



Johnson Matthey

March 10, 2017

U.S. Nuclear Regulatory Commission  
2100 Renaissance Blvd, Suite 100  
King of Prussia, PA 19406-2713

Docket ID: NRC-2016-0276

Re: Comments on Category 3 Source Security and Accountability, Revisions to Regulations

To Whom It May Concern,

Tracerco, a business unit of Johnson Matthey Inc., does not believe that the proposed regulatory revisions intended to increase the security requirements for category 3 quantities of radioactive material are either necessary or appropriate. The proposed changes do not address and will have no beneficial impact on the concerns identified in the GAO audit and investigation. We believe that the current security standards relating to category 3 quantities of radioactive material are adequate and do not need to be revised. The rules and requirements associated with generally licensed devices are also adequate in their present form and should remain unchanged.

For Tracerco, the burden of this proposed rule change would be considerable both operationally and commercially. The proposed regulatory changes would require significant investment, out of proportion to the benefits gained, to develop and maintain a compliant security program. We are concerned that the burden of a program of this nature could unnecessarily discourages the use of devices containing radioactive material in applications for which they are both cost effective and safe.

The risks related to category 3 quantities of radioactive material were carefully considered and assessed during the development of the current security standards. Appropriate safety and security standards were established consistent with those assessments. Those standards are effective and do not require revision.

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