



September 15, 2010

9/14/2010  
75FR 40756

(5)

Annette Vietti-Cook  
Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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RULES AND DIRECTIVES  
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USNRC

Re: Request for Extension of Public Comment Period on "Physical Protection of Byproduct Material; Proposed Rule" (75FR33902) and Draft Guidance Document (75FR40756); Docket No. NRC-2008-0120

Dear Ms. Vietti-Cook:

The American Society for Radiation Oncology (ASTRO) respectfully requests the U. S. Nuclear Regulatory Commission (NRC) staff extend the public comment periods for the referenced proposed rule from October 13, 2010 to January 15, 2011 and for the referenced draft guidance from November 12, 2010 to January 15, 2011. Extending these public comment periods would allow the stakeholder community sufficient time to review the substantial, lengthy documents and provide detailed comments to assist the NRC in its rulemaking.

ASTRO is the largest radiation oncology society in the world, with 10,000 members who specialize in treating patients with radiation therapy. As a leading organization in radiation oncology, biology, and physics, the Society is dedicated to the advancement of the practice of radiation oncology by promoting excellence in patient care, providing opportunities for educational and professional development, promoting research and disseminating research results and representing radiation oncology in a rapidly evolving healthcare environment.

The proposed rule and guidance document are extensive in length and scope. Moreover, the proposed rule differs in some significant respects from the existing

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AMERICAN SOCIETY FOR RADIATION ONCOLOGY

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ASTRO 2010 PPAC Nomination Letter  
September 2009

security-related orders, and would impose new requirements on stakeholders beyond those contained in the previously issued and implemented security orders.

Attendees at the September 1 public meeting in Austin, Tex. expressed concern that they have not had adequate time to analyze how requirements in the proposed rule differ from those specified under the existing orders, and more importantly, how implementation of the proposed rule may impact them. In addition, ASTRO is concerned that there will not be enough time after the last public meeting scheduled for September 20 to assess the remarks made at that meeting and meet the current filing deadline. Additional time is necessary to ensure that stakeholders fully understand the proposed rule, as well as the ramifications of its implementation.

ASTRO believes an extension until January 15, 2011 is reasonable and would benefit the NRC, stakeholders, and the public by allowing for the development of thorough and constructive comments. Please contact me at 703-839-7366 or [richardm@astro.org](mailto:richardm@astro.org) if you have any questions.

Sincerely,



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CC: Ms. Merri L. Horn, FSME/DILR/RB-B, NRC