

## Mayo Clinic

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Richard J. Vetter, Ph.D.  
Radiation Safety Office

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TO: Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attn: Docketing and Service Branch

FROM: Richard J. Vetter, Ph.D.  
Radiation Safety Officer  
Mayo Clinic

RJVetter

RE: Proposed Rule Concerning Financial Responsibility for Cleanup of  
Accidental and Unexpected Releases of Radioactive Materials by NRC  
Licensees

DATE: December 11, 1985

The following comments are submitted for your consideration with regard to the Advanced Notice of Proposed Rule Making on Financial Liability Requirements Applicable to NRC Licensees published in the Federal Register on June 7, 1985.

Because of the nature of the radionuclides and radiopharmaceuticals used by medical institutions, incidents involving the accidental and unexpected release of radioactive materials have been rare and have had inconsequential effects on the environment. Occasional spills that do occur during the use of these materials have been effectively dealt with by initial clean up or in some cases quarantine of an area to accomplish decontamination by radioactive decay. Long lived radionuclides used in research are used in small quantities that are readily contained in the event of an accidental spill. Use of these materials in medical institutions has never posed a threat to the environment or public health.

The proposed rule will increase the cost of using radioactive materials in medical institutions without increasing safety. There is no significant danger of accidental releases of radioactive materials by medical licensees. Minimal releases that may occur are easily contained and cleaned up without danger to the general public. We believe that medical facilities should be exempted from this proposed rule making.

Thank you for your consideration in this matter.

jlm

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add: Mary Jo Seeman, 623 SS  
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