



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

## International Isotopes Inc.

September 10, 2010

Secretary  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville MD 20555-0001

Attn: Rulemaking and Adjudications Staff  
Re: Docket ID: NRC-2008-0120 and NRC-2010-0194

DOCKETED  
USNRC

September 13, 2010 (11:45am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Dear Secretary:

I had the pleasure of attending the September 1, 2010 NRC Public Meeting on the Draft Implementation Guidance for 10 CFR Part 37 held in Austin Texas. And while I had reviewed both the proposed rule and draft Implementation Guide prior to the meeting, it was only after listening to the comments and experiences of other stakeholders and subsequent discussions allowed me recognize the full effect the proposed rule and its implementation could have on our specific operations not to mention those of the radioactive source manufacturing and user industries as a whole. I suspect that the second public meeting scheduled for September 20<sup>th</sup> will be just as productive and informative as the first. Unfortunately this leaves very little time for licensees and other stakeholders to evaluate the full impact of the proposed rule and develop meaningful and comprehensive comments to the proposed rule and draft implementation guide.

I am requesting that the comment periods for the Proposed Rule (75FR33902) and the Implementation Guidance (75FR47494) are extended to January 15, 2011. This would provide all stakeholders with a sufficient amount of time to consider the full impact of the proposed rule and provide constructive comments.

Please contact me by phone at (208) 524-5300 or by email at [jjmiller@intisoid.com](mailto:jjmiller@intisoid.com) if you have questions regarding these documents.

Sincerely,

John J. Miller, CHP  
Radiation Safety Officer

JJM-2010-22

cc: Ms. Merri Horn

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4137 Commerce Circle, Idaho Falls, Idaho 83401  
Phone: 208-524-5300, 800-699-3108 Fax: 208-424-1411  
Website: [www.intisoid.com](http://www.intisoid.com)

Template = SECY-067

DS10

## Rulemaking Comments

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**From:** Horn, Merri  
**Sent:** Monday, September 13, 2010 7:01 AM  
**To:** Rulemaking Comments  
**Subject:** FW: Part 37 Extension Request  
**Attachments:** JJM-2010-22\_NRC\_Part 37 Ext.pdf

I received the attached request for extension on the part 37 rulemaking.

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**From:** John J. Miller [mailto:jjmiller@intisoid.com]  
**Sent:** Friday, September 10, 2010 5:20 PM  
**To:** Horn, Merri  
**Subject:** Part 37 Extension Request

Hi Merri,

I wanted to let you know that I thought the workshop was one of the most informative NRC workshops I had attended. I think the Proposed Part 37 Rule is significant enough to warrant a Regulator/Industry Task Force although I think we all lack the luxury of time. I hope the September 20<sup>th</sup> meeting is as productive as the one in Austin, I wish I could attend that but need to get caught up in the office.

I have attached an electronic copy of a letter requesting an extension. I have is addressed to Secretary and copied you. Could you forward the electronic copy to the correct person, I didn't think sending it to the email address listed in the federal register for comments would be the correct email.

Thanks hope you have a good weekend.

John J. Miller, CHP  
Radiation Safety Officer  
International Isotopes, Inc.

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Received: from HQCLSTR01.nrc.gov ([148.184.44.79]) by TWMS01.nrc.gov  
([148.184.200.145]) with mapi; Mon, 13 Sep 2010 07:01:13 -0400  
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From: "Horn, Merri" <Merri.Horn@nrc.gov>  
To: Rulemaking Comments <Rulemaking.Comments@nrc.gov>  
Date: Mon, 13 Sep 2010 07:01:12 -0400  
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