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Cindy Bradley, Chief Rules, Announcements, and Directives Branch Office of Administration MS: TWB-5 B1M U. S. Nuclear Regulatory Commission Washington, D. C. 20555-0001

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The comments contained in this letter are specific <u>only</u> to the use of CsCl sealed sources in industrial fixed gauging devices. I have no experience with the use of CsCl sources in blood irradiation or bio-medical research so am not addressing those areas.

While the activity of CsCl sources used in fixed industrial gauging devices falls below either Category I or Category II limits, they in no way should pose a terrorist threat; however, they do present a radiological problem. Many of these sources were distributed in the late 1960s and early 1970s and are still in use. Failure of these sources can contaminate the surrounding area and Cesium can be inhaled by personnel. This has happened.

I would propose the following actions:

- Ban the distribution of CsCl sources of any activity for use in industrial environments.
- Issue an advisory that all those sources still in use be replaced with sources utilizing more current technology; e.g., ceramic matrix.
- Authorize disposal in DOE approved sites.

Thank you for your consideration.

Sincerely,

Radiation Technology, Inc.

Davis C. Bryon Doris C. Bryan, Radiation Safety Officer SONSE Review Complete Cide = J. Jank CARACTER STREDS= HUH-02

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P.O. Box 27637 • Aurtin Texar 78755 • (512) 346-7608 • Fax (512) 795-8718