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Subject: Comments - National Source Tracking of Sealed Sources

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The following comments pertain to the proposed rule for National Source Tracking of Sealed Sources, as published in the Federal Register, Vol. 70, No. 144, July 28, 2005.

We are specifically commenting on the inclusion of Category 3 sources (sources at 1/10th of the Category 2 threshold).

1. As a large cancer treatment medical center, we are an authorized user of two high dose rate remote afterloader devices with two Ir-192 sources (12 Ci and 10 Ci each). To allow for simultaneous source exchanges and for decay in storage on one source for research, we are authorized for three 12 Ci sources and two 10 Ci sources at any one time. The inclusion of Category 3 would effect our brachytherapy program.
2. The source exchange occurs every three months.

We already keep excellent inventory records, which is required by the NRC, so inclusion of these sources in the national tracking system is an additional reporting requirement. The source exchange is a service provided by the manufacturer, who then takes possession of the source exchanged, so if these Ir-192 sources were included, it is better for the manufacturer to handle the reporting of this. Lastly, the Ir-192 sources in the remote afterloading devices are probably ill suited for use in the RDD's and RED's and it may not be necessary to include these in this tracking system.

Cheryl Culver Schultz, M.S.
Corporate Radiation Safety Officer
William Beaumont Hospital
248-551-0548
fax 248-551-8297
e-mail: cschultz@beaumont-hospitals.com

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