

**Britt T. McKinney**  
Sr. Vice President & Chief Nuclear Officer

**PPL Susquehanna, LLC**  
769 Salem Boulevard  
Berwick, PA 18603  
Tel. 570.542.3149 Fax 570.542.1504  
btmckinney@pplweb.com



OCT 10 2005

DOCKET NUMBER  
PROPOSED RULE 20, 32 + 150  
(70FR 43646)

Secretary  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

DOCKETED  
USNRC

October 20, 2005 (10:30am)

**SUSQUEHANNA STEAM ELECTRIC STATION  
COMMENTS ON NATIONAL SOURCE TRACKING  
OF SEALED SOURCES (RIN 3150-AH48)  
PLA-5973**

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

The following are PPL Susquehanna, LLC's comments on proposed rule changes to implement a National Source Tracking System for certain sealed sources. The proposed rule was published in the Federal Register on Thursday, July 28, 2005, Page 43646.

1. The rule will require licensees to report and track sources through the national database, but does not provide the assignment of a source tracking number for each source. The requirement should be that for every source reported to the NRC through the tracking system the NRC should be required to provide a unique tracking number for each source.
2. The proposed rule states that the database will automatically remove sources which have decayed below Category 2 levels and that the licensee will be notified that they have been removed from the database. The proposed change to 10 CFR 20 does not reflect this statement. The proposed language should be revised to clearly state this.
3. The NRC has opted not to include sources in the database over which they have no regulatory authority but will make reporting voluntary. All sources regardless of origin which meet the criteria need to be listed in the database. Any individual who would use the material to construct a radiological dispersal device (RDD) will not be concerned who manufactures or regulates the material.
4. It is unclear whether the activities in the table apply to the parent radionuclides and the daughter products or to just the parent radionuclides. The wording should clearly state for which products the table is applicable.

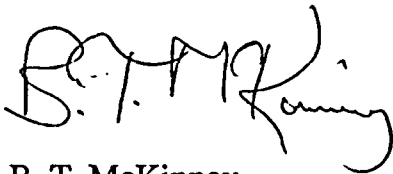
Template = SECY-067

SECY-02

5. For some radioisotopes such as plutonium, the amounts should be reported in grams instead of activity units.
6. The transaction reports should not be completed for sources transferred to temporary job sites. They should only be completed when transferred between licensees. This is an unnecessary administrative burden.
7. Category 3 sources need not be included in the database. Since it takes a thousand of these sources to be the strength of a Category 1 source, there appears to be little justification in tracking them.
8. The information contained in the National Source Tracking System does not need to be handled as safeguards material or safeguards-modified. It is appropriate to handle as official use only and should be excluded from public disclosure under 10 CFR 2.390. This is an unnecessary administrative burden.
9. The proposed rule should address any potential Safeguards Information conflicts when sources are disposed of as part of a Radioactive Material Quantities of Concern (RAMQC) shipment.

If you have any questions, please contact Mr. C. T. Coddington at (610) 774-4019. .

Sincerely,

A handwritten signature in black ink, appearing to read "B. T. McKinney". The signature is stylized with a large, looping "M" and "K".

B. T. McKinney

cc: NRC Region I  
Mr. B. A. Bickett, NRC Sr. Resident Inspector  
Mr. R. V. Guzman, NRC Project Manager  
Mr. R. Janati, DEP/BRP