



August 31, 2006 (4:30pm)

August 31, 2006

Secretary  
ATTN: Rulemakings and Adjudications Staff  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

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RE: Comment on FR 42952. July 28, 2006: Requirements for Expanded Definition of  
Byproduct Material

Dear Secretary,

UniTech Services Group, Inc. (UniTech) possesses 10 nuclear laundry licenses throughout the country: eight (8) in Agreement States, and two (2) in non-Agreement States, where NRC maintains jurisdiction. Typically, the Agreement States licenses authorize "radioactive material" while NRC licenses authorize "byproduct material." For example, NRC licenses list "any byproduct material with atomic numbers 1 through 83" and "any byproduct material with atomic number 84 through 102." Both Agreement States and NRC licenses have additional authorizations for special nuclear material and source material and all of UniTech's licenses include broad scope authorizations; i.e., for a wide range of atomic numbers.

UniTech requests that newly regulated accelerator produced and naturally occurring radioactive materials be authorized under the current license authorizations referencing byproduct material until such time that the licenses are renewed or amended such that the NRC, or Agreement State, could include appropriate and specific language, at their discretion, identifying and authorizing the newly NRC-regulated materials. One way to easily accomplish this is to provide a general license for specific licensees containing broad scope authorizations. Alternatively, the rule could provide that licensees authorized to receive, use, possess, etc., radionuclides with a range of atomic numbers which includes the newly regulated radionuclides are similarly authorized with respect to the newly regulated radionuclides. Licensees so authorized already have the controls in place to allow for safe handling of the new radionuclides, and the blanket authorization will save the licensees and the Commission unnecessary paperwork and expenditure of resources. If the Commission desires information on which licensees are handling the new radionuclides, it could request the information by letter

Thank you for Commission consideration of this request. If you have any questions regarding this request, please contact me at 610-948. 9700, extension 19, or Michael Fuller at 413-543-6911, extension 25, at your earliest convenience.

Sincerely,

UniTech Services Group, Inc.

Glenn Roberts  
Health Physicist

cc: Michael R. Fuller, Esq., Manager, Health Physics and Engineering

Template = SECY-067

SECY-02

**From:** "Glenn Roberts" <glenn@u1st.com>  
**To:** <SECY@nrc.gov>  
**Date:** Thu, Aug 31, 2006 1:40 PM  
**Subject:** Comments on FR 42952

The attached comments will also be submitted today via Federal Express.

Thank you for your consideration.

Sincerely,

UniTech Services Group, Inc.

Glenn Roberts, CHP, CIH

Health Physicist

UniTech Services Group, Inc.

610-948-9700, x19

glenn@u1st.com

Visit our website at <<http://www.u1st.com>> [www.u1st.com](http://www.u1st.com)

**CC:** "Michael Fuller" <mikef@u1st.com>

**Mail Envelope Properties** (44F71F0D.6DE : 4 : 5854)

**Subject:** Comments on FR 42952  
**Creation Date** Thu, Aug 31, 2006 1:39 PM  
**From:** "Glenn Roberts" <glenn@u1st.com>

**Created By:** glenn@u1st.com

**Recipients**

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| MESSAGE                      | 338         | Thursday, August 31, 2006 1:39 PM |
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| USG Comments on FR 42952.PDF |             | 77685                             |
| Mime.822                     | 112394      |                                   |

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