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# PUBLIC SUBMISSION

**Docket:** NRC-2010-0209  
Request for Comment on the Draft Policy Statement on the Protection of Cesium-137 Chloride Sources and Notice of Public Meeting

**Comment On:** NRC-2010-0209-0003  
Notice of Public Meeting: Draft Policy Statement on Protection of Cesium-137 Chloride Sources

**Document:** NRC-2010-0209-DRAFT-0008  
Comment on FR Doc # 2010-24392

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## Submitter Information

**Organization:** Council on Radionuclides and Radiopharmaceuticals

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## General Comment

See attached file(s)

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## Attachments

**NRC-2010-0209-DRAFT-0008.1:** Comment on FR Doc # 2010-24392

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Add - J. Jankovich (JPJ2)  
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December 16, 2010

Ms. Cindy Bladey, Chief  
Rules, Announcements, and Directives Branch  
Office of Administration  
MS: TWB-5 BIM  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Draft Policy Statement on the Protection of Cesium-137 Chloride Sources

**Reference:** (75 FR 37483)  
Docket Number: NRC-2010-0209

Dear Ms. Bladey:

These comments are submitted on behalf of the Council on Radionuclides and Radiopharmaceuticals (CORAR)<sup>1</sup>. CORAR appreciates the opportunity to comment on the Draft Policy Statement on the Protection of Cesium-137 Chloride Sources.

CORAR generally supports NRC's recognition of the critical importance of these sources in applications related to medical use and other industries, as well as the fact that the current regulatory framework along with efforts of NRC and licensees has been very effective in securing control of these sources. This is a great example of when NRC works closely with industry stakeholders to achieve an effective and reasonable approach on this issue that benefits everyone. CORAR also agrees with NRC's position that replacement of these sources with alternatives is not practicable or necessary in the short term, due to the effectiveness of existing controls and the lack of disposal options. In addition to these general comments, CORAR submits the following regarding the content of the Draft Policy Statement.

- The Background section of the Draft Policy states that NRC and licensee measures have ensured the security of Category 1 and 2 sources and states support of the recommendations of international community and references the IAEA Code of Conduct for the Safety and Security of Radioactive Sources,

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

However, there is no specific discussion in the wording of the Statement of Policy to the effect that the scope of the Policy is limited to Category 1 and 2 sources and NRC should make this clear.

- CORAR fully supports the Commission's view in the Draft Policy Statement that it imperative to develop a pathway for the long term storage and disposal of these sources. We also encourage NRC and other agencies to continue to engage stakeholders in the effort to find a solution.
- Why, as stated in the Statement of Policy, does NRC consider it "prudent" to develop and use alternative forms of Cs-137 when previously in the Statement NRC states that sources are already adequately protected under current NRC requirements?
- While CORAR recognizes that the threat environment is subject to change, any potential security requirements that would result in an action to ban the use of these sources need to consider, in advance, the domestic implications as well as the unintended consequence of increasing their availability in countries with less rigorous or effective security arrangements in place.

CORAR appreciates the opportunity to comment on this important subject and would be glad to provide clarification or additional information.

Yours Sincerely,



Roy Brown  
Senior Director, Federal Affairs  
Council on Radionuclides and Radiopharmaceuticals