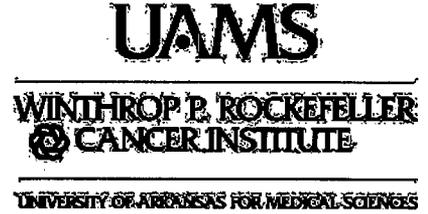


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USNRC

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October 13, 2008

RECEIVED

Mr. Michael T. 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  
53

Re: *Comments on the Security and Continued Use of Cesium-137 Chloride Sources*

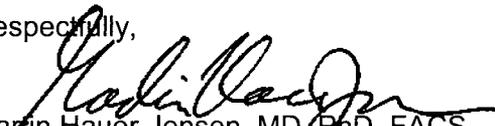
Dear Mr. Lesar,

It is my understanding that an initiative to greatly limit or eliminate the use of Cs-137 radiation sources is being discussed. The background is the concern that these sources may fall in the wrong hands who might consider using them to harm American civilians and military personnel. It should be pointed out, however, that the initiative, rather than making the country safer, will actually place the American population at greater risk in the long run.

1. The government has determined that the threat of radiological or nuclear terrorism is real, and that development of medical countermeasures against radiation is an unmet need of high priority.
2. As a result, many government agencies, including DHHS, DoD, and DHS, direct substantial efforts and resources toward development of medical countermeasures against radiation.
3. Because of their specialized expertise and knowledge, radiation biologists play a critical role in the development of countermeasures. Cs-137 irradiators are an indispensable tool in these development efforts.
4. If Cs-137 irradiators were to be eliminated, much of the ongoing research performed by radiation biologists would come to a halt, and the development of effective medical countermeasures would suffer a substantial setback. This would adversely impact our level of preparedness and thus make the US increasingly vulnerable to radiological and nuclear threats.
5. Conversely, retaining Cs-137 research irradiators is clearly in the public interest. It will facilitate continued development of medical countermeasures against radiation and ensure an optimal level protection of US military personnel and the general population.

I agree that increased control with Cs-137 sources is necessary. However, I suggest that options like implementing additional security measures, increasing screening requirements for personnel, and possibly restricting the use of Cs-137 sources to trained radiation biologists should be considered instead.

Respectfully,

  
Martin Hauer-Jensen, MD, PhD, FACS  
Professor of Pharmaceutical Sciences, Surgery, and Pathology  
Associate Dean for Research, College of Pharmacy  
Director, Division of Radiation Health

SONSI Review Complete  
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E-RIDS = ADM-03  
Add = J. Sankovich (SP52)