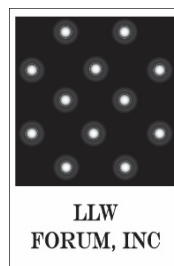


# **Disused Sources Working Group Report on the Management and Disposition of Sealed Sources Survey**



## **Summary of Responses May 11, 2015**





LOW-LEVEL RADIOACTIVE WASTE FORUM, INC.  
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# **SECTION ONE: CRCPD AND RELATED PROGRAMS**



**2. The Conference of Radiation Control Program Directors' (CRCPD's) orphaned source recovery and Source Collection and Threat Reduction (SCATR) programs should continue to be funded.**

		Response Percent	Response Count
High Priority		82.9%	34
Medium Priority		17.1%	7
Low Priority		0.0%	0
answered question			41
skipped question			7

**3. My state will or has forwarded CRCPD literature to the state's licensees for the latest (2014-2015) SCATR initiative.**

		Response Percent	Response Count
Yes		71.4%	30
No		28.6%	12
answered question			42
skipped question			6

**4. My state operates its own orphaned or disused source recovery program. (If so, please give more details in the Your State Program section.)**

		Response Percent	Response Count
Yes		11.9%	5
No		88.1%	37
answered question			42
skipped question			6

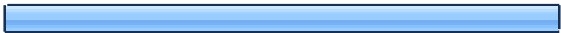

**5. The Department of Defense (DoD) has enacted a much more restrictive acceptance policy regarding radioactive material or low-level radioactive waste found by Radiation Control Programs in the public domain. Has your state been negatively impacted by this more restrictive DoD acceptance policy? (If yes, please describe in the comments section at the end of this survey.)**

		Response Percent	Response Count
Yes		29.3%	12
No		70.7%	29
answered question			41
skipped question			7



**6. CRCPD should receive additional funding or existing funding should be earmarked for a new CRCPD led outreach program to educate licensees on life-cycle obligations related to sealed sources.**

		Response Percent	Response Count
High Priority		35.7%	15
Medium Priority		52.4%	22
Low Priority		11.9%	5
answered question			42
skipped question			6




**7. My state would support the above educational outreach program and distribute CRCPD literature to the state’s licensees.**

		Response Percent	Response Count
Yes		83.3%	35
No		16.7%	7
answered question			42
skipped question			6

**8. My state currently operates an educational outreach program that provides information on the life-cycle costs that come with owning a source. (If so, please give more details in the Your State Program section.)**

		Response Percent	Response Count
Yes		11.9%	5
No		88.1%	37
answered question			42
skipped question			6

**9. A detailed study should be conducted by CRCPD to identify measures to promote opportunities for the reuse and recycling of sources.**

		Response Percent	Response Count
High Priority		28.6%	12
Medium Priority		57.1%	24
Low Priority		14.3%	6
answered question			42
skipped question			6




**10. A detailed study should be conducted by the U.S. Environmental Protection Agency (EPA) to identify measures to promote opportunities for the reuse and recycling of sources.**

		Response Percent	Response Count
High Priority		38.1%	16
<b>Medium Priority</b>		<b>45.2%</b>	<b>19</b>
Low Priority		16.7%	7
answered question			42
skipped question			6



**11. The CRCPD should develop a secure “source exchange” registry for source users, manufacturers and recyclers to facilitate the transfer of sources from licensees in possession of unwanted but still useful material or devices to licensees with a beneficial use for them. The program would provide registered users with detailed source information, such as the make and model of registered excess sources that meet specific application requirements, as well as information and/or assistance with the paperwork required to complete the transaction.**

		Response Percent	Response Count
High Priority		42.9%	18
<b>Medium Priority</b>		<b>47.6%</b>	<b>20</b>
Low Priority		9.5%	4
answered question			42
skipped question			6



**12. A federal entity should provide funding assistance for the sealed source exchange program.**

		Response Percent	Response Count
High Priority		57.1%	24
Medium Priority		33.3%	14
Low Priority		9.5%	4
answered question			42
skipped question			6



**13. My state has existing programs and/or policies that encourage reuse and recycling of disused sealed sources. (If so, please give more details in the Your State Program section.)**

		Response Percent	Response Count
Yes		11.9%	5
No		88.1%	37
answered question			42
skipped question			6




