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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

Dear Secretary:

*7/14/2010*  
*75 FR 40756*

*3*

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RULES AND DIRECTIVES  
 BRANCH  
 USNRC

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](mailto:kate.roughan@qsa-global.com).

Sincerely,

*Cathleen Roughan*

Cathleen Roughan

Director, Regulatory Affairs and Quality Assurance

Cc: Meri Horn, Senior Project Manager

*SONSI Review Complete*  
*Template = ADM-013*

*E-REDS = ADM-03*  
*add = P. Goldberg (PF15)*  
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