

APPENDIX ONE

State	Total number of SL's	Number of Category 3 SL's	Number of Category 3 GL's	Number of Category 3 SL's sources	Number of Category 3 GL's sources	Hours to Collect Data
CT	155	19	1	3		6
IL	624	102	14	135	50	40
PA	630	91	16	63	11	30
WA	330	22	0	42	0	8

Overview

In preparation for the DSWG's response to the NRC's *Federal Register* notice on Category 3 source protection and accountability, the LLW Forum asked five states to provide the following information:

- total number of specific licenses;
- total number of Category 3 specific licenses;
- total number of Category 3 general licenses;
- total number of Category 3 specifically licensed sources;
- total number of Category 3 generally licensed sources; and,
- total time to collect this data.

The states initially responded that this assignment would very tedious because most states do not electronically track Category 3 sources and it would require reviewing individually (i.e., manually) all specific licensees and all general licensees to determine if they authorize Category 3 radioactive sealed sources.

Additionally, it would require states to contact each broad scope licensee because they are authorized to possess "Any byproduct material with atomic numbers 3 through 83" or "Any byproduct material with atomic numbers 1 through 83, and 88, with half-lives of less than or equal to 120 days," and the radioactive sealed sources are not specifically accounted for by the radioactive materials license.

One of the five states declined to respond because they did not have a tracking system and could not afford to commit the staff time to do the manual review of each specific and general license.

The above chart summarizes the states' responses.

Specific Comments

The following specific comments were provided by each of the responding states:

- Connecticut has a total number of 2 Category 1 SLs, 2 sources that are Category 1 SLs, 16 Category 2 specific licenses and 225 Category 2 specifically licensed sources.
- Illinois numbers will vary once we start sending out inquiries on true possession vs. authorization and also factor in co-location.
- Pennsylvania stated the reasoning our total number of Cat 3 specifically licensed sources are listed as indeterminate is based on two major factors. The first factor would be 10 CFR 35.65 (Authorization for calibration, transmission, and reference sources) which states:

1. Any person authorized by § 35.11 for medical use of byproduct material may receive, possess, and use any of the following byproduct material for check, calibration, transmission, and reference use.

a. Sealed sources, not exceeding 1.11 GBq (30 mCi) each, manufactured and distributed by a person licensed under § 32.74 of this chapter or equivalent Agreement State regulations. Meaning that these licensees would not be required to register all of their check sources with the state of Pennsylvania, therefore none would be listed on the license, and no record is kept of these sources within the Department.

Secondly, we have other Universities and other facilities that fall under a Broad Scope. These licensee in many cases are currently allowed to possess “Any byproduct material with atomic numbers 3 through 83” or “Any byproduct material with atomic numbers 1 through 83, and 88, with half-lives of less than or equal to 120 days,” in which these materials are not specifically account for by source. All tolled, the state currently licenses 17 broad scope licenses within the state that could fall under one, two, or both of these classes. Based on these 2 factors, we cannot currently determine an accurate total number of sources within the state.

- Washington stated that the total number of specifically licensed Category 3 sources was estimated by reviewing the licensees' inventory records in the latest inspection reports, and by assuming that each high dose-rate remote afterloader has one Category 3 source.