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Division of Administrative Services
Office of Administration
Mail Stop T6-D59
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Subject: NRC Radiation Source Protection and Security Task Force
Request for Public Comment
RSPS-TF

The following constitutes the formal written comments of *AnaLog Services, Inc.*, and Syd H. Levine, individually. *AnaLog Services, Inc.* holds an NRC agreement state radioactive materials license and is a small business entity. *AnaLog Services, Inc.* does repair and modification work for independent well logging/wireline/perforating companies all over the United States (these companies are usually NRC or agreement state licensees and are also small businesses). We appreciate this opportunity to offer our comments from the perspective of the small independent "mom and pop" segment of the well logging/wireline industry.

Topic No. 1

The list of radiation sources requiring security based on potential attractiveness of the source to terrorists and the extent of the threat to public health and safety.

The public health and safety considerations for a Radiological Dispersal Device (RDD), often called a dirty bomb, constructed from the types of sealed sources typically used in well logging, has been greatly exaggerated. The Health Physics Society (HPS) is comprised of professionals with a great deal of knowledge about the risk of malevolent use of radioactive materials. The following two HPS links shed light on the real risks of an RDD:

http://hps.org/documents/RDDPAGs.pdf
http://hps.org/documents/RDDPAGs.Background.pdf

SISP Review Complete
Template = ADM-013

E-RIDS = ADM-03
Add = M. Orrin (MLH1)

In anticipation of comments urging the Task Force to include radioactive tracer material as an area needing more stringent regulation, your commentors would point out that said tracer material has a very short half-life. Iodine-131 is now the most common radiotracer used in the oilfields, and it has a half-life of only 8.04 days. The existing regulations are adequate for these short half-life materials with respect to protection and security.

Topic No. 2

The national system for recovery of lost or stolen radiation sources.

The Off-Site Recovery Project (OSRP) is the single most effective thing the government has done in this area. If there is an approved way to dispose of sources without cost, nobody in their right mind would intentionally "lose" a source as a disposal method. Your commentors would urge the continuation of the OSRP on a no-fee basis.

While not a requested comment, we were interested to see there is supposed to be program to match unwanted sources with licensees in need of such sources. Your commentors have never heard of this program despite many years of experience in this area, including going back to before the OSRP when there were many, many AmBe well logging sources orphaned and in storage after the 1986 oil price crash. At present, there is an acute shortage of AmBe sources for well logging, but hundreds are in storage pursuant to the OSRP program. DOE has ceased sales of Americium, and the last domestic manufacturer of AmBe sources in the United States (Gammatron) is essentially out of business. There is only one company offering AmBe sources now, and they are being made from Russian Americium, a significant national security concern. Your commentors would urge the government to determine which AmBe sources in OSRP storage meet regulatory requirements, and offer these to the well logging industry. Such an effort serves public policy and enhances national security.

Topic No. 3

Storage of radiation sources that are not used in a safe and secure manner.

Current NRC and agreement state laws, regulations, rules, and policies are adequate in this area.

Topic No. 4

The national source tracking system for radiation sources.

Inclusion of Category 3 sources in the national source tracking system will do nothing to enhance protection or security. While a few of the small independent well loggers have Category 2 sources, nearly all have Category 3 sources. These small independent entities are extremely sensitive to any increase in regulatory burden. One great concern of the regulated well logging community is that routine transport of well logging sources to and from temporary job sites should be exempt from reporting. Industry security history is very good given the thousands and thousands of miles these sealed sources have been transported in well logging operations.

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Topic No. 5

A national system to provide for the proper disposal of radiation sources.

DOE's Off-Site Source Recovery Program (OSRP) has been a great success, and has done much to ensure orphaned or unwanted sources are properly dealt with. Following the old adage, it would be a mistake to tamper with success; hence, your commentors would strongly urge against the imposition of user fees for the OSRP.

Decommissioning financial assurance requirements should not be tampered with. Small independent well loggers are already tremendously burdened with regulatory costs. Driving these independents out of business, and leaving only a small number of large companies is bad public policy needless to say. Many small logging companies closed after the oil price crash fiasco of 1986 with very little difficulty, and the OSRP did not exist at the time.

Topic No. 6

Import and export controls on radiation sources to ensure that recipients of radiation sources are able and willing to adequately control radiation sources.

The rule making effective December 28, 2005, would seem to be adequate. In any event, it should be given some time to see if there are any problems.

Topic No. 7

Procedures for improving the security and control for use and storage of radiation sources.

Current NRC and agreement state laws, regulations, rules, and policies are adequate in this area. Your commentors would again urge caution in imposing unnecessary additional regulatory burdens on the small independent sector of the well logging industry.

Topic No. 8

Procedures for improving the security of transportation of radiation sources.

Current US DOT and state laws, regulations, rules, and policies are already extremely thorough (and burdensome) in this area.

Topic No. 9

Background checks for individuals with access to radiation sources.

Many small independent well loggers have already been subject to the BATFE FBI explosives licensing security check. Your commentors would urge that efforts be made to prevent the duplication of efforts with multiple security checks. A good starting place would be if one has passed a BATFE FBI security check, it should be deemed adequate for NRC or agreement state purposes.

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Topic No. 10

Alternative technologies.

Your commentors think alternative technologies are a grand idea, but alternative technologies are most likely a pipe dream. The fundamental technology behind radiation based well logging is quite mature, and various alternatives have been investigated. Nevertheless, DOE will have no difficulty finding folks to spend taxpayer dollars looking for alternative technology.

Again, we thank you for this opportunity to comment.

AnaLog Services, Inc.

Syd H. Levine, President

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