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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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PUBLIC MEETING ON
CATEGORY 3 SOURCE SECURITY
AND ACCOUNTABILITY

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Tuesday, February 28, 2017

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Houston Marriott at the
Texas Medical Center
6580 Fannin Street
Houston, Texas

The above-entitled hearing was conducted
at 3:00 p.m.

BEFORE:

GEORGE SMITH, Facilitator

NRC STAFF PRESENT:

LINDA EUSEBIO

MARK SHAFFER

GEORGE SMITH

DUNCAN WHITE

IRENE WU

A G E N D A

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P R O C E E D I N G S

(3:00 p.m.)

1
2
3 MR. SHAFFER: Good afternoon. My name is
4 Mark Shaffer. I'm the director for the Division of
5 Nuclear Material Safety in NRC's Region IV office in
6 Arlington, Texas.

7 I want to thank you today for
8 participating in the meeting. Today we're going to
9 focus on the re-evaluation of Category 3 source
10 security and accountability.

11 Irene will cover some of the background on
12 this, but let me introduce the issue just a little
13 bit. Let me note that the U.S. Government
14 Accountability Office, the GAO, conducted an audit of
15 NRC's and the agreement states' licensing process, and
16 during that audit they identified some concerns
17 related to source security and accountability for
18 Category 3 sources.

19 Now, subsequent to that GAO report, the
20 NRC Commission directed the staff to perform a
21 re-evaluation, including pros and cons of different
22 methods for validating licenses and pros and cons for
23 including Category 3 sources into the National Source
24 Tracking System.

25 Part of the Commission's direction to the

1 staff was to engage with stakeholders so that we can
2 fully assess the regulatory impact of any potential
3 changes to existing processes or regulations.

4 So I'd like to make it clear now to
5 everyone here and on the webinar that the meeting
6 today, we're not in the process of changing the
7 regulations or the requirements. What we are doing is
8 an evaluation to support the development of
9 recommendations to the Commission and, in particular,
10 whether or not requirements regarding security and
11 accountability of Category 3 sources should be changed
12 and, if changes are recommended, what the changes or
13 new requirements might be.

14 The results of the evaluation are not
15 predetermined. The NRC has not made any decisions
16 regarding changing regulations. Actually, on the
17 contrary, we're in the early stages of performing this
18 evaluation, and the meeting today is part of our
19 process to receive some stakeholder feedback to help
20 us formulate recommendations to the Commission.

21 You might know the staff's recommendations
22 to the Commission are due in August of this year.
23 Ultimately the Commission will decide whether or not
24 to pursue regulatory changes to the security and
25 accountability of Category 3 sources.

1 We recognize that obtaining stakeholder
2 input is an important part of this effort, and we must
3 use that in our evaluation to enable us to develop
4 well-thought-out and comprehensive set of
5 recommendations.

6 So today's public meeting is obviously a
7 part of that process. Today's series of meetings and
8 webinars, we've done a series of those, and we're
9 hosting more of these webinars.

10 The public comment period closes in March
11 of this year. So therefore, to the extent possible,
12 it would be very helpful to us today if you could
13 provide some specificity, even numerical estimates if
14 you have them, in your comments regarding the
15 regulatory impact and how that might affect your
16 business or might affect the requirements that we have
17 in place now.

18 So we want to hear all of you. Any other
19 comments -- we really would solicit any comments that
20 you have today. But if you can focus on specificity
21 of how that impact -- might impact you, it would be
22 much appreciated.

23 I want to thank you again for being here
24 today. It's very helpful to us to interact with all
25 the stakeholders so we can have a more clear

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1 understanding of the impact on any changes that might
2 be recommended to the Commission.

3 Looking forward to an engaging dialog
4 today, and with that, I'll turn it over to George
5 Smith, who's going to be the facilitator today.

6 MR. SMITH: Okay. Thank you, Mark.

7 Before we get started, I'd like to just go
8 over some -- the emergency exit and some of the other
9 processes.

10 So if you have to use the restroom, it's
11 out the door, to the left -- the women to the left,
12 and the men to the right. Also, if we have an
13 emergency, there are a couple of emergency exits.

14 If you see to the left, there's an
15 emergency exit downstairs. To the right also is an
16 emergency exit downstairs, or you can just go down the
17 escalators.

18 We'd like for everyone to at least meet
19 across the street, and we'll make sure we have --
20 we'll grab the sign-in sheet and make sure we account
21 for everyone, at least before you disperse, if you
22 decide not to come back to the meeting.

23 And from what I understand, the hotel
24 won't do a practice type of evacuation, so if it
25 occurs, it is real, so just keep that in mind.

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1 So we also have members of the NRC
2 Agreement States Category 3 Source Security and
3 Accountability Working Group in attendance, here and
4 on the phone, and these individuals may ask clarifying
5 questions.

6 So if you give a remark, they may ask some
7 clarifying questions just to make sure we capture the
8 essence of your comment.

9 So to minimize any interruptions, we ask
10 that you -- if you have a cell phone, if you can put
11 it in the courtesy mode at this time, either vibrate
12 or silent. And we understand that, you know, you have
13 to make -- you may have to make or receive an
14 important phone call, but if that's the case, if you
15 can, just step outside the room and make that call or
16 receive that call; we'd appreciate it.

17 So for those on those on the phone, please
18 make sure you've logged in to the webinar in order to
19 follow along with the slide presentation.

20 If you have not registered for the
21 webinar, the webinar registration information is
22 available in the public meeting notice on the NRC
23 public meeting website.

24 So a copy of the slides used in today's
25 meeting will be made available on the Category 3 web

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1 page, located on the NRC website also.

2 So the agenda for today: First we'll go
3 over the public comment process. Next we'll give a
4 brief background on how we got here and why we were
5 asking for your inputs. Then we'll go over the
6 different comment areas and open the floor for
7 comments on each of the questions in the *Federal*
8 *Register* notice.

9 So we'll go between the room and the phone
10 line and the webinar, so we have folks in all three
11 locations. And at the end of the meeting we'll
12 provide information on the remaining Category 3 source
13 security and accountability public meetings and
14 webinar dates and then close the meeting.

15 So this is a Category 3 public meeting,
16 which means we will be soliciting feedback to ensure
17 your issues and concerns are presented, understood,
18 and considered by the NRC. This meeting is being
19 transcribed to accurately capture your comments, so
20 the transcription is here.

21 Your comment during the public meetings --
22 or this public meeting and those submitted to the NRC
23 will be considered by NRC in preparing a report to the
24 Commission as directed by the Staff Requirement
25 Memorandum for COMJMB-16-0001.

1 The NRC does not plan to provide specific
2 responses to stakeholder feedback during this meeting,
3 so we're asking for specific comments of your concerns
4 during this meeting.

5 Please do not provide nonpublic, official-
6 use-only safeguards and/or classified information
7 related to a specific facility.

8 For those on the phone, the operator will
9 place you in a queue if you have comments to provide
10 at today's meeting. The operator will inform you when
11 you will be allowed to present your comments.

12 So if you do not have the opportunity to
13 provide comments today, or if you have additional
14 comments, please submit your comments to the NRC by
15 March 10, 2017, via <https://www.regulations.gov> for
16 docket ID NRC-2016-0276. Or you can mail your
17 comments to Cindy Bladey, Office of Administration,
18 Mail Stop: OWFN-12-H08, U.S. Nuclear Regulatory
19 Commission, Washington, DC 20555-0001. So please
20 include the docket ID number, NRC-2016-0276 in the
21 subject line of your submission.

22 So now I'll turn it over to Irene Wu, who
23 will provide you some background information.

24 MS. WU: All right. Thank you, George.

25 My name is Irene Wu, and I am the project

1 manager at the Nuclear Regulatory Commission and the
2 co-chair of the NRC agreement state group that is
3 conducting this re-evaluation.

4 As you may know, the Commission issued a
5 Staff Requirements Memorandum for COMJMB-16-0001,
6 dated October 18, 2016, which direct the NRC staff to
7 take specific actions to evaluate whether it is
8 necessary to revise NRC regulations or processes
9 governing Category 3 source protection and
10 accountability.

11 However, this is not the first time that
12 we have reviewed strategies for the protection and
13 accountability of Cat 3 sources. In 2007 the GAO, or
14 U.S. Government Accountability Office, conducted
15 an investigation on NRC's materials licensing program
16 and was able to obtain a radioactive materials license
17 using a fictitious company and place orders that would
18 have resulted, if actually obtained, in receipt of an
19 aggregated Category 3 quantity of radioactive
20 material.

21 After the 2007 investigation, the NRC and
22 agreement states made a number of significant changes
23 to strengthen the licensing and regulatory processes
24 to
25 prevent individuals who may have malevolent intent

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1 from obtaining a radioactive materials license.

2 In 2009, licensees began reporting
3 Category 1 and 2 sources to the National Source
4 Tracking System. Staff had proposed to expand
5 reporting to the NSTS to include Category 3 sources;
6 however, the Commission did not reach a decision on
7 the proposed rulemaking, and the final rule was not
8 approved.

9 In 2014 GAO initiated another audit of the
10 materials licensing program to determine whether the
11 licensing vulnerabilities identified in 2007 had been
12 addressed by the NRC and agreement states.

13 As part of its audit, GAO rented
14 storefront warehouse space to demonstrate a fictitious
15 company's legitimacy during prelicensing visits. The
16 GAO was successful in one of three attempts and
17 acquired a license for a Category 3 well logging
18 source, which they used to place one order for a
19 Category 3 source.

20 GAO then altered the license and used it
21 to place a second order for an additional Category 3
22 source. In doing so, GAO effectively demonstrated the
23 ability to obtain an aggregated Category 2 quantity of
24 material, although at no point in the investigation
25 were radioactive materials actually shipped to the

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1 fictitious company.

2 GAO published its final report for the
3 material licensing audit and investigation in July
4 2016. In August of 2017, we plan to submit a notation
5 vote paper to the Commission with our recommendations.

6 It is also relevant to note that we
7 recently completed our comprehensive review of 10 CFR
8 Part 37, which are the physical protection
9 requirements for Category 1 and 2 quantities of
10 radioactive material.

11 That report, which is publicly available,
12 was sent to Congress in December of 2016, and the
13 results of that assessment will inform our evaluation
14 of Category 3 source security and accountability,
15 which is currently underway.

16 That was a quick high-level overview of
17 how we got here, and I've included some resources on
18 the slide if you want to delve further into the
19 background.

20 The specific tasks outlined in the SRM
21 that will be addressed in the notation vote paper are
22 as follows: an evaluation of the pros and cons of
23 different methods of verifying the validity of a
24 license prior to transfer; an evaluation of the pros
25 and cons of including Category 3 sources in the

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1 National Source Tracking System; an assessment of any
2 additional options for addressing the source
3 accountability recommendations made by the GAO; a
4 vulnerability assessment which identifies changes in
5 the threat environment between 2009 and today that
6 argue in favor or against expansion of the National
7 Source Tracking System to include Category 3 sources;
8 a regulatory impact analysis of the accrued benefits
9 and costs of the change to include impacts to the NRC,
10 agreement states, non-agreement states, and regulated
11 entities; a discussion of potential regulatory actions
12 that would not require changes to our regulations, to
13 include changes to guidance, training, and other
14 program improvements; an assessment of the risks posed
15 by the aggregation of Category 3 sources into Category
16 2 quantities; collaboration with agreement state
17 partners, non-agreement states, regulated entities,
18 public interest groups, industry groups, and the
19 reactor community to fully assess the regulatory
20 impact of any recommendations to be made in the
21 notation vote paper and, lastly, any other factors to
22 help inform the Commission's decision.

23 For those unfamiliar with some of these
24 systems, let me provide a brief explanation of the
25 National Source Tracking System web-based licensing

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1 system and the license verification system.

2 The National Source Tracking System, or
3 NSTS, was deployed in 2008 and is a web-based system
4 that accounts for high-risk radioactive sources from
5 the time that they are manufactured or imported
6 through the time of their disposal or export, or until
7 they decay enough to be no longer of concern.

8 While NSTS provides a relatively up-to-
9 date accounting system regarding risk-significant
10 sources inventories, it is important to note that it
11 is not a real-time tracking mechanism for sources.

12 Reporting to the NSTS is all after the
13 fact, and the requirements for what is required to be
14 reported can be found in 10 CFR 20.2207, and these
15 requirements include reporting licensee information,
16 transaction date, source manufacturer, source model,
17 source serial number, radioactive material in the
18 source, and source activity.

19 Typical methods of reporting to the
20 National Source Tracking System include direct
21 reporting via online access, emailing or faxing the
22 Form 748, which is the National Source Tracking
23 Transaction Report; or providing an electronic batch
24 file to be uploaded directly into NSTS.

