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Subject: Comments regarding the petition for NRC rulemaking; 2007 JAN 25

I am opposed to Governor Gregoire's petition to require the addition of GPS units to industrial radiography cameras, and I also oppose her alternative - for the Commission to grant states the flexibility to impose more stringent requirements than those required under current NRC regulations.

I submit the following opinion:

GPS units would not prevent theft of the devices, would provide little if any deterrence to thieves or terrorists. If someone has the wherewithal to steal a camera, they will likely have the ability to defeat its GPS unit.

We have complied with Increased Controls that currently apply to industrial radiography sources (national inventory, enhanced facility and vehicle security requirements, reliability and trustworthiness background checks on personnel, restrictions on access to procedures and equipment, etc.) and feel they are sufficient and appropriate requirements that provide reasonable assurances to deter theft. Despite the time and monetary investments the measures require, we recognize the threat posed by high activity radiation sources.

GPS units costs to licensees, especially to a small company, could be substantial. Modifications to radiography cameras needed to incorporate GPS units will impose costs on equipment manufacturers due to research and development, the regulatory approval process (expensive and time-consuming safety evaluations will be required), and altered production processes.

Replacement of /alteration to existing equipment would be costly for users and create work time schedule and shipping burdens especially for small companies.

State officials like to keep control of what happens in their state - industrial radiography is a cross-jurisdictional service industry; licensees (and registrants) perform their activities wherever they are in demand. The current regulations attempt to provide a uniform set of regulations that apply to industrial radiographic operations in all jurisdictions.

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