



July 11, 2007

DOCKETED
USNRC

7

July 12, 2007 (10:19am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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

RE: Docket No. PRM-71-13
Petition for Rulemaking - Global Positioning Satellite (GPS) Tracking

As a manufacturer of industrial radiography devices and radioactive sources we do not support the proposed rulemaking.

The petitioner states that if a device as small as a cell phone can be GPS-enabled, certainly a truck or even a radiography device can be similarly equipped.

We do not support requiring vehicles to be equipped with GPS systems for several reasons.

- Industrial radiography licensees have recently adopted increased controls for mobile devices in vehicles. The imposition of a GPS system would represent an unjustified additional significant financial burden to the radiography industry.
- There is a significant lack of formal study to identify the effectiveness of GPS systems when used with vehicles.
- The petitioner states that in August 2006, a truck containing an industrial radiography source was stolen and that the truck and its highly radioactive contents were recovered quickly. This event highlights the conclusion that the current controls are effective.

We do not support requiring radiography devices to be equipped with GPS systems because there is a significant lack of formal study to identify the cost, effectiveness and practicality of GPS systems when used in or on portable devices.

It is worth noting that any proposal to increase the security of radioactive materials should be considered from two dramatically differing perspectives; criminal activity vs terrorist activity. If a GPS system is required by rulemaking it will be known to the public. It is therefore highly unlikely that a GPS system could be protected from being destroyed, removed or disabled by a sophisticated terrorist.

We strongly oppose the proposal for the Commission to grant states the flexibility to impose more stringent requirements than those required under current NRC regulations. Most radiography licensees work in several states. It is counterproductive and unnecessarily financially burdensome for licensees to be subjected to different regulations from state to state.

Sincerely,
Kelley Richardt
Regulatory and Quality Manager

SOURCE PRODUCTION & EQUIPMENT CO., INC.
113 Teal St., St. Rose, LA 70087 USA
Phone: (504) 464-9471 Fax: (504) 467-7685 Email: spec@spec150.com

Template= SECY-067

SECY-02

From: "Bonnie Hughes" <bonnie@spec150.com>
To: <SECY@nrc.gov>
Date: Wed, Jul 11, 2007 5:34 PM
Subject: PR31-71-13

Dear Sirs:

Please see attached comments to the petition from the State of Washington.

Thank you,
Kelley Richardt
Regulatory and Quality Manager
Source Production & Equipment Co., Inc.
113 Teal St., St. Rose, LA 70087
504-464-9471 fax 504-466-9151

Mail Envelope Properties (46954CC7.78E : 24 : 34702)

Subject: PR31-71-13
Creation Date Wed, Jul 11, 2007 5:21 PM
From: "Bonnie Hughes" <bonnie@spec150.com>

Created By: bonnie@spec150.com

Recipients

nrc.gov

TWGWPO02.HQGWDO01
SECY (SECY)

Post Office

TWGWPO02.HQGWDO01

Route

nrc.gov

Files	Size	Date & Time
MESSAGE	251	Wednesday, July 11, 2007 5:21 PM
TEXT.htm	982	
commentsPR31-71-135.pdf	158996	
Mime.822	221854	

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled