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Security and Continued Use of Cesium-137 Chloride Sources and Notice of Public Meeting

Comment On: NRC-2008-0419-0001
Request for Comments on the Security and Continued Use of Cesium- 137 Chloride Sources and Notice of Public Meeting

Document: NRC-2008-0419-DRAFT-0004
Comment on FR Doc # E8-17545

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General Comment

I am a member of the Health Physics Society, emeritus Fellow thereof and an emeritus Certified Health Physicist. I offer the following comments for consideration.

There is no discussion of the mechanism(s) for exposing the public to the sources or the CsCl that might be distributed into public places therefrom, or the probability of such exposure or distribution. Without such discussion, the public has no ability to judge whether the proposed banning of such sources is reasonable. Such discussion should be made part of this docket. My personal opinion is that the probability of harm to any American citizen in the United States is negligible from CsCl sources under consideration here and the probability of significant contamination from such sources is also negligible.

The cost of replacing the sources would be born by the public whose doctors prescribe medical diagnostic or therapeutic tests or treatments using the sources. Medical costs are already very high in the USA and such replacement would only drive them higher with, possibly, no measurable benefit. Actual costs of replacements should be made part of this docket including costs to patients. My personal opinion is that any change in the current use of CsCl sources such as is contemplated in this docket, would be so expensive as to be

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an unacceptable additional burden on health costs.

The NRC should conduct a rigorous, scientifically valid risk-benefit study to see if replacement would actually be beneficial as opposed to doing nothing or doing something in between a ban/replacement and doing nothing. My personal opinion is that such a cost-benefit study would show the cost would far exceed any real reasonably probable benefit.

Since all incidents with CsCl sources have occurred outside the USA, it is highly probable that the current safeguards within the USA are adequate reasonably to protect the public. Therefore, only sources outside the USA are a real potential problem. The NRC should request the IAEA to develop standards that, if properly used by a foreign nation, would prevent public exposure(s) of the type under consideration here. The NRC should not act to prevent the export of CsCl sources or machines containing them because it might penalize US companies that make such machines.