

STATE	YES/DATE	NO
ALABAMA		
ARIZONA		
ARKANSAS		
CALIFORNIA		
COLORADO		
FLORIDA		
GEORGIA		
IOWA		
ILLINOIS		
KANSAS		
KENTUCKY		
LOUISIANA		
MAINE	2/17/05	
MARYLAND		
MASSACHUSETTS	2/28/05	
MISSISSIPPI		
NEBRASKA		
NEVADA		
NEW HAMPSHIRE		
NEW MEXICO		
NYS DOH		
NY DOL		
NY DEC		
NYC DOH		
NORTH CAROLINA		
NORTH DAKOTA	2/3/05	
OHIO		
OKLAHOMA		
OREGON		
RHODE ISLAND		
SOUTH CAROLINA		
TENNESSEE		
TEXAS		
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION		
UTAH		
WASHINGTON	3/9/05	
MINNESOTA		
PENNSYLVANIA	2/2/05	
WISCONSIN	3/1/05	

MICHIGAN

2/4/05

**From:** "Allard, David" <djallard@state.pa.us>  
**To:** <ATM@NRC.GOV>  
**Date:** 2/2/05 7:46PM  
**Subject:** "Hazardous Scrap - Beware" and Draft Public Brochure

To: Aaron T. McCraw, Office of State and Tribal Programs  
TEL: (301) 415-1277

cc: Paul H. Lohaus, Bob Bores, et al.

Hi Aaron,

I appreciate NRC asking for state input on this "Hazardous Scrap - Beware" and Draft Public Brochure. Via this e-mail, I'm forwarding them to other PaDEP BRP folks for review and comment.

My input, first thought is, the poster is way too busy. In fact, I'd say page two of the brochure would be all you need. It says it all. I've printed one, done a few suggested edits, scanned, and attached it for your consideration. However, the one strong comment I would make is, do it generic for scrap yards and solid waste facilities, e.g., landfills and incinerators. We're finding many many more sources at landfills vs. scrap yards these days.

Lastly, I would ask that you make your documents "open" and not pdf when you distribute finals. That way the states can edit if they want or just add their contact info, and then transmit electronically. In fact, if you give me page two of that brochure in Word or ppt, we'll give you credits and have on the street pronto!

Thnx,

Dave

\*\*\*\*\*  
David J. Allard, CHP, Director  
PA Dept. of Environmental Protection  
Bureau of Radiation Protection  
P.O. Box 8469  
Harrisburg, PA 17105-8469

Tel: 717-787-2480  
Fax: 717-783-8965  
E-mail: djallard@state.pa.us  
<http://www.dep.state.pa.us/dep/deputate/airwaste/rp/rp.htm>

\*\*\*\*\*  
The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

-----Original Message-----

From: owner-stp-announcements@nrc.gov  
[mailto:owner-stp-announcements@nrc.gov] On Behalf Of Gwendolyn Davis

Sent: Wednesday, February 02, 2005 5:33 PM

To: Gwendolyn Davis

Cc: RidsNmsslms@nrc.gov; RidsRgn1DnmsRsao@nrc.gov;  
RidsRgn1MailCenter@nrc.gov; RidsRgn1OraRslo@nrc.gov;  
RidsRgn2DnmsRsao@nrc.gov; RidsRgn2MailCenter@nrc.gov;  
RidsRgn2OraRslo@nrc.gov; RidsRgn3Dnms@nrc.gov; RidsRgn3DnmsRsao@nrc.gov;  
RidsRgn3MailCenter@nrc.gov; RidsRgn3Ora@nrc.gov;  
RidsRgn3OraRslo@nrc.gov; RidsRgn4DnmsRsao@nrc.gov;  
RidsRgn4MailCenter@nrc.gov; RidsRgn4OraRslo@nrc.gov  
Subject: STP-05-010, Opportunity to Comment on Draft Revisions  
toNUREG/BR-0108

**\*\* High Priority \*\***

... "Hazardous Scrap - Beware" and Draft Public Brochure

All Agreement States Letter STP-05-010 w/Enclosures are contained in the attached electronic files; can be located in ADAMS at: ML050330525; and will be posted at the STP web site: <http://www.hsrp.doe.gov/nrc/home.html>

Any problems should be reported to Jim Myers, [jhm@nrc.gov](mailto:jhm@nrc.gov).

Thank you.

**CC:** <PHL@NRC.GOV>, <RJB@NRC.GOV>, <jhm@NRC.GOV>, "Urciuolo, Louis" <lurciuolo@state.pa.us>, "Hamm, Ronald" <rhamm@state.pa.us>, "Wilson, Scott" <scwilson@state.pa.us>, "Yusko, James" <jyusko@state.pa.us>, "Karron, George" <gkarron@state.pa.us>, "Derstine, Terry" <tderstine@state.pa.us>, "Shearer, Dwight" <dwshearer@state.pa.us>, "Maher, John" <jomaher@state.pa.us>, "Seiber, Benjamin" <bseiber@state.pa.us>, "Wilson, Scott" <scwilson@state.pa.us>, <tdevine@crpdpd.org>, <ebailey@dhs.ca.gov>, <fitch@nmenv.nm.us>

# Radioactive Source - Beware!

## THIS IS WHAT YOU SHOULD DO...



RECOGNIZE RADIOACTIVE ITEM, IF UNSURE OF RADIOACTIVE NATURE OF ITEM, TREAT AS RADIOACTIVE.



DO NOT TOUCH THE SOURCE!



PUT DISTANCE BETWEEN YOU AND THE SOURCE AND IF POSSIBLE, PUT SOMETHING BETWEEN YOU AND THE SOURCE, 10 to 20 feet.



WARN OTHERS AND SECURE THE AREA.



CONTACT YOUR STATE RADIATION CONTROL OFFICE, THE U.S. ENVIRONMENTAL PROTECTION AGENCY, OR THE U.S. NUCLEAR REGULATORY COMMISSION IMMEDIATELY.

- ▶ State of \_\_\_\_\_  
Tel: \_\_\_\_\_
- ▶ NRC 24 hour Ops Center  
Tel: \_\_\_\_\_
- ▶ EPA National Response  
Tel: \_\_\_\_\_

## BACKGROUND

Each year, a number of radioactive items are lost, stolen, or abandoned. Some of these items are recovered by law enforcement personnel or members of the public. Please familiarize yourself with the information contained in this brochure to better prepare yourself in the case that you should find radioactive material.

*scrap yard and landfill*

## RADIATION WARNING SYMBOL

This symbol should appear on containers and devices which hold radioactive substances. Its color and size may vary; however, its color is usually magenta or black on yellow. Please note that not all containers and devices requiring the radiation warning symbol will be properly marked with the symbol.



## NATURE AND QUANTITY OF RADIOACTIVE MATERIAL

The following are examples of terms normally used in association with the radiation warning symbol to indicate the nature of the radioactive material and its quantity. Certain other markings describing the type of container may also appear.

Examples: Nature of Radioactive Material  
Cesium 137 (Cs-137 or <sup>137</sup>Cs)  
Iridium 192 (Ir-192 or <sup>192</sup>Ir)  
Cesium 137 (Cs-137 or <sup>137</sup>Cs)  
Radium 226 (Ra-226 or <sup>226</sup>Ra)

Examples: Quantity of Radioactive Material  
Curie (Ci)  
Megacurie (mCi)  
Microcurie (μCi)  
Gigabecquerel (GBq)

Examples: Other Markings  
DOT  
Type A or B  
CERAMIC  
UNCLASSIFIED

## TYPICAL ITEMS



PORTABLE X-RAY UNIT



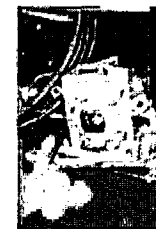
RADIOACTIVE SOURCE CONTAINER



RADIOACTIVE MEDICAL WASTE



RADIATION WARNING



RADIOACTIVE SOURCE



RADIOACTIVE SOURCE



WELL LOGGING SOURCE

**From:** "Griffin, Justin M." <jgriffin@state.nd.us>  
**To:** "atm@nrc.gov" <atm@nrc.gov>  
**Date:** 2/3/05 4:12PM  
**Subject:** RE: STP-05-010, Opportunity to Comment on Draft Revisions to NUREG/BR-0108

Message 1

Dear Mr. McCraw,

As suggested in the All Agreement State Letter dated February 2, 2005, I'll be sending 16 photos (<10 MB total) I've personally taken during inspections in N.D. I will break them into 4 email messages to meet our email size constraints.

Feel free to use any of these photos in the scrap metal poster or brochure as you see fit.

Other common items that may be handled by scrap-metal recyclers include materials from oil field operations or oil processing facilities. This includes assorted tubulars, drill stem, pipes, heater-treaters, valves, tanks, etc. which are contaminated with naturally occurring radioactive material (NORM).

If you have any questions or need additional information to support the photos, please let me know.

Sincerely,

Justin M. Griffin, P.E.

