|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **State** | **Total number of SL’s** | **Number of Category 3 SL’s** | **Number of Category 3 GL’s** | **Number of Category 3** **SL Sources** | **Number of Category 3 GL Sources**  | **Hours to Collect Data** |
| **CT** | 155 | 19 | 1 | 3 |  | 6 |
| **IL** | 624 | 102 | 14 | 135 | 50 | 40 |
| **PN** | 630 | 566 | 187 | indeterminate | 628 | 30 |
| **SC** |  |  |  |  |  |  |
| **WA** | 330 | 22 | 0 | 42 | 0 | 8 |

**Category 3 Source and Device Information**

**Specific Comments:**

•  Connecticut: Connecticut has a total number of two Category 1 Specific Licenses, two sources that are Category 1 Specific Licenses, 16 Category 2 Specific Licenses and 225 Category 2 specifically licensed sources.

•  Illinois: Illinois states that numbers will vary once the state starts sending out inquiries on true possession verses authorization and also factoring in co-location.

•  Pennsylvania:Pennsylvania notes that the reason that their total number of Category 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 as follows:

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.*
2. *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, the state has universities and other facilities that fall under a broad scope. These licensees, 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 accounted 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 two factors, Pennsylvania cannot currently determine an accurate total number of sources within the state.

•  South Carolina: South Carolina states that they do not have any device manufacturers and that they do not have a tracking system for Category 3 sources, either specifically or generally licensed.

•  Washington: Washington states 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.

**General Comments**

•  This is a tedious effort, as it requires the review of each file manually.

•  Category 3 sources can be tabulated, but it won’t be an easy task.

•  The U.S. Nuclear Regulatory Commission (NRC) doesn’t know how hard it is to get this information, very resource intensive work.

•  An incentive to completing this work is the knowledge that NRC will soon be asking for it.