



Association of Device Distributors and Manufacturers (ADDM)
17 Norfolk Rd., Holbrook, MA 02343

www.addm.us

ABB Inc.

Baker Hughes, Inc.

*Berthold
Technologies USA
LLC,*

*Honeywell
International, Inc.*

IRSC, Inc.,

*Metso Automation
USA, Inc.*

*Morpho Detection,
Inc.*

QSA Global, Inc.

*Rapiscan
Systems, Inc.*

RMD, Inc.,

*Source Production
and
Equipment
Company, Inc.*

January 10, 2014

Margie Kotzalas
Chief, Licensing Branch
Division of Materials Safety and State Agreements
Office of Federal and State Materials and Environmental Programs
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Dear Ms. Kotzalas:

The Association of Device Distributors and Manufacturers requests that an on-going dialog be establish between the ADDM, the NRC, the CRCPD, and the OAS regarding the standardization of reciprocity regulations in the U.S.

Distributors and service providers of products containing radioactive sources find it extremely difficult to comply with the different regulatory inconsistencies between the NRC and all Agreement States in regards to reciprocity. In addition to obvious differences in requirements, there are subtle differences in interpretation which often have the potential for causing misunderstanding and unclear expectations.

We request a conference call at your convenience in order to begin this dialog.

If you have any questions please call me at 781.767.2176 or email me at schapel@irsc-inc.com.

Sincerely,

Sean C. Chapel,
President

cc: Duncan White, NRC Agreement States Program
Mike Welling, VA, Chairperson OAS
Mike Snee, OH, Chairperson Elect, CRCPD
Joe Klinger, IL, Chairperson, CRCPD

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