



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

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 20th 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 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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