

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

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## PUBLIC SUBMISSION

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**Docket:** NRC-2009-0084

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-0010

Comment on FR Doc # 2010-29108

### Submitter Information

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### General Comment

The NRC would also welcome preliminary input on the following issues for potential future rulemaking: Q.(1). Yes, the NRC needs to include 11(e)2 into the general license in 40.22. Current regulations are hampering the ability of analytical laboratories to perform necessary testing on the waste material generated by ISR and conventional uranium mining facilities if they do not have either a state of NRC license. Regulations regarding waste disposal including requirements for analytical testing that exceed mere radioanalytical techniques, namely all RCRA requirements. As such laboratories incapable of performing the required organic analytes currently ship 11(e)2 materials to unlicensed analytical facilities for compliance purposes.

Template = SECY-067

DS 10

## Rulemaking Comments

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**From:** Gallagher, Carol  
**Sent:** Tuesday, November 23, 2010 3:41 PM  
**To:** Rulemaking Comments  
**Subject:** NRC-2009-0084-DRAFT-0010.pdf - Adobe Acrobat Professional  
**Attachments:** NRC-2009-0084-DRAFT-0010.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 TWMS01.nrc.gov  
([148.184.200.145]) with mapi; Tue, 23 Nov 2010 15:41:40 -0500  
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