



Source Security Working Group

2000 M St NW, Ste 520

Washington, DC 20036

Recommendations to President-Elect Donald J. Trump and Transition Team

January 2017

Radiation technologies are a critical and underappreciated component of our modern economy. The use of radiological sources and radioisotopes extends into nearly every sector of industry. Radiation technologies provide cutting-edge cancer treatments, sterilize a substantial proportion of medical devices used by healthcare professionals, precisely measure oil and gas reserves, and aid in pipeline inspection, among other uses. Maintaining safe and effective access to radioisotopes is essential to ensure the safety of American roads and bridges, help grow and sterilize our food supply, assist manufacturers in measuring thickness and depth, and support advanced scientific research.

It is imperative that the American people continue to benefit from radioisotopes' unique properties for their health, safety, and economic prosperity.

The Source Security Working Group encourages the President-Elect and his transition team to promote policies that balance security with the wealth of benefits radioisotopes provide. We believe the safety and security of radiological sources is of paramount importance and is enhanced and updated to reflect changing risk environments. However, it is essential that these sources continue to be available for the benefit of the American people and the American economy.

The Source Security Working Group recommends the incoming administration base its policies on three guiding principles:

- **Maintain the Nuclear Regulatory Commission (NRC) as the principal federal regulator for the domestic civilian use of radioisotopes.**

The NRC has the experience, expertise, and technology to maintain safety and security for all domestic radioisotope users. Through the NRC's and Agreement States' regulatory processes, both the risks and benefits of radioactive isotopes are considered prior to license approval. As such, the NRC should maintain its regulatory primacy in conjunction with Agreement State regulators.

The transition team should also support the Radiation Source Protection and Security Task Force (RSPSTF), chaired by the NRC and encompassing fourteen different federal agencies. Created through the Energy Policy Act of 2005, it has found in three separate reports that there are no significant gaps in security with respect to radioactive sources. Upholding the NRC's role as principal federal regulator will ensure that this security regime endures.

- **Do not require artificial transitions to alternative technologies.**

The National Nuclear Security Administration and the Department of Homeland Security's Domestic Nuclear Detection Office, among others, have supported activities to replace radiological sources with alternative technologies that do not use radioactive materials. Examples include a move to sterilizing all medical equipment through electron beams or ethylene oxide rather than with gamma irradiation, a solution that is not effective for high-density or complex products such as implantable medical devices like hip replacements.

We support alternative technologies that are technologically-mature and cost-competitive. However, the fact remains that radioisotopes perform specialized functions that may not be possible to duplicate with non-radioactive technologies. Government mandates to abandon radioactive source-based technology in health care, oil and gas exploration, and agriculture could result in less efficient, less effective technologies, putting lives and jobs at risk. In fact, such a move could increase the national security risk as this technology would move offshore to countries and regulatory environments that may not be as mature as those which exist in the US.

- **Support U.S. policy to provide a reliable domestic supply of key radioisotopes.**

The Department of Energy Office of Science's Isotope Development & Production for Research and Applications Program, as well as the National Nuclear Security Administration's medical isotope production program, play a critical role in ensuring the continued domestic availability of many isotopes used throughout industry, healthcare, and research. Their continued operation is essential to safeguarding a domestic isotope supply. As the administration assembles its Fiscal Year 2018 budget, fully-funded programs will secure American health, employment, and economic competitiveness.

Ultimately, radioisotopes play an under-recognized role in our nation's economy. They create hundreds of thousands of high-paying jobs across the country and are deeply involved in all sectors of our economy, from health care to agriculture to oil and gas to manufacturing. The Trump administration's support is important to protect the broad role of radioisotopes and radioactive sources in our economy and our lives.

The Source Security Working Group is committed to promoting policies that ensure the safe and effective use of radioisotopes is maintained. We ask that the incoming administration strives to achieve the same goals.