

February 3, 2000

Mr. Robert Quillin, Director
Laboratory and Radiation Services Division
Colorado Department of Health and Environment
8100 Lowry Boulevard
Denver, CO 80230

Dear Mr. Quillin:

On behalf of the CRCPD Committee on Unwanted Radioactive Material (E-34), I invite Colorado to participate in a pilot program for a "round-up" of unwanted cesium sources. The program is funded by the Environmental Protection Agency with additional assistance and support from the Nuclear Regulatory Commission, the Department of Energy, and representatives from the scrap metal industry. The funding is primarily meant to facilitate economical management of unwanted radioactive sources, not to pay directly for costs of disposal. However, since this is a pilot project, there may be some discretion permitted based on individual circumstances for true "orphan" sources.

The pilot program will be limited to Colorado and discrete Cs-137 sources. We anticipate being able to accept anything above an exempt quantity (10 microcuries) up to several curies. Ideally, a single collection point should be used to permit a broker to consolidate to the legal limit of the package. We will need your assistance in several areas including:

1. Contacting individual licensees to determine specific needs. For example, is the source leaking or still housed in a gauging device? What packaging is needed and how will the source be transported to the point of collection?
2. Soliciting a central point of collection; i.e., one of the licensees participating in the pilot program, state facility, or a local broker.
3. Collecting the money used to fund actual disposal costs (with the exception of an actual "orphan" source).
4. Assisting with any specific licensing issues related to the "round-up".
5. Provide information to the media, "advertise" the round-up and respond to media information requests.

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The pilot program funding will cover the cost of the broker removing a source from its housing, properly handling any leaking sources identified, and consolidating the radioactive waste. There is some flexibility as to resources that can be provided to Colorado, for example, media briefing materials. The goal of the pilot program is to facilitate creatively and constructively the round-up and disposal process.

Since Colorado is in the Rocky Mountain Compact, the Cs-137 waste will be shipped to the Hanford LLRW Site in the State of Washington. The regulatory agency staff indicated that brokers are routinely consolidating loads because it lowers the overall disposal costs. There is a requirement for each owner to have a disposal permit (\$400 for up to 50 ft³), and the owner is defined as the person who put the radioactive material to the last practical use (not the broker). Most likely, one of the licensees involved with the round-up will need to act as the shipper. If any sources turn up that cannot be associated with an owner, the State of Colorado may have to act as the owner unless one of the licensee's can be persuaded to "adopt" the source for the purpose of disposal.

The E-34 Committee has high expectations for the success of this pilot program. Based on our experience in Colorado, we hope to move forward and perform round-ups on a national level. The process should take 6 months to a year to complete. We are willing to work with you in developing the time-table along with our funding sponsors. Please respond by February 21, 2000 if you wish to participate. Thank you for your interest in the program.

Sincerely,



Joe Klinger, Chair
E-34 Committee on Unwanted Radioactive Sources
Conference of Radiation Control Program Directors, Inc.

JGK:kjg

cc: Chuck Hardin, Executive Director

Board of Directors (State + Federal)