

Gallagher, Carol

From: Shaffner, James
Sent: Wednesday, October 21, 2015 2:44 PM
To: Gallagher, Carol
Subject: FW: Scoping Comment for NRC-2015-0182

2015 OCT 21 PM 7:12

Comments in re: Doc. ID NRC 2015-0182

RECEIVED

From: M Albanese [mailto:malbanese@qaltek.com]
Sent: Thursday, October 15, 2015 6:01 PM
To: Shaffner, James <James.Shaffner@nrc.gov>
Cc: Travis Snowden <tsnow@qaltek.com>
Subject: [External_Sender] Scoping Comment for NRC-2015-0182

8/3/2015
82FR 46057

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To whom it concerns,

We'd like to thank the NRC for addressing this issue. It is an issue which needs to be addressed to properly respond to the concerns in the industry and drive understanding of the liabilities and limiters which exist and reduce the effectiveness of disposal.

We agree that applying the fixed cost, let alone any financial assurance for the sealed sources below the current financial assurance quantities has little merit relative to the complexity and costs incurred by the regulator and licensees. We believe increasing the cost of owning materials will only introduce new complexities and higher regulatory costs.

Has the NRC considered a financial assessment program, rather than financial assurance, for sealed sources. The licensee and regulators would share the responsibility of ensuring the licensee has an appropriate source disposition plan (i.e. transfer for reuse, decay or dispose). This determined disposition plan will drive a sharing of knowledge of disposition costs or reutilization opportunities among the licensees and the regulators (transfer and quotes to dispose). These disposition plans may require a specific timeline for updates by the licensee which can be confirmed via quotations or appropriate estimation based on validated pricing. While this does not confirm that they have a method to pay for such liability, it does require licenses of such sealed sources to acknowledge their disposal liability. Then a letter from an accountant or acknowledgment of such liability on the financials or cash statement could be an appropriate, and a more simplistic and relevant level of evaluation.

Sealed source use/reuse values and disposition costs should remain with the licensee since they should be the ones most familiar with their disposition options and associated costs. Through this process, regulators and inspectors can gain knowledge as to the validated disposition costs guiding organizations and their source liabilities.

This approach would in effect educate the licensee and regulators of disposition options and costs. This, in the long term, would provide a window for the regulator to understand end user costs for different types of sealed sources and develop a relevant financial liability matrix for regulation.

Sincerely,
Michael Albanese and Travis Snowden

SUNSI Review Complete

Template = ADM - 013

E-RIDS= ADM-03

Add= R. Whited (ARW2)

J. Shaffner (59511)