25 The web-based licensing system, or WBL,

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1 was deployed in 2012 and is a licensing system that is
2 accessible through the internet. At this time access
3 to WBL is limited to only regulators.

4 The objectives of WBL are to provide an
5 up-to-date repository of all risk-significant or
6 Category 1 and 2 licenses nationwide and to provide an
7 up-to-date repository of all licenses of NRC and three
8 agreement states who have adopted the use of WBL.

9 Many states have expressed interest in
10 using WBL, and we are currently working with several
11 states towards full use of the system.

12 WBL is available to state agencies free of
13 charge, and their adoption of the system and built-in
14 process flows create more consistency in licensing for
15 the states that use it.

16 States that are not using WBL directly
17 provide NRC with their Category 1 and 2 licenses as
18 they are issued or amended, to be uploaded in WBL by
19 our contractors. Having the most current Category 1
20 and 2 licenses in WBL is essential for the
21 functionality of the license verification system.

22 So the license verification system, or
23 LVS, was deployed back in 2013 and is a web-based
24 system that enables authorized licensees to confirm
25 that a license is valid and accurate and that a

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1 licensee is authorized to acquire quantities and types
2 of radioactive materials being requested.

3 The process to verify a license is as
4 follows: Step 1, and authorized customer requests a
5 Category 1 or Category 2 quantity of radioactive
6 material from an authorized supplier and provides a
7 copy of its license or specific license information
8 needed to query the license record through LVS.

9 Step 2, the authorized supplier submits
10 the issuing agency license number and either the
11 amendment number or the license issue date to LVS in
12 order to verify the official copy of the customer's
13 license.

14 Step 3, LVS queries WBL to obtain the
15 possession limit for Category 1 and 2 authorized
16 materials and a copy of the license image.

17 Step 4, WBL provides the license image to
18 LVS to compare the possession limits and current NSTS
19 inventory.

20 Step 5, LVS queries the NSTS and compares
21 the possession limit for Category 1 and 2 authorized
22 materials to the current NSTS inventory.

23 And step 6, if the customer is above its
24 possession limit in the National Source Tracking
25 System, LVS will display a message for the supplier to

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1 contact the regulator.

2 Step 7, if no issues exist, LVS displays
3 the official license image obtained from WBL, and the
4 authorized supplier notes the license verification is
5 complete in LVS.

6 And the last step is the supplier -- step
7 8, the supplier completes the purchase order, and the
8 material is transferred to the customer.

9 Licensees opting not to have access to LVS
10 or those receiving a message by LVS to contact the
11 regulator must use the manual process to complete the
12 verification of a license.

13 And to facilitate that process, the
14 transferring licensee may contact our help desk by
15 phone or email to provide the necessary information to
16 populate the NRC Form 749, which is the manual license
17 verification report.

18 So to get access to these systems,
19 applicants have to go through a credentialing process,
20 and the credentialing process typically takes about a
21 month to complete and includes a verification of
22 employment, a determination that the person has a need
23 to know, and an identity proofing step to verify that
24 the person applying for a credential is who he or she
25 claims to be.

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1 Once the credentialing process is
2 complete, the NRC issues an electronic credential
3 which allows the systems to uniquely identify each
4 user. The credentialing process is the same, so if a
5 user has access to one system, they do not have to go
6 through the full credentialing process again for the
7 second system. They simply have to contact our help
8 desk to get that access.

9 The credential used for NSTS and LVS is
10 called a one-time password, which, in combination with
11 a personal identification number or PIN, will give
12 them access to the systems.

13 A one-time password, or OTP, is a password
14 that is valid for only one log-in session. Currently
15 NRC offers three options for OTPs: a card, a token,
16 or a smartphone app. An OTP is provided to a user
17 free of charge, and no software installation is
18 necessary.

19 Some of the enhancements that are under
20 consideration for this re-evaluation are verification
21 of Category 3 licenses through the LVS or the
22 regulatory authority, as is done with Category 1 and
23 2 licenses; inclusion of Category 3 sources in NSTS,
24 as is done with Category 1 and 2 sources; and
25 expanding physical security requirements to include

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1 Category 3 quantities of radioactive material along
2 with Category 1 and 2 quantities of radioactive
3 material.

4 These potential enhancements form the
5 basis for the questions in *Federal Register* notice
6 that we issued on the subject, published on January 9,
7 2017.

8 The FRN lists 22 questions that are
9 separated into sections based on the topics and
10 applicability to relevant stakeholders. These include
11 general questions related to license verification,
12 general questions related to the NSTS, specific
13 questions for licensees related to license
14 verification, specific questions for licensees related
15 to NSTS, specific questions for agreement states
16 related to license verification, specific questions
17 for agreement states related to the NSTS and other
18 questions.

19 The NRC wants to clarify while the *Federal*
20 *Register* notice included questions directed towards
21 particular stakeholders, the NRC is actually looking
22 for comment and responses from all members of the
23 public on all questions.

24 The FRN grouped questions in a particular
25 fashion to facilitate input from some stakeholders

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1 that may wish to provide some input to this activity
2 but may have limited resources to do so, but all
3 members of the public are welcome to provide their
4 thoughts on any of the listed questions.

5 So before we move to the comment portion
6 of this period, I did want to include a slide to show
7 the different thresholds for Category 1, 2, and 3
8 quantities of radioactive material.

9 As you can see from the table, the
10 Category 3 threshold is greater than one-tenth of the
11 Category 2 threshold but less than the Category 2
12 threshold. Also of note is that the list of
13 radionuclides that are currently subject to physical
14 security requirements in 10 CFR Part 37 is different
15 than the list of radionuclides included in NSTS.

16 The four radionuclides highlighted in the
17 table are the radionuclides that are included in NSTS
18 but not subject to 10 CFR Part 37, and the main reason
19 that these four radionuclides were included in NSTS is
20 because DOE likely possesses these isotopes, and they
21 report to the National Source Tracking System.

22 So I will now turn the meeting back over
23 to George, who will solicit comments from meeting
24 participants.

25 MR. SMITH: Okay. Thank you, Irene.

1 So before we move on to this portion of
2 the meeting, are there any questions on Irene's slides
3 in the room?

4 (No response.)

5 MR. SMITH: No questions.

6 Robin, are there any questions on the
7 phone line?

8 THE OPERATOR: I'm sorry. No comments or
9 questions at this time.

10 MR. SMITH: Okay. Thank you.

11 Any indications of questions in the
12 webinar?

13 MS. EUSEBIO: No comments or questions on
14 the webinar.

15 MR. SMITH: Great. Thank you.

16 So now we'll transition into the comment
17 portion of the meeting. As a reminder, we do not plan
18 to provide specific responses to stakeholders'
19 feedback during this meeting. We're asking for the
20 specifics of your comments, but we don't plan to
21 provide any responses to your questions.

22 We will use these comments to inform our
23 evaluation and recommendations. We will prepare a
24 document summarizing all of the comments we receive
25 today and at other meetings and written comments that

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1 will be part of the notation vote paper to be
2 submitted to the Commission in August 2017.

3 Please do not provide nonpublic official-
4 use-only safeguard and/or classified information
5 related to a specific facility, and as a reminder,
6 this meeting is being transcribed.

7 Before providing comments today, please
8 state your name and the name of the organization, if
9 any, that you are representing.

10 The first several questions are general
11 questions related to the license verification. So
12 question 1: Should the current method for
13 verification of licenses prior to transferring
14 Category 3 quantities of radioactive material listed
15 in 10 CFR 30.41(d)(1) through (5), 10 CFR 40.51(d)(1)
16 through (f) and 10 CFR 70.42(d)(1) through (5) be
17 changed such that only the method prescribed in 10 CFR
18 37.71 are allowed.

19 So as you can see on the slides, we've
20 included a summary of the five methods of license
21 verification that are described in 10 CFR Part 30, 40,
22 and 70.

23 So here in the room, if you have any
24 comments, if you can, please use the microphone in the
25 middle so we can accurately capture your comments,

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1 again, as they're being transcribed.

2 Are there any comments here in the room on
3 this statement -- I'm sorry -- this question?

4 (No response.)

5 MR. SMITH: Robin, are there any
6 indications of comments on the telephone line?

7 THE OPERATOR: No comments on the phone
8 line.

9 MR. SMITH: Okay. Thank you.

10 Any of indication of comments on the
11 webinar?

12 MS. EUSEBIO: No comments on the webinar.

13 MR. SMITH: Okay. Thanks. We'll give it
14 a couple of seconds. Again, if you have any comments,
15 just go up to the microphone.

16 (No response.)

17 MR. SMITH: Okay. We're going to move on
18 to question number 2. And also, if you decide you do
19 have a comment on a previous question that we've
20 covered, it's no problem; you can always come up the
21 microphone, or you can make a comment on the phone
22 line or in the webinar. We do welcome all comments.

23 So question number 2: Will there be an
24 increase in safety and/or security if the regulations
25 were changed to only allow license verification

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1 through the NRC license verification system, or LVS,
2 or the transferee's license issuing authority for
3 transfers of Category 3 quantities of radioactive
4 material?

5 If so, how much of an increase would there
6 be? Any comments here in the room?

7 (No response.)

8 MR. SMITH: Duncan or Irene, would you
9 like to provide some previous comments that we've had
10 in this area? I think we've had quite a few.

11 MR. WHITE: Yeah. This is Duncan White
12 from the NRC. In previous webinars and public
13 meetings, people noted that they didn't feel overall
14 there would be a increase in safety and security,
15 although some people did note that the use of LVS
16 would make a more secure system, because you would
17 have to use a system where we have the licenses
18 deposited at WBL, and that would be on the current
19 versions of that.

20 So they felt it was kind of a dual answer,
21 that it wouldn't be a big increase in security, but
22 they saw the importance of using a system that had
23 only official copies of the licenses available.

24 MR. SMITH: Right. So if there are some
25 in the audience, if you're not using LVS, we'd like to

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1 get some comments from you, to give your thoughts on
2 the use of LVS for Category 3.

3 (No response.)

4 MR. SMITH: Robin, are there any
5 indications on the phone line of comments?

6 THE OPERATOR: Yes. We have one from
7 Roland Vasquez.

8 MR. SMITH: Okay. Great. Thank you.

9 MR. VASQUEZ: I had a question on number
10 one. The question is [inaudible]. Did the question
11 contemplate transfer of [inaudible]?

12 MR. SMITH: Were you able to understand?

13 I'm sorry. We're going to get someone in
14 to try to increase the volume, but if you can please
15 provide your comment again, we'd appreciate it. We
16 didn't hear your comment.

17 MR. VASQUEZ: Sure. My comment is -- and
18 a question -- that question 1 uses the word
19 "quantities" and not -- (loud electronic sound).

20 MR. SMITH: That didn't work.

21 Go ahead. I'm sorry. I was trying to
22 amplify your voice.

23 MR. VASQUEZ: Okay. Did the question
24 contemplate the transfer of individual sources for
25 Category 3, or did it contemplate the transfer of

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1 sources which in aggregate exceed the Category 3
2 threshold?

3 MR. WHITE: This is Duncan White, NRC.
4 The participation for Category 3 sources, this would
5 be any source -- the quantity is the individual
6 sources that would be transferred.

7 If it turned out to be an aggregation of
8 sources, say, multiple sources of one kind, again,
9 that kind of falls under the same category as Category
10 3 sources if they're aggregated; we're talking about
11 the quantities of material at one time.

12 So it can be aggregation, or it could be
13 a single source.

14 MR. VASQUEZ: Okay. Then maybe a followup
15 question: When you say "at one time," I hear you to
16 say per transfer. Is that right?

17 MR. WHITE: Yes, because sometimes you may
18 have an aggregation of sources that may be in a single
19 device; for example, say you ship something from one
20 location to another. You may aggregate, say, Category
21 4 sources into a single package and transfer all at
22 once as a Category 3 quantity of material.

23 MR. VASQUEZ: Okay. Great. Thank you.

24 MR. SMITH: Okay. Thank you very much.

25 Are there any comments here in the room?

1 MR. O'DONEL: To clarify --

2 MR. SMITH: We need you to --

3 MR. WHITE: Yeah, use the mic.

4 MR. SMITH: And if you could state your
5 name, too, and any organization you're representing.

6 MR. O'DONEL: Rob O'Donel, Suntrac
7 Services.

8 To clarify, if there was a shipment of six
9 sources that were 500 millicuries, that would be 3,000
10 millicuries, so that's -- the aggregate is above the
11 Category 3 threshold. So you would have to do -- you
12 possibly would have to do the National Source Tracking
13 System with one shipment?

