

PR 30,32,33,34,35,36,37,39,51,71 and 73  
(75FR33901)



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27 July 2010

ATTN: Rulemakings and Adjudications Staff

Secretary  
U.S. Nuclear Regulatory Commission  
Washington DC, 20555-0001

RE: Docket ID NRC-2008-0120

To Whom It May Concern:

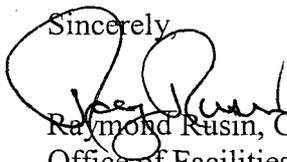
The Rhode Island Agreement State Program has received and reviewed the above referenced document. We appreciate the opportunity to comment on the proposed rule to adopt enhanced security requirements under 10 CFR 37.

We wish to go on record as fully supporting the comments submitted with regard to Docket ID NRC-2008-0120 by the Organization of Agreement States (OAS) in their letter of 8 July 2010. We specifically wish to echo their comments regarding a potential increase in workload that these proposed changes could impose on Agreement State programs. While larger Agreement State programs may be able to absorb some of this increased workload, smaller programs (such as Rhode Island) would have trouble accommodating the additional workload. Furthermore, the Rhode Island Agreement State Program does not have the necessary expertise to handle what are essentially "law enforcement" activities, nor are we likely to be able to hire additional staff to undertake these responsibilities. In addition, because many of these proposed changes would impose duties that are beyond traditional radiation control agency functions, it is likely that we would have to seek amendments to our enabling legislation to undertake these activities.

We have no additional comments to offer at this time.

If you have any questions regarding this letter, please contact Bill Dundulis of my staff at (401) 222-7767 or via e-mail: [bill.dundulis@health.ri.gov](mailto:bill.dundulis@health.ri.gov).

Sincerely,

  
Raymond Rusin, Chief  
Office of Facilities Regulation  
Radiation Control Program

cc: David Walter, OAS Chair

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