**Letter to Management of a Company Holding a Radioactive Material License who Possesses a Sealed Source or Device**

*Note: This letter should be printed on letterhead of radioactive materials program.*

Dear \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_: *(insert name)*

Your facility has been issued Radioactive Material License No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_ *(insert license number)* to possess and use a radioactive sealed source or device that contains a radioactive sealed source. As you know, the use of radioactive material has many applications that benefit society. However, when the radioactive sealed source or device is no longer viable for its intended use, many licensees choose to store the source for an extended period of time rather than properly dispositioning the source.

This letter is intended to serve as a reminder that sources or devices that are no longer in use represent a potential liability and may be more vulnerable than sources that are in use. They must be properly secured to prevent loss, theft or other malevolent use pending final disposition. Indeed, in today’s national security environment, disused sources may pose a threat to the public as they could be used individually or in aggregate in a radiological dispersal device (RDD or dirty bomb) or a radiation exposure device (RED). An RDD incident in a major metropolitan area could result in massive quantities of contaminated material requiring millions of dollars in cleanup costs. Radioactive material licensees possessing disused sources or devices are legally responsible for the proper management and use of their radioactive material and are liable for environmental or public health and safety consequences should their radioactive material damage the environment or create a public health and safety impact.

Licensees are therefore advised to properly disposition disused sealed sources and devices as soon as practical. The management options available include reuse by another licensed user; recycling the radioactive material; and, disposal in a licensed facility. Devices containing radioactive material may only be transferred to or received by a company or individual licensed by the U.S. Nuclear Regulatory Commission (NRC) or an Agreement State. In addition, licensees may be required to coordinate source disposition with the appropriate low-level radioactive waste compact authority. Fortunately, there are resources available to help you properly disposition your sources or devices in a safe and environmentally responsible manner.

**Reuse and Recycle Options**

In some cases, reuse by another licensee is possible and may provide a responsible way to manage disused radioactive sealed sources or devices. While the source may no longer work for your application, it may be of value to another licensed user. For instance, it may be possible to transfer higher activity sources to a licensed processor for recycling. In such cases, the radioactive material may be removed from the original device for reprocessing or repurposing. This process can be initiated by contacting the manufacturer of your sources or devices directly or by contacting the Conference of Radiation Control Program Directors (CRCPD)—a nonprofit organization of individuals from government agencies that regulate and control the use of radioactive material and radiation sources. CRCPD can assist with finding, and in some cases funding, an outlet for radioactive material. *For information regarding reuse and recycle options, please contact Russ Meyer at* *RMeyer@crcpd.org* *or go to* [*www.crcpd.org*](http://www.crcpd.org)*.*

**Disposal Options**

Most sealed sources will require permanent disposal, which is available to licensees in all states. Commercial radioactive waste brokers can assist you with packaging, transportation and disposal. *For information regarding commercial radioactive waste brokers, please go to www.crcpd.org/stateservices/comm\_svcs.aspx or to www.bpdirectory.com.*

**Source Collection and Reduction Program** In addition, the CRCPD administers the Source Collection and Threat Reduction (SCATR) program. To qualify for the SCATR program, radioactive material must be no longer wanted by the owner; discrete radioactive material (sealed sources or vials); generally or specifically licensed; not eligible for assistance by another federal program; acceptable for disposal at a commercial low-level waste facility; and, included in a collection program coordinated or organized by a radiation control agency in cooperation with the CRCPD. Currently, the SCATR program provides a 40% cost share. However, the cost share will be reduced to 30% effective April 1, 2017 and to 20% effective April 1, 2018, so licensees are strongly encouraged to take advantage of SCATR at your earliest convenience in order to maximize the cost-share benefits. As the SCATR collections are usually conducted in campaigns with a limited window of opportunity, licensees that currently possess disused sources should register their sources immediately at <http://osrp.lanl.gov/PickUpSources.aspx> and contact the SCATR program to determine eligibility and include disposition costs in your budget process. *For information regarding the SCATR program, please contact Russ Meyer at* *RMeyer@crcpd.org* *or go to http://crcpd.org/StateServices/SCATR.aspx.*

**Off-Site Source Recovery Project** Users of higher activity sources that are not acceptable under the SCATR program and licensees possessing transuranic sources can seek assistance from the Off-Site Source Recovery Project (OSRP)—a federal program sponsored by the National Nuclear Security Administration (NNSA). OSRP recovers excess, disused and unwanted sealed sources in the interest of national security, public health and safety. These recoveries have included sources from universities, hospitals, research and industrial facilities. As OSRP is subject to limited federal funding, licensees interested in using the program are encouraged to do so at your earliest convenience. *For information regarding the OSRP, please go to* [*http://osrp.lanl.gov*](http://osrp.lanl.gov).

For your further information, enclosed please find a pamphlet outlining the issues and information discussed in this letter. If you are currently storing a disused sealed source or device that contains a radioactive sealed source, it is your responsibility as the licensee to make plans to properly disposition these disused sources in a timely manner. Doing so will reduce the security burden for your facility, decrease your liability should the radioactive material negatively impact public health, allow more flexibility given that available disposal options are often subject to policy decisions that can change over time, and reduce your ultimate disposition costs. *Disposal costs will only go up!*

If you have questions or require additional information, please contact \_\_\_\_\_\_\_\_\_\_\_\_\_ *(insert name)* at \_\_\_\_\_\_\_\_\_\_\_\_ *(insert contact phone number)* or by email at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ *(insert contact email address).*

Sincerely,

*[Head of radioactive materials program]*

Enclosure