

From: "Chris Staton" <STATONCD@dhec.sc.gov>
To: <pxm@nrc.gov>
Date: 7/23/2007 3:40:11 PM
Subject: South Carolina - Liquid KI

Dear Pat,

Despite recent offers, by the Department of Health and Human Services and the Nuclear Regulatory Commission, of availability for additional doses of liquid Potassium Iodide (KI) the State of South Carolina has decided to defer to our original request to be restocked with 65mg doses of KI in the tablet form.

As you recall our agency letter, dated April 26th, requested a new stock of tablet form KI to replace the state's current stock, set to expire November 2007. We requested 1,840,000 doses of the 65mg tablet version to cover the number of current residents living within our state's five (5) Fixed Nuclear Facility (FNF) Emergency Planning Zones (EPZ) as well as any anticipated population increases through the year 2013. We requested the replacement stock be delivered sometime in the September/October timeframe.

After much discussion and consideration, the state has determined that the liquid KI available could not meet the states' needs, in regards to replacing our expiring stock of KI. While our state appreciates the offer of liquid KI and understands the budget situation that the NRC faces over the next few months, accepting this form of liquid KI would pose several major financial, logistic and potentially legal issues.

Among the concerns we have, the most pressing is the financial and logistical issues involved with liquid KI storage. Given the year-round climate and weather conditions in our state, acceptance of liquid KI would prompt severe financial burdens associated with pre-distributing and storing the liquid doses in our regional and county offices. In our state, 13 (thirteen) of our counties are designated host counties. Taking into account our pre-distribution needs, each of these 13 offices would be required to rent climate-controlled space and/or facilities to store the liquid KI being offered. At a cost of \$105/per-month-per-unit (on average statewide), or \$1,260/annually-per-unit, our agency would be required to take on an annual financial burden upwards of \$16,000 to store the offered liquid form of KI.

In addition, our agency members voiced concerns over individual distribution/dispensability control of liquid KI. The vials of liquid KI contain enough for 15 (fifteen) adult doses, but are not distributed in a form that is easily divisible for families with fewer than 15 members. Safe distribution, of the appropriate amount of liquid KI, to each interested family would require health officials to break the seals of the bottles and separate the liquid into additional containers. The issue here is two-fold: cost of the additional vials and "custody controls". If a health official divides the liquid KI, or removes it, from the original packaging they have – potentially – violated the manufacturer's storage instructions because the integrity of the original vial has been compromised. However, not dividing the dosage could also result in families having enough liquid KI at their disposal to – potentially – cause an overdose to one or more family members.

While dosing instructions and inserts are included in the liquid KI packages, our agency cannot rely on the residents to strictly adhere to those directions under the stressful conditions that could result from a radioactive incident.

Given the concerns we voiced, we feel that it be imperative that the State of South Carolina respectfully request a restock of our KI in the manner addressed above and as originally stated in our April 26th request letter.

Sincerely,
Chris Staton, Director
Division of Waste Assessment & Emergency Response
SC DHEC

CC: "Mary N. Bright" <BRIGHTMN@dhec.sc.gov>, "Ted Holland" <HOLLANTW@dhec.sc.gov>, "Ron Kinney" <KINNEYRW@dhec.sc.gov>, "Sandra Threatt" <THREATSJ@dhec.sc.gov>

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