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Council on Radionuclides and Radiopharmaceuticals, Inc.

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Executive Director

January 26, 2000

Rules and Directives Branch
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Subject: Draft Regulatory Guide DG-3014, Standard Format and Content of Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR Parts 30, 40, 70 and 72, June 1999.

These comments on the above referenced subject are submitted on behalf of the Council on Radionuclides and Pharmaceuticals (CORAR)¹. CORAR members and our customers are licensees that have considerable inventories of radionuclides. Consequently the financial assurance provisions in DG-3014 is of interest to us.

On Page 4 the draft guide properly indicates that Part 30 licensees are not required to demonstrate financial assurance if the radionuclides in possession have half-lives less than 120 days. However, the table in Appendix A lists numerous short lived radionuclides including ¹²⁵I, ¹³¹I, ⁹⁹Mo, ³²P, ³⁵S, ^{99m}Tc and ¹³³Xe. This is confusing for Part 30 licensees. CORAR recommends that short-lived radionuclides should be removed from this table or explanations added to clearly indicate that they do not apply to Part 30 licensees.

CORAR appreciates the opportunity to comment on this draft Regulatory Guide and would be glad to provide further comments or clarification if needed.

Yours sincerely,

Leonard R. Smith
Chairman, CORAR Committee on Regulatory and Legislative Issues

¹ CORAR members include the major manufacturers and distributors of radiopharmaceuticals, radioactive sources and research radionuclides used in the U.S. for therapeutic and diagnostic medical applications and for industrial environmental and biomedical research and quality control.