**14. If there were a sealed source exchange program, my state would encourage our licensees to participate in it and forward information.**

		Response Percent	Response Count
Yes		95.2%	40
No		4.8%	2
answered question			42
skipped question			6

**15. The Off-Site Source Recovery Program (OSRP) should continue to be funded.**

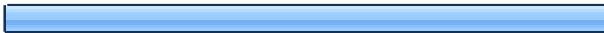


		Response Percent	Response Count
High Priority		78.6%	33
Medium Priority		21.4%	9
Low Priority		0.0%	0
<b>answered question</b>			<b>42</b>
<b>skipped question</b>			<b>6</b>

**16. DOE/NNSA should continue to collect disused Greater than Class C (GTCC) and large Class C sources that cannot go into an existing compact facility for safe storage until a GTCC waste site is available.**

		Response Percent	Response Count
High Priority		90.5%	38
Medium Priority		7.1%	3
Low Priority		2.4%	1
<b>answered question</b>			<b>42</b>
<b>skipped question</b>			<b>6</b>



**17. In providing collection services, DOE/NNSA should ensure its actions continue to be in compliance with state and compact requirements.**




		Response Percent	Response Count
High Priority		90.5%	38
Medium Priority		7.1%	3
Low Priority		2.4%	1
<b>answered question</b>			<b>42</b>
<b>skipped question</b>			<b>6</b>

# **SECTION TWO: ADDITIONAL REUSE AND RECYCLING POLICIES**




**18. States and the U.S. Nuclear Regulatory Commission (NRC) should encourage potential buyers of sealed sources to reuse sources that are available or already in their possession.**

		Response Percent	Response Count
High Priority		57.1%	24
Medium Priority		33.3%	14
Low Priority		9.5%	4
		<b>answered question</b>	<b>42</b>
		<b>skipped question</b>	<b>6</b>

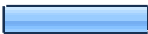


**19. NRC should establish policies and procedures to ensure that recycling operations are not disguises for waste brokering or long term storage of disused sources that are unlikely to be recycled.**

		Response Percent	Response Count
High Priority		61.9%	26
Medium Priority		28.6%	12
Low Priority		9.5%	4
answered question			42
skipped question			6


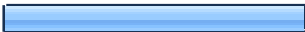

**20. NRC and States should develop inspection procedures to identify disused sources in long term storage.**

		Response Percent	Response Count
High Priority		33.3%	14
Medium Priority		50.0%	21
Low Priority		16.7%	7
answered question			42
skipped question			6




**21. To prevent orphaned foreign sources, NRC should reconsider its policy of allowing importation of foreign sources for management by manufacturers.**

		Response Percent	Response Count
High Priority		21.4%	9
<b>Medium Priority</b>		<b>57.1%</b>	<b>24</b>
Low Priority		21.4%	9
<b>answered question</b>			<b>42</b>
<b>skipped question</b>			<b>6</b>

**22. Foreign sources should only be imported if the importer can guarantee that they will be used in the US or exported.**




		Response Percent	Response Count
High Priority		35.7%	15
<b>Medium Priority</b>		<b>45.2%</b>	<b>19</b>
Low Priority		19.0%	8
<b>answered question</b>			<b>42</b>
<b>skipped question</b>			<b>6</b>

**23. To prevent the accumulation of an excessive number of sources by manufacturers and suppliers, NRC and States should require manufacturers and suppliers to implement procedures to annually dispose of sources that have no recycle or reuse value.**



		Response Percent	Response Count
High Priority		50.0%	21
Medium Priority		33.3%	14
Low Priority		16.7%	7
		<b>answered question</b>	<b>42</b>
		<b>skipped question</b>	<b>6</b>

# **SECTION THREE: STRATEGIES TO ENCOURAGE DISPOSAL**

**24. NRC and states should put a time limit on the storage of disused sources.**



		Response Percent	Response Count
High Priority		47.5%	19
Medium Priority		32.5%	13
Low Priority		20.0%	8
		answered question	40
		skipped question	8

**25. Two years is enough time for a licensee to arrange disposal of disused sources. (If disagree, please add a comment to suggest other time limits.)**




		Response Percent	Response Count
Yes		66.7%	26
No		33.3%	13
		answered question	39
		skipped question	9





