

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

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February 14, 2011

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USNRC

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

February 15, 2011 (10:45am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Gentlemen:

Subject: **Comments of the Wyoming Mining Association (WMA) on the Proposed Rule *Distribution of Source Material to Exempt Persons and to General Licensees and Revision of General License and Exemptions* – Federal Register Volume 75, Number 142, Monday, July 26, 2010 pages 43425 to 43446 and Implementation Guidance for Distribution of Source Material to Exempt Persons and to General Licensees and Revision of General License and Exemptions; Draft Guidance Document for Comment – Federal Register Volume 76, Number 5 / Friday, January 7, 2011 / Proposed Rules pages 1100 to 1101**

The Wyoming Mining Association (WMA) is an industry association representing mining companies, contractors, vendors, suppliers and consultants in the State of Wyoming. Among its mining industry members are uranium recovery licensees, including in-situ and conventional uranium recovery operators, several companies planning new uranium recovery operations and several companies conducting final reclamation/restoration operations. The Association has reviewed both the proposed rule and proposed implementation guidance and since they are directly related is providing the following comments on both in a single document:

Current Status of the Regulations as Applied to Uranium

10 CFR Part 40.13 Unimportant quantities of source material states in part:

a) Any person is exempt from the regulations in this part and from the requirements for a license set forth in section 62 of the Act to the extent that such person receives, possesses, uses, transfers or delivers source material in any chemical mixture, compound, solution, or alloy in which the source material is by weight less than one-twentieth of 1 percent (0.05 percent) of the mixture, compound, solution or alloy. The exemption contained in this paragraph does not include byproduct material as defined in this part.

(b) Any person is exempt from the regulations in this part and from the requirements for a license set forth in section 62 of the act to the extent that such person receives, possesses, uses, or transfers unrefined and unprocessed ore containing source material; provided, that, except as authorized in a specific license, such person shall not refine or process such ore.

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In addition, **10 CFR 40.22 Small quantities of source material** states:

(a) A general license is hereby issued authorizing commercial and industrial firms, research, educational and medical institutions and Federal, State and local government agencies to use and transfer not more than fifteen (15) pounds of source material at any one time for research, development, educational, commercial or operational purposes. A person authorized to use or transfer source material, pursuant to this general license, may not receive more than a total of 150 pounds of source material in any one calendar year.

(b) Persons who receive, possess, use, or transfer source material pursuant to the general license issued in paragraph (a) of this section are exempt from the provisions of parts 19, 20, and 21, of this chapter to the extent that such receipt, possession, use or transfer are within the terms of such general license: Provided, however, That this exemption shall not be deemed to apply to any such person who is also in possession of source material under a specific license issued pursuant to this part.

(c) Persons who receive, possess, use or transfer source material pursuant to the general license in paragraph (a) of this section are prohibited from administering source material, or the radiation therefrom, either externally or internally, to human beings except as may be authorized by NRC in a specific license.

Source material is defined in 10 CFR 40.4 as follows:

Source Material means: (1) Uranium or thorium, or any combination thereof, in any physical or chemical form or (2) ores which contain by weight one-twentieth of one percent (0.05%) or more of: (i) Uranium, (ii) thorium or (iii) any combination thereof. Source material does not include special nuclear material.

Special nuclear material is defined in 10 CFR 40.4 as follows:

Special nuclear material means: (1) Plutonium, uranium 233, uranium enriched in the isotope 233 or in the isotope 235, and any other material which the Commission, pursuant to the provisions of section 51 of the Act, determines to be special nuclear material; or (2) any material artificially enriched by any of the foregoing.

The above definitions, **as far as uranium is concerned**, limit the source material uranium to either:

- ♦ Natural uranium or any chemical mixture, compound, solution, or alloy in which the source material (**uranium in this case**) is by weight less than one-twentieth of 1 percent (0.05 percent) of the mixture, compound, solution or alloy or;
- ♦ Depleted uranium

Any material *artificially enriched* in uranium-233 or uranium-235 is specifically exempted from being considered as source material since it is by definition special nuclear material. Thus as far as uranium is concerned the definition of source material is effectively limited to natural and depleted uranium. There are fourteen (14) isotopes of uranium, however only three (Uranium-238, Uranium-234 and Uranium-235) occur in nature. Any other isotopes of uranium are manufactured ones that are either the product of reactions occurring in nuclear reactors (11(e).1 byproduct material) defined in 10 CFR Part 20 as follows:

(1) Any radioactive material (except special nuclear material) yielded in, or made radioactive by, exposure to the radiation incident to the process of producing or using special nuclear material;

or accelerator produced material that are clearly not source material.

