



INTERNATIONAL SOURCE SUPPLIERS
AND PRODUCERS ASSOCIATION

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SAFE AND SECURE AT THE SOURCE



2017 March 8

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Cindy Bladey
Office of Administration
Mail Stop OWFN - 12 - H08
US Nuclear Regulatory Commission
Washington, D.C. 20555 - 0001

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HULLS - 2399-2

Subject: Comments to 2017 January 9 Federal Register Notice; Category 3 Source Security and Accountability (Docket ID: NRC-2016-0276)

Dear Ms. Bladey:

On behalf of the membership of the International Source Suppliers and Producers Association (ISSPA), and in follow-up to the letter received and response provided to Sabrina Atack of the NRC, ISSPA has had the opportunity, at its Annual General Meeting, to discuss this subject matter thoroughly. In addition, members have been able to attend and participate in the public meetings NRC held over the past several weeks. Finally, we have had the opportunity to discuss this with both NEI and the Source Security Working Group (SSWG), both of whom will be submitting comments.

We appreciate the opportunity to comment and ISSPA both concurs and supports the positions made and comments provided by the aforementioned organizations. We conclude that based on all available information, and discussions with many licencees and industry associations, that expansion of the WBL, NSTS and LVS, and adding further security controls for Category 3 sources, is unwarranted. We strongly discourage the expansion of NSTS to include Category 3 sources.

Thank-you again for the opportunity to comment and your consideration of these comments. Please feel free to contact me if you have any questions.

Sincerely,

Paul Gray
Chairman, ISSPA

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