Environmental Engineer                      PH#: 701.328.5188

Radiation Control Program                      FAX: 701.328.5200

North Dakota Dept. of Health                      EMAIL: jgriffin@state.nd.us  
<mailto:jgriffin@state.nd.us>

<http://www.ndhealth.gov/aq/rad> <<http://www.ndhealth.gov/aq/rad>>

-----Original Message-----

From: O'Clair, Terry L.

Sent: Thursday, February 03, 2005

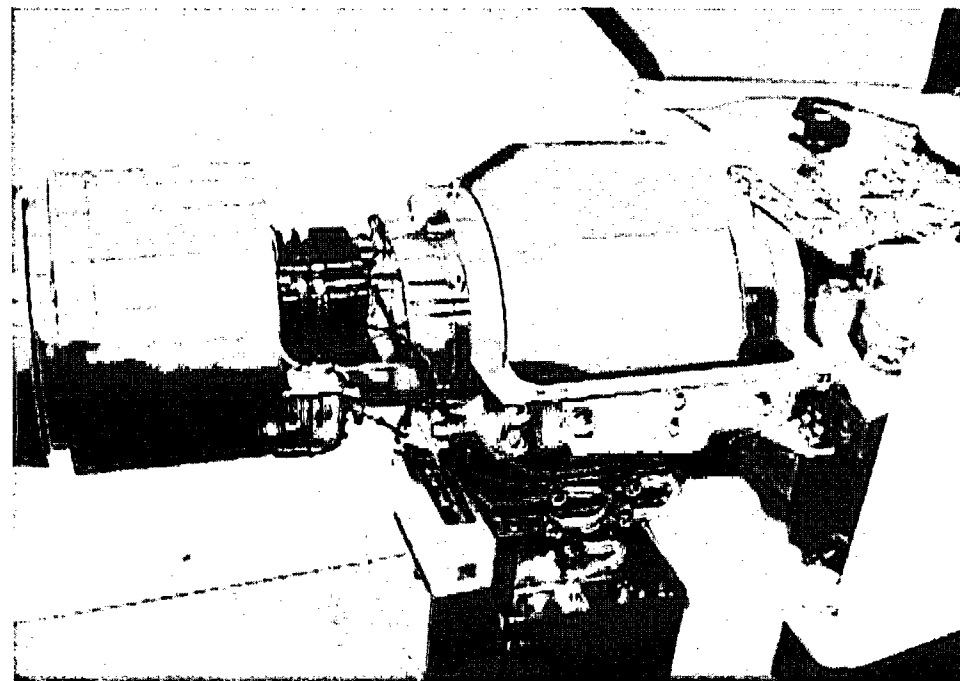
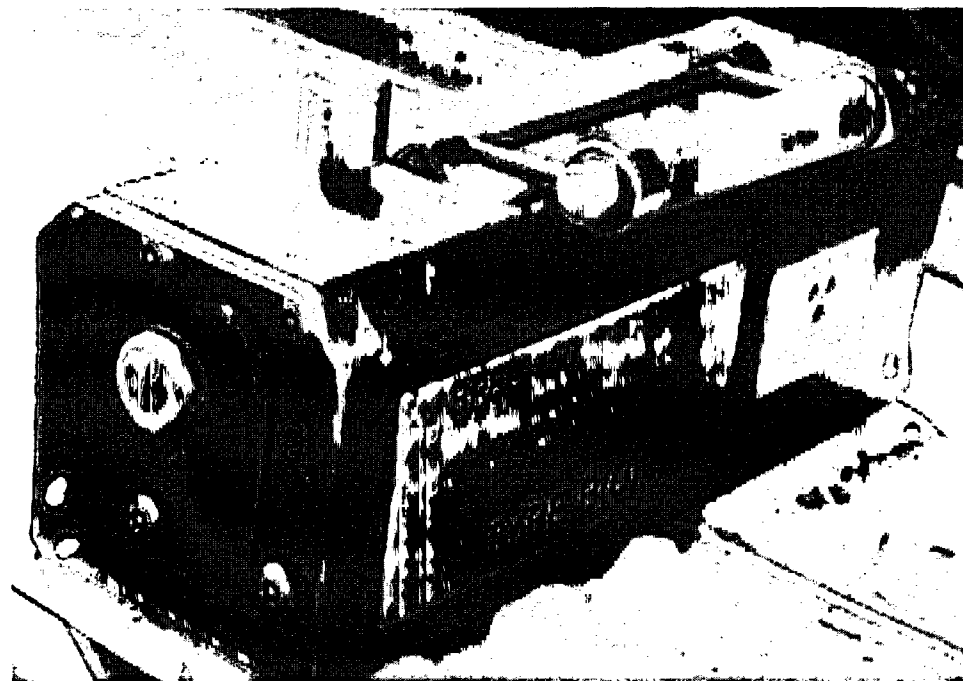
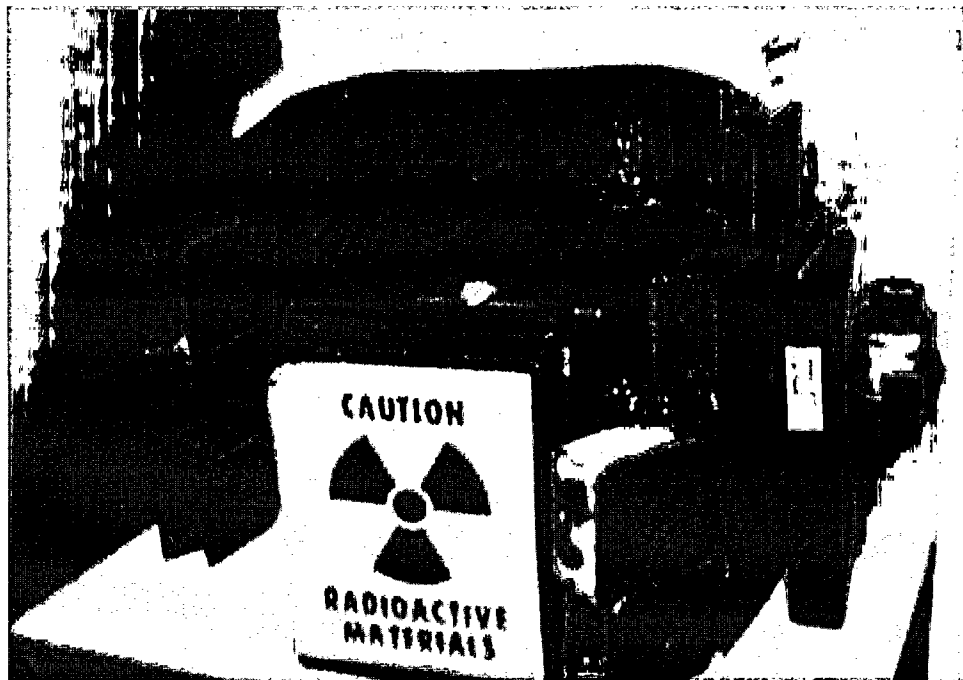
Subject: FW: STP-05-010, Opportunity to Comment on Draft Revisions to NUREG/BR-0108

