

PRM-32-6
Rulemaking Comments (75FR01559)

March 10, 2010 (9:00am)

From: Camomilli, Guy S. (KSC-QA000) [guy.s.camomilli@nasa.gov]
Sent: Wednesday, March 10, 2010 7:27 AM
To: Rulemaking Comments
Cc: carol.gallager@nrc.gov; McIntosh, Angela; Angotti, Catherine M. (HQ-QA000)
Subject: Docket No. PRM-32-6; NRC-2009-0547

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As noted in FR/Vol. 75, No. 7/Tuesday, January 12, 2010/Proposed Rules, Docket No. PRM-32-6; NRC-2009-0547, the following comments are submitted:

NASA believes that the proposed labeling requirements without controlling the sale of tritium exit signs, may not be completely successful. One NASA Center installed additional, more visible labels on tritium exit signs, including tri foils, which provided contact information if the signs were damaged or moved. However these added controls were not completely successful.

The suggestion of prohibiting tritium exit signs is seen as an oversimplification of what would be involved. Replacing tritium exit signs would create a financial burden for both disposal of the tritium exit signs, and installation of alternate technology signs. During the tritium exit sign data call last year, most Centers examined alternative technologies to self-luminescence. The alternatives examined were impractical in locations without the presence of a "light source" or electrical service. The cost associated with installing electrical service for alternative signs, in locations where the self-luminescent signs are present would be non-trivial. However, when another suitably viable technology is available, it would be worth re-evaluating the suggestions by the petitioner.

NASA suggests that the NRC provide a simple and inexpensive means to dispose of excess tritium exit signs if controls are tightened. Currently disposal is very expensive, and not within the constraints of NASA's budget at our field Centers. If increased controls are necessary, a "free" depository would be quite helpful.

If there are any questions or a need for clarification of any of the above, please do not hesitate to contact me at the number below.

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Subject: Docket No. PRM-32-6: NRC-2009-0547

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Thread-Index: AcrATQYpmSrDSt/zR6Oc6xDC4xle7A==

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