



National Organization of Test Research and Training Reactors

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Chair

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PR 20, 30, 40, 50, 70 and 72
(73FR03811)

DOCKETED
USNRC

March 12, 2008 (11:51am)

March 6, 2008

Annette Vietti-Cook, Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 200555-0001
Attention: Rulemaking and Adjudications Staff

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Subject: RIN 3150-AH45: Request for Extension of the Public Comment Period for
Decommissioning Planning Rulemaking.

Dear Ms. Vietti-Cook:

The Test, Research and Training Reactor Organization (TRTR), on behalf of the non-power reactor community, requests a 90-day extension of the Public Comment Period for Decommissioning Planning rulemaking.

The proposed rulemaking impacts a broad range of issues directly affecting regulations in Chapter 10 of the Code of Federal Regulations Parts 20, 30, 40, 50, 70 and 72. A preliminary assessment of the rule changes and associated guidance documents indicate that to effectively respond, evaluations will need to be made in the areas of health physics, environmental protection, decommissioning planning and financial assurance. Due to the complexity of the issues involved, many licensees in our organization will not be able to adequately evaluate the impact of the rulemaking to their facilities within the normal comment period. The requested Comment Period extension will help achieve the Commission's stated goal to "appropriately consider all relevant issues and identify and resolve unintended consequences if they exist."

If we can provide further information, please contact me at 617-253-4202; bernardj@MIT.EDU or John Ernst at 573-882-5226; ernstj@missouri.edu.

Sincerely,


John Bernard
Chairman, TRTR

JAB/koc

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Template = SECY-067

SECY-02