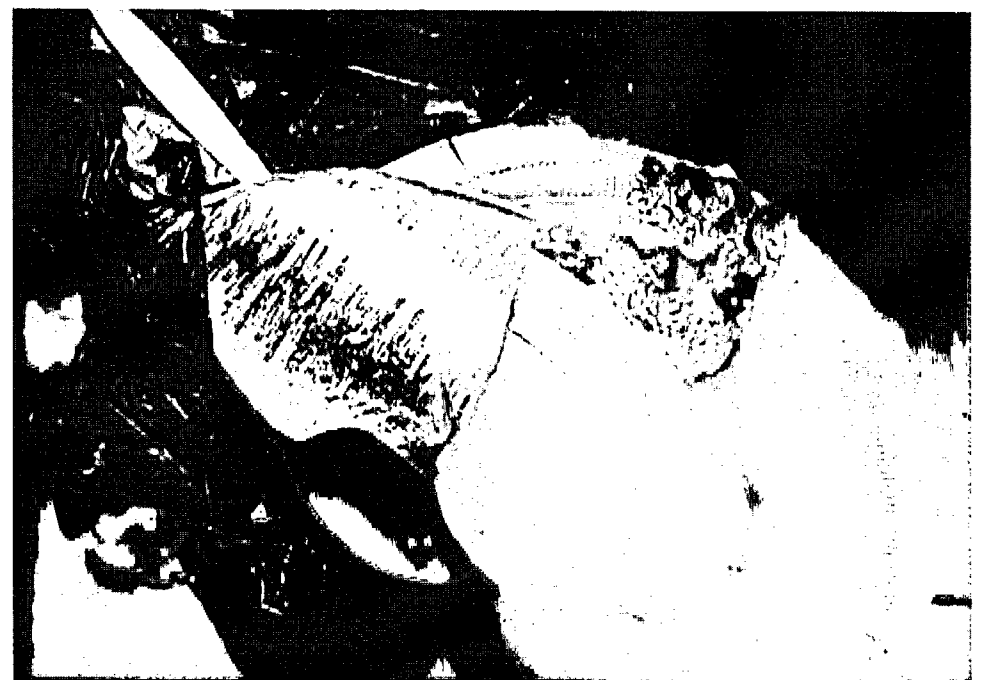
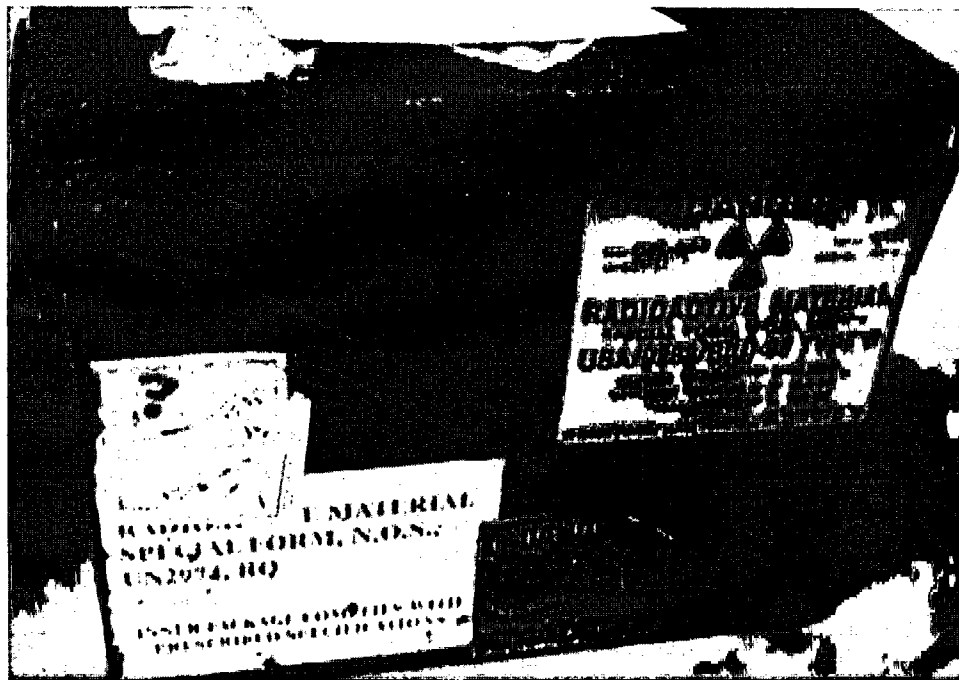
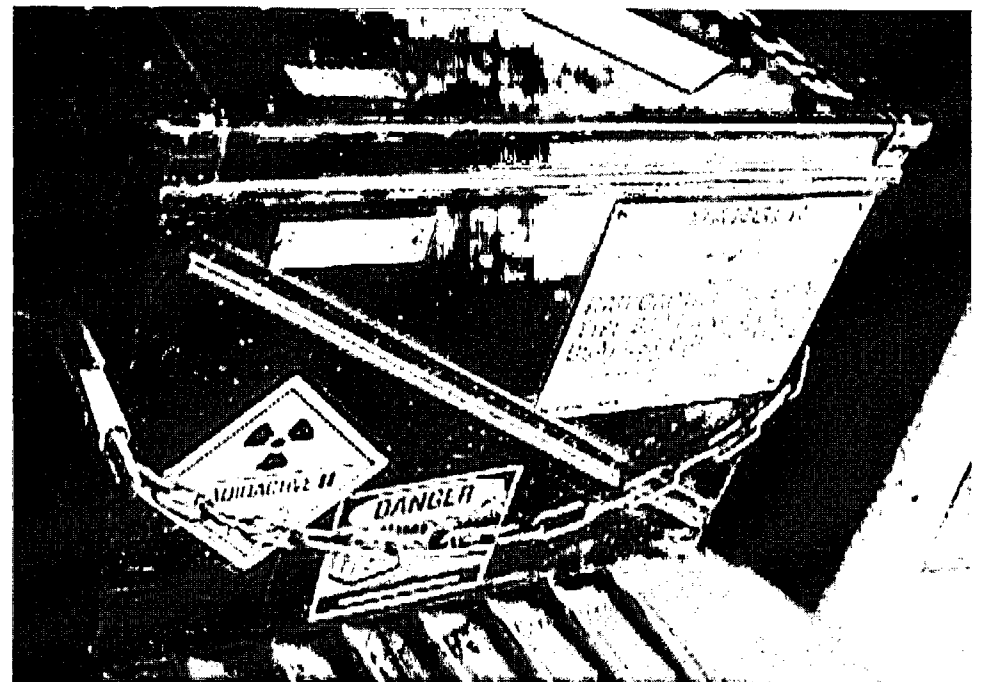
... "Hazardous Scrap - Beware" and Draft Public Brochure ...

All Agreement States Letter STP-05-010 w/Enclosures are contained in the attached electronic files; can be located in ADAMS at: ML050330525; and will be posted at the STP web site: <http://www.hsrdo.ornl.gov/nrc/home.html>

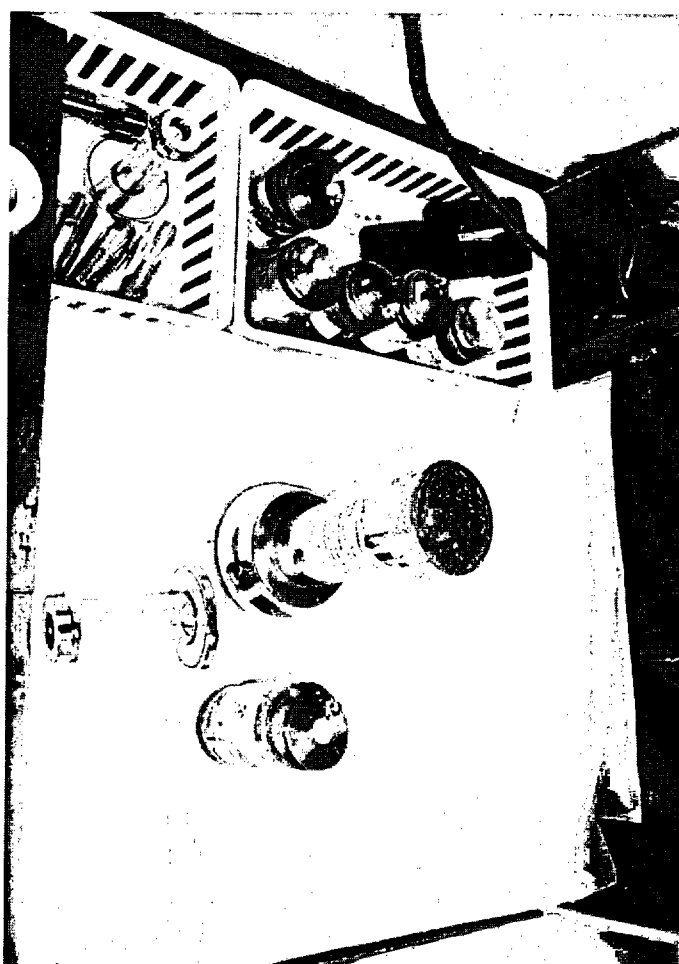
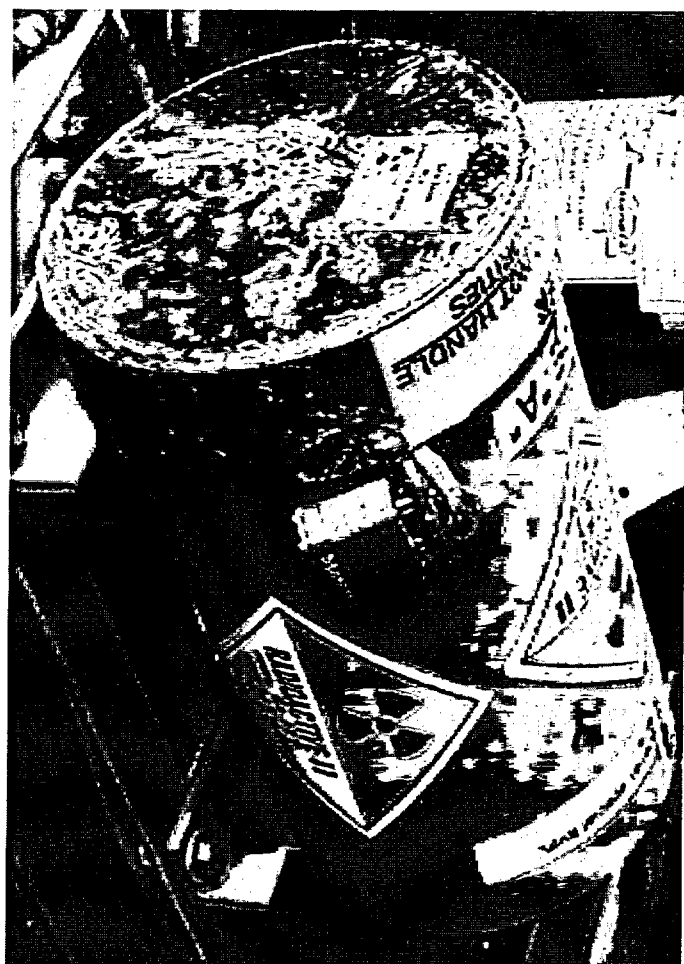
Any problems should be reported to Jim Myers, [jhm@nrc.gov](mailto:jhm@nrc.gov).

