-043

DS03

Rulemaking Comments

From: CHATEAUVERT, Carol [Carol.Chateauvert@nordion.com]
Sent: Friday, September 30, 2011 11:43 AM
To: Rulemaking Comments
Cc: CHATEAUVERT, Carol
Subject: Rulemaking & Adjudications re Docket ID NRC-2011-22102
Attachments: 20110930_ISSPA_comments_NRC.pdf

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

Attention: Rulemaking & Adjudications

The attached letter is being sent to you on behalf of Grant Malkoske, Chairman, International Source Suppliers and Producers Association (ISSPA).

Please feel free to contact Mr. Malkoske at +1 (613) 762-0282 if you have any questions regarding the attached letter.

Regards,

Carol Chateauvert (on behalf of G. Malkoske, Chairman, ISSPA)
Administrative Assistant
Finance
Nordion
T. +1 (613) 592-3400, ext. 2173
F. +1 (613) 592-9001
E. carol.chateauvert@nordion.com
www.nordion.com

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