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Subject: estimated annual distribution of generally licensed devices

I just noticed something in the x-ray fluorescence analyzer assessment that I wasn't sure if we had clarified previously. You have stated a number of devices distributed annually which is approximately the same as the number provided in Enclosure 3 of NMSS's paper on the strawman device exemption. The numbers reported in that paper are total numbers out there, not annual, but are limited to those in NRC jurisdiction, that is, distributed to recipients in non-Agreement states. In the case of x-ray fluorescence analyzers, these numbers may actually be a good estimate of total annual distribution. NRC staff in NMSS estimates that there are about 3 times as many generally licensed devices nationally than those we control, i.e. twice as many in Agreement States as non-Agreement States. If the sources are replaced approximately every three years, you would get the same number estimated annually for total distribution. For devices with different average lifetimes this would not be the case, although you could estimate it similarly. I'm going to talk to another person in NMSS to see if we can get some better numbers on annual distribution but we would have to use the general estimate of 3 times for the total national distribution.