



QSA GLOBAL

September 30, 2011

Office of the Secretary
U. S. Nuclear Regulatory Commission,
Washington, DC 20555-0001
Attention: Rulemaking and Adjudications

QSA Global, Inc.

40 North Avenue
Burlington, MA 01803
Telephone: (781) 272-2000
Toll Free: (800) 815-1383
Facsimile: (781) 273-2216

Subject: Comments to NRC on Request for a License to Import Radioactive Waste.
Docket ID NRC-2011-22102

QSA Global is a manufacturer and distributor of radioactive sources and devices that conducts business internationally, and is subject to the same import restrictions as GE Hitachi.

QSA supports the approval of this import license application, as there are no safety or security concerns with the importation of these sources. Typically the number and volume of non US origin sources that need to be imported is a very small percentage of the overall source volume handled and contributes an insignificant amount to the waste volume. Most US manufacturers and distributors export more sources than they import.

In this particular case GE is acting responsibly by attempting to honor return agreements as the successor company to the original manufacturer of the sources, Amersham. This is consistent with the IAEA guidance for the Code of Conduct on the Safety and Security of Radioactive Sources.

With the Part 110 rule change last year an import license is now required if a non US origin source is being imported for the purpose of waste disposal. Unfortunately, the phrase "of U.S. origin" in reference to sealed radioactive sources was introduced into the 10 CFR 110.2 final rule without having been discussed or reviewed in the proposed rule. As a result, input from industry on the unintended consequences of and burdens from this restriction, including significant hardship on US companies who conduct business globally and have legal obligations to accept return source shipments, was not provided to the NRC during the comment period. Given the lack of notice and comment, we would recommend that NRC not rely on the phrase "of U.S. origin" to deny this application, and when issuing the import license, clarification is included within the license that recognizes sources that are imported for recycling may be imported under the general license §110.27.

In addition, we ask that NRC recognize that the intentions of GE Hitachi are consistent with the objectives of the NNSA Global Threat Reduction Initiative, and consider the application in that context.

We appreciate the opportunity to comment on this license request. Please contact me should you have any questions or require additional information.

Sincerely,

Cathleen Roughan
Director, Regulatory Affairs/Quality Assurance