Health Physics Society Perspectives

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HPS Perspectives

- HPS fundamentally agrees with and strongly endorses that the draft policy and compliments the Commission
- HPS believes the draft policy does not go far enough in two areas:
  1. Consideration of Cat 3 sources
  2. Integrate of “alternative technologies” in the licensing process

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Area 1: Cat 3 CsCl Sources

- HPS Position: All Cat 3 sources should be subject to enhanced security and controls
- Cat 3 is the "dividing line" for enhanced security for "dangerous sources" as defined by IAEA
- NRC Policy Statement should include enhanced security for Category 3 sources and expand policy discussion to well logging and level gauge sources

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Area 2: Alternative Technologies

- HPS agrees that R&D not in NRC's scope
- HPS Position is to use "alternative technologies," as provided by the *Energy Policy Act of 2005, "to promote the replacement of risk-significant radioactive sources*."
- The interagency Radiation Source Protection and Security Task Group Annual Reports update the suitability of non-radioactive material "alternative technologies"

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Area 2: Alternative Technologies

(continued)

- NRC Draft Policy does not incorporate "Alternative Technologies" in licensing process:
  - Formal consideration of non-radioactive material "alternative technologies" in license applications is absent
  - Interagency Task Force could define what technologies are available and equivalent
  - Cost would be a reasonable consideration

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