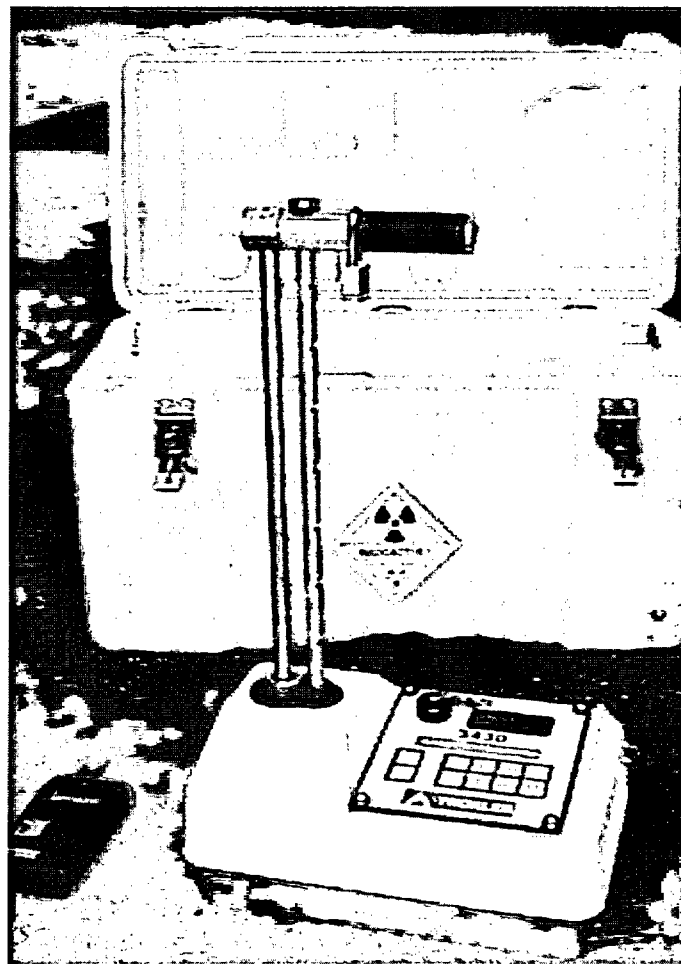
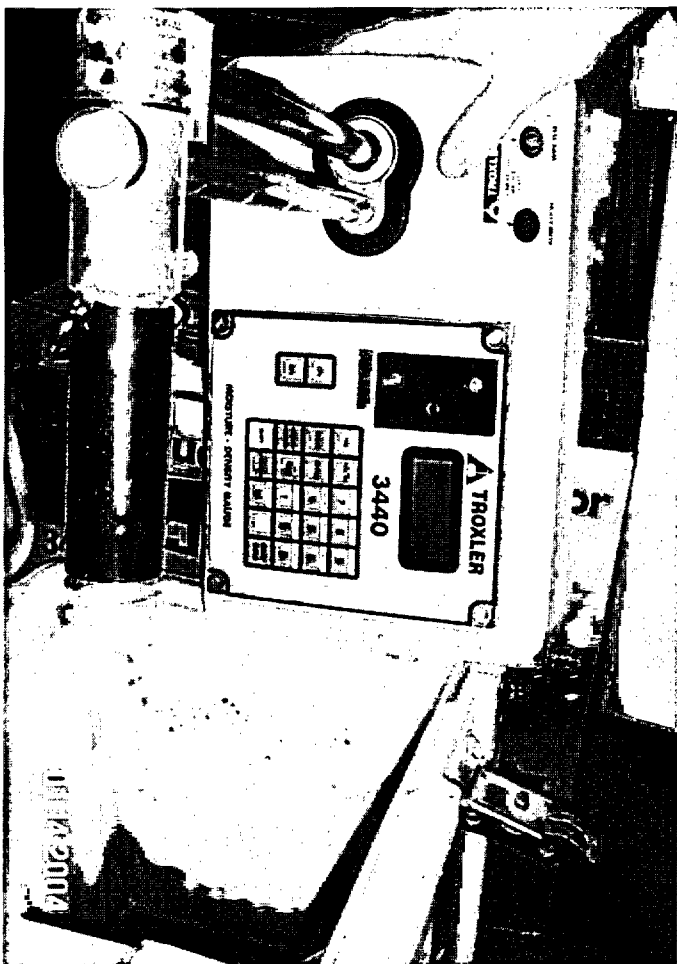
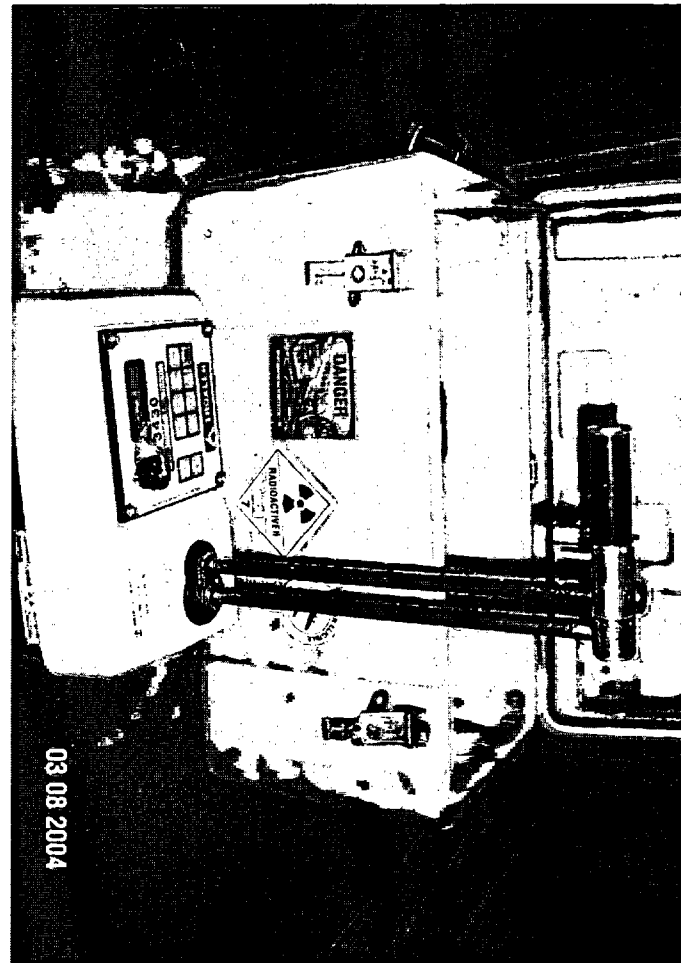
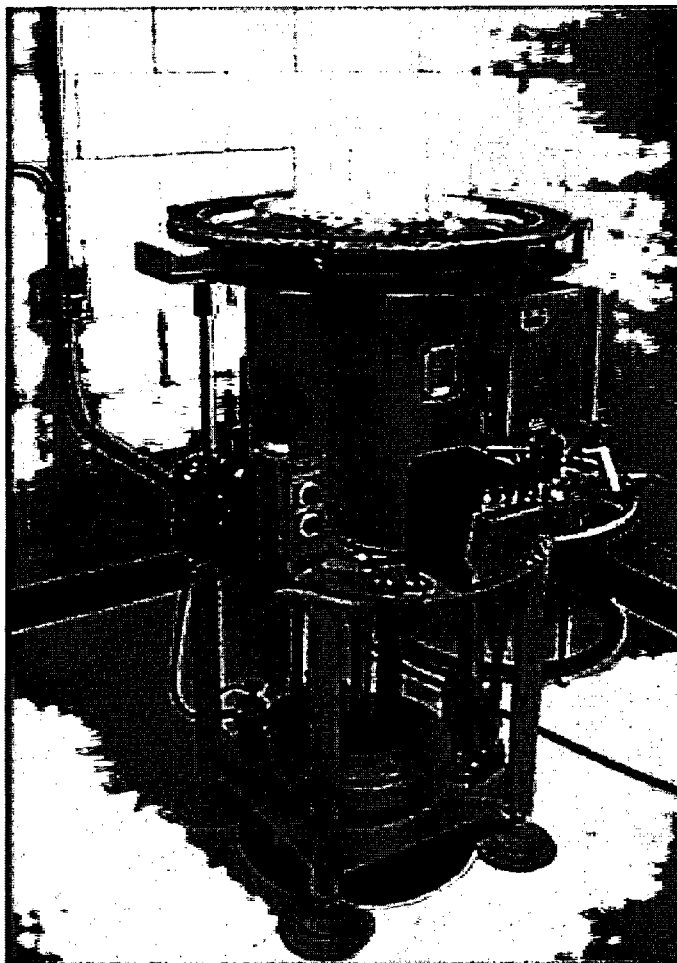
Thank you.











