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75 FR 57081

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# PUBLIC SUBMISSION

**Docket:** NRC-2010-0282  
Safety Culture Policy Statement

**Comment On:** NRC-2010-0282-0002  
Revised Draft Safety Culture Policy Statement: Request for Comments

**Document:** NRC-2010-0282-DRAFT-0003  
Comment on FR Doc # 2010-23249

## Submitter Information

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**Organization:** ACMP  
**Government Agency Type:** Federal  
**Government Agency:** NRC

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## General Comment

See attached file(s)

## Attachments

**NRC-2010-0282-DRAFT-0003.1:** Comment on FR Doc # 2010-23249

*SUNSI Review Complete  
Template = ADM-013*

*E-RIDS = ADM-03  
Add = M. Schwartz (mes)*



## American College of Medical Physics

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### Submitted Electronically

September 23, 2010

Cindy K. Blady  
Chief, Rules, Announcements, and  
Directives Branch (RADB), Division of Administrative Services, Office of Administration,  
Mail Stop: TWB-05-B01M  
U.S. Nuclear Regulatory  
Commission  
Washington, DC 20555-0001

Attn: Rulemaking and Adjudications Staff

Re: Docket ID NRC-2010-0282 - Revised Draft Safety Culture Policy Statement: Request for Comments [75FR57081]

Dear Ms. Blady:

The American College of Medical Physics (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 Revised Draft Safety Culture Policy Statement (75FR57081) to December 15, 2010. We do not believe that a 30-day comment period is sufficient to prepare thorough and constructive comments that this topic deserves.

Additionally, the revised proposed policy statement was only published 10 days prior to the public meeting. This again is insufficient time to prepare for the meeting. As the workshop will be held on September 28<sup>th</sup>, and the transcript from a public workshop is typically not available for 7-14 days after the meeting, in reality there may only be 5 days to review the transcript and reflect on issues raised during the workshop.

ACMP agrees that a positive safety culture is important and therefore responding to the Commission draft policy statement is a priority and we would like to have sufficient time to provide constructive, well-developed comments for the Commission's consideration.

We believe an extension until December 15, 2010 is a reasonable time period and will allow for thorough and constructive comments. Please feel free to contact me if you have additional questions.

Sincerely,

Christopher Serago, Ph.D., FAAPM, FACMP, FACR  
[serago.christopher@mayo.edu](mailto:serago.christopher@mayo.edu)

cc: Maria E. Schwartz ([Maria.Schwartz@nrc.gov](mailto:Maria.Schwartz@nrc.gov))  
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