

**Rulemaking Comments**

**From:** Mike Taylor [TaylorJM@ldschurch.org]  
**Sent:** Friday, March 26, 2010 6:01 PM  
**To:** Rulemaking Comments  
**Cc:** McIntosh, Angela  
**Subject:** Docket No. PRM-32-6: ID NRC-2009-0547

March 29, 2010 (10:45am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

The following comments are offered on the petition for rulemaking for tritium exit signs from the Association of State and Territorial Solid Waste Management Officials published in the Federal Register / Vol. 75, No. 7 / Tuesday, January 12, 2010.

Responsible management of self-luminescent tritium exit signs is important. The petition is supported that labeling be improved on tritium exit signs and the expiration date be distinctly legible without taking the sign down.

**Petition Statement:** "The petitioner states that it would ideally like to see tritium exit sign technology immediately replaced by alternative technologies. "

**Comment:** It would be an unreasonable financial burden to require tritium exit sign users to immediately replace tritium exit signs in current use with signs using alternative technologies.

**Petition Statement** (from the final report "Lack of Tritium Exit Signs Control and Contamination of landfill Leachate," dated July 2009 and included as part of the petition): "The focus group also recommends that NRC evaluate the need for a national and/or individual State-level tracking or registration program for tritium exit signs."

**Comment:** NRC regulations currently require that licensees keep records related to tritium exit signs. Regulations require that tritium exit signs be accounted for at all times and disposed of properly. Tritium exit sign manufacturers are required to keep records of exit signs sold to licensees and report this information to the NRC and Agreement States. It is unclear how additional tracking or registration requirements would reduce the risk of improper exit sign disposal. Additional tracking and registration requirements may also involve annual fees from Agreement States. Additional tracking and registration requirements would be an unreasonable recordkeeping and financial burden.

Proper disposal of tritium exit signs is complex and relatively expensive. A simple and inexpensive process for disposal of expired tritium exit signs would likely be as effective in reducing improper disposal as increased tracking and registration requirements.

Thank you for considering these comments.

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To: "Rulemaking.Comments@nrc.gov" <Rulemaking.Comments@nrc.gov>

CC: "Angela.McIntosh@nrc.gov" <Angela.McIntosh@nrc.gov>

Date: Fri, 26 Mar 2010 16:00:35 -0600

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

Thread-Topic: Docket No. PRM-32-6: ID NRC-2009-0547

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