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OFFICE OF SECRETARY
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November 14, 2005

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

RE: Proposed Rule: National Source Tracking of Sealed Sources. 70 Federal Register 43646.
RIN 3150-AH44

Dear Ms. Vietti-Cook:

These comments are concerning the proposed national source tracking of sealed sources. They are provided by the Radioisotopes Sub-Group of the Nuclear Sector Coordinating Council (NSCC-R). The NSCC-R was established in collaboration with the Department of Homeland Security as part of an active effort to identify assets, liabilities and priorities for protecting the nuclear sector of the infrastructure in the development of a National Infrastructure Protection Plan. This group consists of members representing the radioisotope industry and covers the broad interests of radioisotope sector security. The scope of the NSCC-R includes all companies in the United States that are licensed to operate radioisotope manufacturing, handling or processing facilities; to distribute radioisotope products; and other organizations, individuals, and users involved in the nuclear industry, including nuclear materials licensees. The mission of the NSCC-R is to develop and recommend strategies that will enhance the physical security and emergency preparedness of the radioisotope sector under the auspices of the National Infrastructure Protection Plan (NIPP).

The NSCC-R 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 NSCC-R has repeatedly communicated to DHS the need for agencies including NRC, within the Government Coordinating Council, and others to ensure that there is coordination between agencies to ensure that rulemaking or any other actions are consistent in approach and do not result in duplicative or conflicting obligations for stakeholders within the nuclear sector. The NRC and other agencies must ensure that they collaborate to consider the consequences of their mandates to avoid needless expenditure of the limited resources available to the government and private sectors. We also urge NRC in the development of this rule to carefully consider the actions outlined in the Nuclear Sector-Specific Plan before finalizing any actions that would affect the NSCC-R.

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.

Yours truly,



Gran Malkoske
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NSCC-R Co-chairs

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