Information Notice 17-01

January 11, 2017

To: Radioactive Materials Licensees in Possession of Sealed Sources

Subject: Disused Sealed Source Disposal

In response to the September 2001 terrorist attacks, various Federal, State, and other Agencies, including California, have attempted to minimize the potential for use of radioactive materials in future terrorist acts. One focus of this activity has been to minimize the availability of sealed sources currently not in use (disused sources). It is estimated that there are tens of thousands of sealed sources within the United States that are in a disused status which may make them more vulnerable to access by terrorists. There are efforts underway currently at the Federal and State levels to securely and safely dispose of disused sources. This Notice is to inform California licensees in possession of such sources of the desirability of taking timely action to legally dispose of disused sources to minimize their potential for use in terrorist attacks. For further information concerning the threats posed by disused sources, see the Report of the Disused Sources Working Group at www.disusedsources.org/wp-content/uploads/2014/12/DSWG-Report-March-2014.pdf. Also, see two additional educational DSWG brochures at www.swrlrwcc.org under Resources then Reading Room.

The Nuclear Regulatory Commission (NRC) and most states, including California, have adopted regulations to restrict possession of certain disused sources to periods not exceeding two years with exceptions allowed under specified circumstances. While these current regulations only apply to sources possessed under the general license specified in 10 CFR 31.5, at least one State (Texas) has adopted similar regulations that apply to sources possessed by specific licensees such as those receiving this Information Notice. It is likely that similar regulations impacting specific licenses will be enacted by additional States in the future.

Currently, there are two nationwide programs in effect that assist with the disposal of disused sources: the Off-site Source Recovery Project (OSRP) sponsored by the National Nuclear Security Administration (NNSA) Office of Global Threat Reduction, and the Source Collection and Threat Reduction (SCATR) program administered by the Conference of Radiation Control Program Directors (CRCPD). The OSRP program is potentially less costly to licensees if the disused sources in question qualify for this program. More information on this program is available at www.osrp.lanl.gov.
The SCATR program is a disposal cost sharing program for disused sources it accepts. Currently, the SCATR program pays for 40% of an accepted disused source’s disposal costs. More information on this program is available at www.crcpd.org (go to Environmental, then SCATR Program).

In addition to disposal of disused sources as low level radioactive waste (LLRW), sometimes the original vendor or manufacturer of disused sources will allow return of sources, or another specific licensee may be interested in obtaining sources for their use. It is important to note that any transfer of sources for disposal at a Low Level Radioactive Waste disposal facility requires the owner of such waste to petition the Southwestern Low-Level Radioactive Waste Commission (SWLLRWC) to export such waste out of the SWLLRW Compact (California, Arizona, North Dakota, and South Dakota). This Compact petition requirement includes situations in which the source was originally transferred for reuse, whether to the original vendor or manufacturer or to other licensees, but instead of reusing the source, the source is subsequently sent to a LLRW disposal facility.

More information concerning export of LLRW out of the SWLLRW Compact is available in the enclosed California Department of Public Health, Radiologic Health Branch Information Notice 13-01, dated June 24, 2013, and on the SWLLRWCC web site www.swllrwcc.org (go to About then Exportation Policy and Requirements, go to Resources then Reading Room, and go to Contact).

Sincerely,

Gonzalo L. Perez, Chief
Radiologic Health Branch
California Department of Public Health

Enclosure: California Department of Public Health, Radiologic Health Branch Information Notice 13-01