14 MS. WU: No. So license verification --
15 in this case you potentially would have to do the
16 license verification for that Category 3 quantity, but
17 for National Source Tracking System that's done on a
18 source level, so if the individual sources don't rise
19 above the Category 3 quantity, then those don't get
20 reported to NSTS if we were to expand NSTS to include
21 Category 3.

22 MR. O'DONEL: So license verification,
23 yes, but NSTS, no. Okay.

24 MS. WU: That's correct.

25 MR. SMITH: Any additional comments here

1 in the room?

2 (No response.)

3 MR. SMITH: Any comments on the webinar?

4 MS. EUSEBIO: No comments on the webinar.

5 MR. SMITH: Okay. Thank you.

6 Robin, any additional comments on the
7 phone line?

8 MR. VASQUEZ: Hi. This is Roland.
9 There's some trouble with the microphone, I thin, in
10 the room. I wasn't able to hear Rob O'Donel's
11 question. I was only partially able to hear Ms. Wu's
12 response. I wonder if the NRC would be willing to
13 restate, for the benefit of the folks on the phone,
14 the questions which are asked in the room.

15 MR. SMITH: Okay. Great.

16 MR. VASQUEZ: Thank you.

17 MR. SMITH: Can you repeat the last
18 question?

19 MR. WHITE: The last question that was
20 asked was about if there was a shipment of multiple
21 sources, each individually a Category 4 quantity, and
22 the aggregate amount was a Category 3, quantity, the
23 question was, would -- is that reportable to NSTS, or
24 is that just reportable in -- for license verification
25 purposes?

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1 And the answer we gave was it would not be
2 required for NSTS, but it would be required for
3 license verification.

4 MR. VASQUEZ: Thank you.

5 MR. SMITH: Okay, Robin. Any additional
6 comments on the line?

7 MR. JACOBI: Rick Jacobi. Actually, I
8 don't have a comment -- a question. I was just -- had
9 the same problem Roland was having. Your discussion
10 comes in and out a little bit.

11 MR. SMITH: Okay. And we apologize, but
12 we are adjusting the mics at this time. But, again,
13 if you cannot hear the comments or questions, please
14 let us know again. We really appreciate that.

15 Okay. We're going to go on to question
16 number 3. If the NRC changed the regulations to limit
17 license verification only through the LVS or the
18 transferee's license issuing authority for transfers
19 of Category 3 quantities of radioactive material,
20 should licensees transferring Category 3 quantities to
21 manufacturers
22 and distributors be excepted from the limitation?

23 Any clarification on that?

24 MR. WHITE: This is Duncan White. The
25 information that we've heard at previous public

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1 meetings and information we've -- from our experiences
2 with Cat 1 and 2 sources is that most transfers occur
3 between manufacturers and individual licensees.

4 And we do know that, for example, for
5 Category 3 sources, one of the groups that would be
6 affected by such a change, if we did do one, would be
7 high-dose afterloaders.

8 And those exchanges are strictly done
9 between the manufacturer and the customer, whereas
10 another group that's maybe impacted by Cat 3 are well
11 loggers; you know, generally they're done between the
12 manufacturer and the end user. There is a number of
13 exchanges that happen from licensee to licensee, so
14 that's one thing we're just trying to get input on, is
15 to make it easier for the end user.

16 One potential thing that we've thought of
17 and we're asking for your input on is, you know, to
18 make it easier for the transfers, would it be easier
19 just to have the manufacturers do it? So put the
20 burden on them, versus having, you know, both end
21 users and the manufacturers do it. So if you have any
22 feedback on that, we would appreciate it.

23 MR. O'DONEL: I agree with the question or
24 the statement, and that would lessen the burden on the
25 licensees. Rob O'Donel, Suntrac Services.

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1 MR. SMITH: Try this one.

2 MR. TORRES: My name's Gamaliel Torres,
3 and I'm with NSSI here in Houston, Texas. So first a
4 question and then a comment, please.

5 So can we define the manufacturer more
6 clearly, please? You know, we -- for example, if a
7 company is a manufacturer and a distributor but not
8 necessarily the manufacturer and distributor on the
9 sealed source device registry for that source, would
10 that still fall in this category?

11 MR. WHITE: This is Duncan White, NRC. We
12 hadn't gone to that level to determine, you know,
13 what -- you know, when we thought about the question,
14 we didn't get to that level about distributor.

15 We're thinking from -- it goes from one
16 specific licensee to either the
17 manufacturer/distributor, whoever that may be, and
18 that is transferred directly to the customer.

19 I understand your point being that the
20 manufacturer and distributor may be a separate entity.
21 I understand that, but that's -- we appreciate that
22 comment and feedback.

23 MR. TORRES: Okay. Well, just to provide
24 a little bit more information without getting too
25 specific, about 40 to 50 percent of our business is --

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1 specifically is for storage and disposal of
2 radioactive material for a wide variety of customers.

3 And we are considered a manufacturer and
4 distributor on our license, but not specifically for
5 those sources.

6 But my other question -- then I'd like to
7 go ahead and answer and -- just answer the question
8 specifically and go ahead with the previous
9 commenters. I'm sorry. One more comment, actually.

10 So the burden will be placed on the
11 customer or on the manufacturer and distributor?

12 MR. WHITE: The intent of the question
13 would be that the burden would be placed on the
14 manufacturer and distributor.

15 MR. TORRES: Okay. Thank you. That's it.

16 MR. SMITH: Great. Thank you.

17 Robin, are there any indications of
18 questions on the phone line?

19 (No response.)

20 MR. SMITH: Robin, is the phone line
21 connected?

22 Stand by a minute. We're having problems
23 hearing the phone lines at this time, so we're going
24 to have to --

25 THE OPERATOR: We're here.

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1 MR. SMITH: Okay. Now, is this Tyler or
2 is this Robin.

3 THE OPERATOR: I've taken over. Would you
4 like to take a question?

5 MR. SMITH: Just stand by one second.
6 We're going to try to get the volume increased a
7 little on the phone line so we can make sure we
8 accurately capture your comments.

9 THE OPERATOR: Standing by.

10 MR. SMITH: Great. And also we do have a
11 comment here in the room.

12 Please state your name and your
13 organization.

14 MS. JIMENEZ: Sandra Jimenez, M.D.
15 Anderson Cancer Center.

16 So working in a medical facility, this
17 will be a big burden on the licensee, specifically for
18 the HDR sources. It would be probably more impactful
19 for the manufacturer or the vendor to handle this type
20 of work, since in most cases they are handling some
21 paperwork for shipping. It just seems like it would
22 go hand in hand.

23 MR. WHITE: Thank you for the comment.

24 MR. SMITH: Thank you.

25 Any indications of --

1 MS. EUSEBIO: No comments or questions on
2 the webinar.

3 MR. SMITH: Okay. We're going to stand by
4 for about five minutes to see if we can rectify the
5 issue with the phone lines, and then we'll start back.

6 (Pause.)

7 MR. SMITH: Everyone should be able to
8 hear me; we just can't hear you guys. If you go on
9 the website if you are not registered on the web, you
10 can register on the web, and you can submit your
11 questions or comments through the web.

12 We apologize for not being able to hear
13 you on the phone lines, but, again, if you cannot get
14 to the web, if you would like to make a comment, we'll
15 pause and then we'll try to get your comment.

16 And, again, if you cannot make a comment
17 today, you can send your comments in to the NRC, to
18 Cindy Bladey, Office of Administration, Mail Stop:
19 OWFN-12-H08, U.S. Nuclear Regulatory Commission,
20 Washington, DC 20555-0001. And, again, we ask you to
21 please indicate -- include the docket ID, NRC-2016-
22 0276 in the subject line for your submissions of any
23 comments.

24 Again, we apologize, but it doesn't appear
25 that we'll be able to fix the phone lines at this

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1 time, so we're going to try to use the webinar to
2 allow you to submit your questions.

3 If you cannot submit your questions to the
4 webinar, please indicate to the operator, Tyler, that
5 you do have a question, and we'll stop and we'll try
6 our best to get your comment.

7 MS. EUSEBIO: George, we have a question
8 on the webinar.

9 MR. SMITH: Okay.

10 MS. EUSEBIO: Or a comment. Sorry.

11 Okay. This is from Roland Backhaus:
12 Presumably this concession is designed to lessen the
13 license verification burden to licensees transferring
14 radioactive material to well known companies with
15 which the transferor has had regular dealing.

16 If so, should a smaller concession apply
17 to other well known companies with which the
18 transferor has had regular dealing but which might not
19 be a manufacturer or distributor?

20 As far putting the burden on the
21 manufacturer/distributor to be exclusively responsible
22 for the transactions, I would make the following
23 comment: I would be concerned that any inaccuracy
24 around accountability may then fall on the licensee
25 who, if not involved in the process, would not have

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1 any knowledge or recourse.

2 This sounds like a potential for the
3 licensee to be subject to possible enforcement for
4 lost/missing sources.

5 If there is going to be accountability and
6 a licensee is going to be held accountable, then the
7 licensee must be involved in all transactions.

8 MR. SMITH: Great. Thank you.

9 Any additional comments in the room?

10 (No response.)

11 MR. SMITH: Okay. We're going to move on
12 to question number 4. Question number 4: Is there
13 anything else we should consider when evaluating
14 different methods of license verification prior to
15 transferring Category 3 quantities of radioactive
16 material?

17 Any comments here in the room?

18 (No response.)

19 MR. SMITH: And those on the phone line,
20 again we apologize, but if you have any comments,
21 please provide those comments through the webinar, and
22 we will capture those comments.

23 And we'll give it a couple of seconds,
24 just to make sure you guys have an opportunity to
25 provide your comments.

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1 Tyler also will definitely stand by. If
2 anyone indicates that they do have a comment, please
3 let us know.

4 There's a comment?

5 MS. EUSEBIO: Yes. I have a comment.

6 This is from Rick Jacobi: I want to be
7 sure I understand this proposal. If a licensee ships
8 individual devices containing, for example, a single
9 500-millicurie cesium-137 source, then that licensee
10 is not required to report the shipment in the National
11 Source Tracking System.

12 But if that licensee is warehousing a
13 dozen of these devices for an aggregate of 5 curies,
14 then that licensee would be required to implement a
15 physical security system.

16 MR. SMITH: Okay. Thank you for the
17 comment.

18 Any comments here in the room?

19 MR. WHITE: Yeah. This is Duncan. I just
20 had a comment on the question that was asked. The
21 individual -- Rick indicated that we had to implement
22 physical security requirements. That is not the case.

23 For Category 3 we're not requiring
24 implementation of physical security requirements.
25 Physical security requirements are explained in Part

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1 37, and this only applies to Category 1 and 2
2 quantities.

3 We do have a question later on in the Q&A
4 session here that asks about should we apply Category
5 3 quantities to Part 37 physical security
6 requirements. When we get to there, we'll certainly
7 ask for everyone's input on that.

8 But to answer Rick's question, we would
9 not require physical security requirements for the
10 scenario he presented.

11 MR. SMITH: Okay. Great. Thanks.

12 Any additional comments on the webinar?

13 MS. EUSEBIO: No more comments on the
14 webinar.

15 MR. SMITH: Okay. Thank you.

16 Any additional comments here in the room?

17 (No response.)

18 MR. SMITH: And, again, Tyler, if there's
19 anyone indicating that they do have a question on the
20 phone line, we'll try to entertain that question, but
21 the best method would be the webinar.

22 THE OPERATOR: [inaudible].

23 MR. SMITH: Tyler, can you repeat your
24 comment?

25 THE OPERATOR: Yes. We have Carrie

1 Crawford.

2 MS. CRAWFORD: Can you hear me?

3 MR. SMITH: Yes, Carrie. We can hear you.

4 MS. CRAWFORD: Okay. Well, I have a
5 comment.

6 MR. SMITH: Okay. Go ahead, Carrie.

7 MS. CRAWFORD: This comment is from Jerry
8 Sullivan: After analyzing the reports, it appears
9 that there is an issue with the license vetting and
10 not security of the Category 3 business sites. That
11 is the issue that should be addressed.

12 Personally I am in full support of
13 increasing the application requirements for Category
14 3 sources. The KDHE is very diligent in vetting
15 process and working closely with the licensee to
16 ensure safety and adequate security for these minimal-
17 source user/owners.

18 By them saying Category 3 and forcing
19 those to a Category 2 license, you will only eliminate
20 small businesses who cannot afford the additional
21 financial burdens of extra security.

22 A Category 2 license appears to only have
23 additional security requirements and still does not
24 address the issue of the [inaudible] requirement.

25 That's the comment.

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1 MR. SMITH: Okay. Thank you, Carrie.

