

DOCKET NUMBER
PROPOSED RULE20.32-150
(70FR 43646)DOCKETED
USNRC

October 11, 2005 (12:30pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Wisconsin Radiation Protection Section's Response to RIN 3150-AH48

The following items are Wisconsin's comments to the proposed rule on national source tracking (STP-05-063)

(21)

1. The proposal under II-B (What is a Nationally Tracked Source?) requests state comments on developing regulations such that Ra-226 sources be tracked on the database. Currently not one of the Ra-226 sources meets the criteria for Category 2 or Category 3. Of the 47 SSD entries found, the maximum amount found was 100 millicuries. Ra-226 sources are small in quantities, typically 5 millicuries per source in portable gauges. Registering these sources would be a minimal benefit in terms of risk reduction.
2. Under item II-B (What is a Nationally Tracked Source?), the question was asked regarding whether or not category 3 sources should be entered into the database. At this time category 3 source strengths do not fall within the security requirements. There is no health and safety benefit for tracking individual sources that do not fall under the current security categorizations. If a licensee co-locates category 3 sources, they would be under the increased controls requirements. For example, a licensee co-locates two or more HDR's containing Ir-192.

WI Category 3 entries:

- a. Cobalt-60: No new licensees, one source to add
- b. Cesium-137: 4 new licensees, two sources to add.
- c. Iridium-192: 7 new licensees, all HDR sources.
- d. Pu/Be: 8 new licensees, all DOE sources which are registered with LANL

A category 3 Cesium-137 source (>2.7 Ci) will be capturing several fixed gauge sources. The number of gauges that a fixed gauge licensee possesses is unknown without an inspection. The license is written for authorization, not quantities. Since the gauges are in fixed locations, typically a large industrial setting, Wisconsin does not think there is a health and safety benefit for adding category 3 Cesium-137 sources to the database.

Template = SECY-067

SECY-02

The number of HDR sources added would be 7, each licensee possesses one unit. These sources are exchanged on a quarterly basis which means 28 entries per year for HDR sources. These sources are located in a device, in a secure hospital location. Wisconsin does not think there is a health and safety benefit for adding category 3 Iridium-192 sources to the database.

The number of Pu/Be entries would be 8, each licensee possesses one source. These sources are being tracked by DOE and are registered with the LANL in the off-site recovery database. Currently Wisconsin has 3 sources listed for return to DOE. Wisconsin does not think there is a health and safety benefit for adding category 3 Pu/Be sources to the database.

3. Wisconsin does not agree with the two independent checkers idea. The licensee's RSO should be a credible source of information for the licensee's sources. The state has the ability to review licensee's information in their state and verify the entries. This would not enhance health and safety.
4. The verification date of June would be a bad month for all academic licensees since school is out and some RSOs take summer vacation during this time. Perhaps a later month like September or October would work better.

From: "Michael Welling" <wellima@dhfs.state.wi.us>
To: <secy@nrc.gov>
Date: Tue, Oct 11, 2005 12:21 PM
Subject: Wisconsin Comments on RIN 3150-AH48 (National Source Tracking Database)

Dear sir or maam,

The attached document is Wisconsin's comments to the database proposed rule. If you have any questions please give me a call or e-mail. Thank you.

Mike Welling

Michael Welling

608-261-7803
Nuclear Engineer
State of Wisconsin
Dept of Health and Family Services
Division of Public Health
Radiation Protection Section

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CC: "Cheryl Rogers" <RogerCK@dhfs.state.wi.us>

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Subject: Wisconsin Comments on RIN 3150-AH48 (National Source Tracking Database)

Creation Date: Tue, Oct 11, 2005 12:20 PM

From: "Michael Welling" <wellima@dhfs.state.wi.us>

Created By: wellima@dhfs.state.wi.us

Recipients

nrc.gov

owf5_po.OWFN_DO
SECY (SECY)

dhfs.state.wi.us

RogerCK CC (Cheryl Rogers)

Post Office

owf5_po.OWFN_DO

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Files

MESSAGE

National Source Tracking Comments.doc

Mime.822

Size

703

35985

Date & Time

Tuesday, October 11, 2005 12:20 PM
24576

Options

Expiration Date: None

Priority: Standard

Reply Requested: No

Return Notification: None

Concealed Subject: No

Security: Standard