

From: Ratliff, Richard [mailto:Richard.Ratliff@dshs.state.tx.us]
Sent: Wednesday, October 22, 2008 5:00 PM
To: Chon Davis
Subject: FW: RCPD-08-019, Request for Comments on the Draft Proposed Rule to Amend 10 CFR Parts 30, 31, 32, 40, and 70

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From: Fleming, Ray
Sent: Wednesday, October 22, 2008 12:35 PM
To: Dunn, Mike; Fogle, David
Subject: RE: RCPD-08-019, Request for Comments on the Draft Proposed Rule to Amend 10 CFR Parts 30, 31, 32, 40, and 70

The only thing that struck me as wrong when I read it was the blanket statement that x-ray fluorescence analyzers should be made exempt. I agree that closed beam XRF devices with isotopes such as Fe-55, Cd-109 and Co-57 could be exempted without seriously impacting safety. I think closed beam devices with Am-241 and Cm-244 should continue to be registered. Most are greater than category 4.

As for open beam XRF devices I think that they should all be specifically licensed due to misuse. At the very least the current GL rules should apply to them.

The rest of it seemed pretty reasonable in my quick read-through.

Ray