

Rulemaking Comments

**PR 73
(75FR42000)**

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USNRC

From: George Miller [gemiller@uci.edu]
Sent: Monday, January 31, 2011 2:57 PM
To: Rulemaking Comments
Cc: Mikael Nilsson; AJ Shaka
Subject: Comments 10CFR Part 73 RIN 3150-A125 (NRC-2008-0619)

January 31, 2011 (3:55 pm)

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Subject: Comments 10 CFR Part 73 RIN 3150-A125 (NRC-2008-0619)

We, at the University of California Irvine Research Reactor have reviewed the draft rule and public comments provided by other facilities and the National Organization of Test, Research, and Training Reactors (TRTR), and would like to provide input on the proposed 10 CFR Part 73 Rulemaking (NRC-2008-0619) as published in the Federal Register Vol. 75 No.138 - Tuesday, July 20, 2010.

The proposed rule adds additional requirements for security at RTR facilities that will further limit student, faculty and researcher access and divert additional resources from our educational and research missions in a climate where funding support at the state level already may be limited. We have no problem with the need to provide a secure and safe environment, but feel that current procedures are more than adequate so that the proposed additional requirements add extremely little to that environment (if anything) while diverting both attention and resources from more important matters.

We support the helpful comments submitted by TRTR (NRC-2008-0619-0019) and ask that we be joined to those specific comments for resolution.

We appreciate the opportunity to provide comment on this important proposal.
Please feel free to contact us with questions.

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Prof. Mikael Nilsson, SRO, Department of Chemical Engineering and Materials Science.
Prof. A. J. Shaka, SRO (trainee) Department of Chemistry.

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