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Physical Protection of Category 1 and Category 2 Quantities of Radioactive Materials

Comment On: NRC-2015-0109-0001

Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material; Request for Comment

Document: NRC-2015-0109-DRAFT-0007

Comment on FR Doc # 2016-05260

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Government Agency Type: Foreign

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RULES AND DIRECTIVES

General Comment

See attached file(s)

Attachments

NRC-10CFRPart37.Comment.120516

SUNSI Review Complete

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Add= G. Smith (yes)



Via Electronic Submittal to Docket ID NRC-2015-0109

Cindy Bladey
Office of Administration
Mail Stop: OWFN-12-H08
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

12 May 2016

**Re: Comments on the Physical Protection of Category 1 and Category 2 Quantities of
Radioactive Material (Docket ID No. NRC-2015-0109)**

Dear Ms. Bladey:

The Industrial Irradiation Association (“iia”) would like to express its sincere appreciation to the U.S. Nuclear Regulatory Commission (NRC) on its development of the 10 CFR Part 37 security requirements for the Category 1 and 2 quantities of radioactive materials.

The International Irradiation Association (iia) is a not-for-profit organization and a recognized NGO of the IAEA. Our Association supports the global irradiation industry and has a diverse and international membership. Our board, management team and members have extensive experience of working within the industry and our Association has been an active promoter of the safe and beneficial use of irradiation technology for more than 50 years. In November 2016 we are organizing and hosting the 18th International Meeting on Radiation Processing (IMRP) in Vancouver, BC Canada.

The technologies, gamma, electron beam and x-ray, are used to improve the characteristics of many everyday products including Healthcare (medical disposable and pharmaceutical products), Consumer Products (Cosmetics, Packaging, Phytosanitary and Food) and Industrial Materials (Wire, Cable and Heat Shrinkable materials).

The purpose of this letter is to provide our complete support of the security regulatory requirements contained in 10 CFR Part 37 and its guidance documents. We believe that the Part 37 requirements have greatly improved the security related to the transportation, storage and use of radioactive materials. In addition, the two NRC-



provided guidance documents to the Part 37 regulations (NUREG 2155, Implementation Guidance for 10 CFR Part 37, and NUREG 2166, Physical Security Best Practices for the Protection of Risk Significant Radioactive Material) also provide extremely useful information on how to implement the Part 37 requirements and improve radioactive material security.

If you have any questions, please contact me at pwynne@iiaglobal.com.

Sincerely,

Paul Wynne
Director and General Manager

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