



Council on Radionuclides and Radiopharmaceuticals, Inc.

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Henry H. Kramer, Ph.D., FACNP
Executive Director

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The Honorable Gregory B. Jaczko, Chairman,
Dale Klein, Peter B. Lyons, and Kristine L. Svinicki, Commissioners,
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Comments on the disposal of Class B, C and certain Class A LLRW.

The Council on Radionuclides and Radiopharmaceuticals (CORAR¹) appreciated the opportunity to discuss the security of low-level-radioactive-waste (LLRW) at the NRC briefing on April 17, 2009. In response to questions received at the NRC meeting, CORAR is preparing a list of radioactive materials that have been discontinued due to perceived difficulties that licensees have disposing radwastes associated with the manufacture and/or use of these products. Meanwhile, CORAR completely agrees with CalRad Forum's comments, dated June 18, 2009, to the NRC on the April 17th briefing. CalRad Forum shows that a large percentage of radwaste radioactivity from material licensees cannot be disposed of at this time. We need reliable access to cost-effective disposal for Class B and C wastes and Class A sealed source and biological wastes. We need a modification of the current LLRW disposal system to enable this to happen. We appreciate your consideration of our concerns.

Yours sincerely,

A handwritten signature in cursive script that reads "L. Smith" followed by a flourish.

Leonard R. Smith, CHP
Cochairman CORAR Committee on Manufacturing Quality and Safety

cc. Dr. Alan Pasternak, CalRad Forum.

¹ CORAR is a North American trade association that includes members who are the major manufacturers and distributors of radiopharmaceuticals, radioactive sources and research radiochemicals used for therapeutic and diagnostic medical applications and for environmental and biomedical research and quality control.