RULEMAKING ISSUE NOTATION VOTE

RESPONSE SHEET

TO:	Brooke P. Clai	rk, Secretary	
FROM:	Commissioner Wright		
SUBJECT:	SECY-22-0112: Radioactive Source Security and Accountability Rulemaking (Docket ID No. NRC-2022-0103; RIN No. 3150-AK83)		
Approved x	_ Disapproved	x Abstain	Not Participating
COMMENTS:	Below	Attached	None
I appreciate the staff's efforts related to the development of this rulemaking. Consistent with my vote on SECY-17-0083, I approve the changes to 10 CFR parts 30, 40, and 70 to update the oral certification method and remove the obsolete method of obtaining other sources of information. However, I disapprove the changes to further ensure validity of license applicants and to increase the requirements for licensees transferring category 3 quantities of radioactive materials. As stated in the staff's regulatory analysis, "NRC staff considers that the existing framework provides reasonable assurance of adequate protection of public health and safety, as well as the common defense and security." The additional burden that will be borne by the NRC, thousands of affected material licensees, and the Agreement States is not consistent with our Efficiency principle given the lack of any safety benefit. There continues to be no evidence of any threat, vulnerability, or consequence that would justify imposing these additional measures.			
Entered in ST	ΓAR	Signature	