SHINE™
Medical Technologies

July 1, 2014   SMT-2014-025

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

SHINE Medical Technologies, Inc. Request for Extension of the Public Comment Period on
10 CFR Parts 26 and 73, "Enhanced Security at Fuel Cycle Facilities; Special Nuclear Material
Transportation" (Docket ID NRC-2014-0118)

SHINE Medical Technologies, Inc. (SHINE) appreciates the opportunity to comment on the
NRC's draft regulatory basis to support rulemaking to amend portions of 10 CFR Parts 26
and 73 to strengthen physical protection of SNM at NRC-licensed facilities and in transit.

SHINE requests an extension of the period to comment on the draft regulatory basis for
10 CFR Parts 26 and 73 from 45 days to 120 days from the date of the Federal Register
Notice (79 FR 34641). Additional time is warranted for SHINE to adequately consider and
address the following questions regarding the draft regulatory basis:

- Is the NRC considering an appropriate approach for each objective described in the draft
  regulatory basis?
- Should implementing material attractiveness and its associated physical protection
  measures be "voluntary" or should it be "mandatory?"
- Given that the potentially revised regulations would be material-based rather than facility-
  based, are the potential regulatory changes sufficiently performance based to allow
  licensees of different facility types to effectively implement the potential physical protection
  performance objectives and strategies for the various categories of special nuclear material?
- Are there other regulatory problems within or related to the scope of the rulemaking efforts
  that the NRC should consider?
- What are the expected and/or unintentional impacts from the desired regulatory changes?

If you have any questions, please contact Mr. Jim Costedio, Licensing Manager,
at 608/210-1730.

Very truly yours,

R. Vann Bynum, Ph.D.
Chief Operating Officer
SHINE Medical Technologies, Inc.
Docket No. 50-608

cc: Project Manager, USNRC