



Council on Radionuclides and Radiopharmaceuticals,

3911 Campolindo Drive
Moraga, CA 94556-1551 (925)
283-1850
Fax: (925) 283-1850
E-mail: corar@silcon.com

Henry H. Kramer, Ph.D., FACNP
Executive Director

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Chief, Rulemaking, Directives and Editing Branch,
Division of Administrative Services
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001

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Subject: CORAR comments on Draft MARSAME Report

Reference: Federal Register Vol. 72, No 9, January 16, 2007. Pages 1708-9.

These comments are submitted on behalf of the Council on Radionuclides and Radiopharmaceuticals (CORAR)¹. CORAR members and their customers manage materials and equipment that are potentially contaminated with radioactive materials and need to be released from control reused or disposed of as waste. Consequently CORAR members are interested in guidelines that assist licensees to safely handle these materials in compliance with regulatory requirements.

CORAR appreciates that MARSAME addresses an assessment need where there is little regulatory guidance. However, CORAR members and their State Radiation Control agencies need guidance which is concise and simple to use. Hence CORAR recommends that the MARSAME report be used only as a technical basis for developing more specific and practical guidance.

1. CORAR members include the major manufacturers and distributors of radioactive chemicals, radioactive sources, and research radionuclides used in the U.S. for therapeutic and diagnostic medical applications and for industrial environmental and biomedical research and quality control.

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Throughout MARSAME radioactive contamination is described as "radionuclides of potential concern". This is an unfortunate choice of terminology since it is used in MARSAME to refer to a range of contamination including trace quantities. For the past five years national and international regulatory authority have used the term "radionuclides of concern" to apply to certain large quantities of specific radionuclides that must be secured against access from terrorists.

We therefore recommend that a different terminology be used in MARSAME. Perhaps the terms "radionuclide of interest" or "potentially affected materials" would better express the intent and avoid confusion.

CORAR appreciates the opportunity to comment on this draft guidance document and would be glad to provide clarification or additional information.

Yours sincerely,

A handwritten signature in black ink, appearing to read "L. Smith". The signature is fluid and cursive, with a large initial "L" and a long, sweeping tail.

Leonard R. Smith, CHP
Co Chairman CORAR Manufacturing Quality and Safety Committee.