

2008 SEP -2 PM 3: 22



Holland Laboratory
15601 Crabbs Branch Way
Rockville, MD 20855

8/28/08

Michael Lesar,
Chief, Rulemaking, Directives, and Editing Branch
Office of Administration
Mail Stop T-6D59
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Washington, DC 20555-0001

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Motivation for participation as a Panel Member for Public meeting [NRC-22080419]: Request for comments on the security and continued use of Cesium-137 Chloride Sources and Notice of Public Meeting

Proposed participant: Stephen J. Wagner, Ph.D.

Issues proposed participant is interested in discussing:

- Issue No. 2. Use of Alternate Technologies, pages 9-10
- Issue No. 3.3 Consideration of government incentives and voluntary actions by industry and manufacturers, page 12

Viewpoint on the issues and affiliation:

Dr. Wagner is Director of Pathogen Management and Blood Product Improvement at the American Red Cross Holland Laboratory in Rockville, MD. He has investigated the storage of gamma irradiated red cells and served on the National Academy of Sciences Committee on Radiation Source Use and Replacement.

The American Red Cross provides approximately 40% of blood components utilized in the United States and currently has eight Ray-Cell devices in 7 facilities and 32 Cesium Chloride irradiators in use at 28 facilities for treating blood components. Through his employment with the Red Cross, Dr. Wagner would like to provide information regarding: 1) the amount of time the Ray-Cells have been in operation; 2) an estimation of the number of products irradiated with the Ray-Cells; 3) the time required for each irradiation cycle and how that compares to Cesium Chloride irradiators; 4) the number, type and cost of Ray-Cell repairs; 5) the "down time" associated with Ray-Cell repairs; 6) the costs of Ray-Cell delivery, installation, purchase, and annual contract; 7) the time required for delivery of a purchased Ray-Cell; 8) the staffing needs for Ray-Cell operation compared to those for gamma irradiators (including staff needed for meeting regulatory requirements and security).

Dr. Wagner would like to also comment on the potential costs incurred by decommissioning our Cesium Chloride gamma irradiators, discuss the need for

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J. Jankovich
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government support for the transportation and storage of the decommissioned devices, estimate the value of ARC's existing Cesium Chloride gamma irradiators pro-rated to their remaining lifetime, and discuss the need for a government buy back of existing Cesium Chloride gamma irradiators.

Sincerely,

A handwritten signature in black ink that reads "Stephen J. Wagner". The signature is written in a cursive style with a large, prominent "S" at the beginning.

Stephen J. Wagner, Ph.D.