**From:** "Thor Strong" <strongt@michigan.gov>  
**To:** <ATM@nrc.gov>  
**Date:** 2/4/05 10:12AM  
**Subject:** Fwd: Hazardous Scrap Beware Pictures

Attached are several digital pictures that we offer for your consideration. If you wish to discuss any of these, please call Mr. Bob Skowronek, Chief of our radioactive materials unit, at 517-241-1253.

Thor Strong, Chief  
Radiological Protection and Medical Waste Section  
Michigan Department of Environmental Quality

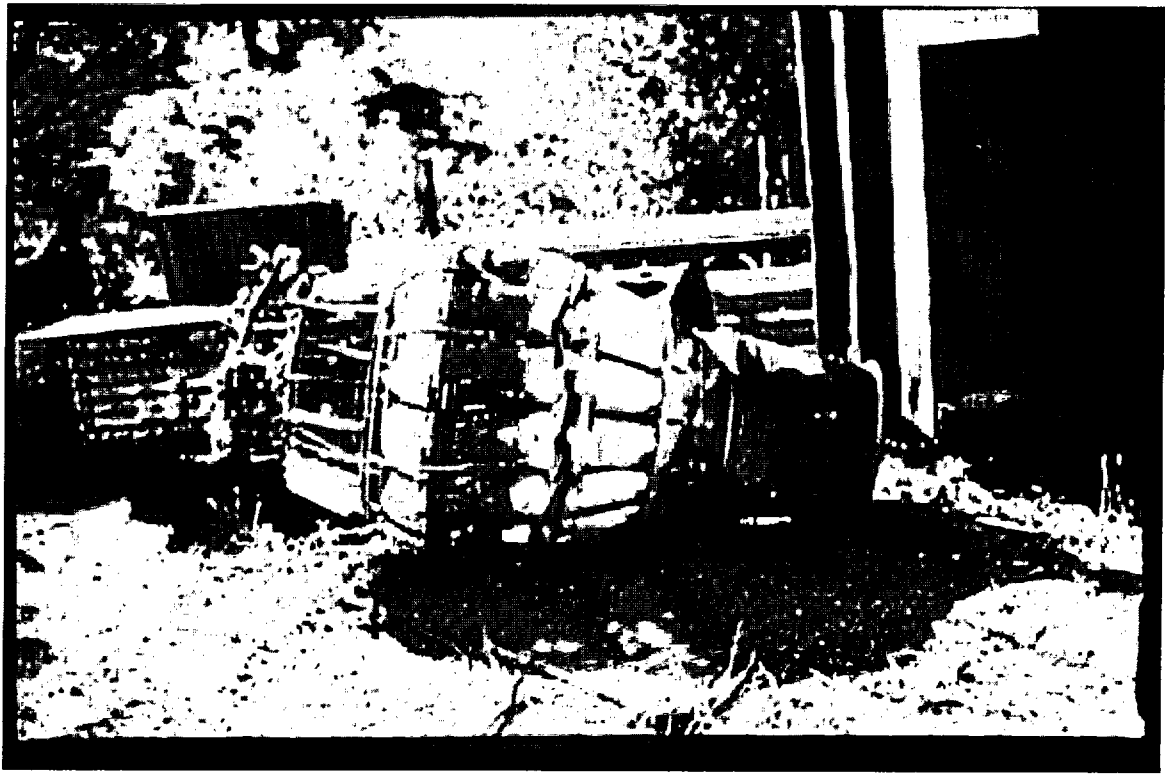
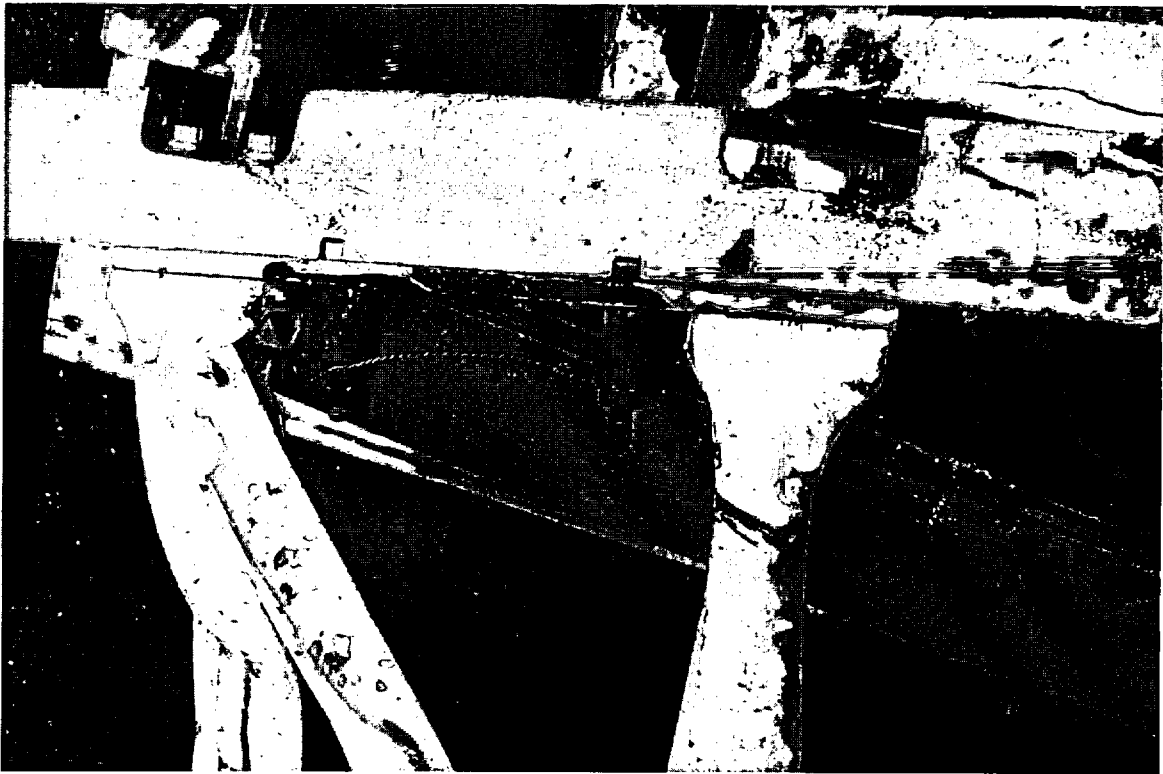
**From:** "Robert Skowronek" <skowronb@michigan.gov>  
**To:** "Thor Strong" <STRONGT@michigan.gov>  
**Date:** 2/4/05 9:59AM  
**Subject:** Hazardous Scrap Beware Pictures

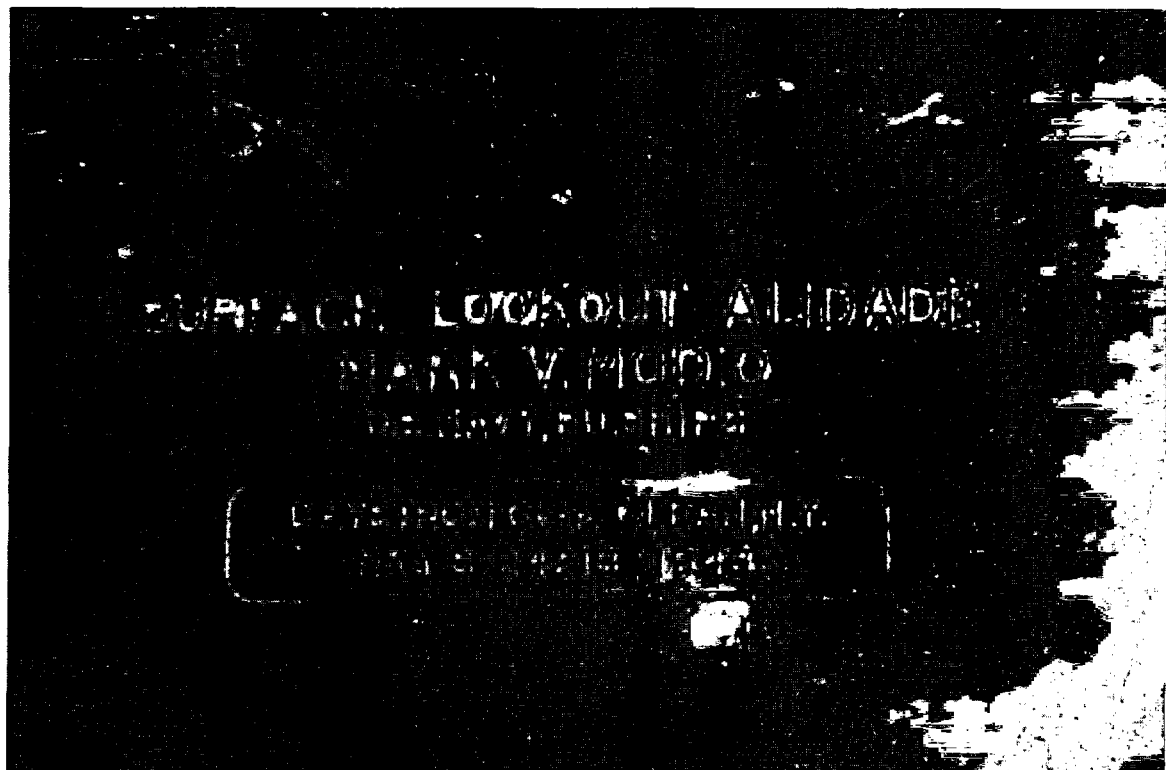
Suggested pictures to submit to NRC for STP-05-010 poster.

