



State University of New York Upstate Medical University

College of Medicine
Radiation Safety Office

September 23, 2008

Michael Lesar
Chief, Rulemaking, Directives, and Editing Branch
Office of Administration
Mail Stop T-6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

7/31/08
73 FR 44780
28

RECEIVED

2008 SEP 30 PM 2:45

RULES AND DIRECTIVES
BRANCH
USNRC

RE: Public Comments on the Continued Use of Cesium-137 Sources

Dear Mr. Lesar,

I would like to respond to the Nuclear Regulatory Commission's Request for Comments on the issue that is referenced above, please accept this letter.

- SUNY Upstate Medical University and University Hospital fully support the comments made by Richard Toohey, PhD, president of the Health Physics Society, urging that a careful and thoughtful approach be taken in making a decision on the recommendations of the National Academy of Sciences (NAS) report on CsCl utilization and possible source replacement.
- SUNY Upstate would also like to note that Question Q2-2, in Issue No. 2 – Use of Alternative Technologies, listed in the request for comments, fails to fully address the issue of the cost of alternative technologies, especially the use of x-ray or electron beams. The cost of alternative technologies should include not only the cost of replacement, calibration and maintenance, but also the cost of down-time for critical-use equipment, such as blood irradiators. It should be possible to arrive at a quantifiable cost for alternative blood sterilization during equipment down-time, as well as the human cost to patients who need blood. It can easily be shown that CsCl sources utilized in blood irradiators have a much more reliable performance record than would machine-produced technologies, and both the costs of reliability of operation or failure should be considered financially and in human life.

The risk of intent to maliciously use CsCl sources in a Radiological Dispersal Device (RDD) is assumed to be 100% for the purposes of protecting sources nationwide. The risk of a given CsCl source being successfully obtained for the purpose of an RDD, under current Increased Control security requirements is, at best, unquantifiable. We urge the Nuclear Regulatory Commission to carefully consider all of the quantifiable risks and costs, and verify that patient safety is not decreased by any potential actions.

Sincerely,

Gerald M. Connock
Gerald M. Connock, L.M.H.P.
Radiation Safety Officer
President, Western New York Chapter Health
Physics Society

SUNSI Review Complete
Template = ADM-013

F-RIDS = ADM-03
Add = J. JanKovich (JPS)