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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

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General Comment

I am a member of the Health Physics Society and a Certified Health Physicist. I am an owner and Executive Director of Radiation Safety & Control Services, Inc., a company that provides health physics consulting services to hundreds of NRC and Agreement State licensees using Cs-137 for industrial and medical applications. We also provide calibration services of portable survey instruments using Cs-137 sources to thousands of clients.

The benefits of using Cs-137 as CsCl are many. Industrial applications involve use of Cs-137 as sealed sources for process control measurements when other technologies cannot be used. Medical applications involve blood irradiation that is necessary for safe use of blood transfusion. Our calibration laboratory uses NIST-traceable Cs-137 sources to provide accurate calibration of survey instruments used in licensed activities as well as supporting homeland security efforts. Cs-137 decay provides a mid-energy photon that is representative of photon energies necessary to measure, with a half-life that provides for a reasonable useful period.

The detonation of a radiological dispersal device (RDD) with Cs-137 would result in some internal and external exposure, but would be unlikely to result in significant deaths. The biggest issue would be the clean-up efforts following the detonation.

The security measures currently in place are adequate to protect the public health and safety, even in a post-9/11 environment. The threat of misuse of Cs-137 would be greater in an effort to replace or eliminate Cs-137 than if licensees

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Based on my training and experience, I believe the proposed recommendation to replace or eliminate Cs-137 as CsCl is not warranted; expenditures necessary for this endeavor would not be justified for the minimal risk avoidance it would offer.