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**Global Nuclear Fuel**

A Joint Venture of GE, Toshiba & Hatachi

**Charles M. Vaughan**  
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February 7, 2006

Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mail Stop T6-D59  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

1/11/06  
71 FR 1776  
10

Subject: Response to Request for Comments on Federal Register 1/11/06, page 1776-1780, titled,  
Radiation Source Protection and Security Task Force: Request for Public Comment

Reference: NRC License SNM-1097, Docket 70-1113

Dear Sir:

Global Nuclear Fuel - Americas, LLC (GNF-A) appreciates the opportunity to provide the following comments on the above Subject.

Topic No. 1

The list of radiation sources (and quantities) requiring security should be consistent with the IAEA Code of Conduct to maintain a unified approach to source security.

Additionally, a risk based approach is needed for the development of a list of isotopes and thresholds used as the basis for security requirements for radioactive materials (other than sources). The approach taken by the NRC and agreement states in 2005 for establishment of security and control measures; which included orders, rulemaking and administrative amendments to radioactive materials licenses, was to extend the IAEA Code of Conduct Category 1 and Category 2 values for sources to non-sources. Extension of the IAEA standard for control of sources to other radioactive materials does not give adequate consideration to the different security risks, and potential malevolent uses, posed by sources versus other forms of radioactive materials. This approach has created undue expenditure of public and private resources in the application of additional controls to radioactive materials that do not necessarily pose a significant threat. For example, the security risks and potential malevolent uses of a source the size of a golf ball are clearly very different from the security risks of an activated component as large as a rail car, even if the activated component is more radioactive than the source. The physically smaller source is a greater security concern because it can be easily hidden, and it is a greater terrorist threat because it can be incorporated into a radiological dispersion device.

SISP Review Complete

Template = ADM-013

E-RFS = ADM-03

Call = M. Khan (MLH1)

Topic No. 2

There is a need for a true national system for recovery of lost, stolen, abandoned or otherwise unwanted sources. The federal register notice cites programs under the DOE and CRCPD, but these programs do not have the resources to handle all of the sources that have been currently identified by licensees and state programs.

Topic No. 3

No comments

Topic No. 4

Category III source quantities should not be added to the proposed national source tracking system for radiation sources. Resources should be focused on the source quantities that pose a significant threat. The referenced IAEA Code of Conduct does not recommend a registry for Category 3 quantities. Category 3 sources are only considered a health threat under circumstances of prolonged exposure. Adding Category 3 quantities would significantly increase the number of sources tracked, disproportionate to the threat they pose.

Topic No. 5

No comments

Topic No. 6

No comments

Please contact me on (910) 675-5656 if you have any questions or would like to discuss these comments further.

Sincerely,

Global Nuclear Fuel – Americas, LLC

A handwritten signature in black ink, reading "Charles M. Vaughan". The signature is fluid and cursive, with the first name "Charles" being the most prominent.

Charles M. Vaughan  
Manager  
Facility Licensing

cc: CMV-06-014  
Beverly Hall - State of N.C.  
Felix Kilar - NEI