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

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Security and Continued Use of Cesium-137 Chloride Sources: Granting Extension of Comment Period

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General Comment

September 29, 2008

Robert J. Lewis, Director
Division of Materials Safety & State Agreements
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U.S... Nuclear Regulatory Commision
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Dear Mr. Lewis

As the manager of a state radiation calibration facility in Nebraska which is responsible for the calibration of radiation detection equipment in 93 counties including the state radiation regulatory agencies and environmental health, I strongly disagree with discontinuing the use of CsCl.

Upon first impulse, it sounds good to get rid of the source, get rid of the problem. No CsCl and then no dirty bombs, the reality of the situation is totally different. You can also use the same argument with Cobalt 60, which would be the logical choice of a back up calibration source. CsCl is an integral part of protecting the nation□□□□□□□□□s economy, from irradiating the nation□□□□□□□□□s blood supply to the calibration of
almost all the radiation detection equipment in the country. CsCl is the gold standard in which the radiation calibration industry has based a vast majority of all

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its policies and procedures from the national to the local levels. To accept anything less then the gold standard would be a disservice to the citizens of Nebraska and of the United States as a whole.

We have looked at the possibility of utilizing Co-60 sources for calibration, as that would currently be the replacement option. It falls short of meeting our needs in several areas but the most important ones are as follows.

1). The half life of CsCI is 30.6 years; the half life of Co-60 is 5.27 years. It would greatly increase the cost of replacing irradiators either in f requency or size of source. Preliminary estimates indicate a five to six fold increase in cost of calibration.

2). The risk-reward ratio is such that the NRC imposed security precautions should mitigate the risk to a reasonable level while the rewards to the economy and civil population far outweigh any associated risk.

While reviewing this matter, please look carefully consider all factors, including the economic factor on private and governmental agencies, in an unbiased and scientific manner.

Respectfully;

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