



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

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9 Sep 2010

Secretary, US Nuclear Regulatory Commission

11555 Rockville Pike

Rockville MD 20555-0001

Attn : Rulemaking and Adjudications Staff

Docket no: NRC-2008-0120

DOCKETED
USNRC

September 9, 2010 (3:30pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Dear Secretary:

We request an extension to the comment period for the proposed 10 CFR 37 to 15 Jan 2011. The supporting guidance document came out a full month after the proposed rule and is quite extensive. Many of the stakeholders were not aware of the proposed rule until approximately a month ago when the notice of the public meetings was sent out. The recent public meeting held in Austin TX demonstrated the need for significantly more public involvement. In addition the second meeting will not be held until 20 Sep 2010 leaving very little time for people to review the transcripts from both the meetings before the comments are currently due. The proposed rule and the implementation guide contain very substantive requirements and need a careful review by stakeholders to fully evaluate impact on their existing operations.

Based on all these factors we believe an extension till 15 Jan 2011 is a reasonable time period and will allow for thorough and constructive comments. I would be happy to provide any additional information if needed, you can contact me at kate.roughan@qsa-global.com.

Sincerely,

Cathleen Roughan

Director, Regulatory Affairs and Quality Assurance

Cc: Meri Horn, Senior Project Manager

Rulemaking Comments

From: Roughan, Kate [Kate.Roughan@qsa-global.com]
Sent: Thursday, September 09, 2010 3:01 PM
To: meri.horn@nrc.gov; Rulemaking Comments
Subject: FW:
Attachments: doc20100909135343.pdf

Meri-

Attached is the Part 37 extension request. Pls let me know if I should email to anyone else. Thank you!!

Kate

-----Original Message-----

From: scans@qsa-global.com [mailto:scans@qsa-global.com]
Sent: Thursday, September 09, 2010 2:54 PM
To: Roughan, Kate
Subject:

KM-5050
[00:c0:ee:1f:8c:49]

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Received: from mail2.nrc.gov (148.184.176.43) by TWMS01.nrc.gov
(148.184.200.145) with Microsoft SMTP Server id 8.1.393.1; Thu, 9 Sep 2010
15:02:17 -0400
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X-SBRS: 2.9
X-MID: 24895014
X-fn: doc20100909135343.pdf
X-IronPort-Anti-Spam-Filtered: true
X-IronPort-Anti-Spam-Result:
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mx2.qsa-global.com) ([66.105.188.84]) by mail2.nrc.gov with ESMTTP; 09 Sep
2010 15:02:16 -0400
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Sep 2010 15:02:14 -0400
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phobos.qsa-global.local (151.182.223.4) with Microsoft SMTP Server id
8.2.254.0; Thu, 9 Sep 2010 14:02:13 -0500
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MIME-Version: 1.0
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X-MS-Has-Attach: yes
X-MS-TNEF-Correlator:
Thread-Index: ActQUDLBz8mgm7fSTJeg2S2hhBpcQwAAPrFw
From: "Roughan, Kate" <Kate.Roughan@qsa-global.com>
To: <meri.horn@nrc.gov>,
<rulemaking.comments@nrc.gov>
Return-Path: Kate.Roughan@qsa-global.com