

Frontier Technology Corporation

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DOCKETED
USNRC

October 14, 2010 (10:25am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

October 1, 2010

RE: Comments concerning the proposed issuance of rules and regulations 10 CFR Part 37;
Docket ID NRC-2010-0194

We are submitting comments concerning the proposed issuance of rules and regulations 10 CFR Part 37. It is clear these new rules and regulations are written with the intent to regulate large corporations and power plant facilities. However, from the perspective of a small company these new rulings will create extreme hardship and place an untenable burden on our ability and the ability of other smaller companies to do business.

In reference to the new background checks (Part 37.25 (6)), the paperwork, time expended, and cost to perform the background checks will be enormous for a small business. We strongly object to the use of credit checks as part of deeming an employee trustworthy and reliable. In the current economic environment, using a credit history evaluation could reflect an inaccurate and erroneous assessment of a person's T&R status. It is an unnecessary invasion of privacy and could remove from employment consideration very competent, skilled workers. Credit history checks should not be used and should be removed completely from this section. We do agree that licensees should be allowed more flexibility to conduct background reviews.

In reference to 10CFR37.1 Subpart C, our comments and concerns are also based on the burden being placed on the small businesses. We are a neutron source manufacturing company. Our daily business depends on the ability to not collocate or aggregate our radioactive material. We follow a well established safety and security plan. To remain below the quantity of concern limit, we manage our radioactive material through quantity control and physical separation of material not in use at any one time. If we are required to aggregate all of our material – which includes the standard, returned sources, sources packed and ready to ship, cell waste (cell sweep, dust, chips), plus isotope material – we will continuously be above the quantity of concern limit. The additional requirements would be a significant economic hardship on any company. The expense would far exceed the estimated one time cost to develop and implement the proposed regulations.

We appreciate the opportunity to comment to these proposed rule changes.

Treva L. Janzow
President / RSO
Frontier Technology Corporation

Template = SECY-067

DS 10

Rulemaking Comments

From: Jeniece Fresh [jeniecegf@gmail.com]
Sent: Thursday, October 14, 2010 9:47 AM
To: Rulemaking Comments
Subject: Docket ID NRC-2010-0194
Attachments: NRC Letter.pdf

Please find attached our comments concerning 10 CFR Part 37 - Docket ID NRC-2010-0194.

These comments were sent on October 12, but we did not receive a response stating the email was received.

Thank you,

Jeniece Fresh
Health Physicist
Frontier Technology Corporation

Received: from mail2.nrc.gov (148.184.176.43) by OWMS01.nrc.gov
(148.184.100.43) with Microsoft SMTP Server id 8.1.393.1; Thu, 14 Oct 2010
09:47:03 -0400

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X-SBRS: 3.9

X-MID: 27517964

X-fn: NRC Letter.pdf

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X-IronPort-Anti-Spam-Result:

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with ESMTP; 14 Oct 2010 09:47:02 -0400

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<Rulemaking.Comments@nrc.gov>; Thu, 14 Oct 2010 06:47:02 -0700 (PDT)

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Date: Thu, 14 Oct 2010 09:46:57 -0400

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Subject: Docket ID NRC-2010-0194

From: Jeniece Fresh <jeniecegf@gmail.com>

To: Rulemaking.Comments@nrc.gov

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