



# HEALTH PHYSICS SOCIETY

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*Specialists in Radiation Safety*

27 June 2022

Secretary, U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTN: Rulemakings and Adjudications Staff

**John Cardarelli**  
**President**

Subject: Docket ID NRC-2017-0031: Decommissioning Financial Assurance for Sealed and Unsealed Radioactive Materials

The Health Physics Society<sup>1</sup> (HPS) is a professional organization whose mission is to promote excellence in the science and practice of radiation safety. The HPS appreciates the opportunity to provide comments, in the attached document, as a response to the Notice in the April 28, 2022 Federal Register (Vol. 87, No. 82).

If you have any questions regarding these comments, please contact the HPS Agency Liaison, Craig Little at 970-260-2810 or by email to [agencyliaison@hps.org](mailto:agencyliaison@hps.org).

Sincerely,

John Cardarelli  
President  
<mailto:jcardarelli@hps.org>

cc: Craig Little, PhD, HPS Agency Liaison  
Brett Burk, HPS Executive Director

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<sup>1</sup> The Health Physics Society is a non-profit scientific professional organization whose mission is to promote the practice of radiation safety. Since its formation in 1956, the Society has grown to include over 4,000 scientists, physicians, engineers, lawyers, and other professionals representing academia, industry, government, national laboratories, the Department of Defense, and other organizations. Society activities include encouraging research in radiation science, developing standards, and disseminating radiation safety information. Society members are involved in understanding, evaluating, and controlling the potential risks from radiation relative to the benefits. Official position statements are prepared and adopted in accordance with standard policies and procedures of the Society.

## **Health Physics Society Comments on Decommissioning Financial Assurance for Sealed and Unsealed Radioactive Materials**

The Health Physics Society (HPS) supports Nuclear Regulatory Commission's recommendation to amend Appendix B, "Quantities of licensed material requiring labeling," to Part 30 of Title 10 of the Code of Federal Regulations (10 CFR), "Rules of General Applicability to Domestic Licensing of Byproduct Material," and 10 CFR 70.25, "Financial assurance and recordkeeping for decommissioning." The details of this recommendation are provided as Alternative 2 in NRC document "DECOMMISSIONING FINANCIAL ASSURANCE REQUIREMENTS FOR SEALED AND UNSEALED RADIOACTIVE MATERIALS Regulatory Basis", Docket ID: NRC-2017-0031RIN: 3150-AK52 dated April 2022.

We believe these revisions will address the petitioner's request while updating the requirements to a more current scientific basis. Specifically, these revisions will:

1. Update the values to a more up-to-date and risk-informed table that is based on ICRP 26/30 as compared to those from ICRP 2 as used in the current table;
2. Add NARM and  $^{68}\text{Ga}$  to Appendix B to 10 CFR Part 30 and other unlisted radionuclides included in the NRC's regulatory authority under the Energy Policy Act of 2005;
3. Remove decommissioning-related barriers to licensing  $^{68}\text{Ga}$  imaging and other emerging medical and industrial technologies that use or plan to use unlisted and NARM radionuclides;
4. Clarify that only radioactive materials with half-lives greater than 120 days are subject to Decommissioning Funding Assurances;
5. Eliminate confusion over the application of Appendix B to 10 CFR Part 30 that has the same title as Appendix C to 10 CFR Part 20.