**26. My state has or plans to add a rule or policy limiting the storage time for disused sources.**

		Response Percent	Response Count
Yes		15.0%	6
No		85.0%	34
answered question			40
skipped question			8




**27. The NRC and states should actively enforce the 2-year storage limit rule for Generally Licensed (GL) devices.**

		Response Percent	Response Count
High Priority		42.5%	17
Medium Priority		32.5%	13
Low Priority		25.0%	10
answered question			40
skipped question			8



**28. My state tracks GL devices in storage and actively enforces the 2-year storage limit rule for GL devices.**

		Response Percent	Response Count
Yes		37.5%	15
No		62.5%	25
answered question			40
skipped question			8



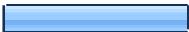
**29. NRC and states should assess fees per source to encourage disposal of disused sources.**

		Response Percent	Response Count
High Priority		20.0%	8
<b>Medium Priority</b>		<b>47.5%</b>	<b>19</b>
Low Priority		32.5%	13
		<b>answered question</b>	<b>40</b>
		<b>skipped question</b>	<b>8</b>



**30. My state has or plans to add fees that are intended to encourage disposal of disused sources.**

		Response Percent	Response Count
Yes		17.5%	7
<b>No</b>		<b>82.5%</b>	<b>33</b>
		<b>answered question</b>	<b>40</b>
		<b>skipped question</b>	<b>8</b>



**31. NRC and states should require licensees to acknowledge in writing that they have received information on and understand their responsibilities related to the life-cycle costs of owning sources.**

		Response Percent	Response Count
High Priority		27.5%	11
<b>Medium Priority</b>		<b>45.0%</b>	<b>18</b>
Low Priority		27.5%	11
answered question			<b>40</b>
skipped question			<b>8</b>

**32. If a strategy only involves a policy change, my state can take the initiative to change disused source policies**




		Response Percent	Response Count
Yes		60.0%	24
No		40.0%	16
answered question			<b>40</b>
skipped question			<b>8</b>

**33. In cases where rule change is required, NRC will need to adopt new rules before my state can take action.**

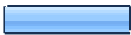

		Response Percent	Response Count
Yes		66.7%	26
No		33.3%	13
answered question			<b>39</b>
skipped question			<b>9</b>

## **SECTION FOUR: FINANCIAL ASSURANCE**




**34. NRC needs to revise financial assurance regulations so that the financial assurance amounts reflect actual disposal costs.**

		Response Percent	Response Count
High Priority		63.2%	24
Medium Priority		26.3%	10
Low Priority		10.5%	4
answered question			38
skipped question			10




**35. My state has or plans to require some licensees carry additional financial assurance. (If so, please give more details in the Your State Program section.)**

		Response Percent	Response Count
Yes		18.4%	7
No		81.6%	31
answered question			38
skipped question			10



**36. To encourage timely disposal, NRC should require financial assurance for all Category 1 and 2 sources.**

		Response Percent	Response Count
High Priority		44.7%	17
Medium Priority		34.2%	13
Low Priority		21.1%	8
answered question			38
skipped question			10

**37. To encourage timely disposal, NRC should require financial assurance for all Category 1 through 3 sources.**




		Response Percent	Response Count
High Priority		31.6%	12
Medium Priority		31.6%	12
Low Priority		36.8%	14
<b>answered question</b>			<b>38</b>
<b>skipped question</b>			<b>10</b>

**38. The current system for determining when financial assurance is required is adequate.**

		Response Percent	Response Count
Yes		44.4%	16
No		55.6%	20
<b>answered question</b>			<b>36</b>
<b>skipped question</b>			<b>12</b>




# **SECTION FIVE: CATEGORY 3 SOURCES**

**39. Individual Category 3 sources, such as Am/Be sources used in well logging, should be subject to greater security requirements.**




		Response Percent	Response Count
High Priority		26.3%	10
<b>Medium Priority</b>		<b>47.4%</b>	<b>18</b>
Low Priority		26.3%	10
<b>answered question</b>			<b>38</b>
<b>skipped question</b>			<b>10</b>





**40. Licensees who may possess several Category 3 sources exceeding the Category 2 level should be subject to greater security requirements.**

		Response Percent	Response Count
High Priority		36.8%	14
Medium Priority		36.8%	14
Low Priority		26.3%	10
		answered question	38
		skipped question	10

