

PR 20,30,31,32,33,35,50,61,62,72,110,  
150,170 and 171  
(71FR42952)



25

September 11, 2006

DOCKETED  
USNRC

Secretary  
US Nuclear Regulatory Commission  
RE: Requirements for Expanded Definition of Byproduct Material (RIN 3150-AH84)  
Attn: Rulemakings and Adjudications Staff

September 12, 2006 (12:23pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Dear staff:

Thank you for the opportunity to submit comments regarding the Nuclear Regulatory Commission document, 10 CFR Part 20, 30, 31 et al. Requirements for Expanded Definition of Byproducts Material; Proposed Rule. This rule details proposed regulations of timepieces and parts containing radium 266; limits the number of such watches that may be repaired per year without special licensing; and regulates those housing parts and components including dials and hands.

NAWCC, Inc, Columbia, Pennsylvania is a 501(c)(3) organization representing nearly twenty five thousand timepiece collectors within the National Association of Watch & Clock Collectors. Additionally, the NAWCC owns and operates the National Watch & Clock Museum, NAWCC School of Horology, and a horological library and research center. More information may be found on our website ([www.nawcc.org](http://www.nawcc.org)) or by calling Jim Bland, Director of Marketing & Media Relations at 717-684-8261 ext 227.

We offer the following modifications for your consideration:

- 1) It is recommended that the proposed limit for repairing timepieces containing radium-266 be increased from ten (10) to eighteen (18) units per year. This limitation should not be restricted by company but by the number of qualified timepiece repair technicians employed. This proposed change will provide necessary consideration for industry consolidation; the emergence of specialized repair centers; and the expansion of geographic markets brought about by the internet and globalization.
- 2) In regards to the possession of larger quantities of timepiece parts, it is recommended that exceptions be extended to IRS designated 501(c)(3) organizations existing prior to the effective date of this rule, operating in whole or in part as an accredited school of watch and/or clock repair and/or specialty museum with a primary focus on housing and exhibiting timepieces and related objects. This exception is requested due to the undo burden this inventory process and licensing fees may have upon these organizations. For educational and safety purposes, it is important that students of horology become familiar with examples of radium parts and watches as part of their training. As a museum, the ability to safely preserve and present practices and objects through exhibits is essential to our educational mission. Providing exemptions to these institutions will provide the proper balance between the goals of regulation and those of education.

Thank you for the opportunity to present these modifications for consideration. We would be happy to discuss these issues with members of the NRC and this committee if necessary.

Sincerely,

Jim Bland  
Director, Marketing & Media Relations

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Template = SECY-067

SECY-02

**From:** Carol Gallagher  
**To:** SECY  
**Date:** Mon, Sep 11, 2006 5:09 PM  
**Subject:** Comment letter on Requirements for Expanded Definition of Byproduct Material

Resending - forgot the attachment

Attached for docketing is a comment letter on the above noted proposed rule from Jim Bland that I received via the rulemaking website on 9/11/06.

His address is:

James P. Bland  
514 Poplar Street  
Columbia PA 17512  
jbland@nawcc.org

Thanks,  
Carol

**Mail Envelope Properties** (4505D074.D21 : 5 : 35764)

**Subject:** Comment letter on Requirements for Expanded Definition of Byproduct  
**Material**  
**Creation Date** Mon, Sep 11, 2006 5:09 PM  
**From:** Carol Gallagher  
**Created By:** CAG@nrc.gov

**Recipients**

nrc.gov  
 TWGWPO02.HQGWDO01  
 SECY (SECY)

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**Route**

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<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	807	Monday, September 11, 2006 5:09 PM
TEXT.htm	703	
1646-0013.doc	576512	Monday, September 11, 2006 4:52 PM

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**ReplyRequested:** No  
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**Concealed Subject:** No  
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