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Ms. Torre Taylor  
Project Manager for OIG Audit Recommendations  
U.S. Nuclear Regulatory Commission  
Washington DC 20555-0001

**Re: Comments on Audit of NRC's oversight for issuing Certificates of Compliance for radioactive material packages (OIG 17 A-21)**

Dear Ms. Taylor:

The Radiopharmaceutical Shippers & Carriers Conference (RSCC) is a group that includes manufacturers, ground and air carriers, and persons engaged in training, health physics, and other aspects in support of the distribution of nuclear medicines to and from medical facilities.

NRC 10 CFR Part 71 certificates of compliance for radioactive materials packages are issued by NRC in coordination with the U.S. Department of Transportation under 49 CFR 173.410-477. The packaging designs and test capabilities are reviewed by technical experts of both agencies. Manufacture of the packaging is under tight quality assurance provisions of Subpart H and specifically Sec. 71.37. This dual-agency program has worked to assure safety in transport and storage for several decades.

Unless experience in transportation or storage indicate a problem with an approved package design, the RSCC sees no value in repeating this dual-agency technical review process. It is an expense to the companies involved, and needless use of time for the agencies. We do not support a term limit on the certificates of compliance.

If for some reason that remains unclear to us, it is determined that a term limit must be adopted, RSCC supports comments of the Nuclear Energy Institute (NEI) on this subject. NEI recommends a term of no less than 10 years.

If you have any questions on this comment by RSCC, please do not hesitate to contact me directly. Thank you for your consideration of our views.

Sincerely,

Lawrence W. Bierlein  
RSCC General Counsel