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11/9/2017  
82FR 2399-2

**Duran-Hernandez, Doris**

**Subject:** FW: Docket ID NRC-2016-0276, Category 3 Source Security and Accountability

**Attachments:** NC RPC Comments on Category 3 Sources 3-8-17.pdf

**From:** Wu, Irene

**Sent:** Wednesday, March 08, 2017 5:09 PM

**To:** Duran-Hernandez, Doris <Doris.Duran-Hernandez@nrc.gov>

**Subject:** FW: Docket ID NRC-2016-0276, Category 3 Source Security and Accountability

For Docket ID NRC-2016-0276

**From:** Plott, Carmine M [<mailto:cmplott@novanthealth.org>]

**Sent:** Wednesday, March 08, 2017 4:55 PM

**To:** Wu, Irene <[Irene.Wu@nrc.gov](mailto:Irene.Wu@nrc.gov)>

**Cc:** Dr. Wayne Thomann, PhD <[thoma010@mc.duke.edu](mailto:thoma010@mc.duke.edu)>; Cox, Lee ([lee.cox@dhhs.nc.gov](mailto:lee.cox@dhhs.nc.gov))

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**Subject:** [External\_Sender] Docket ID NRC-2016-0276, Category 3 Source Security and Accountability

Dear Ms. Wu:

Please accept the attached letter from the North Carolina Radiation Protection Commission in response to the Federal Register Notice published on January 9, 2017 regarding Category 3 source security and accountability.

Thank you for this opportunity to provide comments. If you have any questions, please feel free to contact me.

Sincerely,  
Carmine Plott, Chair  
North Carolina Radiation Protection Commission

**Carmine M Plott, PhD, CHP, DABR**  
Radiation Safety Officer and Diagnostic Medical Physicist

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**SUNSI Review Complete**  
**Template = ADM - 013**  
**E-RIDS= ADM-03**

Add= *I. Wu (IWX)*

2017  
11-08 PM 5:11  
RUBEN G. GONZALEZ



**North Carolina Department of Health and Human Services  
Division of Health Service Regulation**

**ROY COOPER**  
GOVERNOR

**MANDY COHEN, MD, MPH**  
SECRETARY

**MARK PAYNE**  
DIRECTOR

**Carmine M. Plott, Ph.D., CHP, DABR, Chair**  
Expert From the State-At-Large

**March 8, 2017**

**Wayne R. Thomann, DrPH, Vice-Chair**  
NC Hospital Association

**Irene Wu, P.E.**  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Jerome Hightower, III, MS, DABMP**  
Environmental Protection Field

**Larry E. Haynes, CHP**  
Public Utility Generating Power by Atomic  
Energy

**Subject: Docket ID NRC-2016-0276, Category 3 Source Security and Accountability**

**Diana Hart, MS**  
Experience in Atomic Energy Field Other  
Than Power Generation

**Dear Ms. Wu:**

**Roger C. Sitt, Ph.D., CHP**  
Scientist or Engineer From University  
Faculty

The North Carolina Radiation Protection Commission<sup>1</sup> appreciates the opportunity to comment on the U.S. Nuclear Regulatory Commission's (NRC) effort to evaluate whether it is necessary to revise NRC regulations or processes requiring Category 3 source protection and accountability. Potential changes include requiring license verification through the License Verification System (LVS) or by directly contacting regulatory authority for Category 3 licenses, including Category 3 sources in the National Source Tracking System (NSTS), and requiring Part 37 security requirements for Category 3 quantities.

**Holly J. Durge, MD**  
NC Medical Society

**John B. Ludlow, DDS, MS, FDSRCS(Ed)**  
NC Dental Society

The Radiation Protection Commission has been monitoring and assessing the proposal and agrees with the North Carolina Agreement State and the Nuclear Energy Institute with regard to this issue. We oppose the expanded regulation of these sources as such changes would add significant burden to our regulated community with no significant benefit to the public we serve.

**Paul Davis, DC, CCSP, CCNA**  
NC Chiropractor Association

**Eileen M. Franklin, MS, DABMP, DABR**  
NC Society of Radiologic Technologists

**David Tobin, DPM**  
NC Board of Podiatry Examiners

**Catherine Eastwood**  
NC Utilities Commission

**Thank you for your consideration of these comments.**

**Chris G. Hoke, JD**  
NC Commission for Public Health

**Sincerely,**

**Vicent**  
NC Environment Management Commission

*Carmine M. Plott*

*Wayne R. Thomann*

**Carmine M. Plott, Ph.D., CHP, DABR, Chair**  
NC Radiation Protection Commission

**Wayne R. Thomann, Dr.P.H, Vice-Chair**  
NC Radiation Protection Commission

**James C. Sawyer, PE**  
NC Department of Transportation

**Michael A. Sprayberry, Director**  
NC Emergency Management

**W. Lee Cox III, Chief**  
NC DHSR Radiation Protection Section

**J. Edgar Geddis, PhD**  
NC Department of Labor

**Bryan A. Strickland**  
NC Industrial Commission

**Melaine Butler, PE**  
NC Department of Insurance

**Christopher B. Taylor**  
NC Medical Care Commission

<sup>1</sup> Created and authorized by North Carolina General Statute 104E-7 in 1975, the Radiation Protection Commission adopts, promulgates, amends and repeals rules, regulations and standards relating to the manufacture, production, transportation, use, handling, servicing, installation, storage, sale, lease, or other disposition of radioactive material and radiation machines. Its membership consists of 11 voting public members and 10 nonvoting ex officio members, all appointed by the Governor.

**Radiation Protection Section**  
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