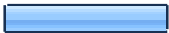

**41. All Category 3 sources should be Specifically Licensed.**

		Response Percent	Response Count
High Priority		42.1%	16
Medium Priority		34.2%	13
Low Priority		23.7%	9
		answered question	38
		skipped question	10


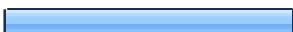
**42. My state requires that all Category 3 sources be Specifically Licensed.**

		Response Percent	Response Count
Yes		15.8%	6
No		84.2%	32
		answered question	38
		skipped question	10




**43. My state requires that some or all “Generally Licensed devices” be Specifically Licensed.**

		Response Percent	Response Count
Yes		24.3%	9
No		75.7%	28
answered question			37
skipped question			11

**44. NRC will need to adopt rules requiring the specific licensure of Category 3 sources before my state can act.**

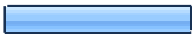

		Response Percent	Response Count
Yes		56.8%	21
No		43.2%	16
answered question			37
skipped question			11

**45. All Category 3 sources should in principle be tracked by NRC.**




		Response Percent	Response Count
High Priority		23.7%	9
Medium Priority		39.5%	15
Low Priority		36.8%	14
answered question			38
skipped question			10

# **SECTION SIX: NATIONAL SOURCE TRACKING SYSTEM (NSTS)**




**46. My State has notified licensees that use the National Source Tracking System (NSTS) system to start using the “use status” field to identify disused sources that are in storage per NRC RIS 2014-04.**

		Response Percent	Response Count
Yes		27.8%	10
No		72.2%	26
answered question			36
skipped question			12

**47. NRC should make the “use status” field mandatory for designating disused sources as disused.**



		Response Percent	Response Count
High Priority		37.8%	14
Medium Priority		48.6%	18
Low Priority		13.5%	5
answered question			37
skipped question			11

**48. NRC should expand the NSTS to track Category 3 sources.**



		Response Percent	Response Count
High Priority		15.8%	6
Medium Priority		42.1%	16
Low Priority		42.1%	16
answered question			38
skipped question			10

# **SECTION SEVEN: SHIPPING CONTAINERS**




**49. NRC and the U.S. Department of Transportation (DOT) should continue to work together to increase the availability of Type B shipping containers by expediting the review and approval of new containers.**

		Response Percent	Response Count
High Priority		76.3%	29
Medium Priority		23.7%	9
Low Priority		0.0%	0
answered question			38
skipped question			10

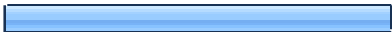


**50. NNSA should assess the supply and demand for Type B containers following completion of its container development program to determine if there remains a shortage affecting sealed source transportation and disposal. The purpose of the assessment would be to determine if further NNSA programmatic efforts are needed.**

		Response Percent	Response Count
High Priority		63.2%	24
Medium Priority		36.8%	14
Low Priority		0.0%	0
answered question			38
skipped question			10




**51. NNSA should continue to assess foreign package designs for Type B containers that might be used to dispose of disused sources in the U.S. In the case of an ongoing shortage, NNSA should engage the package certificate holders regarding the submission of applications to have these packages certified for domestic use.**

		Response Percent	Response Count
High Priority		60.5%	23
Medium Priority		36.8%	14
Low Priority		2.6%	1
answered question			38
skipped question			10

**52. NRC and DOT should expedite the approval of existing foreign type B containers for domestic use.**

		Response Percent	Response Count
High Priority		57.9%	22
Medium Priority		36.8%	14
Low Priority		5.3%	2
answered question			38
skipped question			10



**53. DOT and NRC should develop a process that will provide licensees and States at least one year advance notice of container certificate expiration.**

		Response Percent	Response Count
High Priority		60.5%	23
Medium Priority		34.2%	13
Low Priority		5.3%	2
		<b>answered question</b>	<b>38</b>
		<b>skipped question</b>	<b>10</b>





## **SECTION EIGHT: GENERAL**




**54. The decision to allow the disposal of sealed sources from outside of the Texas Low-Level Radioactive Waste Disposal Compact (Texas Compact) at the Waste Control Specialists (WCS) commercial disposal facility has provided an important mechanism for the proper management and disposition of disused sources.**

		Response Percent	Response Count
Yes		94.6%	35
No		5.4%	2
answered question			37
skipped question			11




