



Submitted electronically via www.regulations.gov

March 10, 2017

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

Re: Category 3 Source Security and Accountability (Docket ID NRC-2016-0276)

Dear Ms. Bladey:

I am writing on behalf of Elekta, Inc. to respond to the Nuclear Regulatory Commission's (NRC) request for comment on Category 3 Source Security and Accountability (Docket ID NRC-2016-0276). Elekta is a cancer care company that has pioneered innovative and technological advancements in oncology that extend and improve the lives of Americans. Elekta develops and manufactures brachytherapy solutions. Brachytherapy is an advanced cancer treatment that uses radiological sources, including Category 3 sources, to precisely treat tumors.

Elekta is committed to ensuring the safe use of radiological sources and to working with the NRC on implementing policies that enhance safety. We are concerned that the policies proposed in the request for comment will not have a measurable impact on safety. However, these policies will result in increased administrative burdens and costs for companies and cancer care providers. We are specifically concerned with the proposal to require Category 3 sources to be included in the National Source Tracking System (NSTS). Access to brachytherapy, a life-extending technology for cancer patients, is currently limited. Increasing undue administrative burdens and costs on companies and health care providers may further limit access to this technology for cancer patients.

We urge NRC to refrain from increasing administrative burdens on cancer care companies and providers and to not require Category 3 sources to be included in the NSTS. Please do not hesitate to contact me at robert.thomas@elekta.com or 202-465-8752 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Thomas", written over a light gray rectangular background.

Robert Thomas
Vice President, Health Policy and Government Affairs