

# H & H X-RAY SERVICES, INC.

P.O. BOX 517 \* WEST MONROE, LOUISIANA 71294-0517

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24 HOUR SERVICE  
1-800-551-5093  
318-396-0767 FAX  
E-MAIL hhxray@bayou.com

DOCKETED  
USNRC

October 12, 2010 (4:15pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

24 HOUR SERVICE  
318-396-2128  
Louisiana

September 29<sup>th</sup>, 2010

US Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
Attn:Mr. Merri L. Horn, Sr.

**RE: Opportunity to Comment on Proposed Rule to Amend 10 CFR Parts 30, 32, 33, 34, 35, 36, 37, 39, 51, 71, and 73 - Physical Protection Of Byproduct Material (FSME-10-048)**

Dear Mr. Horn,

H & H X-Ray Services would like to take this opportunity to comment on the proposed rule changes to Physical Protection Of Byproduct Material. Our company **strongly opposes** the proposed rule changes. We feel that the Nuclear Regulatory Commission has lost touch with the way the industry operates. If that was not the case, then the NRC would understand that the proposed rule changes are **unnecessary** and in the case of "Physical Protection Requirements During Use," simply **unrealistic**. The burden our company would bear, brought forth by these proposed rule changes, would be substantial.

H & H X-Ray Services has reviewed the Organization Of Agreement States response dated July 9<sup>th</sup>, 2010, as well as the state of Texas response dated August 18<sup>th</sup>, 2010 and is in full agreement with their assessment of the proposed rule changes.

H & H X-Ray Services hopes that the NRC as well as the Agreement States, will consider the ramifications of these proposed changes and will rescind the Proposed Rule Changes. If you have any questions or need additional information please to call me at 1-800-551-5093.

Sincerely,

  
Toby Head  
RSO

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