

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

**DOCKETED  
USNRC**

November 23, 2010 (4:00pm)

**OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF**

# PUBLIC SUBMISSION

<b>As of:</b> November 23, 2010 <b>Received:</b> November 20, 2010 <b>Status:</b> Pending_Post <b>Tracking No.</b> 80b9b4e6 <b>Comments Due:</b> November 23, 2010 <b>Submission Type:</b> Web
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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-2009-0084-0002

Distribution of Source Material to Exempt Persons and to General Licensees and Revision of General License and Exemptions

**Document:** NRC-2009-0084-DRAFT-0004

Comment on FR Doc # 2010-18223

## Submitter Information

**Name:** Steve Calhoun

**Address:**

3100 Fujita Street  
Torrance, CA, 90505

**Organization:** Industrial Dynamics Company, Ltd.

## General Comment

To Whom It May Concern:

I reviewed the NRC proposed rule which directly affects the products my company has designed, manufactured and shipped to end users for more than 40 years. Should this proposed rule pass and require our End Users to possess a Specific License, it will most certainly have a financial impact on my company in the form of lost orders, lost business, business transferred overseas, etc. Equally important is the financial impact it could potentially cause for End Users of my company's equipment (General Licensees).

While I understand and agree with the need to enforce accountability of Generally Licensed Devices (GLD), I do not believe imposing high fees and specific licensing requirements is the solution. I suspect that many General Licensees will opt to dispose of the GLDs instead of pursuing the Specific Licensing strictly based on the fees.

Customers purchase our equipment due to the high reliability and energy-efficiency of our gamma devices. Imposing fees of this nature would certainly force any potential client of my company to reconsider their decision to purchase our equipment. My company's customer base spans from general packaging to large beverage suppliers, all of whom rely on our equipment as part of their quality inspection process.

My company is dedicated to full compliance with all regulatory requirements and we are confident that if General Licensees were held accountable via formal and regular reporting processes, the likelihood of improved device tracking and reporting by General Licensees would increase greatly, without any increase in fees or specific licensing requirements.

As the proud owner of an American business, I urge you to reconsider this matter and come to a more

reasonable solution, one that would allow my business and my customers operate efficiently.

Thank you for your time.

Sincerely,  
Steve M. Calhoun  
President & CEO

## **Rulemaking Comments**

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**From:** Gallagher, Carol  
**Sent:** Tuesday, November 23, 2010 3:30 PM  
**To:** Rulemaking Comments  
**Subject:** Comment on Distribution of Source Material to Exempt and General Licensees...  
**Attachments:** NRC-2009-0084-DRAFT-0004.pdf

Van,

Attached for docketing is a comment letter on the above noted proposed rule (75 FR 43425) from Steve Calhoun that I received via the regulations.gov website on 11/23/10.

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 15:31:15 -0500  
Content-Type: application/ms-tnef; name="winmail.dat"  
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From: "Gallagher, Carol" <Carol.Gallagher@nrc.gov>  
To: Rulemaking Comments <Rulemaking.Comments@nrc.gov>  
Date: Tue, 23 Nov 2010 15:30:15 -0500  
Subject: Comment on Distribution of Source Material to Exempt and General  
Licensees...  
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General Licensees...  
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