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February 21, 2012

DOCKETED
USNRC

Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attn: Rulemakings and Adjudications Staff

September 13, 2012 (2:50 pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Subject: 10 CFR Part 73 Petition

The Organization of Agreement States (OAS) Executive Board (Board) has reviewed the above document and offers the following comment for review by the Nuclear Regulatory Commission (NRC).

The NRC has listed certain radioactive isotope quantities in a table identified as "Radionuclides of Concern" which delineates a quantity of concern. If a nuclide exceeds the limits in this table, it requires added security measures to ensure their safe and effective control. The petitioner (George Hamaway) has requested that neutron sources used at colleges be monitored with radiation alarms to prevent their removal. The Board disagrees with the petitioner's request as the quantity of a Pu/Be source is typically 4 curies which is well below the 16 curie limit in the "Radionuclides of Concern" table. In addition, the university is required to have security measures in place to "secure from unauthorized removal or access licensed materials that are stored in controlled or unrestricted areas" under 10 CFR 20.1801.

Sincerely,

Cheryl K Rogers, OAS Chair
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DS10

Docket, Hearing

From: Rogers, Cheryl K - DHS [Cheryl.Rogers@dhs.wisconsin.gov]
Sent: Thursday, September 13, 2012 2:27 PM
To: Docket, Hearing
Cc: Horn, Merri
Subject: Late submittal on 10 CFR 73 petition re neutron source monitoring
Attachments: Part_73_petition_2_21_12.pdf

Dear Secretary, US NRC, Attn: Rulemakings and Adjudications Staff:

Please accept this comment later as a late submittal. The letter was drafted and should have been sent February 21, 2012.

Sincerely,
Cheryl K. Rogers, Radioactive Materials Program Supervisor WI Dept. of Health Services
608-266-8135