

PR 30, 31, 32 and 150
(71FR00275)

December 11, 2006 (10:44am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Comment on: **Exemptions from Licensing, General Licenses, and Distribution of
Byproduct Material: Licensing and Reporting Requirements (RIN
3150-AH41)**

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Greetings,

I am very sorry I was unable to comment in a timely manner on this topic.

As part of the NRC's mission to protect the public and the environment, the NRC should consider the eventual fate of these devices. I think the NRC should require that disposal costs be factored into the original cost of devices licensed by the NRC for distribution to non-specific licenses, and that disposal information should be specifically imprinted on each device.

Exempt Devices

Although the NRC's regulations are quite clear that there are no regulations regarding the disposal of these materials. When student apartments are remodeled in this town, all smoke detectors are removed and transferred to the closest dumpster. Think of five hundred rooms, hallways, and public areas. Even at only a microcurie each, that is still over 600 annual limits of intake (ALIs) being transported to our local landfill. It would be *much* better if there was a mechanism by which this material would be returned to a vendor for proper recycling or disposal. However, if the vendor required any sort of fee the local landlords would not be apt to spend the money (I know I wouldn't). I suggest that manufacturers be required to post "For proper disposal mail to" on the inside. It is possible that you could talk an industry group to set up one national address for receiving this material. This would be the environmentally correct thing to do with this material.

Disposal costs should be factored into the original cost of the device.

Generally Licensed Devices

Disposal costs should be factored into the original cost of the device. Often the disposal cost of a small source is more than the final net worth of the device.

Consider a twenty-year old liquid scintillation counter or gas chromatograph. The device may have been working for the last few years, but it has probably not been actively used. The responsible party may have left years ago or simply forgotten that the GC has a radioactive source. When the re-modelers arrive, the "garbage" is disposed to a recycling center.

Consider tritium EXIT signs. We have all heard of signs being removed by vandals or construction people. These Generally Licensed Devices are not tracked as carefully as they should be and are advertised as "install them and forget them". A dozen years ago the municipal parking garage "lost" over twenty. I think the NRC would hear of more reports of lost/stolen/improperly-disposed signs if people knew they were required to report missing devices.

Consider smoke detectors designed for industrial applications. I recently had to

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SECY-02

determine how to dispose of twenty smoke detectors that had been in use since 1968. Each of these contained 80 uCi (100 times the ALI). Nobody wanted to answer our e-mails or phone calls until I thought to register them with the WIPP. What county library or construction company will think to contact them?

Thank you for considering this late comment.

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Any opinions in this e-mail are solely those of the author, and are not represented as those of his employer.

From: Evangeline Ngbea
To: SECY
Date: Mon, Dec 11, 2006 9:23 AM
Subject: Fwd: Comment letter on Exemptions from Licensing, General Licenses...(71FR00275)

>>> Carol Gallagher 12/08/2006 11:08 AM >>>
Van,

Attached for docketing is a comment letter on the above noted proposed rule from Eric Boeldt that I received via the rulemaking website on December 7, 2006.

Carol

Mail Envelope Properties (45798DF4.9DD : 5 : 35764)

Subject: Comment letter on Exemptions from Licensing, General
Licenses...(71FR00275)
Creation Date 12/08/2006 11:08:20 AM
From: Carol Gallagher

Created By: CAG@nrc.gov

Recipients

nrc.gov

TWGWPO01.HQGWDO01
ESN (Evangeline Ngbea)

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Route

nrc.gov

Files	Size	Date & Time
MESSAGE	602	12/08/2006 11:08:20 AM
TEXT.htm	457	
1671-0007.wpd	17815	12/08/2006 11:03:34 AM

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is not eligible for Junk Mail handling
Message is from an internal sender

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled