



## WHITEHEAD INSTITUTE

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Mr. Charles W. Hehl  
Director  
Division of Nuclear Materials Safety, Region I  
U.S. Nuclear Regulatory Commission  
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475 Allendale Road  
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Joseph P. Ring, Ph.D., CHP  
Radiation Protection Officer  
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Dear Mr. Hehl and Dr. Ring:

We just received the invitation to the Security and Control Workshop. We must compliment you on organizing the workshop on this timely subject. Unfortunately, we will not be able to attend the Workshop on that date and, while you did not solicit comments from people who could not attend, we wish to offer comment anyway.

The NRC proposal is in response to two serious incidents involving presumably intentional contamination of an employee. The NRC response on security may very well have no impact upon an identical incident in the future. We think it's important to bear in mind the problem as we seek a solution.

An over reaction on security could have a serious negative impact on the academic research culture. This culture is dependent upon an open intellectual environment. When the Whitehead Institute building was designed, we intentionally included features that would enhance interactions between members of the research staff. For example, all the labs along each side of the building have doorways into the adjacent lab (as well as there being a corridor outside the labs). This single feature has vastly improved the level of contact between staff in separate lab rooms. Without the inter-lab doors, one would proceed to the corridor to get to one's destination and would have no reason to enter an adjacent lab. The people next door might as well be on a different floor. With the door, there

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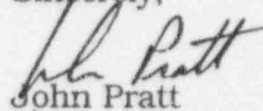


is contact and interchange. This is a small example of how physical openness enhances intellectual openness. An over-emphasis on security would cause labs to be locked whenever its members leave. After locking the door two or three times a day, it would probably remain locked, thereby altering the open environment into one of isolation. We point this out only to illustrate how an emphasis on security can damage the larger and more important quality of maintaining an open intellectual environment.

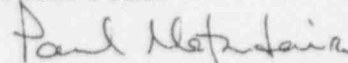
As users of radioactive materials, we share a concern for the security of material amounts, most particularly the stock material. Stock material should be maintained in locked cabinets or containers with inventory and usage logs maintained. However, smaller amounts in use and waste materials ought not to be subject to security restrictions that would impede the open nature of academic research labs without a material benefit to safety.

We need to keep the security issue in perspective and not get into an over-response that jeopardizes the very quality that lies at the heart of the quality of academic research.

Sincerely,



John Pratt



Paul Matsudaira  
Radiation Protection Officer