**55. If the WCS commercial disposal facility continues to be authorized to accept out-of-region waste, my state will encourage licensees to take advantage of this disposal option. (This question only applies to states without access to another facility.)**

		Response Percent	Response Count
Yes		93.3%	28
No		6.7%	2
answered question			30
skipped question			18

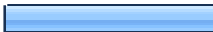


**56. Given the recently released NRC revised Branch Technical Position on Concentration Averaging and Encapsulation (CA BTP) as published on February 25, 2015, States that host Class B and C low-level waste disposal facilities should review their disposal policies and waste acceptance criteria to assess the applicability of the alternative approaches for disposal of higher activity sources described in the updated NRC guidance.**

		Response Percent	Response Count
High Priority		23.1%	9
Medium Priority		56.4%	22
Low Priority		20.5%	8
answered question			39
skipped question			9

**57. NNSA should continue to support the development and use of alternative technologies to replace certain existing Category 1 to 3 sources that may pose a threat to national security, including incentives to encourage users to consider transition to non-isotopic alternatives.**

		Response Percent	Response Count
High Priority		42.1%	16
Medium Priority		42.1%	16
Low Priority		15.8%	6
answered question			38
skipped question			10

**58. NNSA should provide incentives to promote the use of alternative technologies in place of Category 1-3 sealed sources.**

		Response Percent	Response Count
High Priority		31.6%	12
Medium Priority		44.7%	17
Low Priority		23.7%	9
answered question			38
skipped question			10

**Page 10, Q59. [Describe your state's disused source disposal, recycling and regulation success stories here.]**

1	Our success stories are limited to those private persons who have no other means of disposal. We have had inquiries from some of our licensees and we direct them to contact CRCPD to determine if the source is eligible for disposal using the CRCPD criteria. We have many cases of private persons thanking us for the opportunity to use this service.	May 6, 2015 10:10 AM
2	non-agreement state	May 1, 2015 2:54 PM
3	North Carolina has an active LLRW Program that requires oversight of the 64 manufactures that produce or store radiological material and annually measures the storage and removal of the LLRW from NC as a whole through LLRW brokers. A DoD request for the removal of LLRW of military origin occurs every four years as the number of radium dials from jeeps and radios for the most part are gathered and secured in remote areas of discovering scrapyards. In many cases the devices do not contain national stock numbers (NSN) so recognition can be difficult. We have successfully tracked the removal of over 150,000 curies of A,B and C waste within the past decade.	Apr 27, 2015 1:14 PM
4	Alaska defers to the NRC on materials matters.	Apr 27, 2015 1:06 PM
5	TN's licensees have been able to dispose of sealed sources as needed. TN's waste brokers and processors have aided in the disposal.	Apr 24, 2015 1:26 PM
6	N/A	Apr 17, 2015 3:22 PM
7	We were able to successfully transfer two disused Am/Be sources to the DOE for disposal in 2014.	Apr 17, 2015 11:21 AM
8	N/A	Apr 16, 2015 3:05 PM
9	We are a NRC state and have no program for source disposal	Apr 14, 2015 1:46 PM
10	We are not an Agreement State, so the US NRC handles most radioactive materials issues. If there is a disused source issue, we will work to assist the possessor as we can, and seek additional help, for example, from the CRCPD, as well as the DOE, EPA, NRC and other federal agencies.	Apr 13, 2015 2:03 PM
11	NH removes discovered sources from the public domain and attempts to coordinate disposal with federal agencies and licensed waste brokers. However funding remains a significant challenge.	Apr 13, 2015 11:32 AM
12	I utilized terry Lavine through CRCPD and recycled or disposed of all orphan and disused source in the Montana Radiological Health Program. I have no other source material. Of note, Montana is not an agreement state...	Apr 10, 2015 2:59 PM
13	CT DEEP identified significant number of leaking radium gages at New England Air Museum. Museum was added to our department license. We have identified and shipped historically significant gages to Smithsonian, cleaned up the exhibits and storage spaces and reduced the number of gages to less than 100 by disposal.	Apr 10, 2015 8:39 AM
14	Virginia will take possession and disposed of sources left by licensees to protect the public health and safety. We work with licensees to ensure they understand	Apr 9, 2015 8:34 AM

