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Date: Wed, Sep 15, 1999 7:52 PM  
Subject: Comment on PRM-40-27

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(Comments due by September 20, 1999)

The state of Washington Radiation Control Program fully supports the petitioners in their proposed rule change affecting source material general licensees' current exemption from 10 CFR Parts 19 and 20. We believe this is a necessary and long overdue action (and should be viewed as a first step in overhauling the entire arena of source material regulation). A comprehensive look at all of 10 CFR Part 40 is certainly in order. However, the Commission should immediately take action on 10 CFR 40.22(b) as proposed by the petitioner since 1) the radiation levels and contamination are "real", 2) personnel are not being properly informed of the hazards, 3) the improper disposal concerns are evident, and 4) there is ample indication that this (the Colorado experience) may not be just an isolated instance.

OFFICE OF REGULATORY  
RULEMAKING AND  
ADJUDICATION STAFF

DOCKET NUMBER  
PETITION RULE PRM 40-27  
(64FR36615)

We would also like to point out that the rule language proposed by the petitioners appears to be "performance based" in accordance with the current regulatory trend. However, please consider the "practical" (if not prescriptive) aspects of this rule change and 1) provide guidance on how we can assure that current source material general licensees will be made aware of the new requirement; 2) provide "instructions" to source materials distributors to not only inform the general licensees of the hazards involved but to inform the appropriate regulatory agencies of those general licensees receiving "large" amounts of source material; and 3) perform dose modeling on the "15 pound at any one time/150 pound annual limit" with an eye toward reducing the quantity limits toward something more appropriate to a "general license".

Thank you for the opportunity to comment.

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