2 There's only one thing I heard in there.

3 You said something about eliminating Category 3.

4 That's not the case.

5 Is that right, Duncan?

6 MR. WHITE: That's correct. We're not
7 eliminating Category 3. Again, what we're
8 contemplating here and getting input on is should we
9 expand the requirement for source tracking and source
10 security for Category 3 sources, not trying to force
11 people into Category 2. That's not what we're doing.
12 We're looking to enhance Category 3 compared to what
13 we do now.

14 MR. SMITH: Okay. Thank you.

15 I'm going to read -- on question 4, would
16 there be an increase in safety and security in the
17 regulations -- I'm sorry -- if the regulations were
18 changed to include Category 3 sources in the NSTS? If
19 so, how much of an increase would there be?

20 Any comments here in the room?

21 (No response.)

22 MR. SMITH: Also -- I am not the slide
23 guy.

24 Also, Duncan, I think we've had quite a
25 few comments on that also.

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1 (Pause.)

2 MR. SMITH: Okay. So we're on question 1.

3 So should Category 3 sources be included
4 in the NSTS? Please provide a rationale for your
5 answer.

6 Any comments here in the room?

7 (No response.)

8 MR. SMITH: Any comments on the web?

9 MS. EUSEBIO: Yes. I have one from Carrie
10 Crawford: After analyzing the reports, it appears
11 that there is an issue with the license vetting and
12 not security of the Category 3 business sites. That
13 is the issue that should be addressed.

14 Personally I am in full support of
15 increasing the application requirements for Category
16 3 sources. The KDHE is very diligent in vetting
17 process and working closely with the licensee to
18 ensure safety and adequate security for these minimal-
19 source user/owners.

20 MR. SMITH: Okay. That's the same
21 comment.

22 MR. WHITE: Yeah. Thank you for the
23 comment.

24 MR. SMITH: Right. Any comments here in
25 the room?

1 (No response.)

2 MR. SMITH: Hey, Tyler, again, if there's
3 anyone indicating that they could not get on the
4 webinar, so they'd like to make a comment, we'll try
5 to receive that over the phone line.

6 THE OPERATOR: Okay. [inaudible]

7 MR. SMITH: Stand by, Tyler. If you can
8 repeat your comment?

9 THE OPERATOR: Yes. We have Roland
10 Backhaus.

11 MR. BACKHAUS: This is Roland. How many
12 Category 3 sources are currently regulated by either
13 NRC or the agreement states?

14 MR. WHITE: This is Duncan White from the
15 NRC. We don't have an exact number of Category 3
16 sources. We think there -- we estimate there's
17 approximately 3600 licensees under NRC and agreement
18 state jurisdiction that have -- possess Category 3
19 quantities or are authorized to possess Category 3
20 quantities.

21 This is in addition to the 1400 licensees
22 that are authorized to possess Category 1 and 2
23 quantities of material.

24 As for the number of sources, we're really
25 not sure how many that number is, but certainly it's

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1 greater than 3600, obviously, because some of them
2 would have multiple -- more than one source per
3 license, obviously.

4 MR. SMITH: Okay. Thank you.

5 Tyler, are there any other indications of
6 comments on the phone line?

7 THE OPERATOR: No further comments on the
8 phone line.

9 MR. TORRES: I'd like to make a quick
10 comment on this, just to answer -- this is Gamaliel
11 Torres again, with NSSI.

12 At least in our experiences with the NSTS,
13 we've found that there's a lot of back and forth to
14 correct the inventory. And so if we're adding a
15 multitude of more sources, we just think that's going
16 to multiply, and so, yes, that's our rationale for our
17 answer to decline on that.

18 MR. WHITE: So just as a follow-up
19 question, has this been your experience from Category
20 1 and 2 sources?

21 MR. TORRES: That is correct, because --
22 especially since we're not the only ones inputting,
23 you know, the information there. DOE or other people
24 are going into our inventory.

25 MR. WHITE: Thank you.

1 MR. TORRES: Thank you.

2 MR. SMITH: Thank you. Any questions or
3 comments on the webinar?

4 MS. EUSEBIO: Yes. From William
5 Laurenson: They should not be included. No
6 justification on how this would improve security. No
7 history of issues regarding licensee accountability;
8 large financial burden on licensee.

9 MR. WHITE: Thank you for the comment.

10 MR. SMITH: Great. Thank you.

11 Any additional comments here in the room?

12 (No response.)

13 MR. SMITH: Tyler, are there indications
14 of comments on the phone line?

15 THE OPERATOR: No questions from the phone
16 line.

17 MR. SMITH: Great. Thank you.

18 So we're going to move on to question
19 number 2: If Category 3 sources are included in the
20 NSTS, should the NRC consider opposing the same
21 reporting requirements currently required for Category
22 1 and 2 sources?

23 And those requirements are under 10 CFR
24 20.2207(f).

25 Again, as you can see on the slides, we've

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1 included a summary of the NSTS reporting requirements
2 in 10 CFR 10.2207(f), which was mentioned on the
3 earlier NSTS slides.

4 Any comments here in the room?

5 (No response.)

6 MR. SMITH: Any comments on the web?

7 MS. EUSEBIO: No comments on the webinar.

8 MR. SMITH: Okay. Tyler, any indications
9 of comments on the phone line?

10 THE OPERATOR: No questions from the
11 phone.

12 MR. SMITH: Okay. Thank you.

13 As a reminder, this meeting is being
14 transcribed. I just want to let you know that.

15 So we'll wait a few seconds.

16 (Pause.)

17 MR. SMITH: Okay. We're going to move on
18 to slide 18. Okay. Question number 3: Should the
19 NRC consider alternatives to the current NSTS
20 reporting requirements for Category 1 and 2 sources to
21 increase the immediacy of information availability,
22 such as requiring the source transfer to be reported
23 prior to or on the same day as the source shipment
24 date?

25 Any comments here in the room?

1 (No response.)

2 MR. SMITH: Any clarifying comments, Irene
3 or Duncan?

4 (No response.)

5 MR. SMITH: No?

6 MR. WHITE: No.

7 MR. SMITH: Okay. Great. Thanks.

8 Any indications of comments on the web?

9 MS. EUSEBIO: No comments on the webinar.

10 MR. SMITH: Okay. Thank you.

11 Tyler, any comments on the phone line?

12 THE OPERATOR: We do. We have one
13 question from Rick. Go ahead, Rick.

14 MR. JACOBI: I have one quick question.
15 For general licensees, if the distributor distributes
16 a device to a general licensee, it is required to
17 report that distribution on a quarterly basis on Form
18 653 or equivalent.

19 So this new distribution or tracking
20 system -- reporting system would simply require them
21 to do that more frequently? Is that -- or additional
22 reporting, twice as often 653 form?

23 MR. WHITE: This is Duncan White.
24 Currently Category 3 general license devices are
25 not -- would not -- are exempt from most regulations,

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1 and we have received comments -- the question from the
2 individual was with regard to Category 3 generally
3 licensed devices, there is a reporting requirement
4 that the manufacturer report this on a quarterly basis
5 to the NRC or to the agreement state and also to the
6 agency where the source is going.

7 And the question was about reporting this
8 and how this would be affected by reporting this to
9 NSTS.

10 Currently Category 3 -- any generally
11 licensed device is exempt from most NRC regulations.
12 There's very few requirements. Just to point out, we
13 have received comments in other webinars and public
14 meetings about Category 3 sources and the need to
15 address them just like specifically licensed sources.

16 So in response to your question, we would
17 have to consider that in our evaluation.

18 MR. SMITH: Okay. Thank you.

19 Any comments -- further comments here in
20 the room?

21 (No response.)

22 MR. SMITH: Any indication of comments on
23 the webinar?

24 MS. EUSEBIO: No comments on the webinar.

25 MR. SMITH: Okay. Thank you.

1 Tyler, any additional comments on the
2 phone line?

3 THE OPERATOR: No further comments on the
4 phone line.

5 MR. SMITH: Okay. Thank you. So we'll go
6 on to question number 4: Would there be an increase
7 in safety and/or security if the regulations were
8 changed to include Category 3 sources in the NSTS? If
9 so, how much of an increase would there be?

10 Any comments here in the room?

11 (No response.)

12 MR. SMITH: Any comments on the web?

13 MS. EUSEBIO: No comments on the webinar.

14 MR. SMITH: Okay. Tyler, any indications
15 of comments on the phone line?

16 THE OPERATOR: Yes.

17 MR. BACKHAUS: Thank you. I want to
18 suggest to the panel or to the phone folks that it
19 might be that someone would have a follow-up question
20 based on responses from the NRC. So if you would, if
21 you'd please just ask if you have a follow-up, I could
22 imagine that someone would have a follow-up question
23 to Duncan's last answer, but I don't want to put words
24 into his mouth.

25 MR. SMITH: Oh, absolutely. Again, if

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1 anyone have any follow-up questions, please indicate
2 that you have a follow-up question, and we will make
3 sure we'll be cognizant of that, to make sure we allow
4 you follow-up questions.

5 And just as a reminder, also, if there are
6 any questions that you have follow-up questions on
7 that we've already covered, you're welcome to revisit
8 that question and to provide us comments at any time.

9 So, again, if you have any follow-up
10 questions, please indicate it. We have a couple of
11 hours for this, that we've allotted for this meeting,
12 and we have a couple more for the second meeting.

13 So thank you for that comment, and so
14 we're going to move on. So indicate to Tyler if you
15 have a follow-up question.

16 So I think we have a question here on --
17 comment or question on the web.

18 MS. EUSEBIO: This is from Sylvia Revel:
19 How would you propose to capture that information?

20 MR. SMITH: Did it clarify which
21 information?

22 MR. WHITE: The question I would have for
23 the individual, is that mean general license devices?
24 We'll wait a second and see if they respond back.

25 MR. SMITH: Okay. So if you can, respond

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1 back on the web.

2 (Pause.)

3 MR. SMITH: While we are waiting, are
4 there any comments here in the room?

5 (No response.)

6 MR. SMITH: Tyler, is there anyone
7 indicating that they have a comment on the phone line?

8 THE OPERATOR: Yes.

9 MR. BACKHAUS: Thank you. I have a quick
10 follow-up question on question 1 and a follow-up
11 question for the one that Rick had just asked.

12 And that is if a specific licensee, for
13 example, is transferring Category 4 quantity material
14 to someone who has a -- that's only generally
15 licensed, how can that specific licensee, through the
16 license verification or otherwise, know how much
17 material that transfer had?

18 MR. SMITH: Okay. And also, Roland,
19 before I respond, what is your full name, and are you
20 representing any organization?

21 MR. BACKHAUS: I'm with Pillsbury.

22 MR. SMITH: Okay. Great. Thanks.

23 MR. WHITE: The individual asked a
24 question about if a -- someone was transferring a
25 Category 4 source to a general licensee, how would

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1 they verify the information of what amount of material
2 or the -- physically verify any information about the
3 general licensee.

4 Just a couple of clarifications. The only
5 way a general licensee could get a source per the
6 regulations is it has to be transferred from a
7 manufacturer to the general licensee, and as someone
8 pointed out earlier, that transfer is reported
9 quarterly to the regulatory agencies involved.

10 Technically you're not allowed to do that
11 transfer unless it's a manufacturer to a general
12 licensee. So that wouldn't be, technically, a legal
13 transfer. But for a -- and one of the issues with
14 general licensees, you know, regardless of category,
15 you know, 3 through 5, again, is they are -- the
16 requirement for a -- for someone to possess generally
17 licensed Category 3 sources are pretty minimal,
18 because they're receiving material that is almost
19 always in a device. The device has certain security
20 enhancements that allow someone to use it with minimal
21 or no safety training. That's really the benefits of
22 having a generally licensed device.

23 Then again, those -- the general licensee
24 concept goes back several decades, and again, in the
25 security stuff that we were talking about today,

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1 license verification, source accountability, it's
2 relatively -- it's what we've been doing for the last
3 10 years or so.

4 So again, the general license system was
5 not designed and the regulations are not in place to
6 handle license verification of things that we are
7 talking about today.

8 So if we want to go forward with generally
9 licensed devices, we would have to modify how we look
10 at them to, you know, treat a Category 3 generally
11 licensed device the same way we treat a Category 3
12 specifically licensed device. We could put them in
13 the same -- again, there's the same risk involved with
14 either -- it doesn't matter if it's a general license
15 or specific license; same risk involved with them.

16 We'd have to make changes to treat them in
17 the same way, again, if we make -- again, getting the
18 input -- this is why we're asking for input, because,
19 again, this is good input we're getting on how do we
20 handle, you know, generally licensed devices, and you
21 have to consider that. We appreciate the comment.

22 MR. SMITH: Great. Thank you.

23 Any follow-up comment on that?

24 (No response.)

