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# PUBLIC SUBMISSION

**Docket:** NRC-2013-0235  
Northwest Medical Isotopes, LLC - Request to Submit a Two-Part Application

**Comment On:** NRC-2013-0235-0014  
Construction Permit Application for the Northwest Medical Isotopes, LLC, Medical Radioisotope Production Facility; Request for Comment on Draft Environmental Impact Statement

81 FR 78865

**Document:** NRC-2013-0235-DRAFT-0008  
Comment on FR Doc # N/A

11/9/2016

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## Submitter Information

**Name:** Steve Mattmuller

## General Comment

Please see attached file.

## Attachments

161223 KMC NRC-2013-0235

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RULES AND REGULATIONS  
ENFORCEMENT  
DIVISION

SUNSI Review Complete  
Template = ADM - 013  
E-RIDS= ADM-03  
Add= D. Drucker (0m03)

December 23, 2016

Cindy Bladey  
Office of Administration  
Mail Stop: OWFN-12\_H08  
US Nuclear Regulatory Commission  
Washington, DC 20555-0001

RE: Docket ID: NRC-2013-0235  
Application for the Northwest Medical Isotopes (NWMI), LLC, Medical Radioisotope Production Facility

Dear Sirs and Madams:

Please consider this letter to be in full support of granting the construction permit application for the Northwest Medical Isotopes, LLC, Medical radioisotope production facility. The benefits of nuclear medicine are well known as is our field's dependence on foreign sources of Molybdenum-99 (Mo-99) for our Mo-99/Technetium-99m (Tc-99m) generators. These generators are the daily source of the invaluable radiopharmaceutical Tc-99m pertechnetate for our patients. In recent years though our field and our patients have suffered through shortages of Mo-99, new producers of Mo-99 are desperately needed.

One might be hard pressed to find a product with a more challenging supply chain than that of Mo-99. Currently all of our Mo-99 is produced overseas as far away as Australia and most is produced using highly enriched uranium (HEU). Worldwide a concerted effort is underway to convert to the production of Mo-99 with the use of low enriched uranium (LEU). This effort has been spearheaded by the US Department of Energy's National Nuclear Security Administration to meet its nuclear non-proliferation goals.

The NNWI project in Columbia, MO can be in essence a win, win, win solution. First, it will use LEU for the production of Mo-99. Secondly it will be produced in Columbia, MO and potentially will be the US's first domestic producer of Mo-99 that is commercially available. Finally it will use current and proven technology in the production of Mo-99. This will keep risks as correctly documented in the draft report as having a potential small impact.

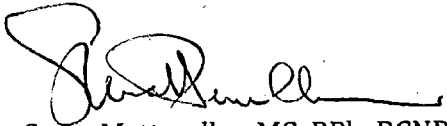
What the draft report doesn't say is that NWMI would be hard pressed to find a better site for their proposed facility. They've chosen a site in a planned research park with roads and utilities already in place. As described this research park is "shovel ready" and was developed exactly for companies like NWMI.

It's within a few miles of the Missouri University Research Reactor (MURR) which has been safely operating for 50 years since 1966. Amongst reactors worldwide, MURR has an enviable record for safety, radionuclide production and reliability. Finally the world's largest manufacturer of Mo-99/Tc-99m generators is located in St. Louis, MO just two hours away.

The NRC's Office of Nuclear Reactor Regulation is to be commended for preparing a thorough and complete draft report. The report has answered all comments submitted to date including all from the US Environmental Protection Agency.

NWMI is building a needed and safe facility in quite possibly the best location in the United States. I fully support this draft report and encourage the NRC to approve a construction permit for NWMI as soon as possible.

Sincerely,



Steve Mattmuller, MS, RPh, BCNP  
Chief Nuclear Pharmacist

NRC ACMUI - member (retired)  
NNSA MMM NSAC Mo-99 Subcommittee - member

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