Risks of Natural and Depleted Uranium

The primary risk to human health from natural or depleted uranium is chemical toxicity. This is clearly stated in the following two (2) documents:

Uranium is a chemical substance that is also radioactive. Scientists have never detected harmful radiation effects from low levels of natural uranium, although some may be possible. However, scientists have seen chemical effects. A few people have developed signs of kidney disease after intake of large amounts of uranium. Animals have also developed kidney disease after they have been treated with large amounts of uranium, so it is possible that intake of a large amount of uranium might damage your kidneys. There is also a chance of getting cancer from any radioactive material like uranium. Natural and depleted uranium are only weakly radioactive and are not likely to cause you to get cancer from their radiation. No human cancer of any type has ever been seen as a result of exposure to natural or depleted uranium.

TOXICOLOGICAL PROFILE FOR URANIUM
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service Agency for Toxic Substances and Disease Registry
September 1999

(e) In addition to the annual dose limits, the licensee shall limit the soluble uranium intake by an individual to 10 milligrams in a week in consideration of chemical toxicity (see footnote 3 of appendix B to part 20).

10 CFR 20.1201(e) Occupational dose limits for adults

These two (2) citations clearly demonstrate that the primary risk from uranium (natural or depleted) is toxicological. This is why 10 CFR Part 20.1201(e) establishes the ten (10) milligram per week dose limit for soluble uranium. This limit is less than the limits established based on radiologic toxicity provided in 10 CFR Part 20 Appendix B Table 1 for natural uranium and fully depleted uranium (Uranium-238). These tables are shown below:

Uranium-natural

Atomic No.	Radionuclide	Class	Table 1 Occupational Values			Table 2 Effluent Concentrations		Table 3 Releases to Sewers
			Col. 1	Col. 2	Col. 3	Col. 1	Col. 2	Monthly Average Concentration (μCi/ml)
			Oral Ingestion ALI (μCi)	Inhalation		Air (μCi/ml)	Water (μCi/ml)	
92	Uranium-natural ³	D, see ²³⁰ U	1E+1	1E+0	5E-10			-
			Bone Surf	Bone Surf				
			(2E+1)	(2E+0)	-	3E-12	3E-7	3E-6
		W, see ²³⁰ U	-	8E-1	3E-10	9E-13	-	-
	Y, see ²³⁰ U	-	5E-2	2E-11	9E-14	-	-	

Uranium-238

Atomic No.	Radionuclide	Class	Table 1 Occupational Values			Table 2 Effluent Concentrations		Table 3 Releases to Sewers
			Col. 1	Col. 2	Col. 3	Col. 1	Col. 2	Monthly Average Concentration (μCi/ml)
			Oral Ingestion ALI (μCi)	Inhalation		Air (μCi/ml)	Water (μCi/ml)	
	ALI (μCi)	DAC (μCi/ml)						
92	Uranium-238 ³	D, see ²³⁸ U	1E+1 Bone Surf	1E+0 Bone Surf	6E-10	-	-	-
			(2E+1)	(2E+0)	-	3E-12	3E-7	3E-6
		W, see ²³⁸ U	-	8E-1	3E-10	1E-12	-	-
		Y, see ²³⁸ U	-	4E-2	2E-11	6E-14	-	-

In these tables the Allowable Limit of Intake (ALI) is based upon 2,000 hours of exposure at the Derived Air Concentration (DAC) (2000 DAC-hours equal one (1) ALI). The Allowable Limits of Intake (ALI's) provided in these tables for either natural uranium or Uranium-238 vary from 2 E+01 microCuries (oral ingestion/Day for natural uranium and depleted uranium) to 4E-02 microCuries (inhalation/Year for Uranium-238).

Natural uranium has a specific activity of approximately 677 picocuries per milligram (6.77 E-01 microCuries per gram). The above range of annual allowable limits of intake for soluble (Day) natural uranium (2E+1 to 1 E+0 microCuries) equates to 29.5 to 1.48 grams of soluble uranium which exceeds the 10 CFR 20.1201(e) chemical toxicity limit of 0.5 grams (10 milligrams per week for fifty (50) weeks (2,000 hours)).

