

1/9/2017
82FR 2399-2

10

Duran-Hernandez, Doris

From: Wu, Irene
Sent: Friday, March 10, 2017 9:02 AM
To: Duran-Hernandez, Doris
Subject: FW: [External_Sender] Comments from the pending cat 3 change, COMJMB-16-0001 or NRC-2016-0276

From: White, Duncan
Sent: Thursday, March 09, 2017 5:02 PM
To: Greg Schrad <GSchrad@culm2energy.com>
Cc: Wu, Irene <Irene.Wu@nrc.gov>
Subject: Re: [External_Sender] Comments from the pending cat 3 change, COMJMB-16-0001 or NRC-2016-0276

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MAR 13 AM 8:45

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Greg:

Thank you for your input and specifics on the potential impacts for Category 3 materials.

Regards,
Duncan

----- Original Message -----

From: Greg Schrad <GSchrad@culm2energy.com>
Date: Thu, March 09, 2017 4:01 PM -0400
To: "White, Duncan" <Duncan.White@nrc.gov>
Subject: [External_Sender] Comments from the pending cat 3 change, COMJMB-16-0001 or NRC-2016-0276

Duncan

I attended the 03/02/2017 webinar on this subject and brought up a concern when possible security changes were talked about. We use our Cat 3 sources in permanently mounted level indicators and we have not changed them in 20 years and do not plan on moving them for another 20 years. The level is continuously monitored remotely. We meet all the requirements for a general license with Cat 3 sources. I have read 10CFR37, specifically on physical security of Cat 2 sources. If the security requirements for Cat 3 sources change and we have to meet Cat 2 security requirements, the changes we would have to make would be substantial and cause a burden financially and physically. I would assume that most companies in similar source use situations would have the same problems. I do not see an issue with the change in reporting, it might bind the system up for a while, but it can happen. The security plans, initial training, continuing training, alarmed access, and new security zones (as I read with category 2) will add a lot. We also don't currently have a good replacement for our detectors if we had to change them to a non-nuclear detector.

SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM-03

Add= I. Wu (IWY 4)

I hope this helps detail some comments for you. Please contact me if you want any additional information or clarification.

Greg Schrad, Plant Engineer

GSchrad@culm2energy.com

570.874.4164

570.874.4456 X413

Gilberton Power Company

81 Eleanor Ave

Frackville, PA 17931