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(25)

I strongly support the elimination of the aggregation of sealed sources for inclusion into the proposed National Source Tracking Inventory.

I strongly recommend that Category 3 sources not be included in any future National Source Tracking Inventory. Our institution would be impacted due to Ir-192 HDR brachytherapy units. We currently have 3 such units. These units are not used or stored in one location. These sources are exchanged by the manufacturer every 3 months and are not exchanged at the same time. Including such sources on the Inventory would require another layer of administrative bureaucracy with little or no gain in security over existing security / inventory measures currently in place to meet Texas radiation control requirements.

Thank you for this opportunity to comment on the proposed final rule.

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