

PR 30,32,33,34,35,36,37,39,51,71 and 73  
(75FR33901)

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## PUBLIC SUBMISSION

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**Docket:** NRC-2008-0120  
Physical Protection of Byproduct Material

DOCKETED  
USNRC

**Comment On:** NRC-2008-0120-0070  
Physical Protection of Byproduct Material; Extension of Comment Period

January 12, 2011 (11:25 am)

**Document:** NRC-2008-0120-DRAFT-0103  
Comment on FR Doc # 2010-25397

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

## Submitter Information

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## General Comment

With reference to the credit checks, I believe that this would be unrevealing despite the USNRC belief that some with "a poor credit history may be coerced into participating in a malicious act." As a T&R Official, if someone has a score of 600 do I tell them that they may be coerced so cannot be approved but someone with a score of 700 may not be coercable? Credit checks are not really very revealing as to character, reliability or patriotism. Bad or mediocre credit is not a crime. Where is the guidance from the NRC when someone becomes coercable? Frankly, I would never make a decision based on credit score and this is what you say in Implementation Guide for 10 CFR Part 37 Question/Answer 5, so why would you have licensees go through the expense and hassle for information that is not particularly useful? Credit histories are notoriously unreliable. I believe it is unnecessary to add this burden to licensees.

Template = SECY-067

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## **Rulemaking Comments**

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**From:** Gallagher, Carol  
**Sent:** Wednesday, January 12, 2011 10:05 AM  
**To:** Rulemaking Comments  
**Subject:** Comment on Proposed Rule - Physical Protection of Byproduct Material  
**Attachments:** NRC-2008-0120-DRAFT-0103.pdf

Van,

Attached for docketing is a comment from Warren Snell on the above noted proposed rule (3150-A112) that I received via the regulations.gov website on 1/11/11.

Carol

Received: from HQCLSTR01.nrc.gov ([148.184.44.79]) by TWMS01.nrc.gov  
([148.184.200.145]) with mapi; Wed, 12 Jan 2011 10:05:43 -0500  
Content-Type: application/ms-tnef; name="winmail.dat"  
Content-Transfer-Encoding: binary  
From: "Gallagher, Carol" <Carol.Gallagher@nrc.gov>  
To: Rulemaking Comments <Rulemaking.Comments@nrc.gov>  
Date: Wed, 12 Jan 2011 10:04:42 -0500  
Subject: Comment on Proposed Rule - Physical Protection of Byproduct Material  
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