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

Comment On: NRC-2008-0419-0014

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

Document: NRC-2008-0419-DRAFT-0054

Comment on FR Doc # E8-22688

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General Comment

I am writing to express concern regarding the possible phase out of radioactive CsCl sources contained in irradiators. Research groups at North Dakota State University find the prospect of losing access to a valuable tool such as this quite worrisome. Their comments specifically are as follows:

I have serious concerns about the potential "phase out" of the 137-CsCl irradiators. This resource has allowed our scientists a unique opportunity to do cutting edge research in diverse fields of specialty. Replacing the capabilities of this source would be costly to the point of being unfeasible in the research that we do, if indeed they could be replaced at all. Currently, my laboratory is using the source to lethally irradiate fungal spores that are used in NIH-funded asthma research. We are currently working with a fellow NDSU researcher who is using the 137-CsCl source in a radiation hybrid mapping scheme that allows high-resolution genetic mapping of wheat (because of its polyploid nature such high-resolution maps are un-heard of in wheat). This resource is absolutely critical to his experiments, and the innovation of this research has been noted by the National Science Foundation who is about to announce an extensive multi-year, multimillion dollar grant for this work. Additionally, this had led to even more applied research to develop improved wheat cultivars needed to meet the diverse needs of an ever growing world population and varied environmental stress (e.g. persistent or emerging disastrous disease problems such as Fusarium head blight or wheat stem rust UG99) with several other NDSU

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faculty as collaborators. Details regarding this research were published in the October 3, 2008 issue of "Science".

It is their contention that a phase out of this important resource seems both short sighted and ill advised.

Additionally, we have concerns regarding the funding for this wholesale replacement of equipment, both in terms of an equivalent replacement and also regarding the disposal of the CsCl source. Our feeling is that it would be unwise and unfair to burden the holders of this equipment with this additional expense given the increased security gained by and the significant amount of resources that have already been directed towards hardening the security surrounding the instrumentation.

As further decisions are made regarding this issue, please keep the items that we have raised in this commentary in mind.