



Increased Controls & Fingerprinting Orders

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Issues with Fingerprinting Orders

- Cost to licensee
- Lack of justification
- Grandfathering of Trustworthy & Reliable (T&R) employees
- Limited opportunity for ACMUI input

Cost to Licensee

Fingerprinting costs for one licensee:

- Local fingerprinting: <\$50
- NRC/FBI costs: \$36
- Total per employee <\$90
- 400 employees @ \$90: \$36,000

Cost to Licensee cont.

Indirect costs (Salary & Benefits):

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|---|----------|
| • Time away from work - 1 hour | \$56 |
| • 400 lab employees @ \$50 | \$20,000 |
| • Security (400 @ 0.25 hr) | \$5000 |
| • Health Physics (set-up, training, communications, etc: 0.2 FTE) | \$15,000 |

Total:	\$40,000
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Cost to Licensee cont.

Cost to Licensee cont.

Budget: Outside Services

- Annual license fees \$29,000
- Dosimeter service \$33,000
- Fingerprinting \$76,000

- If margin = 2.4%, gross needed = \$3.2M
- Repeat every 5 years??

Justification

- Unfunded mandate
- RSO must justify to management
- Not based on a vulnerability analysis
- No security issues with irradiators
- Nuclear Materials Events Database (NMED): 1 “lost” irradiator – 420 Ci; high school license expired 1986; inspection in 2000 failed to locate source (oversight).

Example

Researcher must be fingerprinted

- > 400 scientific publications
- Grants total \$ millions
- Current research:
 - collagen induced arthritis
 - HLA-B27 gene linked spondyloarthropathies
 - experimental autoimmune encephalomyelitis
 - allergen induced asthma
 - diabetes
 - lupus
 - coeliac disease

Grandfathering of T&R Employees

- Researcher should be grandfathered
- Current users passed T&R determination
- Fingerprint requirement disqualifies them
- All current users should be grandfathered

ACMUI Input

- This is first opportunity for ACMUI to address fingerprinting with The Commission
- Email to NRC Staff (5/23/07)
- Ralph Lieto & I met with NRC Implementation Task Force (7/31/07); briefed ACMUI by conference call 8/15/07

Conclusions

- Initial costs significant
- Lack of justification for Category 2 sources
- T&R employees should be grandfathered
- Lack of ACMUI input

Acronyms

- ACMUI – Advisory Committee on the Medical Uses of Isotopes
- FBI – Federal Bureau of Investigation
- NMED – Nuclear Materials Events Database
- NRC – Nuclear Regulatory Commission
- RSO – Radiation Safety Officer
- T&R – Trustworthy and Reliable