



Virtua  
Department of Diagnostic Imaging Physics  
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March 10, 2017

Nuclear Regulatory Commission  
Washington, D.C.  
Attn: Rulemaking and Adjudication Staff

**Subject:** Comment on Proposal of Additional Regulations and Processes for Category 3 Sources

**Reference:** Docket ID NRC-2016-0276

Virtua is pleased to submit our comments for consideration on the NRC's proposed processes and regulations governing source protection and accountability of Category 3 sources of radioactive material.

We operate a licensed facility that sends and receives Category 3 sources three times per year for a high dose rate afterloading system utilizing a single vendor. This vendor ships us a source and we return our current source to them for disposal. Since we utilize a single pathway and exclusive vendor due to the make/model of our HDR brachytherapy unit, it is unreasonable to require us to spend additional time entering information in the License Verification System (LVS) and the National Source Tracking System (NSTS) for no perceivable security benefit. Our license does not permit us to possess Category 2 amounts of the Category 3 sources we receive, and to acquire them in aggregate through intentional or unintentional means would take a profoundly unique and unrealistic set of circumstances. We have specific policies in place that were included in our license application that prevent us from possessing Category 2 amounts. In the unlikely event that we would receive an unexpected source that would put us over the Category 2 amount, our response plan it to immediately return the source to the vendor as per our license commitment.

The possibility of imposing Part 37 physical security requirements on Category 3 sources would introduce a profound burden to facilities with HDR brachytherapy. Current requirements for source security are sufficient to protect these sources. These sources are secured in controlled areas that a limited amount of staff can access. These staff members have already had background checks conducted in order to gain employment at our facility. Requiring us to implement Part 37 requirements would cause us to invest significant resources in security upgrades, development of new policies and procedures, and credentialing of our staff that we do not believe would increase the security of our sources and does not rise to the level of risk perceived by the enhanced security.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Januseski', written over a horizontal line.

Daniel Januseski, M.S.  
Radiation Safety Officer