**Page 10, Q59. [Describe your state's disused source disposal, recycling and regulation success stories here.]**

	the possibilities for transferring and disposing of sources.	
15	N/A Delaware is non-agreement state Member of Appalachian States LLRW Compact Registers, but does NOT license radioactive material facilities	Apr 1, 2015 3:22 PM
16	We have encouraged and taken advantage of all available programs such as the OSR, SCATR and National Orphan Source program through CRCPD. In addition, we developed a state orphan source program for schools throughout our state and later for all sources encountered within our state.	Mar 31, 2015 11:33 AM
17	The Radioactive Materials Section will retrieve from the public sector unwanted radioactive materials and store them until we arrange and pay for their disposal. This is done as a courtesy to the public. We do not surcharge licensees for this cost, these costs are paid directed from program funds.	Mar 27, 2015 1:11 PM
18	Texas has always encouraged disposal of source that are not being used	Mar 26, 2015 5:22 PM
19	Many of our licensees have taken advantage of the orphan source and SCATR programs. These programs and their financial assistance allowed our licensees to properly dispose of and recycle, sources that otherwise would have been left in storage. Regardless of the security provided for the storage at a licensee, it is better to have them recycled for active use, or properly disposed. That provides much better security and extends the usefulness of many sources.	Mar 25, 2015 11:47 AM
20	Informing all licensees and also persons that discover abandoned sources, for example at scrap facilities, about CRCPD SCATR initiatives and CRCPD lists for common outlets and waste brokerage services have been helpful towards source disposals. Licensee's possessing larger sources are often aware of and take assistance from DOE OSRP efforts. Calls by us to manufacturers notifying them of discovered abandoned or orphaned or disused sources have resulted in manufacturers taking back sources at no or minimal cost. Our registered consultant lists available on our website place persons needing assistance with persons, often local, who know of and can help with above initiatives.	Mar 25, 2015 10:27 AM
21	We find that homeowners who have sources, for whatever reason, to be the most difficult to handle. We do not collect sources so we give them disposal options which are very expensive. One time, we were disposing of all our disused sources and allowed a homeowner to add his source in with our inventory. The cost was only \$35.00, but this was a rare opportunity. And the homeowner complained that he had to pay! Another homeowner found uranyl nitrate from her deceased father and a disposal company agreed to take it for free! SCATR has been useful for our general licensees that had sources in storage for over 10 years.	Mar 25, 2015 9:21 AM

**Page 11, Q60. [Add suggestions for new disused source related programs or improvements to existing programs here.]**

1	?	Apr 27, 2015 1:07 PM
2	<p>Suggested Improvement for DOD's source collection program South Carolina has a large military presence resulting in DOD sources (primarily Radium) that find their way into metal recycling facilities. In the past, the DOD has been of great help and service to remove these threats to public health and the environment by bearing the financial responsibility or properly dispositioning their sources and and providing for the logistics of disposal. Prior to the DOD moratorium, metal recycling facilities had confidence that when they found what appeared to be a DOD source, that DOD would take responsibility for their source. The recycling facility would contact the State to help arrange for the disposal through DOD. In the Fall of 2013, we contacted DOD about a source that was found at a recycling facility and we were advised that DOD had suspended collection activities until review by their legal staff of their policy regarding recovery of the collection of their sources. Since that incident, we have not had any notifications of potential DOD radioactive materials at recycling facilities. Prior to that time, we received about 4 notifications per year on average. Our concern is that recycling facilities may no longer be incentivized to report these sources and assure proper dispositioning.</p>	Apr 17, 2015 3:47 PM
3	N/A	Apr 16, 2015 3:06 PM
4	<p>More sources from past federal uses should be accepted for disposal by federal entities. Several sources from military origins discovered in our state have been rejected for disposal because of the strict requirements for providence, to include sources from Allied countries.</p>	Apr 13, 2015 11:38 AM
5	<p>Consideration may be necessary to allow a licensee more than two years (with a potential limit of five years) to arrange for disposal or final disposition if the licensee can demonstrate it is actively arranging for disosal or is taking legitmate steps to budget for final disposition of its disused sealed sources.</p>	Apr 10, 2015 6:19 PM
6	<p>Manufacturers and distributors need to be encouraged to help licensees dispose of unwanted sources. The cost needs to be lowered to prevent a financial burden on licensees. Also they should be encouraged to charge a disposal fee when a device is purchased which will allow for a timely disposal of the device when the licensee no longer desires its use.</p>	Apr 9, 2015 8:36 AM
7	<p>Funds could be made available to the states to pay for the unwanted radioactive materials disposal costs.</p>	Mar 27, 2015 1:14 PM
8	None	Mar 26, 2015 5:22 PM

Page 12, Q61. [Add any additional comments here.]