Uranium-238 has a specific activity of 340 picoCuries per milligram (3.40 E-1 microCuries per gram). The above range of annual allowable limits of intake for soluble (Day) natural uranium (2E+1 to 1 E+0 microCuries) equates to 58.8 to 2.94 grams of soluble uranium, which also exceeds the 10 CFR 20.1201(e) chemical toxicity limit of 0.5 grams (10 milligrams per week for fifty (50) weeks (2,000 hours)).

This clearly shows that the primary human health issue with natural or depleted uranium is chemical toxicity and not radiologic toxicity, making natural or depleted uranium's primary toxicological hazard no different from that of other heavy metals such as vanadium, molybdenum, lead, cadmium or mercury. In essence, natural or depleted uranium presents similar human health risks to other heavy metals with the addition of a minimal amount of radioactivity.

Regulation and/or restriction of hazardous materials should be risk informed/based. These proposed additional restrictions on natural or depleted uranium are not justified, since they are not risk based or informed. If the logic of these additional restrictions were carried further, they would lead to additional restrictions on the transfer and possession of other heavy metals as well. It appears as if these additional restrictions are being driven more by perceived radiological risks as opposed to the real chemical ones.

Revision to 10 CFR 40.22 Small Quantities of Source Material – Possession Limits

10 CFR 40.22 currently states:

40.22 Small quantities of source material.

(a) A general license is hereby issued authorizing commercial and industrial firms, research, educational and medical institutions and Federal, State and local government agencies to use and transfer not more than fifteen (15) pounds of source material at any one time for research, development, educational, commercial or operational purposes. A person authorized to use or transfer source material, pursuant to this general license, may not receive more than a total of 150 pounds of source material in any one calendar year.

This rulemaking proposes to change this section to read as follows:

§ 40.22 Small quantities of source material.

(a) A general license is hereby issued authorizing commercial and industrial firms; research, educational, and medical institutions; and Federal, State, and local government agencies to receive, possess, use, and transfer uranium and thorium, in their natural isotopic concentrations and in the form of depleted uranium, for research, development, educational, commercial, or operational purposes in the following forms and quantities:

(1) Not more than 1.5 kg (3.3 lb) of uranium and thorium in any form at any one time. A person authorized to possess, use, and transfer source material under this paragraph may not receive more than a total of 7 kg (15.4 lb) of uranium and thorium in any one calendar year. Source material possessed under paragraph (a) (2) of this section does not apply toward these limits; and

(2) Not more than 7 kg (15.4 lb) of uranium and thorium at any one time so long as the form is solid and nondispersible. A person authorized to possess, use, and transfer source material under this paragraph may not receive more than a total of 70 kg (154 lb) of uranium and thorium in any one calendar year and may not alter the chemical or physical form of the source material possessed under this paragraph. The total quantity of source material possessed under this paragraph must include source material possessed under paragraph (a) (1) of this section;

WMA believes that that these new limits are overly restrictive and not based on the risks posed by the material.

These more restrictive limits will ultimately pose problems for small laboratories that provide services to members of the uranium recovery industry. These more restrictive limits may ultimately force some laboratories to obtain specific licenses as opposed to operating under general licenses and remaining below current limits. Some laboratories rely on these exemptions to perform certain types of work and scrupulously remain below the current limits. These additional restrictions may ultimately be passed on to uranium recovery licenses in the form of additional costs.

Revision to 10 CFR 40.22 Small Quantities of Source Material – Requirement for a Specific License to Distribute

This proposed rule contains the following new language:

(e) No person may initially transfer or distribute source material to persons generally licensed under paragraph (a) of this section, or equivalent regulations of an Agreement State, unless authorized by a specific license issued in accordance with § 40.54 or equivalent provisions of an Agreement State. Initial distribution of source material to persons generally licensed by paragraph (a) of this section before [EFFECTIVE DATE OF FINAL RULE] without specific authorization may continue for 1 year beyond this date. Distribution may also be continued until the Commission takes final action on a pending application

for license or license amendment to specifically authorize distribution submitted no later than 1 year beyond this date.

