

EDO Principal Correspondence Control

FROM: DUE: 07/28/09

EDO CONTROL: G20090378

DOC DT: 06/26/09

FINAL REPLY:

Grant Malkoske
GIPA (Gamma Industry Processing Alliance)

TO:

Chairman Jaczko

FOR SIGNATURE OF :

** GRN **

CRC NO: 09-0318

Miller, FSME

DESC:

NRC TaskForce on Radiation Source Protection,
Subgroup on Alternative Technology
(EDATS: SECY-2009-0332)

ROUTING:

Borchardt
Virgilio
Mallett
Ash
Ordaz
Burns/Gray
Doane, OIP
Rivera, OEDO

DATE: 07/06/09

ASSIGNED TO:

CONTACT:

FSME

Miller

SPECIAL INSTRUCTIONS OR REMARKS:

Coordinate response with OIP.

Template: SECY-017

E-RIDS: SECY-01

EDATS Number: SECY-2009-0332

Source: SECY

General Information

Assigned To: FSME

OEDO Due Date: 7/28/2009

Other Assignees:

SECY Due Date: 7/28/2009

Subject: NRC Task Force on Radiation Source Protection, Subgroup on Alternative Technology

Description:

CC Routing: NONE

ADAMS Accession Numbers - Incoming: NONE

Response/Package: NONE

Other Information

Cross Reference Number: G20090378, LTR-09-0318

Staff Initiated: NO

Related Task:

Recurring Item: NO

File Routing: EDATS

Agency Lesson Learned: NO

OEDO Monthly Report Item: NO

Process Information

Action Type: Letter

Priority: Medium

Sensitivity: None

Signature Level: FSME

Urgency: NO

OEDO Concurrence: NO

OCM Concurrence: NO

OCA Concurrence: NO

Special Instructions: Coordinate response with OIP.

Document Information

Originator Name: Grant Malkoske

Date of Incoming: 6/26/2009

Originating Organization: GIPA (Gamma Industry Processing Alliance)

Document Received by SECY Date: 7/6/2009

Addressee: Chairman Jaczko

Date Response Requested by Originator: NONE

Incoming Task Received: Letter

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

Date Printed: Jul 06, 2009 11:34

PAPER NUMBER: LTR-09-0318
ACTION OFFICE: EDO / OIP

LOGGING DATE: 06/29/2009

AUTHOR: Grant Malkoske
AFFILIATION: CANADA
ADDRESSEE: CHRM Gregory Jaczko
SUBJECT: USNRC Task Force on Radiation Source Protection, Sub Group on Alternative Technology

ACTION: Direct Reply
DISTRIBUTION: RF, SECY to Ack

LETTER DATE: 06/26/2009
ACKNOWLEDGED: Yes
SPECIAL HANDLING: EDO...coordinate response with OIP

NOTES:
FILE LOCATION: ADAMS

DATE DUE: 07/28/2009 DATE SIGNED:

EDO --G20090378

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GIPA

Gamma Industry Processing Alliance

Via fax: (301) 415-1672

June 26, 2009

Chairman Gregory B. Jaczko
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Chairman Jaczko:

Re: USNRC Task Force on Radiation Source Protection, Sub Group on Alternative Technology

I am writing to you on behalf of the Gamma Industry Processing Alliance (GIPA), an industry group comprised of the suppliers of cobalt-60 and the major companies within the United States that employ panoramic industrial irradiators for various processing applications. GIPA is also a chapter of the International Irradiation Association (IIA). Our mission is to ensure that gamma irradiation remains a safe, secure and vital processing technology for the sterilization of healthcare products, for the enhancement of food safety, as well as other agricultural and industrial applications. In fact, more than 45% of the single-use sterile medical products, manufactured in the United States, such as syringes, IV sets, gowns, gloves, endoscopic devices, implants and other medical devices, are treated by gamma radiation for the healthcare system and benefit of patients.

GIPA was contacted the first week in June by a company, ICF International, that we understand is under contract to the USNRC to develop a report which will provide information on the life-cycle costs and benefits associated with current and alternative technologies to Category 1 and 2 radioactive sources. We understand that this report is due to the USNRC by the end of July, 2009.

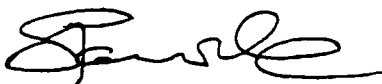
On June 15, GIPA received a statement of work from ICF International defining the scope of the report, with a request to provide information on the life-cycle costs associated with the utilization of panoramic irradiators. This is the first instance that GIPA has been informed of these details. Whilst attempts were made to contact some of our members prior to this, the two individual companies that were contacted have expressed their concern about providing the business confidential information that was requested of them. On Monday, June 22, I spoke with the ICF International researcher who is compiling this information and was further informed that the first draft of the report is due at the end of this week.

As you would appreciate, this study is of significant importance to our industry. GIPA is very concerned about the lack of consultation that has taken place on this study to this point in time. We do not think that the information requested at this late date by ICF International can be compiled or presented in a manner that will address the purpose of the study in a meaningful nor a contextual way.

GIPA is very interested in working with the USNRC on this important matter. We recommend that both the gamma processing industry and the health care industry be engaged, within a realistic timeline, to provide meaningful information for the study. Consequently, we also request that the due date for completion of the study be extended to accommodate this.

We would be most pleased to meet with you or USNRC staff to discuss this further.

Yours sincerely,



Grant Malkoske
Chairman, GIPA

Copy to: Joseph DeCicco, USNRC
Maribelle Rodriguez, ICF

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Fax Transmission

To: Chairman Gregory B. Jaczko, USNRC

Fax #: (301) 415-1672

Date: June 26, 2009

From: Grant Malkoske, Chairman, GIPA

of pages: 2 including cover sheet