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Decommissioning Financial Assurance Requirements for Sealed and Unsealed Radioactive Materials

Comment On: NRC-2017-0031-0003

Decommissioning Financial Assurance for Sealed and Unsealed Radioactive Materials

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General Comment

I have been a Nuclear Pharmacists/Authorized User for nearly 23 years and have seen regulations improve safety over the years. I oversee a cyclotron facility but did spend 6 years using generators and now have a Ge/Ga generator at my facility. I assume these proposed changes are mostly for future emerging technology or some older technology that now has increased efficiency so that exposure and waste footprint need review.

This business is a small operation and any additional decommissioning cost does hurt ability to remain viable; however, I do understand the need for safety. We are currently using an alternative method being that we have signed documents with the generator manufacturer for them to take back the source, (Generator), when expired. My request for consideration is to offer some alternative measures such as this for the small companies while maintaining the safety of employees and environment for the community.