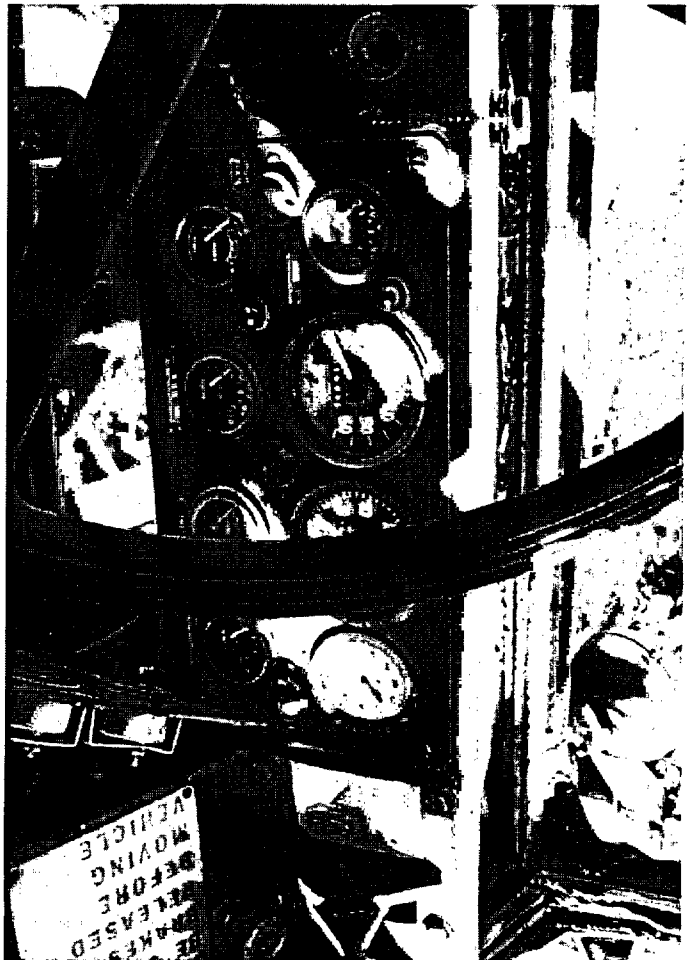
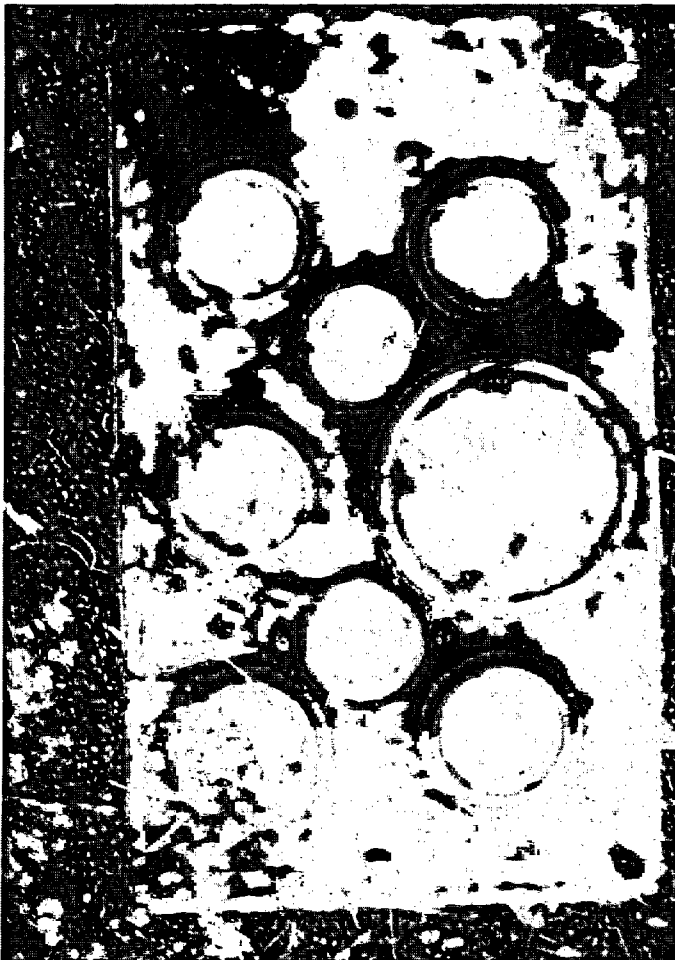
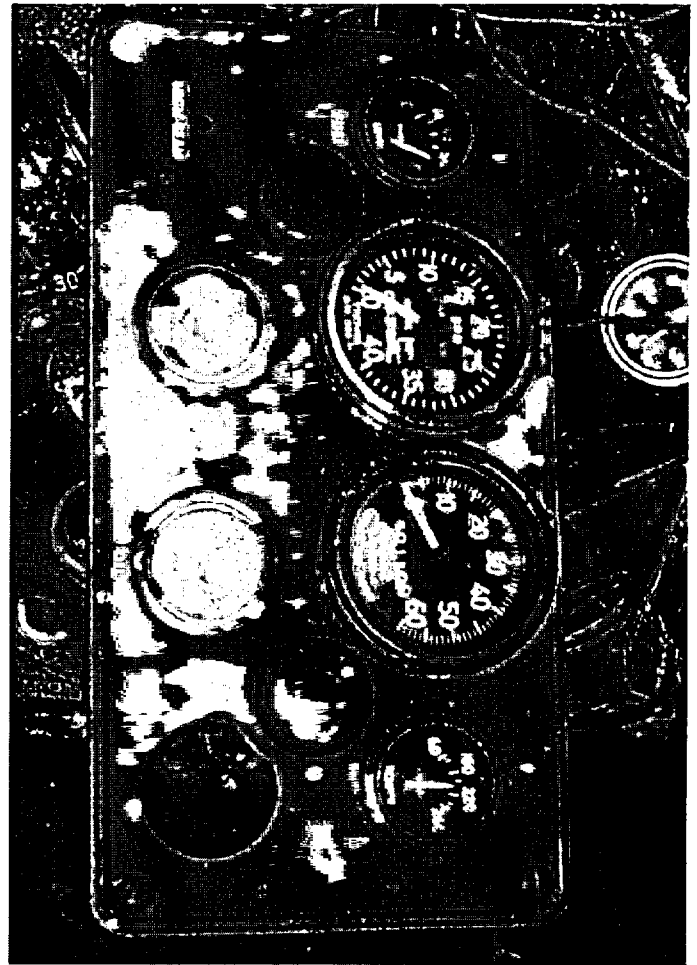
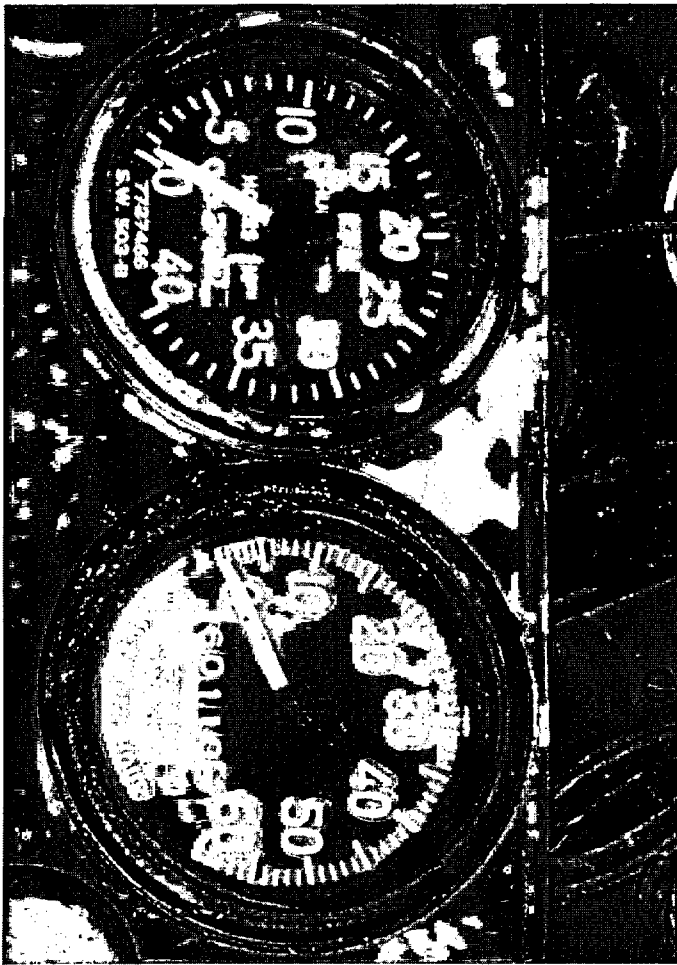
ATM@NRC.GOV

