

**NONDESTRUCTIVE TESTING MANAGEMENT ASSOCIATION**

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(15)

Government and Industry Affairs Committee

October 7, 2005

DOCKETED
USNRC

Ms. Annette L. Vietti-Cook
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemakings and Adjudications Staff

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PROPOSED RULE
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October 7, 2005 (11:20am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

**RE: Proposed Rule: National Source Tracking of Sealed Sources. 70 Federal Register
43646.**

RIN 3150-AH44

Gentlemen:

These comments concerning the proposed national source tracking of sealed sources are provided by the Government and Industry Affairs Committee (GIAC) of the Nondestructive Testing Management Association (NDTMA). The Nondestructive Testing Management Association was originally founded as a consortium of industrial radiography company owners. The origination was formed as a way to share information and to better the industry, as it has evolved it has grown to encompass all methods of non-destructive testing but continues to strive to serve the NDT community. Industrial radiography is still a large portion of the membership. The Government and Industry Affairs Committee works closely the regulatory agencies to promote safety and as a forum to have the industry point of view heard. Industrial radiographers generally use Category 2 type radioactive sources. Tracking of Category 3 sources does not directly affect radiography companies but many of these companies also possess compaction and moisture density gauges that would fall under the Category 3 umbrella. The possibility that inclusion of Category 3 sources may degrade the quality of the information in the source tracking database should be sufficient enough reason for these sources to not be included.

The NRC should not require reporting of sources at the temporary field site level. Radiographers may be required to conduct operations at more than one location during any given day. If the data must be input by the close of business each day then the information received will be an indication of where the source may have been rather than an indication of where the source actually is. If less than meaningful information is collected the integrity of the whole database is compromised. The requirement to track sources at the job site location would be cumbersome even for small operators possessing only one or two sources. In these small operations only a few people perform all the functions currently required to add additional responsibility to track less than meaningful information would be a burden. This applies to all temporary field sites including those performed in another state under the same license or under reciprocity. The burden would be even greater for large companies with many sources that are sent out on a daily basis.

In reference to the inclusion of a quality assurance check a similar rationale would apply. For a small company resources are already limited, personnel to provide the additional check may not exist. The intent is to obtain the most accurate information possible to be contained in the database. There is no reason at this time to believe that the information submitted will not be accurate. A check of the validity of the database information could be made a part of the

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SECY-02

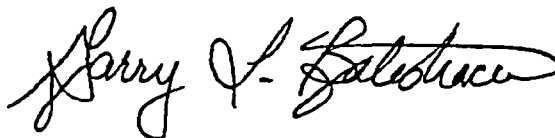
inspection process. If at that time it is found that there is a problem additional control can be put into place.

NDTMA and especially GIAC is fully supportive of any actions taken to enhance the security of the nuclear sector as long as efforts are focus to produce optimal results. The NRC and other agencies must ensure that they work with other agencies to consider the consequences of their mandates to avoid needless expenditure of the limited resources available to the government and private sectors.

We appreciate your attention to the issue of radioactive materials security and welcome any opportunity for further dialogue on the proposed national sealed source tracking system.

Sincerely,

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