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Council on Radionuclides and Radiopharmaceuticals, Inc.

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Rules, Announcements, and Directives Branch,
Office of Administration,
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001

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BFR 28073
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Subject: CORAR Comments to the NRC on Draft Regulatory Guide DG-3039 "Standard Format and Content for Emergency Plans for Fuel Cycle and Materials Facilities.

Reference: Federal Register, May 19, 2010, Volume 75, Number 96, Notice of Issuance and Availability of Draft Regulatory Guide, DG-3039, Standard Format and Content for Emergency Plans for Fuel Cycle and Materials Facilities. Pages 28073-28074.

The following comments are provided on behalf of the Council on Radionuclides and Radiopharmaceuticals (CORAR¹). CORAR members and their major material licensee customers maintain Emergency Plans as required by NRC and Agreement State regulations.

We recognize the inclusion of additional security considerations in Emergency Plans. On page 5, Section 1.2 the requirement that "The emergency plan should include a list of all hazardous chemicals used at the site..." is impractical for some licensees. A radiochemical manufacturer may have thousands of hazardous chemicals, some in multiple locations. Inventories of materials are usually listed in implementation procedures rather than the emergency plan. Perhaps a better approach would be to list in the emergency plan only those hazardous chemicals that have quantities and locations that could significantly affect the ability to safely respond to an emergency involving licensed materials.

We appreciate the opportunity to comment on this Draft Reg Guide and would be glad to provide clarification and further information.

Yours sincerely,

Leonard R. Smith, CHP.

Co-chair CORAR Committee on Manufacturing Quality and Safety.

1. CORAR members include the major manufacturers and distributors of radiopharmaceuticals, radioactive sources and radiochemicals used in the U.S. for therapeutic and diagnostic medical applications and for industrial, environmental and biomedical research and quality control.

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