

# PUBLIC SUBMISSION

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**Docket:** NRC-2015-0182  
Financial Planning for Management of Radioactive Byproduct Material

*8/13/2015*

**Comment On:** NRC-2015-0182-0001  
Financial Planning for Management of Radioactive Byproduct Material

*FR 46057*

**Document:** NRC-2015-0182-DRAFT-0008  
Comment on FR Doc # 2015-18891

*9*

## Submitter Information

**Name:** Anonymous Anonymous  
**Organization:** Radiation Protection Section  
**Government Agency Type:** State  
**Government Agency:** Wisconsin Department of Public Health

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## General Comment

See attached file(s) for WI comments on:

NRC-2015-0182

## Attachments

WI Comments to NRC-2015-0182

SUNSI Review Complete

Template = ADM - 013

E-RIDS= ADM-03

Add= *R. Whited (ARW2)*

*J. Schaffner (Jas 99)*



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October 19, 2015

Cindy Bladey  
Office of Administration  
Mail Stop: OWFN-12-H08  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

RE: Comments on Financial Planning for Management of Radioactive Byproduct Material  
(NRC-2015-0182)

Dear Ms. Bladey,

The State of Wisconsin, Radioactive Materials Program has reviewed the above document and submits the following comments:

Question 1: Our experience is that disposition pathways other than traditional disposal occasionally surface, but they are not reliable. Wisconsin is not aware of any alternate disposition pathways that should be considered when developing financial planning requirements.

Question 2: We support having disposal costs addressed and financial mechanisms in place prior to licensing the source. If these costs are held in funds somewhere, licensees should be required to periodically review the estimated disposal costs and adjust financial mechanisms accordingly.

Question 3: Yes, licensees should be required to declare disused sources for Category 1 and 2 sources. Wisconsin recommends declaring a source as disused no later than 24 months after its last use.

Question 4: Financial planning should not be required for sources with a half-life less than 120 days.

Question 5: Any proposed rulemaking should be assigned Compatibility C. Some Agreement States have existing successful programs for dealing with source disposal and orphan sources. States need the flexibility to require their licensees to provide additional financial planning beyond what NRC may choose to require. It is critical to give States the opportunity to innovate on this issue.

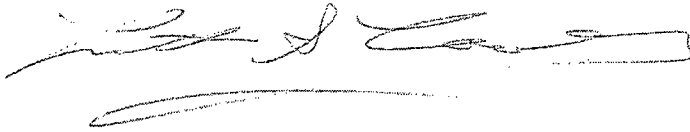
Question 6: Licensees who possess sources in quantities requiring financial planning should be specifically licensed. Regulatory agencies need to know about these sources and have the financial mechanisms in place *prior* to purchase. The general license program is not set up to handle additional requirements. In addition, sources requiring financial planning should be subject to routine inspections to ensure said planning is still required and satisfactory.

Question 7: Money left in a fund following payment of disposition costs should be returned to the licensee.

Question 8: The National Source Tracking System (NSTS) contains the parameters necessary to track sealed sources subject to financial planning requirements. NSTS would be enhanced by requiring licensees to use the existing "Long Term Storage" field.

Wisconsin encourages NRC to coordinate efforts with the CRCPD working group tasked with revising financial planning requirements. Thank you for the opportunity to provide this information.

Sincerely,

A handwritten signature in black ink, appearing to read "Luther Loehrke", with a horizontal line underneath it.

Luther Loehrke  
Radiation Protection Section  
State of Wisconsin