25 MR. SMITH: Any comments on the web?

1 MS. EUSEBIO: No comments on the webinar.

2 MR. SMITH: Okay. Tyler, any indication
3 of additional comments on the phone line?

4 THE OPERATOR: No additional comments
5 here.

6 MR. SMITH: Okay. Are there any comments
7 here in the room?

8 (No response.)

9 MR. SMITH: Okay. I'm going to question
10 number 5. Hey, and also, as a reminder, you know, if
11 we have gone over any questions that you'd like to
12 make comments on, please provide those comments. We
13 welcome any comments on any of the questions that
14 we've covered today, at any time during this meeting.

15 So question number 5: Is there anything
16 else we should consider as part of our evaluation of
17 including Category 3 sources in the NSTS?

18 Tyler, is there any indications of
19 comments on the phone line?

20 THE OPERATOR: No comments on the phone.

21 MR. SMITH: Any comments on the web?

22 MS. EUSEBIO: No comments on the web.

23 MR. SMITH: Okay. Thank you.

24 Any comments here in the room?

25 (No response.)

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1 MR. SMITH: Are there any additional --

2 MR. WHITE: This is Duncan White. One of
3 the things that we heard at other webinars and public
4 meetings is, as an alternative, a couple of people
5 proposed that we -- that the Category 3 licensee would
6 report their inventory at some frequency, say,
7 semiannual or annually to the NRC or to the agreement
8 state, in lieu of doing NSTS.

9 Again, that was something that was offered
10 up by a couple of commenters, so if anyone in the room
11 or on the phone or on the web have any feedback on
12 that, we'd like to hear that, too.

13 MR. SMITH: Great. Thank you.

14 Any comments here in the room?

15 (No response.)

16 MR. SMITH: Tyler, any additional comments
17 there on the phone line?

18 THE OPERATOR: No questions on the phone.

19 MR. SMITH: Any indications of comments on
20 the web?

21 MS. EUSEBIO: No comments on the webinar.

22 MR. SMITH: Okay. So we'll give it a
23 couple of seconds, just to make sure those who make
24 comments on the web have an opportunity to present
25 those comments.

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1 And, again, if you're on the phone line,
2 if you can log into the web and state questions
3 through the web, that would be great. We can hear you
4 on the phone lines, but we're having to go back and
5 forth to try to listen to the speakers, and we
6 apologize for that.

7 And if you can't log into the web, that's
8 perfectly fine. We'll get your question through the
9 phone.

10 Okay. We're going to move on to slide
11 number 19, for question number 1. Now, these are
12 specific questions for licensees, related to license
13 verification per the FRN.

14 However, we welcome all stakeholders'
15 comments. We like to hear all perspectives related to
16 that questions. So if you're not a licensee, that's
17 fine. Any comment that you may have, we welcome those
18 comments, both here in the room, the phone line, or on
19 the webinar.

20 So question number 1: It currently takes
21 approximately one month to get credentialed to access
22 LVS. If you currently do not have online access to
23 LVS and NRC establishes new requirements for license
24 verification involving Category 3 quantities of
25 radioactive material, will you be inclined to sign up

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1 for online access, or would you use alternative
2 methods for license verification, such as emailing the
3 NRC Form 749, which is the manual license verification
4 report, to the LVS help desk, or call the license
5 issuing regulatory authority directly?

6 Are there any comments here in the room?

7 (No response.)

8 MR. SMITH: Any indication of comments on
9 the web?

10 MS. EUSEBIO: No comments on the webinar.

11 MR. SMITH: Okay. Thank you.

12 Tyler, any indications of comments on the
13 phone line?

14 THE OPERATOR: No comments on the phone
15 line.

16 MR. SMITH: Okay. Thank you. We'll give
17 it a couple of seconds.

18 MR. WHITE: This is Duncan White again.
19 Some feedback we received at other webinars and public
20 meetings was people who would use it infrequently,
21 say, someone who would do like one transfer a year,
22 they would probably use the help desk and not do it
23 electronically.

24 Or a couple of people indicated they would
25 have to do -- if they could do it more often, they

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1 would probably do it electronically because, again, it
2 would be easier to do it that way.

3 That's the kind of feedback we've been
4 getting so far.

5 MR. SMITH: Thank you, Duncan.

6 Again, we'll give it a couple of seconds,
7 and we'll move on to the next question if there's no
8 other comments for question number 1.

9 (Pause.)

10 MR. SMITH: Tyler, any indications of
11 questions on the phone -- comments?

12 THE OPERATOR: Still no questions on the
13 phone.

14 MR. SMITH: Any comments on the web?

15 MS. EUSEBIO: No comments on the webinar.

16 MR. SMITH: Okay. Thank you.

17 Any additional comments here in the room?

18 (No response.)

19 MR. SMITH: Okay. So we're going to move
20 on to the second question. So question number 2 on
21 slide 20: Approximately how many transfers involving
22 Category 3 quantities of radioactive material do you
23 do monthly? What percentage involve transfers
24 directly to/from a manufacturer?

25 Again, for this question we welcome all

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1 comments from all stakeholders. We like to get all
2 perspectives on these questions, so please provide
3 your comments if you're a licensee or not.

4 Any comments here in the room?

5 (No response.)

6 MR. SMITH: Any indications of comments on
7 the web?

8 MS. EUSEBIO: No comments on the webinar.

9 MR. SMITH: Okay.

10 Tyler, any comments on the phone line?

11 THE OPERATOR: Yes, we have Roland.

12 MR. BACKHAUS: Hi. I just had a comment
13 related on what Duncan referred to as previous
14 comments that the NRC has received related to a more
15 lenient reporting period for Category 3 transfers.

16 And I'd like to suggest that if tracking
17 Category 3 is important, the NRC ought to track
18 Category 3. And if it's not important, then the NRC
19 ought to stop tracking Category 3.

20 But it seems to me that a problem is
21 introduced by having a lenient reporting period during
22 which additional transfers could be made against the
23 license. In the long run I'm not sure of the
24 benefits.

25 MR. SMITH: Any comments on that, Duncan?

1 MR. WHITE: Yeah. The individual
2 indicated that if NRC thinks it's important to track
3 Category 3 at any level, even in a more lenient way,
4 we should just do it -- not do it that way; either do
5 it or not do it, you know. Do it the way we would do
6 other ones or not do it at all. And that's basically
7 what the individual was saying.

8 Again, we appreciate the feedback on that.
9 Again, that was -- we were looking for other ways of
10 trying to capture and track what's out there with
11 Category 3 sources, and that's really what the intent
12 of the question was, so I appreciate the feedback on
13 that one.

14 MR. SMITH: Okay. Thank you.

15 And, Roland, if you have any additional or
16 any follow-up comments, we'd entertain them at this
17 point.

18 MR. BACKHAUS: No, that's it. Thank you.

19 MR. SMITH: Okay. Thank you.

20 MS. EUSEBIO: I have a comment.

21 MR. SMITH: Any comments on the webinar?

22 MS. EUSEBIO: Yes. I have one from Rick
23 Jacobi: Generally I think the LVS would be an
24 improvement in the license verification process. I
25 don't see any downside to implementing it as a

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1 requirement.

2 MS. WU: Thank you for the comment.

3 MR. SMITH: Okay. We do have a comment
4 here in the room?

5 MR. RINCON: Yes. Carlos Rincon with
6 NSSI. On number 2, on the quantities for the monthly,
7 it could be anywhere -- pertaining to our company,
8 could be anywhere from 10 to 30 items going or coming
9 into our facility, and it would be from licensee to
10 licensee; it wouldn't be to a manufacturer.

11 MR. WHITE: Thank you for the feedback.
12 We appreciate it.

13 MR. SMITH: All right. Thank you.

14 Tyler, any additional comments on the
15 phone line?

16 THE OPERATOR: No.

17 MR. SMITH: Great. Thanks.

18 If there are no additional comments, then
19 we'll go on to question number 3. And, again, if you
20 have any additional comments on any of the questions
21 that we have covered, we welcome those comments at any
22 time.

23 So question number 3: Should license
24 verification be required when transferring to an
25 established manufacturer?

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1 Any comments here in the room?

2 (No response.)

3 MR. WHITE: This is Duncan White. Earlier
4 during this webinar and meeting, a couple of people
5 did allude to the fact that if someone -- if we know
6 someone is an established manufacturer, that should be
7 good enough. I think someone -- people did make that
8 comment.

9 So this question does get to that, but if
10 we get any additional feedback on that, again, it
11 would be appreciated.

12 MR. SMITH: Great.

13 Tyler, any additional comments on the
14 phone line?

15 THE OPERATOR: No additional comments on
16 the phone.

17 MR. SMITH: Any indication on comments on
18 the web?

19 MS. EUSEBIO: No comments on the web.

20 MR. SMITH: Okay. Thank you.

21 We'll wait a couple of seconds.

22 (Pause.)

23 MR. SMITH: Okay. We'll go on to question
24 number 4: Do you have online access to LVS? If so,
25 have you experienced any issues with LVS? Do you have

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1 any recommendations on how to improve LVS?

2 Any comments here in the room?

3 (No response.)

4 MR. SMITH: Do we have anyone here in the
5 room that use LVS?

6 (No response.)

7 MR. SMITH: No?

8 MR. TORRES: Rarely.

9 MR. SMITH: Tyler, any indications of
10 comments on the phone?

11 THE OPERATOR: No comments on the phone.

12 MR. SMITH: Okay. Thank you.

13 Any comments on the web?

14 MS. EUSEBIO: No comments on the web.

15 MR. WHITE: This is Duncan White. In
16 trying to -- I'm trying to recall if we had any
17 feedback from other -- at other webinars and public
18 meetings about LVS or not, and I don't recall anything
19 specific that came up.

20 MR. SMITH: Okay. Irene has a question.

21 MS. WU: This is Irene Wu, NRC. I do
22 recall it wasn't feedback on LVS per se, but it -- we
23 did get some feedback on the time frame in which you
24 have to perform the license verification, so we did
25 have several people give us feedback, asking for a

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1 specific time frame ahead of the transfer and when it
2 needed to be done.

3 MR. SMITH: Now, because you do not use
4 LVS frequently, you wouldn't understand how Category
5 3 would affect that as far as having online access to
6 it?

7 MR. TORRES: Gamaliel Torres with NSSI.
8 In regards to your question, we've only used LVS when
9 we've made large shipments to a disposal site, with
10 WCS, but setting the limits to Category 3 threshold
11 would require us to use it at a definitely much more
12 frequent interval.

13 MR. SMITH: Okay. Great.

14 MR. TORRES: It would definitely require
15 us to use it much more frequently between -- almost on
16 a daily basis between our customers.

17 MR. WHITE: Don't run away. What's your
18 experience been with LVS when you have used it? Do
19 you have any comments?

20 MR. TORRES: We did the paper way the
21 first time last year. Nothing online yet. But we're
22 approved with the NSTS; we have our PIN and token, so
23 it would just be an extra permission to request --

24 MR. WHITE: Right.

25 MR. TORRES: So we would go the online

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1 way.

2 MR. WHITE: Thanks.

3 MR. TORRES: Thank you.

4 MR. SMITH: Great. Thank you very much.

5 Tyler, any indications of additional
6 comments on the phone line?

7 THE OPERATOR: No comments on the phone.

8 MR. SMITH: Again, if you are on the phone
9 line or if you're on the web, we would like to hear
10 your experiences with LVS. And I think we've gotten
11 that feedback before that some used the paper as
12 opposed to online access.

13 So -- and that's interesting also, that if
14 Category 3 were -- if you were to use online access
15 for Category 3, how would that affect your
16 organization? That's the type feedback we're looking
17 for.

18 So if you're on a phone line or if you're
19 on the web, please provide that feedback. And we'll
20 give it a couple of seconds.

21 (Pause.)

22 MR. SMITH: Okay. We're going to move on
23 to slide 21, question 1 -- so, again, these questions
24 are specific for licensees related to the NSTS per the
25 FRN. However, we do welcome all comments, if you're

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1 licensees or not, if you're a licensee or not. We
2 would like all perspectives on these questions, so
3 please provide some comments if you have a point of
4 view you'd like for us to capture.

5 So question number 1: It currently takes
6 approximately one month to get credentialed to access
7 NSTS. If you currently do not have online access to
8 NSTS and NRC establishes new requirements for the
9 tracking of Category 3 sources in the NSTS, would you
10 be inclined to sign up for online access or would you
11 use alternative methods for NSTS reporting, such as
12 emailing or faxing the NRC Form 748, National Source
13 Transaction Report, to the NSTS help desk?

14 Because it's a lot of information, Irene
15 or Duncan, could you guys provide any sort of
16 specifics that -- to complement this question?

