



RULES AND DIRECTIVES  
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USNRC

September 29, 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

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RE: Public Comment on Security and Continued Use of Cesium-137 Chloride Sources  
Docket ID: [NRC-2008-0419]

Dear Mr. Lesar,

In response to the Request for Comments by the Nuclear Regulatory Commission on the issue referenced above, please accept this letter.

- We fully support the comments made by Richard Toohey, PhD, president of the Health Physics Society, urging a careful and thoughtful approach in making a decision on the recommendations of the National Academy of Sciences (NAS) report on CsCl utilization and possible source replacement.
- We also 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, chiefly 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. A quantifiable cost for alternative blood sterilization during equipment down-time should be possible, as well as a human cost for patients who need blood. It is easily demonstrable that CsCl sources utilized in blood irradiators have a much more reliable performance record than would machine-produced technologies, and both the costs of continuity 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,

Christopher Kessler, M.S., Certified Health Physicist®  
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SONSI Review Complete  
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E-RDS = AD7-03  
Cee = J. Jaskowski  
(JPS2)