This new restriction will force laboratories that provide small quantities of dissolved uranium standards to exempt (general license) organizations to obtain specific licenses increasing costs to their customers.

This new restriction may also create problems for calibrators of instruments used in the uranium recovery industry. Beta probes used in the uranium recovery industry are generally calibrated using depleted uranium so that the probe is calibrated to beta radiation energies specific to the uranium decay chain. Beta probes are often calibrated on depleted uranium slabs. This is mentioned in American National Standard – Radiation Protection Instrumentation – Test and Calibration – Portable Survey Instruments (ANSI N323A – 1997) when it states in Section 4.2.1.6:

“Correction factors for beta dose/dose rate measurements shall be determined using either ISO 6980: 1994 sources for point sources and standard distributed sources (e.g., depleted uranium slabs...)”

Calibrators may now encounter additional problems or expense obtaining such calibration sources. Organizations that distributed calibration disks made of depleted uranium under a general license will now be forced to obtain a specific license increasing costs to calibrators.

Unrefined and Unprocessed Ore Exemption

WMA notes that this proposed rule does not contain any language that impacts the exemption for unrefined and unprocessed ore.

10 CFR Part 40.4 Definitions defines unrefined and unprocessed ore as follows:

Unrefined and unprocessed ore means ore in its natural form prior to any processing, such as grinding, roasting or beneficiating, or refining.

10 CFR 40.13 Unimportant quantities of source material states in part:

(b) Any person is exempt from the regulations in this part and from the requirements for a license set forth in section 62 of the act to the extent that such person receives, possesses, uses, or transfers unrefined and unprocessed ore containing source material; provided, that, except as authorized in a specific license, such person shall not refine or process such ore.

The exemption for unrefined and unprocessed ore is a critical portion of 10 CFR Part 40 and rightfully remains unchanged for the following reasons:

- ♦ It defines the nuclear fuel cycle as beginning with the processing of source material ore and thereby exempts mining of source material from regulation as part of the nuclear fuel cycle.
- ♦ It rightfully exempts natural materials from regulations.
- ♦ It starts the regulatory regime only upon the processing of naturally occurring materials thus limiting regulation to anthropogenic materials.

Questions concerning 11(e).2 Byproduct Material

The preamble to the proposed rule contains the following question:

- (1) *Should the general license in § 40.22 be expanded to cover 11(e)2 byproduct material, i.e., mill tailings and wastes, to allow for small quantities, such as samples, to be more readily transferred for testing, for example? Given that the entire material is 11(e) 2 byproduct material, and not just the uranium or thorium contained in the material, would higher weight limits be appropriate? If allowed, should any other conditions be changed (e.g., waste disposal, etc.) or added?*

10 CFR part 40 should be revised to include a general license for 11(e).2 byproduct material. Uranium mill tailings are a major component of 11(e).2 byproduct material. These tailings are lower in activity (since the natural uranium has been largely removed) than the unrefined and unprocessed ore of which they are a waste following processing of that ore. Unrefined and unprocessed ore is already exempt from regulation under 10 CFR Part 40 under 10 CFR 40.13. Such a revision would be a boon to laboratories serving the uranium recovery industry.

The need to transfer quantities of 11(e).2 byproduct material to laboratories for testing includes but is not limited to:

- ♦ Testing of tailings samples for geotechnical properties prior to reclamation of a tailings impoundment
- ♦ Testing of samples of material for radioactive material content prior to disposal of the materials or to provide reclamation information.
- ♦ Testing of samples of material for chemical properties prior to disposal to determine compatibility with materials already in the disposal site.

Size requirements for geotechnical testing can be quite large. As such a possession limit of 150 pounds and an annual receipt limit of no more than 1,000 pounds would not be unreasonable.

Issues related to Thorium

The definition of source material includes thorium. The proposed rule raises the following concern regarding thorium:

Certain radionuclides of uranium and thorium, when isotopically separated, have the potential to present significantly higher doses, in particular, thorium-228, thorium-229, and uranium-232. Thorium-230 when separated from the uranium decay series is also a higher specific activity material. Although the NRC is not aware of these isotopes being separated for commercial use, if the separated isotopes were readily available, the current provisions of § 40.22 would allow a person to receive quantities large enough in terms of activity to present a security concern without obtaining a specific license.