17 MS. WU: Okay. Irene Wu, NRC. So this
18 question is really driving at, you know, the number of
19 transactions that you do. So, again, a reminder that
20 transactions here are manufacturing sources, importing
21 sources, transferring, receiving, exporting,
22 disposing, or disassembling of sources.

23 So different than license verification,
24 which is, again, just done prior to the transfer,
25 reporting to the NSTS Category 1 and 2 sources, is

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1 done for all of those transactions by close of
2 business the following day.

3 So based on your volume of transactions,
4 that's usually what dictates whether people want to
5 sign up for the online and direct method of reporting
6 to NSTS or by using the paper, emailing, faxing of the
7 Form 748.

8 MR. SMITH: Thank you, Irene.

9 Any additional comments here in the room?

10 (No response.)

11 MR. SMITH: Tyler, any additional comments
12 on the phone line?

13 THE OPERATOR: Yes. We have Rick Jacobi.

14 MR. JACOBI: This is difficult for me. I
15 have questions -- a comment; I think it's a question,
16 and it also relates to the question 1 here. I just --
17 it seems to me that anytime I can do something
18 electronically, it's much easier and much more
19 efficient for me.

20 And the questions you have about do people
21 prefer to do it by email or fax or postal service, I'm
22 just curious, is NRC pushing back going to electronic
23 reporting? It seems to me the prudent thing.

24 MR. WHITE: Rick was asking why we're
25 asking this question: Is NRC -- basically his

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1 question gets to the part of the fact that, you know,
2 what's our experience? Do people want to do paper
3 because they don't want to sign up? Rick thinks if
4 you sign up for it, it will be easier.

5 Just to give a little background on what
6 this question also -- where this comes from, when NRC
7 first started using NSTS, there was -- we did offer a
8 online version, but there was some issues and problems
9 with it, and we had to overcome them.

10 And, again, with Category 1 and 2
11 quantities of material, there was a certain -- there
12 was, you know, a -- for everyone there was a learning
13 curve involved with doing that; you know, how to make
14 the system work better, and we worked through some
15 stuff, you know, on the NRC side and certainly with
16 the licensees.

17 Again, people who had large numbers of
18 transfers were pushing against, you know, to do this
19 electronically as best and easy as possible.

20 And the reason for asking the question
21 here regarding the Category 3 is, again, the number of
22 Category 3 licensees, if we go forward and implement
23 this and put -- and change the rules that do this.

24 We're basically tripling -- nearly
25 tripling the number of licensees that would have to do

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1 this, so it would be quite a -- a lot of people would
2 have to possibly do this.

3 Some people may already do it for other
4 things and would just continue doing it, but some
5 people -- like for people who maybe just have HDRs
6 only or only well loggers, they would never have done
7 this before, and there may be, again, a learning
8 curve.

9 So we're certainly looking for feedback
10 along those lines of how people would do this. And
11 again, we ask these questions from a perspective of
12 what we went through in 2009, 2010, you know,
13 learning.

14 MS. WU: This is Irene Wu with the NRC.
15 I'll also add, a big part of what we're going to be
16 doing is doing a cost-benefit analysis, and so the
17 feedback we get here, if people are telling us that
18 more people will be doing -- more inclined to do
19 emails and faxes versus direct online reporting, that
20 helps us estimate costs for NRC in terms of the
21 contractor support to upload that information into
22 NSTS and provide user support.

23 MR. SMITH: Rick, are you still there?

24 MR. JACOBI: Yeah, I'm here.

25 MR. SMITH: Now, do you have any

1 experiences yourself with the NSTS that you'd like to
2 share?

3 MR. JACOBI: Not specifically with NSTS,
4 but, you know, when you transfer specifically licensed
5 material to another person, you know, you have to
6 verify that they're licensed to receive it, you know,
7 early on.

8 You know, if there was a database, an
9 electronic system, it just seems to me that would be
10 much more efficient and much more reliable. And I'm
11 just having trouble myself understanding why anyone
12 would object to doing it electronically.

13 MR. SMITH: You know, I think I've heard
14 some comments in the past that with the amount of
15 transactions, some choose not to use the electronic
16 process. I don't know if anyone here in the room have
17 that experience. That may be the case.

18 MR. TORRES: Hello. Gamaliel Torres of
19 NSSI. Mine may be more of a question than a
20 statement. It seems it's easy to verify your
21 inventory if it doesn't change, online, super simple.
22 But if you do have changes -- and people were doing it
23 incorrectly, but if you do have -- if your inventory
24 does change from year to year, you know, in Category
25 1, Category 2, you still have to print it out, and you

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1 still have to submit the changes, you know, of the
2 other means, not necessarily online.

3 So it seems to me if somebody who has a
4 large number of transactions, online is not the most
5 conducive way to submit those changes or track those
6 changes.

7 MR. SMITH: Okay. Great. Good comment.

8 Any additional follow-up, Rick?

9 MR. JACOBI: No. Thank you very much.

10 MR. SMITH: Okay. Thank you.

11 I think we do have a comment on the web.

12 MS. EUSEBIO: This is from John Hageman:
13 Question 2, for transfer or disposal of multiple
14 sources, the process should be expedited by using a
15 batch-entering method.

16 MR. SMITH: Okay. Thank you for the
17 comment.

18 MS. JIMENEZ: Hi. Sandra Jimenez from
19 M.D. Anderson. This is just a comment.

20 MR. SMITH: Okay. Great.

21 MS. JIMENEZ: So I've used the NSTS for
22 annual verification, but yet there's still the option
23 to use the email or the fax. And I tend to just go
24 with the email, even though I've gone online, you
25 know, and submitted that way. But I tend to still

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1 want to go to the email, for some reason, I don't
2 know.

3 So maybe it's just because the option is
4 still there and people are more comfortable with using
5 the email option. It's just an easier route.

6 MR. SMITH: Okay. Thank you very much.

7 Any additional comments on the telephone
8 line?

9 THE OPERATOR: Go ahead. The line's open.

10 MR. BACKHAUS: Thank you. I'd like to
11 just offer that one of the unintended consequences of
12 tripling the number of your potential -- probably
13 greatly increasing your number of transactions which
14 would be recorded and interactions to LVS is that it
15 might that some of the companies that are doing this
16 national report or otherwise doing more verification,
17 and it might be that where now one or two people might
18 be responsible for doing those checks, we'll call it,
19 if the volume increases significantly, there might be
20 that the companies, you know, apply to get more
21 credentialed people.

22 And I think there's no limit of the number
23 of credentialed individuals per company, and so it
24 might be that rather than improve the accountability
25 and security, it could be that the sheer number of

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1 folks that are involved in the process within the
2 companies that do these transactions might
3 inadvertently muddy the waters, might create
4 difficulties, cause problems.

5 I offer that as an observation related to
6 tripling the number, you know, probably drastically
7 increasing the number of interactions with the system.

8 MR. SMITH: Thank you. Really appreciate
9 your comments there, Roland.

10 Any additional comments here in the room?

11 (No response.)

12 MR. SMITH: Are there any follow-up
13 questions on the telephone phone line there, Tyler?

14 THE OPERATOR: No, sir. No questions.

15 MR. SMITH: Okay. Thank you.

16 Any additional comments or questions on
17 the web?

18 MS. EUSEBIO: No comments on the web.

19 MR. SMITH: Great. Thank you.

20 So we're going to go on to question number
21 2. So a couple of -- just want to make sure everyone
22 understands that any of the questions we have covered,
23 we can always go back and receive those comments. We
24 appreciate those comments. And also this meeting is
25 being transcribed.

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1 Also we'd like to remind you not to
2 provide any kind of specific information: facilities,
3 any safeguards information, any kind of classified
4 information with your comments.

5 So question number 2: Do you have online
6 access to NSTS? If so, have you experienced any
7 issues with NSTS? Do you have any recommendations on
8 how to improve NSTS?

9 Any comments here in the room?

10 (No response.)

11 MR. SMITH: It appeared that some
12 stakeholders feel that there's a little redundancies
13 there in the NSTS and in providing some of the
14 information by email, so maybe that should be
15 captured.

16 Any comments, Tyler, on the telephone
17 line?

18 THE OPERATOR: No questions.

19 MR. SMITH: Any comments on the web?

20 MS. EUSEBIO: No comments on the web.

21 MR. SMITH: Okay. We'll give it a couple
22 of seconds. Maybe some other folks are trying to give
23 comments on the web.

24 (Pause.)

25 MR. SMITH: Okay. We're going to move on

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1 to slide 22. So, again, these questions are specific
2 questions for agreement states related to license
3 verification per the *Federal Register* notice.

4 But, again, we like to emphasize the fact
5 that we would like to receive comments from all
6 stakeholders, any perspective that you may have. If
7 you're not an agreement state regulator, we would
8 still like to receive your comments if you have
9 perspective on the next set of questions.

10 So question number 1: Approximately how
11 many licenses do you authorize for Category 1, 2, and
12 3 quantities of radioactive material?

13 I think we do have some -- we've gotten
14 some feedback on that, Duncan and Irene?

15 MR. WHITE: Yeah. It varies from
16 agreement state to agreement state, from information
17 we have received. Again, some agreement states have
18 a larger number of industrial licensees or a large
19 number of medical licensees in their states, and their
20 numbers proportionate to the total number of licensees
21 they have would vary.

22 So one reason for asking this question is
23 because we recognize every agreement state's not the
24 same, there's not the same ratio. So this is why
25 we're asking for that feedback and input.

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1 MR. SMITH: Great.

2 Any comments here in the room?

3 (No response.)

4 MR. SMITH: Tyler, any additional comments
5 on the telephone line?

6 THE OPERATOR: (No response.)

7 MR. SMITH: Any comments on the web?

8 MS. EUSEBIO: No comments on the web.

9 MR. SMITH: Great. Thank you.

10 So we'll give it a couple of seconds.

11 (Pause.)

12 MR. SMITH: Okay. We'll go to question
13 number 2: If license verification through the LVS or
14 the transferee's license issuing authority is required
15 for transfers involving Category 3 quantities of
16 radioactive material, would you encourage the use of
17 LVS among your licensees or plan for additional burden
18 imposed by the manual license verification process?

19 Any comments here in the room?

20 (No response.)

21 MR. SMITH: Any clarifying remarks?

22 MR. WHITE: We received feedback from both
23 agreement states and from licensees that this would
24 obviously be an increased burden, and some -- a couple
25 of comments from licensees included that they felt

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1 they don't -- their agreement states was already
2 challenged by resources, and this is -- just imposes
3 more undue burden on the resources of the state.

4 MR. SMITH: Okay. Thank you.

5 Tyler, any additional comments on the
6 phone line?

7 THE OPERATOR: (No audible response.)

8 MR. SMITH: I'm sorry, Tyler. I didn't
9 hear your response.

10 THE OPERATOR: No questions from the phone
11 line.

12 MR. SMITH: Okay. Thank you.

13 Any additional comments on the web?

14 MS. EUSEBIO: No comments on the web.

15 MR. SMITH: Okay. Thank you.

16 We'll give it a couple of seconds.

17 (Pause.)

18 MR. SMITH: Okay. We're going to go to
19 slide 23, question number 3: So if license
20 verification through the LVS or the transferee's
21 license issuing authority is required for transfers
22 involving Category 3 quantities of radioactive
23 material, would you consider adopting the web-based
24 licensing, WBL, to ensure that the most up-to-date
25 licenses are available for license verification

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1 through the LVS or voluntarily provide your Category
2 3 licenses, similar to what some agreement states do
3 now for Category 1 and 2 licenses to be included in
4 WBL, or would you do neither and prefer licensees to
5 use the manual license verification process?

6 Any clarifying remarks on this?

7 MS. WU: This is Irene Wu, NRC. In
8 previous public meetings and webinars, we did get some
9 feedback from the states that they would voluntarily
10 provide their Category 3 licenses to be included in
11 WBL.

12 MR. SMITH: Thank you, Irene.

13 Any comments here in the room?

14 (No response.)

15 MR. SMITH: Okay. Thank you.

16 Tyler, any additional comments on the
17 telephone line?

18 THE OPERATOR: No comments from the phone.

19 MR. SMITH: Any comments on the web?

20 MS. EUSEBIO: No comments on the web.

21 MR. SMITH: Okay. Thank you.

22 We'll give it a couple of seconds.

23 (Pause.)

24 MR. SMITH: Okay. We're going to question
25 number 4. Again, these are specific questions for

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1 agreement states related to license verification per
2 the *Federal Register* notice, but we would like all
3 comments from any stakeholders, regardless if you're
4 agreement state, a regulator, or not.

