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PR 30, 40, 70, 170 and 171
(75FR43425)

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Distribution of Source Material to Exempt Persons and General Licensees and Revision of 10 CFR 40.22 General License

Comment On: NRC-2009-0084-0005

Distribution of Source Material to Exempt Persons and to General Licensees and Revision of General License and Exemptions; Extension of Comment Period

Document: NRC-2009-0084-DRAFT-0008

Comment on FR Doc # 2010-29108

Submitter Information

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General Comment

Q.(5) Obviously, any additional fees will be burdensome. The NRC has created such a complex and convoluted web of regulations, including the 4852 page NUREG-1556, Consolidated Guidance About Materials Licenses, that the NRC staff (including inspectors) overseeing the compliance with the regulations are interpreting that source material encompasses analytical samples for testing and characterization from both licenses and non-licensees. How does one know that the material is source material prior to analytical testing? When does the material become source material? The inspectors are indicating that as soon as you add acid, for analytical sample preservation, required by approved analytical methodologies for uranium testing, that material is now classified as source material from any unknown analytical sample, even though the concentration in the sample has not been determined. Currently, an analytical facility providing sample characterization for source and byproduct material for licensees and non-licensees could potential be charged > \$30,000 annually for license renewal (~10k for byproduct and ~20k for source material); >\$15,000 application fees (~6k for by product and ~10k for source material); plus the cost of the application process and the regulatory compliance required in NUREG 1556. These fees eclipse the cost for both conventional and ISR facilities producing millions of pounds of source material annually for economic profit.

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4 Rulemaking Comments

From: Gallagher, Carol
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To: Rulemaking Comments
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Attachments: NRC-2009-0084-DRAFT-0008.pdf

Van,

Attached for docketing is a comment letter on the above noted proposed rule (75 FR 43425) from Sheryl Garling that I received via the regulations.gov website on 11/20/10.

Thanks,
Carol

Received: from HQCLSTR01.nrc.gov ([148.184.44.79]) by OWMS01.nrc.gov
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