



American College of Medical Physicists

One Physics Ellipse • College Park, MD 20740-3846

Phone: (301) 209-3360 • Fax: (301) 209-3343

acmp@acmp.org

www.acmp.org

SUBMITTED ELECTRONICALLY

September 23, 2010

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

Attn: Rulemaking and Adjudications Staff
Re: Docket no: NRC-2008-0120 (75FR33902 and 75FR47494)

Dear Ms. Annette Vietti-Cook:

The American College of Medical Physicists (ACMP) is a professional organization composed of medical physicists who provide clinical support to both diagnostic imaging and radiation oncology programs within the United States. ACMP requests an extension to the comment period for the proposed rule: 10 CFR Part 37 on the *Physical Protection of Byproduct Material* (75FR33902) and the *Implementation Guidance for Physical Protection of Byproduct Material; Category 1 and Category 2 Quantities of Radioactive Material* (75FR47494) to January 15, 2011. The proposed rule was published for comment on June 15, 2010 and the Implementation Guidance August 6, 2010. Due to the significance and breadth of this proposed rule and the implementation guidance, we feel that extending the public comment period to January 15, 2011 will allow the stakeholder community sufficient time to review and provide detailed comments.

The basis for this request was highlighted during today's meeting in Rockville, MD. During this meeting it was clear that a number of stakeholders had not been able to review the proposed rule and implementation guidance in sufficient detail to provide effective comments to the Commission on the issues that differ from the requirements specified under the existing orders and the proposed rule. In addition, licensees that are not currently under increased control orders may not be aware of the potential implication for their programs and therefore not aware of the need to provide comments.

Based on all these factors we believe an extension until January 15, 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.

Sincerely,

Christopher Serago, Ph.D., FAAPM, FACMP, FACR
Chairman
serago.christopher@mayo.edu

cc: Merri Horn

DOCKETED USNRC

September 24, 2010 (11:15a.m.)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

See plate Serago-067

DS-10