5 Question 4: What would the impact in time
6 and resources be on your program to handle the
7 additional regulatory oversight needed for Category 3
8 licensees if license verification through the LVS or
9 the transferee's license-issuing authority was
10 required for transfers involving Category 3 quantities
11 of radioactive material?

12 Any agreement state stakeholders would
13 like to make any comments?

14 (No response.)

15 MR. SMITH: Put you on the spot.

16 Any other stakeholders in the room like to
17 make any comments?

18 (No response.)

19 MR. SMITH: Anyone on the telephone line
20 would like to make any comments?

21 THE OPERATOR: No comments on the phone.

22 MR. SMITH: Any stakeholders on the web
23 would like to make any comments?

24 MS. EUSEBIO: No comments on the web.

25 MR. SMITH: Okay. Again, we would really

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1 like to emphasize the fact that we're looking for all
2 perspectives on these questions, so if you'd like to
3 make comments, please do.

4 And if there are any questions that we've
5 covered that you'd like to make comments, we'd welcome
6 those comments also.

7 Okay. We're going to the next question 1
8 on slide 25. And these are specific questions for
9 agreement states related to the NSTS per the *Federal*
10 *Register* notice. But, again, you know, we would like
11 comments from all stakeholders related to these
12 questions.

13 Question 1: The NRC currently administers
14 the annual inventory reconciliation process on behalf
15 of the agreement states. This process involves
16 providing hard copy inventory to every licensee that
17 possesses nationally tracked sources at the end of the
18 year. Processing corrections to inventories and
19 processing confirmations of completion of the
20 reconciliations into the NSTS, the process involves a
21 significant amount of staff time and resources from
22 November to February.

23 If the agreement states were to adopt
24 administration of the annual inventory reconciliation
25 process and if Category 3 sources were included in the

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1 NSTS, what would the additional regulatory burden be
2 on agreement states to perform the annual inventory
3 reconciliation for Category 1, 2, and 3 sources?

4 And, again, we're looking for comments
5 from all stakeholders relating to this question.

6 Any stakeholder comments here in the room?

7 (No response.)

8 MR. SMITH: Any comments on the web?

9 (No response.)

10 MR. SMITH: No comments on the web?

11 MS. EUSEBIO: No comments on the web.

12 MR. SMITH: Any comments on the phone
13 line?

14 THE OPERATOR: No comments on the phone
15 line.

16 MR. SMITH: Okay. We'll stand by for a
17 couple of seconds.

18 (Pause.)

19 MR. SMITH: Okay. We'll move on to other
20 questions. So these are the last set of questions.

21 Question 1: Should physical security
22 requirements for Category 1 and 2 quantities of
23 radioactive material be expanded to include Category
24 3 quantities?

25 Irene, I think we've gotten quite a few

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1 comments on this?

2 MS. WU: Yeah. Irene Wu, NRC. So in the
3 past public meetings and webinars, some of the
4 feedback we received on this was that we should not be
5 expanded physical security requirements for Category
6 1 and 2 quantities to include Category 3.

7 MR. SMITH: So we do have a comment here
8 in the room.

9 MS. JIMENEZ: Sandra Jimenez, M.D.
10 Anderson. I would agree. No. This is -- for those
11 that already have Cat 1 and Cat 2, they have already
12 had the administrative burden on them as well as the
13 cost for maintaining these systems, as well as
14 security that also has to be included, working with
15 the local PD.

16 Now adding an additional category will
17 also add more financial burden and more administrative
18 burden. So it just -- I don't see -- I don't know of
19 any past Category 3 type of emergencies that would
20 require such security safeguards in place.

21 So I don't agree with this.

22 MR. SMITH: So you believe the security of
23 the current requirements are adequate?

24 MS. JIMENEZ: Just not for Category 3.

25 MR. SMITH: And that's what I'm asking:

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1 For Category 3 do you believe those current
2 requirements for Category 3 are adequate, so you
3 shouldn't have to add --

4 MS. JIMENEZ: Well, there is already some
5 security involvement with sources in general. Now, if
6 you want to be more specific in terms of how you want
7 those sources secured without having to add the
8 additional security requirements already in place for
9 Category 1 and 2, that might be an option to look
10 into.

11 So I know you don't specifically state how
12 they have to be secured, other than it has to be
13 secured. That's some additional comments that could
14 be made for that.

15 MR. SMITH: So you're speaking
16 specifically security requirements for Category 3.

17 MS. JIMENEZ: Yes.

18 MR. SMITH: Okay.

19 MR. WHITE: I have a follow-up question
20 for you. Don't run away.

21 One of the requirements under Part 37 is
22 for T&R.

23 MS. JIMENEZ: Yes.

24 MR. WHITE: And what would be the
25 increased burden for doing T&R for Cat 3, say your

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1 facility?

2 MS. JIMENEZ: My facility's quite large,
3 so we have both medical and research type Cat 1 and
4 Cat 2 already in place, so this would be more of an
5 issue for clinical areas, and added T&R, which is
6 already a full-time job for most people.

7 Luckily for us, we have, you know, human
8 resources that do help us out with this, but for a lot
9 of other smaller institutions, it's the RSO that's
10 having to help with this type of security process.

11 MR. WHITE: What you're saying is you have
12 a much larger number of people you would have to
13 process than you do now.

14 MS. JIMENEZ: Currently with the large
15 program that we already have in place.

16 MR. WHITE: So you're just piling on more
17 burden, is what you're saying, then.

18 MS. JIMENEZ: Right.

19 MR. WHITE: Okay.

20 MS. JIMENEZ: You know, the program is
21 there, it's functioning. This is now just --

22 MR. WHITE: Processing a lot more people
23 now.

24 MS. JIMENEZ: Yes.

25 MR. WHITE: Okay.

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1 MR. SMITH: Great. Thank you very much.
2 Any additional comments on the line,
3 Tyler?

4 THE OPERATOR: Yes. We do have Rick
5 Jacobi.

6 Go ahead, Rick.

7 MR. JACOBI: I asked earlier if you had a
8 device that had, let's say, 500 millicuries of cesium-
9 137 per device, but you had 10 to 12 of these devices,
10 so that you're now exceeding the Category 3
11 threshold -- I asked earlier if you would have to have
12 a physical security program, and I thought the answer
13 earlier was no, although I think the rules of the
14 proposal, the answer should be yes.

15 So is the answer yes or no, I guess?

16 MR. WHITE: I was thinking about if we
17 went to Category 3, again -- and we're talking
18 about -- we're talking about today license
19 verifications, we're talking about source security and
20 source accountability, and then we're talking about
21 physical security requirements; talking about three
22 different things are covered by different parts of the
23 regulation.

24 So in this particular case we're asking
25 about the physical security, we're talking about Part

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1 37, should we apply Category 3 -- to Category 3
2 sources -- treat them the same way as you do Category
3 1 and 2, which means that they would have to meet all
4 the requirements under Part 37, all the physical
5 requirements.

6 So, again, it would be -- the amount of
7 material you would have -- if you had a Category 3
8 quantity of material and you were -- and that's what
9 you possessed, you would have to meet Part 37
10 requirements if we made changes to the regulation.

11 So that's how we answered the question
12 earlier, and, again, the same answer still applies
13 here: If you have Category 3 quantities of materials
14 and we change the regulations that you have to meet
15 Part 37 requirements, yes, you would have to do that.

16 MR. JACOBI: Okay. I must have
17 misunderstood you earlier. But a follow-up to that is
18 you have a license to have, say, 10 devices containing
19 500 millicuries cesium-137, and you actually only
20 possess two of these devices, so that you're actually
21 in possession of less than the Category 3 quantity,
22 but you're authorized to possess more than a Category
23 3 quantity, you have to have a Part 37 physical
24 security program. Is that correct?

25 MR. WHITE: The actual amount of material

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1 you possess, do you have to follow Part 37 or not? So
2 in your scenario you have two sources but which do not
3 meet -- didn't rise to the level of, say, if we went
4 to Part 37 with Category 3, you would not have to do
5 that.

6 Although you are authorized under your license to have
7 Category 3 quantities, you actually don't possess it,
8 therefore, you do not have to follow physical security
9 requirements.

10 Again, that's what applies to Category 1
11 and 2 now, so you use the same requirements there.

12 MR. JACOBI: Okay. Thank you.

13 MR. SMITH: Also, for clarity, it would
14 make a difference where the material is located. Is
15 that correct? So if it's aggregated in one location,
16 would the requirements apply?

17 MR. WHITE: Absolutely. That's another
18 thing that we take into account, again. If the
19 materials is not -- is colocated, then it would -- the
20 potential to aggregate material, from a risk
21 standpoint, if they are not colocated, say, they're
22 stored or, you know, used in separate buildings, then
23 there would not be the requirements for physical
24 security that come in Part 37. So that is taken into
25 account.

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1 MR. SMITH: Okay. One more comment for
2 clarification. So we talked about Category 1 and 2
3 meeting Part 37 requirements, so if Category 3 is
4 added to Part 37, that process will go through
5 rulemaking, and at that time it will be decided what
6 type of physical security requirements are required?

7 MR. WHITE: Absolutely. Again, this is --
8 again, we're collecting information now to do this,
9 we're looking for people's input on this. Again, as
10 Irene talked about in the beginning part, the
11 introductory comments, the Commission asked us in the
12 SRM to basically throw a pretty wide net, look at a
13 lot of different things, and this is one of the things
14 that we want to ask about, is, again, we are asking
15 about license verification, accountability, we're
16 asking about tracking, you know, source security, but
17 we're also asking about -- we're just taking it one
18 step further and asking about physical security.

19 Again, the Commission wants us to look at
20 a pretty broad spectrum when it comes to Cat 3; it's
21 very clear that that's what they want us to do, asking
22 this particular question as part of this.

23 And to be very clear, George, we would
24 have to go through rulemaking, again, and do an
25 analysis and do that, again, get any input -- again,

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1 this is the reason I asked the woman from M.D.
2 Anderson about what was the impact if she had to go to
3 Cat 3 with T&R.

4 She would have -- although she has a
5 system in place to handle it, she would have a much
6 larger number of people; that's a resource impact for
7 her particular facility.

8 And, again, this would be for -- you know,
9 if we went to this -- for any of the facilities if we
10 went to include Category 3 in Part 37. And this is
11 one thing we're looking for, is what is the actual
12 impact; what's the dollars-and-cents impact? What's
13 the impact of that?

14 And that's another thing that we're
15 looking for, because that helps inform us in how, you
16 know, we look at the recommendations.

17 And, again, in August, when this paper
18 goes up, it's going to make recommendations on our
19 path forward. Again, we may say to do certain things,
20 and since we're asking the question about Category 3
21 in Part 37, you know, feedback we've gotten so far has
22 been no different here than anywhere else, and the
23 answer is no. They don't see the benefit for it.
24 That's something we'll certainly let the Commission
25 know, and we'll make our recommendations based on

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1 that.

2 But, again, to actually do this, there's
3 several -- many steps and probably several years away
4 from doing it, if we do do it at all.

5 MR. SMITH: Okay. Great. Really
6 appreciate that.

7 We do have a comment here in the room --
8 oh, before -- and I apologize for this.

9 Rick, do you have any follow-up comments
10 on that?

11 MR. JACOBI: Follow-up comments? I work
12 a lot in the oil and gas industry in Texas, and
13 companies that distribute devices used in that
14 industry, metering devices, for instance, may have an
15 individual device that only has 2- or 300 millicuries
16 of cesium-137 in it.

17 But the distributor, at his location,
18 might have a warehouse where he's got nine, ten, or
19 twelve of these sitting in the warehouse and ready to
20 be distributed, either imported or exported, or
21 distributed domestically.

22 And so he would exceed, I would think, the
23 Category 3 quantity in the aggregate, but once he sold
24 them -- and I'm kind of getting to question number 2
25 here. Once that goes to the general licensee, the

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1 general licensee might also possess, you know, 15 or
2 20 of those devices and some would be sunk in the Gulf
3 of Mexico, or some would be in pipelines offshore, and
4 some would be in warehouses, so that they would be
5 distributed and not aggregated all in one place.

6 But it would be easy, and I think it would
7 be common for general licensees that have Category 3
8 quantities on their license, that many might actually
9 possess Category 3 quantities in aggregate, even
10 though the individual device is low.

11 And then the distributor certainly would,
12 I think, exceed the Category 3 quantity. That's kind
13 of where I'm coming from in all this. I think there's
14 commercial implications of this proposed -- of this
15 proposal.

16 MR. WHITE: Yeah. Thanks for the input on
17 that. Again, the distributor, the people who have the
18 stuff sitting in the warehouse, as you said, they
19 would probably have a specific license, because you
20 have to have a specific license in order to distribute
21 to a general licensee. That's a requirement of the
22 NRC or an agreement state.

