

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



Radiation Safety Office
Radiation Safety Lab
University of Cincinnati Medical Center
P.O. Box 670591
Cincinnati, Ohio 45267-0591

Phone (513) 558-4110
Fax (513) 558-9905

September 17, 2010

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Email: rulemaking.comments@nrc.gov
Attn: Rulemaking and Adjudication Staff

Subject: Docket ID NRC-2008-0120

DOCKETED
USNRC

September 20, 2010 (10:50am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Dear Sir/Madam:

The University of Cincinnati requests an extension of the comment periods for 10 CFR 37 et al. (Docket ID NRC-2008-0120) and its associated implementation guidance (Docket ID NRC-2010-0194). The University of Cincinnati requests the extensions result in both documents having the same comment period ending date. For this request, the University of Cincinnati recommends the comment period ending date for both documents be extended to the end of the year (i.e., December 31, 2010).

This request is based in part on the complexity of the rule and the probable significant impact to a large number of licensees. The request is also based on the overall length of both documents and the fact that both documents significantly interrelate. It is believed that in order to provide useful comments a careful review and simultaneous analysis of both documents is needed.

The University of Cincinnati appreciates this opportunity to provide an initial comment. Specific comments for each of the documents will be submitted at a later date.

If you have any questions do not hesitate to call or email.

Sincerely,

Victoria Morris

Victoria Morris, MS, CHP
University of Cincinnati
Radiation Safety Officer
(513) 558-4110
vicki.morris@uc.edu

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DS 10



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University of Cincinnati Medical Center
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September 17, 2010

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Email: rulemaking.comments@nrc.gov
Attn: Rulemaking and Adjudication Staff

Subject: Docket ID NRC-2010-0194

Dear Sir/Madam:

The University of Cincinnati requests an extension of the comment periods for the Implementation Guidance for Physical Protection of Byproduct Material; Category 1 and Category 2 Quantities of Radioactive Material (Docket ID NRC-2010-0194) and its associated rule (Docket ID NRC-2008-0120). The University of Cincinnati requests the extensions result in both documents having the same comment period ending date. For this request, the University of Cincinnati recommends the comment period ending date for both documents be extended to the end of the year (i.e., December 31, 2010).

This request is based in part on the complexity of the rule and the probable significant impact to a large number of licensees. The request is also based on the overall length of both documents and the fact that both documents significantly interrelate. It is believed that in order to provide useful comments a careful review and simultaneous analysis of both documents is needed.

The University of Cincinnati appreciates this opportunity to provide an initial comment. Specific comments for each of the documents will be submitted at a later date.

If you have any questions do not hesitate to call or email.

Sincerely,

Victoria Morris

Victoria Morris, MS, CHP
University of Cincinnati
Radiation Safety Officer
(513) 558-4110
vicki.morris@uc.edu

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; Fri, 17 Sep 2010
16:32:39 -0400

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X-SBRS: 5.2

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X-fn: Comments extention for 10 CFR37 and guidance.doc

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Outbound.ucmail.uc.edu (Proprietary) with ESMTP id AA5DD4C1F9 for
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([10.23.4.102]) with mapi; Fri, 17 Sep 2010 16:32:37 -0400

From: "Morris, Victoria (morrisvr)" <MORRISVR@UCMAIL.UC.EDU>

To: "rulemaking.comments@nrc.gov" <rulemaking.comments@nrc.gov>

Date: Fri, 17 Sep 2010 16:32:36 -0400

Subject: Docket ID NRC-2008-0120 and NRC-2010-0194

Thread-Topic: Docket ID NRC-2008-0120 and NRC-2010-0194

Thread-Index: ActWp3bDo7Y7YxEWQ2q8vFGM0dEdCg==

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Return-Path: prvs=86980128a=morrisvr@ucmail.uc.edu

Rulemaking Comments

From: Morris, Victoria (morrisvr) [MORRISVR@UCMAIL.UC.EDU]
Sent: Friday, September 17, 2010 4:33 PM
To: Rulemaking Comments
Subject: Docket ID NRC-2008-0120 and NRC-2010-0194
Attachments: Comments extention for 10 CFR37 and guidance.doc

Attached are individual comments from the University of Cincinnati requesting an extension for the comment period for the two referenced items.

Vicki Morris, MS, CHP
Radiation Safety Officer
University of Cincinnati
Phone (513) 558-4110
Fax (513) 558-9905