

July 27, 2009

Grant Malkoske
Chairman, International Source Suppliers
and Producers Association
447 March Road
Ottawa, ON K2K 1X8, Canada

Dear Mr. Malkoske:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your July 6, 2009, letter addressed to Chairman Jaczko, that expressed your concerns about the short timeline of the request for information by ICF International (ICF), and your interest to work with us on matters associated with panoramic irradiator usage.

Allow me to provide some background as to why ICF is requesting the information. The Energy Policy Act of 2005 legislation required, among other things, the establishment of an inter-agency Radiation Source Protection and Security Task Force (Task Force), to be chaired by the Chairman of the NRC. This Task Force was charged with evaluating and providing recommendations on security of radiation sources in the U.S. and reporting its findings to Congress and the President every four years. One of the 10 recommendations in the Task Force's 2006 report focused on the use of alternative technologies to reduce potential risk associated with radioactive sources. You can access this report at <http://nrc-stp.ornl.gov/asletters/other/sp06082.pdf>.

The Task Force established the Alternative Technologies Subgroup (Subgroup) to evaluate financial incentives, research needs, and cost-benefit analyses of potential alternatives to radioactive sources currently being used. As part of the Subgroup's efforts to provide its findings and recommendations to the Task Force, the Subgroup contracted with ICF to provide life-cycle cost-benefit analyses of current radiological technologies and viable alternatives. The Subgroup is scheduled to provide its report to the Task Force by the end of this calendar year, to support the delivery of the next Task Force report in 2010. As a result, ICF is working under a short timeline under its contract to gather information. However, after receiving your letter, the NRC recently allocated additional time to ICF to produce their final analyses.

I note your efforts to provide to ICF the best information possible to support the efforts of the Task Force. The ICF effort is an important component of the Subgroup's work, but it is not the only component. Source security and risk reduction efforts on the part of regulators, source users, and source manufacturers, is no small undertaking and will be a concerted, well thought-out process that will be a long-term undertaking by those involved. Engagement of stakeholders involved will continue well beyond the Subgroup and the Task Force reports in the next year, given that current radioactive technologies have such a high benefit versus risk in industry and medicine, and have a well-established history of safe use. Engagement with the

stakeholders will continue beyond the ICF contract, and we welcome a dialogue with your organization and other interested stakeholders on these important matters in the future. Please feel free to contact the Subgroup's Chairperson, Joseph DeCicco, at Joseph.DeCicco@nrc.gov or 301-415-7833, if you are interested in scheduling a meeting.

I hope the above alleviates some of your concern, and I look forward to future engagement with industry in addressing these issues.

Sincerely,

/RA/

Charles L. Miller, Director
Office of Federal and State Materials
and Environmental Management Programs

cc: Maribelle Rodriguez, ICF

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Identical letter sent to G. Malkoske, Chairman, Gamma Industry Processing Alliance

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