

**From:** "Leola DeKock" <dekoclm@dhfs.state.wi.us>  
**To:** <NRCREP@nrc.gov>  
**Date:** Fri, Feb 10, 2006 11:32 AM  
**Subject:** Request for Comments - Radiation Source Protection and Security Task Force (RSPS-TF)

ATTN: Chief, Rules and Directives Branch, Division of Administrative Services, Office of Administration

The Wisconsin Department of Health and Family Services, Radiation Protection Section is providing the attached comments as requested in the January 11, 2006, Federal Register. The Radiation Source Protection and Security Task Force (Task Force) requested public input on the major issues before the Task Force.

Thank you for the opportunity to comment on these important topics.

Please contact me at dekoclm@dhfs.state.wi.us or telephone (608) 266-7384, or fax at (608) 267-3695 if you have any questions.

Sincerely,

Leola Dekock  
Nuclear Engineer, Senior  
Division of Public Health  
Radiation Protection Section  
Department of Health and Family Services  
(608) 266-7384  
dekoclm@dhfs.state.wi.us

\*\*\*\*\*

NOTICE: This E-mail and any attachments may contain confidential information.  
Use and further disclosure of the information by the recipient must be consistent with applicable laws, regulations and agreements. If you received this E-mail in error, please notify the sender; delete the E-mail; and do not use, disclose or store the information it contains.

1/11/06

71 FR 1776

14

RECEIVED

2006 FEB 10 PM 12:37

RULES AND DIRECTIVES  
BRANCH  
101100

SISP Review Complete

Template = ADM-013

F-RIDS = ADM-03

Adm = M. Dunn (4241)

**Mail Envelope Properties** (43ECC022.20D : 2 : 57869)

**Subject:** Request for Comments - Radiation Source Protection and Security Task Force (RSPS-TF)  
**Creation Date:** Fri, Feb 10, 2006 11:32 AM  
**From:** "Leola DeKock" <[dekoclm@dhfs.state.wi.us](mailto:dekoclm@dhfs.state.wi.us)>  
**Created By:** [dekoclm@dhfs.state.wi.us](mailto:dekoclm@dhfs.state.wi.us)

**Recipients**

nrc.gov  
twf4\_po.TWFN\_DO  
NRCREP

**Post Office**

twf4\_po.TWFN\_DO

**Route**

nrc.gov

**Files**

MESSAGE  
Security reponse letter.doc  
Mime.822

**Size**

1193  
99840  
139392

**Date & Time**

Friday, February 10, 2006 11:32 AM

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**Reply Requested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard



DIVISION OF PUBLIC HEALTH

Jim Doyle  
Governor

1 WEST WILSON STREET  
P O BOX 2659  
MADISON WI 53701-2659

Helene Nelson  
Secretary

**State of Wisconsin**  
**Department of Health and Family Services**

608-266-1251  
FAX: 608-267-2832  
dhfs.wisconsin.gov

February 10, 2006

Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mail Stop T6-D59  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

NRCREP@nrc.gov

**Subject: Request for Comments - Radiation Source Protection and Security Task Force (RSPS-TF)**

The Wisconsin Department of Health and Family Services, Radiation Protection Section is providing the enclosed comments as requested in the January 11, 2006, Federal Register. The Radiation Source Protection and Security Task Force (Task Force) requested public input on the major issues before the Task Force.

The following comments refer to the topics and assigned number, as identified in the publication.

There are no additional comments on Topics 1, 3, 6, 8, 9, and 10.

Topic 2: The national system for recovery of lost or stolen radiation sources.

**COMMENTS:**

The present NRC General License Tracking System (GLTS) isn't accurate.

The DOE Off-Site Source Recovery Program isn't always effective. The types of sources are not inclusive, limited to specific radionuclides. The program has had difficulties with support for the program. The program has been active and inactive since the NRC/DOE MOU of 2000.

The Trilateral Initiative was discussed. What is the status of the numerous portable gauges reported stolen or missing in the southern US states? Have there been any successful recoveries of lost materials?

Topic 4: The national source tracking system for radiation sources.

**COMMENTS:** Modify the reporting requirements if Category 3 sources are subject to additional security measures. .

Topic 5: A national system to provide for the proper disposal of radiation sources.

COMMENTS:

Should the threshold be re-adjusted to the individual source activities?

- This may require additional financial assurance for some licensees.
- This may reduce the financial assurance for some licensees, which would be more financially prudent.

Topic 7: Procedures for improving the security and control for use and storage of radiation sources.

COMMENTS:

A process needs to be in place to ensure that high-risk radioactive sources cannot be obtained before verification-through inspection or other means-that the materials will be used as intended. This may affect additional devices.

Thank you for the opportunity to comment on these important topics. Please contact me at [dekoclm@dhfs.state.wi.us](mailto:dekoclm@dhfs.state.wi.us) or telephone (608) 266-7384, or fax at (608) 267-3695 if you have any questions.

Sincerely,

Leola DeKock  
Nuclear Engineer, Senior  
WI Radiation Protection Section  
Radioactive Materials Program