

**PRM-73-15
(76FR76327)**

As of: December 16, 2011 Received: December 10, 2011 Status: Pending_Post Tracking No. 80f7f6cb Comments Due: February 21, 2012 Submission Type: Web

PUBLIC SUBMISSION

Docket: NRC-2011-0251

Installation of Radiation Alarms in Rooms Housing Neutron Sources

DOCKETED
USNRC

Comment On: NRC-2011-0251-0001

Installation of Radiation Alarms for Rooms Housing Neutron Sources

December 19, 2011 (9:20 am)

Document: NRC-2011-0251-DRAFT-0002

Comment on FR Doc # 2011-31367

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Submitter Information

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IL,

General Comment

Docket ID NRC-2011-0251 security of Neutron Sources (Am-241-Be; Pu-239-Be sources) rooms housing neutron sources

1. Why in the world would anybody want to steal a neutron source? There is no point in worrying about anybody stealing something if there is no motive. Has a neutron source ever been stolen? George Hamawy's letter doesn't mention any thefts. How exactly could there be a hostage situation with a neutron source? It makes no sense.
2. Has George Hamawy ever heard of natural background radiation? I doubt it. Natural background may be more radiation than the neutron sources. Low level sources, such as bananas, are not really hazards at all. There is no reason to believe that a radiation detector that did not ring constantly because of background radiation would detect the difference created by removing a neutron source. Also, is it possible to shield the neutron source from the alarm detector while stealing the neutron source?
3. What is the purpose of the neutron sources? Do they really need multiple neutron sources or would just one be enough? "The samples are lowered in holes next to the source for irradiation." So the samples are supposed to capture neutrons so that they can be observed emitting gamma rays or electrons? Is this the chemistry department?
4. Collecting a whole lot of neutron sources would not provide enough Pu239 to make a plutonium bomb, nor even a dirty bomb. Terrorists would not be interested.

Template = SECY-067

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5. There is no reason to believe that any person would respond to the alarm.

The best solution is to put the barrels in a locked room. This request for rulemaking appears to be irrational without further information showing a mistake in the above. George Hamawy may be trying to create public fear where such fear is unreasonable. George Hamawy may be working for the coal industry as well as Columbia University.

Rulemaking Comments

From: Gallagher, Carol
Sent: Friday, December 16, 2011 3:49 PM
To: Rulemaking Comments
Subject: Comment on PRM-73-15
Attachments: NRC-2011-0251-DRAFT-0002.pdf

Attached for docketing is a comment on PRM-73-15 that I received via the regulations.gov website on 12/10/11.

Thanks,
Carol