**CC:** "Kenneth Coble" <COBLEK@michigan.gov>, "Theodore Wentworth"  
<WENTWORT@michigan.gov>

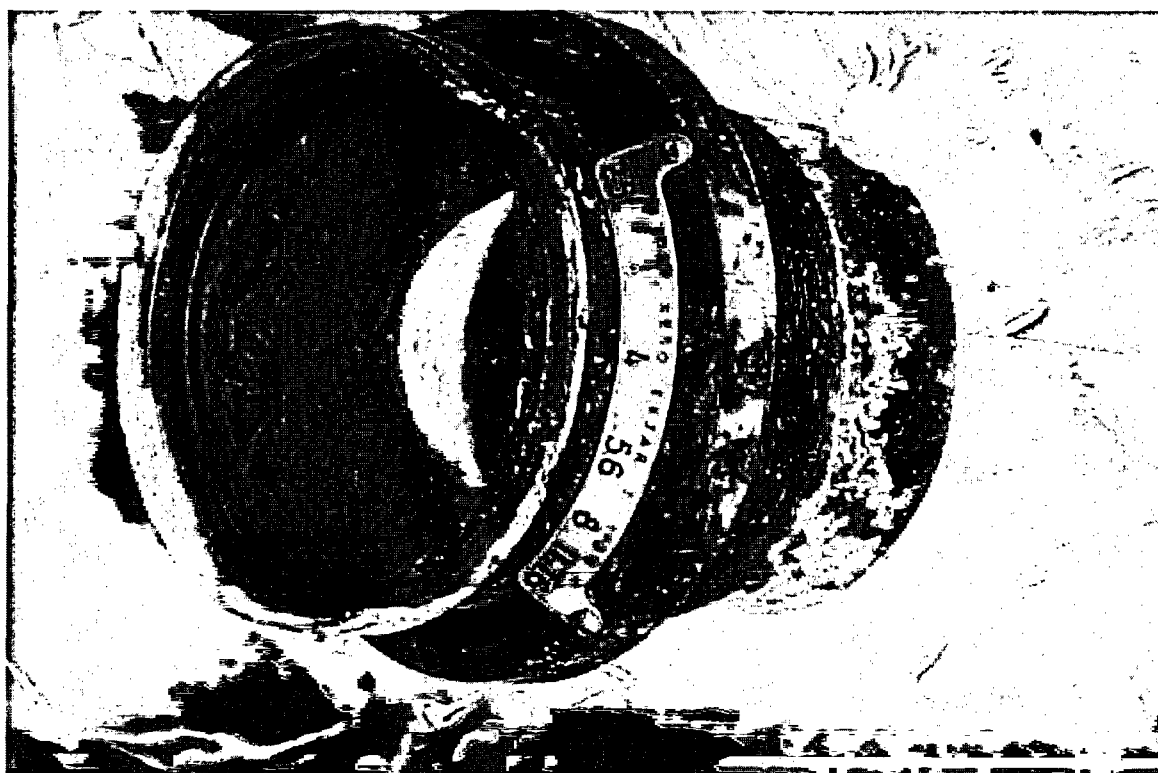


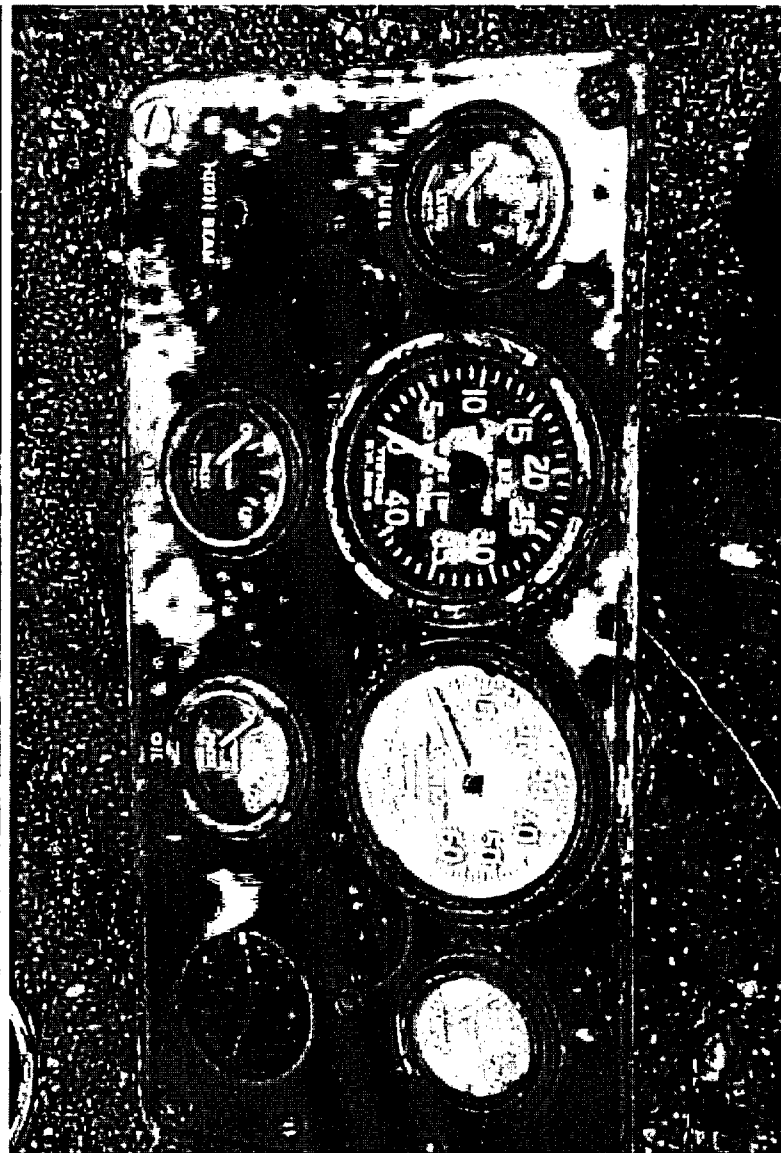
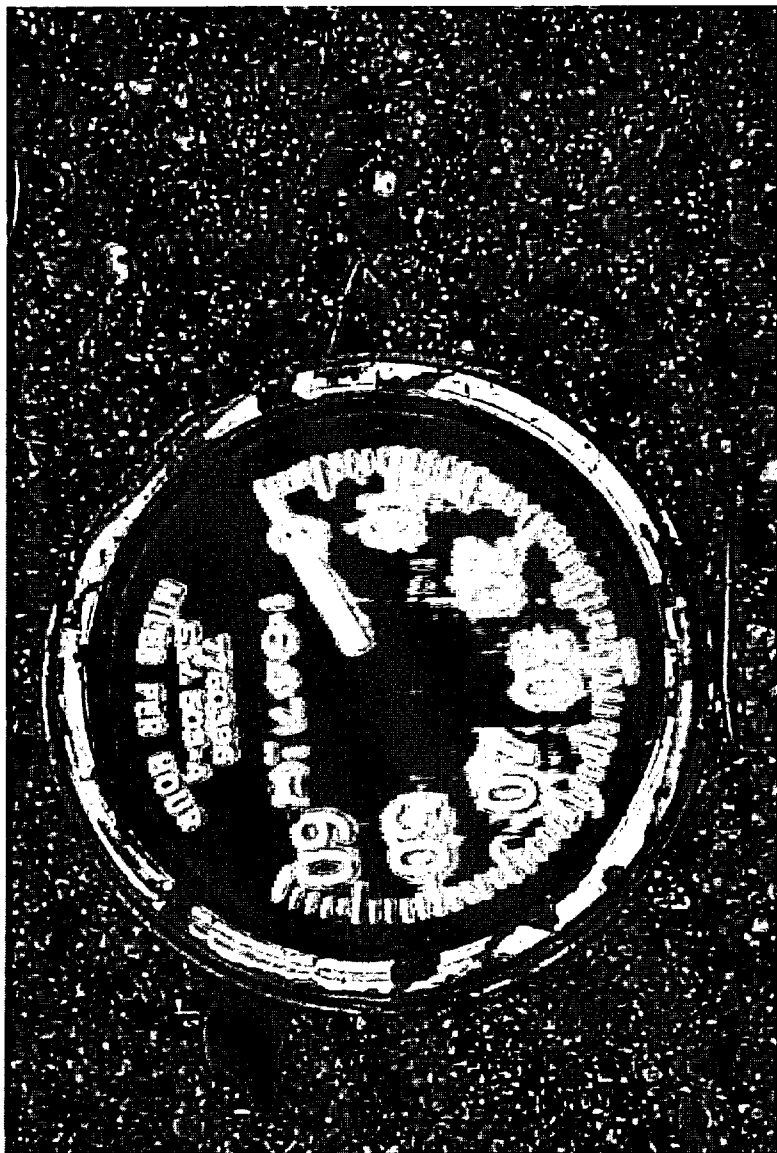












**From:** "Whalen, Michael (DPH)" <Michael.Whalen@state.ma.us>  
**To:** "ATM@NRC.GOV" <ATM@nrc.gov>  
**Date:** 2/28/05 2:34PM  
**Subject:** E-23 Comments: Scrap Metal Poster/Brochure

Aaron:

Please find attached a letter outlining E-23 comments regarding the Scrap Metal Poster and Brochure.

