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11/9/2017
82FR 2399-2

Duran-Hernandez, Doris

Subject: FW: Docket ID NRC-2016-0276, Category 3 Source Security and Accountability

Attachments: NC RPC Comments on Category 3 Sources 3-8-17.pdf

From: Wu, Irene

Sent: Wednesday, March 08, 2017 5:09 PM

To: Duran-Hernandez, Doris <Doris.Duran-Hernandez@nrc.gov>

Subject: FW: Docket ID NRC-2016-0276, Category 3 Source Security and Accountability

For Docket ID NRC-2016-0276

From: Plott, Carmine M [<mailto:cmplott@novanthealth.org>]

Sent: Wednesday, March 08, 2017 4:55 PM

To: Wu, Irene <Irene.Wu@nrc.gov>

Cc: Dr. Wayne Thomann, PhD <thoma010@mc.duke.edu>; Cox, Lee (lee.cox@dhhs.nc.gov)

<lee.cox@dhhs.nc.gov>; Crowley, David P (david.crowley@dhhs.nc.gov) <david.crowley@dhhs.nc.gov>

Subject: [External_Sender] Docket ID NRC-2016-0276, Category 3 Source Security and Accountability

Dear Ms. Wu:

Please accept the attached letter from the North Carolina Radiation Protection Commission in response to the Federal Register Notice published on January 9, 2017 regarding Category 3 source security and accountability.

Thank you for this opportunity to provide comments. If you have any questions, please feel free to contact me.

Sincerely,
Carmine Plott, Chair
North Carolina Radiation Protection Commission

Carmine M Plott, PhD, CHP, DABR
Radiation Safety Officer and Diagnostic Medical Physicist

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Add= *I. Wu (IWX)*

2017
11-08 PM 5:11
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North Carolina Department of Health and Human Services
Division of Health Service Regulation

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March 8, 2017

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Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Docket ID NRC-2016-0276, Category 3 Source Security and Accountability

Dear Ms. Wu:

The North Carolina Radiation Protection Commission¹ appreciates the opportunity to comment on the U.S. Nuclear Regulatory Commission's (NRC) effort to evaluate whether it is necessary to revise NRC regulations or processes requiring Category 3 source protection and accountability. Potential changes include requiring license verification through the License Verification System (LVS) or by directly contacting regulatory authority for Category 3 licenses, including Category 3 sources in the National Source Tracking System (NSTS), and requiring Part 37 security requirements for Category 3 quantities.

The Radiation Protection Commission has been monitoring and assessing the proposal and agrees with the North Carolina Agreement State and the Nuclear Energy Institute with regard to this issue. We oppose the expanded regulation of these sources as such changes would add significant burden to our regulated community with no significant benefit to the public we serve.

Thank you for your consideration of these comments.

Sincerely,

Carmine M. Plott, Ph.D., CHP, DABR, Chair
NC Radiation Protection Commission

Wayne R. Thomann, Dr.P.H, Vice-Chair
NC Radiation Protection Commission

¹ Created and authorized by North Carolina General Statute 104E-7 in 1975, the Radiation Protection Commission adopts, promulgates, amends and repeals rules, regulations and standards relating to the manufacture, production, transportation, use, handling, servicing, installation, storage, sale, lease, or other disposition of radioactive material and radiation machines. Its membership consists of 11 voting public members and 10 nonvoting ex officio members, all appointed by the Governor.

Radiation Protection Section
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