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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

7/31/08
73 FR 44780

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

Dear Mr. Lesar,

In response to the Request for Comments by the Nuclear Regulatory Commission on the issue referenced above, please accept this letter which supports the position presented by the AAMC and FASEB in their earlier letter. That letter urges caution against precipitous action to prohibit the use of cesium-137 chloride in irradiators that have important uses in research. Not only radiation researchers but a wide range of other biomedical researchers will face negative consequences. As stated, in their letter, I believe that due consideration and thought must be given to the process and impact of technology transition, the lack of appropriate alternatives, and the adequate vetting of any alternative that is eventually identified.

Furthermore, 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. I 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,

Richard J. Sohn, Ph.D.
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SUNSI Review Complete
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