

Hunt, Jane

From: Jeanne Miller
Sent: Wednesday, March 28, 2012 1:42 PM
To: Consultation
Subject: Comment(s) on 2.0 section of RD/GD-338: Security Measures for Sealed Sources document

Comment: Aggregation of source activities was not formally addressed prior to this document.

If multiple sources are in storage at the same site, or being transported on the same vehicle, will aggregation of activities still be applied if there are two barriers for each individual source (envelopes of security): ie sources are locked in a secure source shield/pig with an approved, unique lock, the source source shields are chained and locked individually to an integral part of the storage area or truck and/or sources are locked within individual pits or storage areas, or compartments on the vehicle? The NRC currently accepts these means to not apply aggregation to the calculation of total source activity and categorization.

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