The definition of source material restricts uranium defined as source material to essentially natural uranium or depleted uranium as explained above. There are five (5) isotopes of thorium that occur in nature being Thorium-227 (Uranium-235 decay chain) Thorium-228 (thorium-232 decay chain), Thorium-230 (Uranium-238 decay chain), Thorium-232 (parent Thorium-232 decay chain) and Thorium-234 (Uranium-238 decay chain)

A number of the above described isotopes have either short half lives or in the case of Thorium-227 is derived from a decay chain whose parent (Uranium-235) does not exist in high concentrations in nature. Only 0.7110% of all natural uranium is Uranium-235.

Most thorium occurring in nature is Thorium-232 (*More than 99% of natural thorium exists in the form (isotope) thorium-232.* - The Toxicological Profile for Thorium) which has a half life of 1.41×10^{10} years meaning that it has a very low specific activity, which in fact is 1.11×10^{-7} Curies per gram (1.11×10^2 picocuries per milligram) making it less active than either natural or depleted uranium.

The occupational dose limits for Thorium-232 are shown below:

Thorium-232

Atomic No.	Radionuclide	Class	Table 1 Occupational Values			Table 2 Effluent Concentrations		Table 3 Releases to Sewers
			Col. 1	Col. 2	Col. 3	Col. 1	Col. 2	
			Oral Ingestion ALI (μCi)	Inhalation		Air (μCi/ml)	Water (μCi/ml)	Monthly Average Concentration (μCi/ml)
				ALI (μCi)	DAC (μCi/ml)			
90	Thorium-232	W, see ²²⁶ Th	7E-1 Bone Surf	1E-3 Bone Surf	5E-13	-	-	-
			(2E+0)	(3E-3)	-	4E-15	3E-8	3E-7
		Y, see ²²⁶ Th	-	3E-3 Bone Surf	1E-12	-	-	-
			-	(4E-3)	-	6E-15	-	-

The Allowable Limits of Intake (ALI's) provided in the table above for Thorium-232 vary from 2 E+0 microCuries (oral ingestion/Week) to 1E-3 microCuries (inhalation/Week/Bone Surface).

Thorium-232 has a specific activity of approximately 111 picocuries per milligram (1.11 E-01 microCuries per gram). The allowable limit of intake for Class W Thorium-230 (2E+0 microCuries) equates to 18.0 grams of Thorium-230. This is a large amount of Thorium-230 and is indicative of its relatively low radiological risk.

As such, if the current source material possession limits remained unchanged but applied only to naturally occurring thorium which is predominately low activity Thorium-232 the Commission's concerns regarding radioactivity from other short half life isotopes of thorium would be alleviated.

Waste Disposal

The preamble to the proposed rule raises issues concerning disposal of source material wastes. It states:

(6) In § 40.22(b)(2)(ii), quantities of source material greater than 0.5 kg (1 lb) per year would be required to be disposed of as radioactive material through the provisions of § 20.2001 or transferred to another person otherwise authorized to receive the source material. Should the NRC consider other disposal alternatives for these larger quantities, such as in U.S. Environmental Protection Agency's Resource Conservation and Recovery Act (RCRA) Subtitle C hazardous waste disposal facilities or RCRA Subtitle D municipal Solid waste landfills?

Source material is radioactive material and clearly must be handled as such in regards to disposal. This does not mean however, that viable alternatives for disposal of source material do not exist. The following are some viable alternatives for disposal of source material wastes:

- **Disposal in Sanitary Sewers**

10 CFR Part 20.2003 **Disposal by release into sanitary sewerage states:**

(a) A licensee may discharge licensed material into sanitary sewerage if each of the following conditions is satisfied:

(1) The material is readily soluble (or is readily dispersible biological material) in water; and

(2) The quantity of licensed or other radioactive material that the licensee releases into the sewer in 1 month divided by the average monthly volume of water released into the sewer by the licensee does not exceed the concentration listed in table 3 of appendix B to part 20; and

(3) If more than one radionuclide is released, the following conditions must also be satisfied:

(i) The licensee shall determine the fraction of the limit in table 3 of appendix B to part 20 represented by discharges into sanitary sewerage by dividing the actual monthly average concentration of each radionuclide released by the licensee into the sewer by the concentration of that radionuclide listed in table 3 of appendix B to part 20; and

(ii) The sum of the fractions for each radionuclide required by paragraph (a)(3)(i) of this section does not exceed unity; and

(4) The total quantity of licensed and other radioactive material that the licensee releases into the sanitary sewerage system in a year does not exceed 5 curies (185 GBq) of hydrogen-3, 1 curie (37 GBq) of carbon-14, and 1 curie (37 GBq) of all other radioactive materials combined.

