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January 22, 1991

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TO: The Secretary of the Commission
Washington, DC 20555

FROM: Sue Engelhardt
Radiation Safety Officer

Abdul Benzikri
Health Physicist

Re: Comments on the Licenses and Radiation Safety
Requirements for Large Irradiators

OFFICE OF REGULATORY
DOCKETING & COMPLIANCE
BRANCH

The following are our comments regarding category II-panoramic, Dry-Source-Storage Irradiators.

We quote, "This category includes irradiators in which the sealed sources are stored in a shield constructed of solid materials and are fully shielded when not in use. Irradiations occur in air within a room accessible to personnel only when the sources are shielded."

From the above quote, teletherapy units which contain sources that can deliver 500 rads per hour at a distance of one meter or more, used for research, calibration of radiological instruments, and/or used at veterinary Medicine facilities, not used on humans, will be effected by this proposed rule.

Did this rule intend to include those type of sources?

If the answer is yes, we believe the proposed rule is too strict for these type of units. These type of units contain sources that remain in their shielded container at all times. When in use, the collimator allows the exposure of radiation to a defined area. These units should follow the **applicable** radiation safety requirements as those required for teletherapy units used on humans, e.g. CFR35.615 Safety Precautions. Since these units are not used for humans, full calibrations, spot checks etc. should not apply.

The second half of the same paragraph, and I again quote, "This category also includes certain beam type irradiators in which the source remains partially shielded".

It is not clear when the source is partially shielded. Is it when the source is in use, or when it is in the storage position?

We thank you for your time. Please let us know your response regarding these comments.

Safety Department

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