

NRCREP - Technical Basis Comment for RAMQC Shipments

From: "Kilfoil, James M." <KilfoilJ@missouri.edu>
To: <nrcprep@nrc.gov>
Date: 02/07/2008 11:44:22 AM
Subject: Technical Basis Comment for RAMQC Shipments

01/04/08
73 FR 826
(4)

Hello:

I attended the recent public meeting on 1-16-08 at NRC headquarters regarding the development of a technical basis for the eventual rulemaking with regards to the shipment of RAMQC. I have a follow-up comment that I wanted to make sure was included for your consideration.

During the meeting several attendees mentioned the difficulty in determining exactly what form the materials in question the regulation was intended to apply to. For example, does the NRC intend to apply this rule to Isotopes of Concern when they are dispersed as in a LSA shipment. Is the regulation intended to apply to irradiated components and hardware such as might be generated by the operation of a reactor. The current orders seem to point towards discrete sources such as are commonly used in medical and industrial applications but leaves unclear exactly how inclusive a shipper should be when preparing a shipment.

To summarize my comment:

The current Orders clearly state one item that is not to be considered, that being spent fuel. As you go forward with the rulemaking process, please be sure to consider and clearly indicate other material shipment types that can reasonably be excluded from these regulations, and should instead be shipped using existing NRC and DOT regulations.

Thank you for your consideration.

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