(b) Excreta from individuals undergoing medical diagnosis or therapy with radioactive material are not subject to the limitations contained in paragraph (a) of this section.

The maximum quantity of source material that could be released in one (1) year is one (1) Curie. Source material such as natural uranium (Activity: 6.77 E-01 microCuries per gram), Uranium-238 (3.4 E-01 microCuries per gram) and Thorium-232 (1.1E-01 microCuries per gram) are ideal candidates for disposal in sanitary sewers (provided that they are readily soluble) due to their low activity. These regulations would allow disposal of up to 1.48E+03 kilograms of natural uranium, 2.94E+03 kilograms of Uranium-238 or up to 9.09E+03 kilograms of Thorium-232 into sanitary sewers provided that the concentration does not exceed the concentration listed in table 3 of Appendix B to 10 CFR Part 20. These limits are so large in the case of these three (3) examples of source material because their activities and related radiological risks are so low.

- **Disposal of Source Material**

Given the very low radiotoxicity of source material the Commission should consider a wide variety of options for disposal. These options already include disposal in sanitary sewers and could also include uranium mill tailings impoundments and other types of disposal sites that can safely contain the material.

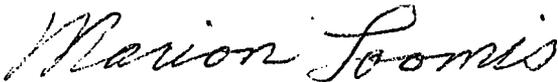
♦ **Processing as Alternate Feed**

If the source material in question is or contains natural uranium then it could be accepted as feed material by a licensed conventional uranium mill and processed. The uranium would be recovered for future beneficial use and any wastes would be placed in the mill tailings impoundment for disposal.

In summation, the Association believes that the risks posed by source material are very low and in the case of natural and depleted uranium related primarily to chemical toxicity just as they are for other heavy metals such as molybdenum, vanadium, cadmium, lead or mercury. Regulations should be risk informed and risk based. As such, the Association believes that possession and annual receipt limits for source material should remain unchanged provided that the isotopes involved are naturally occurring and that no specific license should be required to distribute source material provided that the isotopes involved are natural ones and the distributor remains within the present possession limits and annual receipt limits. The Association believes that the exemption for unrefined and unprocessed ore should remain and that disposal of source material can best be managed via disposal in sanitary sewers (as is already established in 10 CFR Part 20), disposal in uranium mill tailings impoundments, processing as alternate feed material (in the case of materials containing natural uranium) or disposal in other suitable facilities due to its very low radiotoxicity.

The Wyoming Mining Association (WMA) appreciates the opportunity to comment on this proposed rule. If you have any questions please do not hesitate to contact me.

Sincerely,
WYOMING MINING ASSOCIATION



Marion Loomis
Executive Director

Cc: Katie Sweeney – National Mining Association (NMA)

PUBLIC SUBMISSION

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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-0012

Comment on FR Doc # 2010-29108

Submitter Information

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Organization: Wyoming Mining Association

General Comment

See attached file(s)

Attachments

NRC-2009-0084-DRAFT-0012.1: Comment on FR Doc # 2010-29108

Rulemaking Comments

From: Gallagher, Carol
Sent: Tuesday, February 15, 2011 8:49 AM
To: Rulemaking Comments
Subject: Comment on Distribution of Source Material to Exempt Persons and to General Licensees...
Attachments: NRC-2009-0084-DRAFT-0012.pdf

Van,

Attached for docketing is a comment from Marion Loomis on the above noted proposed rule that I received via the regulations.gov website on 2/14/11.

Thanks,
Carol

Received: from HQCLSTR01.nrc.gov ([148.184.44.76]) by TWMS01.nrc.gov
([148.184.200.145]) with mapi; Tue, 15 Feb 2011 08:49:40 -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: Tue, 15 Feb 2011 08:48:58 -0500
Subject: Comment on Distribution of Source Material to Exempt Persons and to
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Thread-Topic: Comment on Distribution of Source Material to Exempt Persons
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Thread-Index: AcvNFxhBg4c5zM+fSC2sZnbNov2Pfg==
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