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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

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Comment on FR Doc # 2016-05260

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RULES AND LINES
MAY 16 10:02 AM '16**General Comment**

GIPA comments

SUNSI Review Complete**Template = ADM – 013****E-RIDS= ADM-03****Add=** G. Smith (GES)

May 12, 2016

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

**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:

As requested in the Federal Register in March 2016, The Gamma Industry Processing Alliance ("GIPA") would like to comment on the U.S. Nuclear Regulatory Commission (NRC) security regulatory requirements contained in 10 CFR Part 37 and its guidance documents.

GIPA represents gamma processing industry leaders. We advocate the development of responsible regulations that enhance the safe and secure management of cobalt-60 sources and related irradiation processing facilities. We are committed to the prompt dissemination of accurate information about this beneficial and vital technology. We believe in acting together to quickly deal with emerging issues that affect the future beneficial applications of gamma processing in North America. Our industry group also has vast experience related to the security of cobalt-60 and believes its continued use is vital to the medical and food industries.

We would like to express our sincere appreciation for the efforts that the NRC has put into the Part 37 regulatory process. We think it has gone a long way to properly secure the transportation and use of radioactive materials, especially cobalt-60. Following are some comments on the regulatory requirements contained in 10 CFR Part 37:

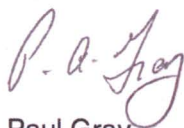
- We believe the new Part 37 regulation is very thorough and details all of the requirements in the previous Orders, as well as contain some new regulatory improvements.
- The Personnel Background Investigation process required under the new regulation is extremely comprehensive and requires extensive training for the "Reviewing Officials" to ensure compliance is being met. In addition, the new requirement for a periodic re-check of this personnel background investigation adds another level of security.

- The Part 37 requirement of a detection system capable of detecting unauthorized removal of material from the security zones is a very good upgrade in the overall security of the facility that addresses many terrorist threat concerns.
- The requirement for each licensee to coordinate an annual meeting with the LLEA is also a very good security improvement that minimizes potential threats for the transport, storage and use of Category 1 radioactive materials.
- And the conversion to "Official Use Only" security-related documentation will greatly improve the communications between authorized staff members while retaining an appropriate level of security for information.

In addition to these comments, GIPA would like to also state that the NRC-provided guidance documents have been extremely useful to our industry in helping better understand and implement the Part 37 requirements. These documents include NUREG 2155 (Implementation Guidance for 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material") and NUREG 2166 (Physical Security Best Practices for the Protection of Risk Significant Radioactive Material). They were very easy to understand and provided means to greatly improve the facility security.

GIPA appreciates the opportunity to comment on the regulatory requirements in 10 CFR Part 37. If you have any questions, please contact me at 613-592-3400 Ext. 2483 or Paul.Gray@nordion.com.

Sincerely,



Paul Gray
Chairman, GIPA