



HEALTH PHYSICS SOCIETY

"Specialists in Radiation Safety"

July 20, 2009

The Honorable Edward J. Markey
United States House of Representatives
2108 Rayburn House Office Building
Washington, DC 20515

Howard W. Dickson, CHP

President

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Dear Mr. Markey:

On behalf of the Health Physics Society, I am pleased to endorse your proposed bill entitled the "American Medical Isotopes Production Act of 2009" and to suggest two additions to the bill for your consideration that I feel will enhance the understanding of the need for the bill and the implementation of the bill's provisions.

From our previous collaborations you know that the Health Physics Society is an independent nonprofit scientific organization of radiation science and radiation safety professionals. As such, we strive to assist national leaders and decision makers in providing excellence in the legislation and regulation of issues related to radiation safety. We have been pleased to support and work with your staff in the past on important legislation like the series of "Dirty Bomb Prevention Act" bills starting in 2002 that culminated in important radiological terrorism prevention and security measures in the Energy Policy Act of 2005, and the more recent "Nuclear Facility and Material Security Act of 2008" introduced last year.

Once again, we would like to support and work with your staff in developing and promoting your "American Medical Isotopes Production Act of 2009."

The Health Physics Society interest in this legislation is based on radiation safety considerations. Specifically, the lack of a reliable supply of the isotope Molybdenum-99 (Mo-99) requires substitution of diagnostic procedures that result in a higher radiation dose to the patient and the medical practitioners performing the procedure than would be received if the Mo-99 daughter, Technetium-99m (Tc-99m), were available. In addition, the lack of a domestic supply of Mo-99 production requires the United States to ship Highly Enriched Uranium (HEU) to foreign countries with the subsequent shipment of the

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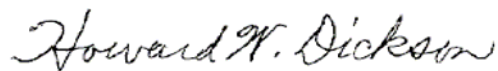
radioactive materials and waste products from the production of the Mo-99 back into the United States. Although we believe this is being done safely, it carries an unnecessary risk as compared to domestic production of Mo-99 using Low Enriched Uranium (LEU). One consequence, however, of using LEU in place of HEU for Mo-99 production is an increase in radioactive waste, including an increase in the production of plutonium. These waste products can be safely disposed of in properly designed disposal facilities. However, approximately 34 states do not have access to the currently authorized disposal facilities licensed by the Nuclear Regulatory Commission.

In light of these radiation safety issues associated with the proposed "American Medical Isotopes Production Act of 2009", the Health Physics Society recommends two additional items be included in the bill:

1. First, we recommend the "Findings" in the bill include a finding that the lack of a reliable supply of Mo-99 results in an unnecessary increase in the radiation doses received by patients and medical practitioners.
2. Second, we recommend the bill require the Secretary of Energy be responsible for seeing that any domestic medical isotope production facility created by this bill has access to an appropriate radioactive waste disposal facility, including a federal facility if no licensed commercial facility is available.

I hope these suggestions are helpful and I look forward to the Health Physics Society helping you in advancing this legislation. Please do not hesitate to contact me if you, or your staff, would like further information or assistance on this matter, or any other radiation safety issue.

Sincerely,

A handwritten signature in cursive script that reads "Howard W. Dickson".

Howard W. Dickson, CHP