23 But, again, appreciate the feedback about,
24 you know, general licensees having several of these
25 sources and potentially having Category 3 quantity.

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1 Appreciate that feedback.

2 MR. JACOBI: Let me just say quickly I
3 understand that they currently don't have physical
4 security requirements. And I appreciate the comment
5 that the physical security requirements would be more
6 or less what's targeted for the Cat 1, Cat 2 based on
7 further deliberations. Thank you.

8 MR. WHITE: That's right. If they're
9 currently Category 3 licensees, you're not required to
10 follow Part 37. Again, they have to follow the
11 security and safety requirements of Part 20 and,
12 again, a licensee might be a radiographer, Part 34;
13 well loggers, Part 39; someone medical, Part 35.

14 MR. SMITH: Okay. We're coming up on
15 the -- I'm showing almost -- it's five o'clock now.
16 We're not going to end it right now. We would like
17 for you to stay around, and we're almost to the end of
18 the questions.

19 And, you know, we've had some technical
20 difficulties, and so we hope that you will give us an
21 opportunity to finish the questions, but, again, if
22 you are not able to stay past five o'clock, you know,
23 you can submit your comments via the web or through
24 the mail or online.

25 All right. We do have a comment here.

1 MR. O'DONEL: Rob O'Donel, Suntrac
2 Services. So the -- if this goes through, Category 3
3 not only as single source but as aggregate at a
4 facility, okay, if the facility secures the sources
5 similar to the current increased security patrol
6 requirements and they're essentially below the -- I
7 mean, they would secure all of their sources -- then
8 would they be exempt from Part 37?

9 MR. WHITE: Again, same rules would apply
10 again. If they kept the material separated and it was
11 not aggregated, yeah, that is correct. Again, we
12 would apply the same rules we apply now for Cat 1 and
13 2 we would apply to Category 3; we'd do the same
14 thing.

15 But I also should point out, too, that we
16 are looking for any feedback on how we look at
17 aggregation and -- because, again, that was one of the
18 specific comments or tasks from the Commission, was to
19 look at that. So we'll take that into account.

20 So just as a follow-up question, you
21 would -- what you're saying -- or let me know, do you
22 think we should maintain the same aggregation rules as
23 we currently do now? Is that what you're getting at?

24 Or you think we should change them, or you
25 want to think about it?

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1 MR. O'DONEL: If you can continue to
2 interpret aggregation how --

3 MR. WHITE: How we're doing it now?

4 MR. O'DONEL: Yeah.

5 MR. WHITE: Okay. Thank you.

6 MR. O'DONEL: And I'll leave it at that.

7 So I'd like to add something that Sandra
8 said. I mean, her facility would be increasing the
9 number of people that go through the T&R. By putting
10 Category 3 quantities -- you know, including them in
11 Part 37, facilities that are currently not doing T&R
12 and have no idea what T&R is -- and some of these
13 facilities are large, maybe upwards of 8,000 people
14 that have access badges and unescorted access to these
15 sources, you know, mainly fixed gauges in the
16 petrochemical industry.

17 So it would be a huge impact to those
18 facilities.

19 MR. WHITE: Thanks for the input.
20 Appreciate it.

21 MS. LONDON: Can you all hear me? This is
22 Lisa London from the NRC.

23 MR. SMITH: We can hear you.

24 MS. LONDON: Okay. I wanted to clarify
25 something I had heard. I know that Duncan was talking

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1 about the Part 37 rules and how they would conceivably
2 apply to Category 3, should the Commission decide to
3 take such action.

4 I wanted to clarify that we would imagine
5 it would apply as they do to Cat 1 and Cat 2, but
6 that's yet to be determined, and it would be up to the
7 Commission.

8 MR. SMITH: Great. Thank you very much.

9 Any additional comments here in the room?

10 (No response.)

11 MR. SMITH: Any additional comments on the
12 phone line?

13 THE OPERATOR: Yes. One question.

14 Go ahead, Roland.

15 MR. BACKHAUS: Thank you. I heard three
16 different elements in response to Rick's question
17 regarding the extent to which oil and gas industry,
18 for example, would need to comply with Part 37. I
19 think I heard a license, which is to say that the
20 license must authorize for that Category 3 threshold.

21 The second piece that I think I heard,
22 that the licensee must in fact be licensed for some
23 higher number to that greater than Category 3
24 threshold.

25 And then the third piece was that that

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1 material that they actually possess must be colocated
2 in such a way that no aggregation could occur and
3 could therefore be a greater risk of theft.

4 Did I understand those three points, or
5 which of those three points is important for a
6 licensee to understand regarding whether or not Part
7 37 requirements apply to them?

8 MR. WHITE: Short answer to your question
9 is, yes, there -- it comes down to each facility and
10 how each facility -- what they possess, how they're
11 located, how much is authorized. These are all
12 iterations that you certainly have talked about and
13 would have to take that into account.

14 But, yes, someone is authorized on the
15 license for a -- again, for a Category 3 licensees,
16 again, as Category 1 and 2, you know, applying the
17 same rules if the Commission agrees to all this down
18 the road.

19 Yeah, someone may possess material,
20 possess it but not have to apply because that don't
21 have that amount of material. They may have that
22 amount of material, but because it's not colocated,
23 they would not have to use physical security
24 requirements, or they may have to use physical
25 security requirements because they have Category 3.

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1 That is correct.

2 So there's three different possible
3 scenarios here again. I could point out this is based
4 on individual -- that the individual licensee does,
5 again, just talking in very general areas here. We
6 can look at each individual licensee and how they do
7 things before you can correctly apply Part 37.

8 Even currently with Category 1 and 2, you
9 have to look at individual licensees and how they
10 handle -- how things are set up at that licensee's.

11 Does that answer your question?

12 MR. BACKHAUS: Thank you.

13 MR. SMITH: Okay. Thank you.

14 Any additional comments, Tyler, on the
15 line?

16 THE OPERATOR: No further questions at
17 this time.

18 MR. SMITH: Any additional comments on the
19 web?

20 MS. EUSEBIO: No comments on the web.

21 MR. SMITH: Any additional comments here
22 in the room?

23 (No response.)

24 MR. SMITH: Okay. Question number 2:
25 Some Category 3 sources are covered under a general

1 license, 10 CFR 31.5. Should the NRC consider
2 establishing maximum quantities in general licensed
3 devices, thereby reserving authorization to possess
4 Category 1, 2, and 3 quantities of radioactive
5 material to specific licensees?

6 Any comments here in the room?

7 MR. WHITE: This is Duncan White. Someone
8 did bring up the scenario where there was a --
9 people -- a licensee may have a specific licensee,
10 then also have a general license for quantities of
11 material that may, you know -- maybe the general
12 license would end up as Category 3 quantity, but they
13 already may possess specifically licensed quantities
14 that may be Category 3.

15 Any sort of feedback or experience with
16 that would be, you know, appreciated. Again, I know
17 from my experience we have seen people with gauges --
18 large facilities with gauges have both generally
19 licensed and specifically licensed quantities of the
20 same device because of they are licensed and how they
21 are regulated there, you know, one is a specific
22 license, one is a general license.

23 So appreciate any feedback on that type of
24 scenario if people have experience with that.

25 MR. SMITH: Okay. We do have a comment

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1 here in the room.

2 If we can get your name and the
3 organization you're representing.

4 MR. POPE: My name's Monty Pope, with
5 Treshco [phonetic]. I just want to comment, and my
6 comment kind of transcends both 1 and 2.

7 And basically I am leaning towards letting
8 the regs stand as they are. That will have
9 significant impact on us commercially and
10 operationally, and I'm still having a hard time seeing
11 the justification for upping it, and the risk
12 associated with it versus the cost is significant, of
13 course.

14 MR. SMITH: Great. Thank you.

15 Tyler, any additional comments on the
16 phone line?

17 THE OPERATOR: Yeah.

18 MR. JACOBI: Actually I just want to kind
19 of reinforce what Monty just said. I think it's
20 really severe commercial implications of requiring
21 generally licensed companies to become specifically
22 licensed for the same devices.

23 And once again, going back to the oil and
24 gas industry, when distributors in Texas and elsewhere
25 are distributing devices to companies like Chevron or

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1 Exxon or somebody like this that may have huge
2 quantities of these devices that, in aggregate,
3 probably exceed -- I'm certain exceed Category 3
4 quantities, if you went to those companies and said,
5 you know, if you have specific devices that are
6 subject to a safety plan and on and on and on, I
7 really think they would be surprised and probably look
8 at other ways to do gauging and metering and
9 monitoring.

10 You know, currently distributors have to
11 report their distribution in Texas, and in some cases,
12 depending on the quantity of the device, general
13 licensees have to file general license acknowledgments
14 in agreement states or others, perhaps the NRC as
15 well.

16 But maybe even those reports could be
17 beefed up a little bit instead of requiring people to
18 have this specific license. I think that would be
19 extremely expensive and not well received.

20 And by the way, with the general license,
21 if distribution reports could be done electronically,
22 I think that would help business.

23 MR. SMITH: Thank you.

24 MR. WHITE: Appreciate the input.

25 MR. SMITH: Any additional comments here

1 in the room?

2 (No response.)

3 MR. SMITH: Tyler, any additional comments
4 on the phone line?

5 THE OPERATOR: Yes, we have Roland.

6 Go ahead, Roland.

7 MR. BACKHAUS: Thank you. My comment
8 follows Rick's, and it also ties back into question 1,
9 first question, and it has to do with how it is that
10 a specific license to a manufacturer or distributor
11 can verify quantities that a company which had that
12 generally, you know, if the rule change is not falling
13 like I hope like it would, that how that distributor
14 can determine the amount of material that his
15 customer, a general licensee -- the previously general
16 licensee, may [inaudible].

17 The fact that they have -- this is
18 especially pointed in a case which Rick described,
19 which is, you know, large companies with some large
20 number of generally licensed devices which don't have
21 as stringent, you know, reporting, maintenance,
22 records, et cetera, requirements as those specifically
23 licensed devices would.

24 And so it seems it's another place for
25 difficulty is how it is that a specific licensee can

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1 verify the quantities that his customers would have,
2 when that customer has sources that that general
3 license might determine whether or not that guy will
4 [inaudible] because his transfer is going to go over,
5 for example, Category 3.

6 MR. WHITE: Appreciate the insight.
7 Again, it's something, you know -- I think the first
8 time we've heard that particular comment, and I
9 appreciate you laying those comments -- those thoughts
10 out, because again that was very helpful. Thank you.

11 MR. BACKHAUS: Thank you.

12 MR. SMITH: Great. Thank you.

13 Any additional comments on the web?

14 MS. EUSEBIO: No comments on the web.

15 MR. SMITH: Any additional comments here
16 in the room?

17 (No response.)

18 MR. SMITH: Tyler, one more time on the
19 phone line, any additional comments?

20 THE OPERATOR: No comments on the phone
21 line.

22 MR. SMITH: Okay. That was the last
23 question. Again, we'd like to apologize for the delay
24 and, you know, not being able to hear the folks on the
25 telephone line.

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1 I'd like to say we do have another meeting
2 that's scheduled today from 6:00 to 8:00, so if you
3 didn't have an opportunity to provide any comments,
4 you can call back in, stay here at the meeting, or log
5 in on the webinar to provide those comments.

6 And also you can provide those comments
7 via the web or via email -- via mail; sorry.

8 So the NRC will host one additional
9 webinar on Category 3 resource security and
10 accountability during the public comment period for
11 this effort. This webinar is scheduled for Thursday,
12 March 2, from 1:00 to 4:00. The webinar is noticed on
13 the public meeting website with a link from our
14 website, so if you would like to register, please use
15 the link from the meeting notice.

16 Finally, we would like to remind you that
17 the public comment period for the FRN that provides
18 these questions closes on March 10, 2017. We
19 encourage your response to the FRN and appreciate your
20 participation in today's meeting. Thank you very
21 much.

22 A copy of the slides will be made
23 available on the Category 3 website, located on the
24 NRC website under the Radioactive Materials, and it's
25 under [www.nrc.gov/](http://www.nrc.gov/security/byproduct/category-3-) security/ byproduct/ category-3-

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1 source-security-accountability-reevaluation.

2 If you have any additional questions
3 related to this meeting or to Category 3 source
4 security and accountability re-evaluation, please
5 contact Duncan White, and Duncan be reached at
6 duncan.white@nrc.gov or 301-415-2958, or Irene Wu at
7 irene.wu@nrc.gov; Irene's work number is 301-415-1951.

8 Okay. Now we're finished.

9 (Whereupon, at 5:17 p.m., the public
10 meeting was concluded.)

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