1	For Item #25: Additional time may be necessary for licensees to get rid of their disused sources. Consideration should be given to setting the disposal deadline at no more than three (3) years.	Apr 27, 2015 3:49 PM
2	Alaska has no state radioactive materials program, so the NRC is the "go to" agency and many of the question answered from that perspective may make it appear Alaska has no interest in orphan sources. However, the situation is actually that Alaska has no authority. Some questions also provided only a "yes" or "no" choice when neither was correct from the perspective of the state of Alaska.	Apr 27, 2015 1:07 PM
3	All GLs should be specifically licensed. The US government should collect all Cs powdered sources and replace them with glass-encapsulated sources.	Apr 16, 2015 3:07 PM
4	We have several small sources that have been orphaned and no method of disposal at this time	Apr 14, 2015 1:47 PM
5	Thanks for sponsoring this important survey!	Apr 10, 2015 6:20 PM
6	CRCPD needs to ensure it works with OAS regarding this topic. Financial Assurance is a separate issue and should not be addressed when talking about source disposals. I recommend CRCPD begin to use words like source disposal costs/fees or unwanted source disposal fees.	Apr 9, 2015 8:38 AM
7	Delaware is non-agreement state Registers, but does not license nor enforce rad material facilities Is member of Appalachian States LLRW Compact	Apr 1, 2015 3:23 PM
8	Comment 15. OSR should consider expansion of range and activity of sources included for acceptance. Comment 23. Require every 2 years for consistency.	Mar 31, 2015 11:34 AM
9	None	Mar 26, 2015 5:22 PM
10	#20 - We do currently identify sources that are in long term storage, and question/encourage licensees to register them in both SCATR and the orphan source programs. #21 - Not sure limiting or denying importation is a good idea. At least we know where those sources are, and likely they are in a more secure location than they would be if not imported. #22 - Requiring a guarantee of use for an imported source is probably futile. What are you going to do if it is not in use, send it back? And then the foreign previous owner denies acceptance...then where are you? At least their security can be better assured here in the US. #23 - While I agree that clearing unused source inventory yearly is a good idea, requiring it does not pay for it, so such a requirement would likely only add paperwork with little result. #24 - Setting a time limit will be very difficult, and would likely result in more requests for exemptions to the rule. If a licensee does not have the money to dispose of sources that have been in storage longer than the rule, what do you do? Is the NRC going to take possession of them? #28 - We try to enforce the GL 2 year storage rule, but we cannot take possession of them and/or afford to dispose of them, so we have allowed longer storage times with regular visits to verify they remain in safe/secure storage. #29 - The GL program should be abolished. These sources should be either exempt or specifically licensed. #33 - My preferred answer is "probably". #45 - I disagree that Cat 3 sources should be tracked using something like NSTS. Our licensees notify us when sources are lost or stolen, regardless if whether they are part of	Mar 25, 2015 12:47 PM



the NSTS. The sole purpose for tracking would be to incorporate it into the LVS. If a licensee is required to document to a supplier a current inventory of sources, and a current copy of their license, the vendor can assess whether the order would put the licensee over their license limits. If we distrust licensees so much, we are at fault for allowing them to continue as a licensee. #47 - If the NRC wants a status for each source then they should require that field to be filled before they allow the licensee to leave that page. #48 - See comments for question #45.

11

Colorado already requires specific licensing for generally licensed devices of Category 3.5 or higher. Colorado does not support expansion of NSTS in any way. Colorado does not see a need to require financial warranty on relatively short lived Category 2 sources such as industrial radiography sources or on sources that can be easily repurposed such as portable gauges. The chances of these sources become orphaned or disused is small. The largest barrier to disposal of sources is disposal costs. The Low-Level Waste Forum could most significantly impact the disused source problem by convincing its members who operate waste disposal facilities to decrease the cost of disposal for disused sources.

Mar 25, 2015 10:58 AM

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