<<E23\_Comments\_ScrapMetalPoster\_Final.wpd>>

Michael P. Whalen Jr., CHP  
CRCPD / E-23 Chairperson  
Massachusetts Radiation Control Program  
90 Washington Street  
Dorchester, MA 02121  
Tele: 617-427-2944 x2020  
Fax: 617-427-2925  
Pager: 800.366.2337 x10735  
Email: michael.whalen@state.ma.us <mailto:michael.whalen@state.ma.us>  
[www.state.ma.us/dph/rcp](http://www.state.ma.us/dph/rcp) <<http://www.state.ma.us/dph/rcp>>

**CC:** "Barty Simonton (E-mail)" <barty\_simonton@dnr.state.ga.us>, "Deborah Kopsick (E-mail) (E-mail)" <kopsick.deborah@epa.gov>, "McAllister, Kathleen (DPH)" <Kathleen.Mcallister@state.ma.us>, "Patrick Dostie (E-mail)" <pat.dostie@maine.gov>, "Paul H. Genoa (E-mail) (E-mail)" <phg@nei.org>, "Ray Turner (E-mail) (E-mail)" <RT@RMrecycling.com>, "Rex Bowser (E-mail) (E-mail)" <rbowser@isdh.state.in.us>, "Shawn Drake (E-mail) (E-mail)" <shawn.drake@state.tn.us>, "Sue Smith (E-mail)" <SSmith@crccd.org>, "Terry Derstine (E-mail)" <tderstine@state.pa.us>, "Terry Devine Ph.D. (E-mail)" <tdevine@crccd.org>, "Tony LaMastra (E-mail)" <alamastra@enter.net>, "Val Anoma (E-mail)" <Anoma.Valentine@epamail.epa.gov>

# CRCPD's Committee on Resource Recovery & Radioactivity

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Conference of Radiation Control Program Directors, Inc. (CRCPD)  
**A Partnership Dedicated to Radiation Protection**

February 28, 2005

Aaron T. McGraw  
U.S. Nuclear Regulatory Commission

**RE: "Hazardous Scrap - Beware" Poster &  
Brochure**

Mr. McGraw:

The CRCPD's E-23 Committee on Resource Recovery and Radioactivity (E-23) wishes to thank the NRC for this opportunity to submit comments on the revision NUREG/BR-0108 "Hazardous Scrap - Beware" poster & accompanying brochure.

Regarding the poster please consider these comments:

1. The audience appears to be scrap handling personnel; however, the inclusion of the picture of "radioactive medical waste" confuses the issue as this is not likely in recycled scrap. If it is also intended for the general public, they are not likely to encounter radioactive scrap. If the NRC wants to hit both audiences and medical waste, make four posters – cannot cram all needed information onto one poster.
2. If the NRC decides to publish only one poster, it should be improved to state: "Unexpected Radioactive Material - Beware."
3. Under "NOTICE" – second bullet – add word, "dense" after "something."
4. Under BACKGROUND
  - A. second paragraph – end second sentence after words, "normal scrap." Very few discoveries and meltings were at "foundries."

Office of the Committee Chairperson

**Michael Whalen Jr.**

---

Massachusetts Radiation Control Program  
90 Washington Street | Dorchester, MA 02121  
Telephone: 617/427-2944, Ext. 2020 | Fax: 617/427-2925  
E-mail: Michael.Whalen@state.ma.us

- B. In the third paragraph, what does the word, "incidents" refer to? Finding the radioactive source, the uncontrolled release, or melting in a furnace? It should be better explained.
  - C. Fourth sentence, last sentence – end sentence after the word, "exists." The uncontrolled release involves more scenarios than processing scrap.
  - D. Sixth paragraph, third sentence – provide a brief explanation why the markings are not present.
5. TYPICAL ITEMS – The picture showing an examination gown, rubber glove and blankets is not radioactive waste and could scare people; it should be deleted. Also, most bricks are not contaminated – could also generate unnecessary calls to state agencies. The ones that are usually from highly regulated locations and not very likely to end up being recycled - this picture should also be deleted.
  6. RADIATION WARNING SYMBOL – Last sentence - the narrative should provide a brief explanation why. It leaves too many questions.
  7. Regarding the poster layout, it would be useful to include a picture of at least one DOT shipping label.
  8. Add a couple of "before and after" shots of pristine sources, and then how they actually looked upon discovery, would get the point across that most unexpected sources will not have the same appearance they had prior to their use and abuse.

Regarding the Brochure please consider these comments:

1. Under "THIS IS WHAT YOU SHOULD DO" – third item – add word, "dense" after "something."
2. RADIATION WARNING SYMBOL – Last sentence - the narrative should provide a brief explanation why. It leaves too many questions.
3. TYPICAL ITEMS – The picture showing an examination gown, rubber glove and blankets is not radioactive waste and could scare people - this should be deleted.
4. If the NRC goes with one brochure to contain all the information needed (i.e., scrap, metal, public, industry-specific), add the word "Unexpected" between "Encounter" and "Radioactive."

General Comments regarding both the brochure and poster are as follows:

1. A list of all the Agreement State 24-hour phone numbers be furnished on separate document. In fact, the first and foremost Agency to contact is the State Radiation Control Agency. Making it look like it's an even choice between calling the state, EPA or NRC could serve to delay the initiation of a response if EPA or NRC are called first, especially since it's

likely (or at least SHOULD be likely) that the call will be referred back to the state RCP.

2. A web site address for direct users with questions needing a more detailed answer. This web-site could also have more pictures of items.
3. Instead of the block heading "Nature and Quantity of Radioactive Material," why not label it "Examples of Some Markings to Look For" and then list what's in the boxes below.
4. The headings "Nature of Radioactive Material," "Quantity of Radioactive Material" and "Other Markings" take up too much space and could be smaller.



5. Regarding the radiation warning symbol, I would recommend changing the wording on the poster and brochure to say: "This symbol should appear on containers and devices that hold radioactive substances, and may be on a label, tag or etched in the metal. Labels are magenta or black on yellow, but marking and colors may be very faded and worn. Also important to note is that not all containers and/or devices requiring radiation warning symbols will be properly marked."

If you have any questions please contact me using one of my contact information listed in the footer on page one of this letter.

Respectfully submitted,

Michael P. Whalen Jr.  
CRCPD / E-23 Chairperson

cc: E-23 Committee Members  
CRCPD OED

**From:** "Michael Mack" <mackml@dhfs.state.wi.us>  
**To:** <ATM@NRC.GOV>  
**Date:** 3/1/05 4:34PM  
**Subject:** comments on poster

Thanks for the opportunity to comment on the poster.

I would definitely make it less wordy and more spacious with room for more pictures.

I would also eliminate the background section, the pictures of generic scrap, contaminated lead bricks, tritium gunsight, and medical waste.

I recommend that you eliminate the nature part of nature and quantity and use an example of a label to illustrate how activity, isotope, etc. are portrayed.

It is difficult to reach the state emergency response number using the NRC website. How about an emergency category with state numbers that is more prominent on the home NRC site.

**From:** "Scroggs, Arden" <Arden.Scroggs@DOH.WA.GOV>  
**To:** "ATM@NRC.GOV" <ATM@NRC.GOV>  
**Date:** 3/9/05 11:18AM  
**Subject:** STP-05-010 comments

Mr. McCraw, These are comments for STP-05-010 "draft revision to NUREG/BR-0108 "Hazardous Scrap - Beware", from Washington State. In all we thought the document was well put together. We would wish to add:

1. Local State radiation control contact information.
2. A mini procedure such that the finder would understand how to minimize potential exposure.

Thanks for the opportunity. Please accept the comments even though they are tardy.

Arden C. Scroggs, Supervisor  
Radioactive Materials Section  
ORP, DEH, DOH  
Washington State  
voice - 360.236.2331  
fax - 360.236.2255  
Public Health - Always working for a safer and healthier Washington

**CC:** "Frazee, Terry" <Terry.Frazee@DOH.WA.GOV>