



Review of Proposed Rule 10 CFR Part 37

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Advisory Committee on the Medical Uses of
Isotopes***

ACMUI Comments on Proposed Part 37 Rule

- ***Radioactive sources are essential for medical and research uses***
- ***Costs to implement and manage Increased Controls License Orders (IC Orders) are substantial***
- ***ACMUI supports NRC in establishing reasonable security requirements***

ACMUI Concerns on Proposed Part 37 Rule

- ***Confusing new requirements diminish security***
 - ***Reviewing official physical access to sources***
 - ***Excessive requirements to determine trustworthiness***
 - ***Licensee held responsible for police involvement***

ACMUI Concerns on Proposed Part 37 Rule

- ***NRC cost estimates are not realistic***
- ***Large differences among sources and licensees require better development of rule***

ACMUI Concerns on Proposed Part 37 Rule

- ***Increased costs to implement rule will reduce patient access to essential medical procedures***
- ***Rule ignores foreign threats but penalizes legitimate domestic medical users***

ACMUI Recommendations on Proposed Part 37 Rule

- ***If Part 37 is needed now, change rule to implement current IC Orders requirements first; otherwise keep IC Orders in place***

ACMUI Recommendations on Proposed Part 37 Rule

- ***Develop a more risk-informed and performance-based model to codify security requirements for byproduct materials***

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