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Subject: Response to proposed rule for national source tracking RIN 3150-AH48

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Response to proposed rule for national source tracking – RIN 3150-AH48

Gentlemen,

The following represents my comments on proposed inclusions in the national source tracking rule.

Inclusion of Category 3 sources

Category 3 sources should NOT be included in the rule at this time. The reason for this position is that the rule is something new, and like many new things, will have a breaking in period while both the regulators and regulated, learn to complete, report, and maintain the necessary records. Unless I am wrong, the number of Category 3 sources is considerably larger than those in Categories 1 and 2, and the potential room for error and increased recordkeeping will only be multiplied by that amount. Perhaps Category 3 sources could be added after the program for Category 1 and 2 sources has been implemented and working smoothly.

Reporting use at temporary jobsites

Reporting of source usage at temporary jobsites should NOT be part of the rule. Most industrial radiographic operations utilize multiple sources each day at multiple sites. It is not uncommon for a single crew to work at four different sites in a day, using the same source. Trying to stay on top of the tracking, recording and reporting of those activities will impose an additional economic burden on the radiographic companies. The risk of error is increased due to the amount of movement of the sources on a daily basis.

Inclusion of quality assurance provision on data submission

A quality assurance provision should NOT be included in the rule. An economic burden would be imposed upon the reporting companies, as it will require additional personnel to re-check the data that is submitted. This would especially impact if Category 3 and reporting at temporary jobsites are included in the rule. The margin for error would be greatly reduced if the required recordkeeping and reporting are kept simple and at a minimum. An inclusion of a quality assurance provision is no guarantee that an occasional error could not occur.

Sincerely,

Ronald J. Hayden
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