

ISSPA

INTERNATIONAL SOURCE SUPPLIERS
AND PRODUCERS ASSOCIATION



DOCKETED
USNRC

CHAIRMAN

SECRETARY

TREASURER

20 December 2012

January 10, 2013 (2:30 p.m.)

Ms. Annette L. Vietti-Cook
Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

OFFICE OF THE SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Subject: Comments on Branch Technical Position on the Import of Non-U.S. Origin
Radioactive Sources, Docket ID NRC-2012-0008

Dear Ms. Vietti-Cook:

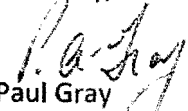
The International Source Suppliers and Producers Association (ISSPA) is an association that is comprised of companies who are international industry leaders in the manufacture, production and supply of sealed radioactive sources and/or equipment that contain sealed radioactive sources as an integral component of the radiation processing or treatment system, device, gauge or camera.

ISSPA appreciates the opportunity to provide comments on the proposed Branch Technical Position (BTP) on the Import of Non-U.S. Origin Radioactive Sources which was published in the Federal Register on October 22, 2012 (77 FR 204). I would like to thank the Staff for their efforts in addressing the unintended consequences with the publication of the final rule of 10 CFR Part 110 which was published in the Federal Register on July 28, 2010.

As part of its Code of Good Practice, ISSPA members commit to safely manage the cradle to grave life cycle of the sealed sources, one key aspect of this is assuring the final disposal of the source. The BTP provides an additional step to ensuring that a source can be returned to an authorized responsible facility for safe and secure handling. The BTP helps remove a potential hurdle for disposal of sources where the manufacturer is unknown, by providing necessary guidance that a source can be assumed to be US origin after a good faith effort has been made and the origin cannot be determined.

We strongly encourage the final publication of the BTP, and would be happy to discuss in more detail or provide additional information if needed.

Sincerely,


Paul Gray
ISSPA Chairman