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150,170 and 171

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Secretary  
US Nuclear Regulatory Commission  
Attn. Rulemakings and Adjudications Staff  
Washington, DC 20555-0001

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Re. RIN 3150-AH84

To whom it may concern,

This is in response to the proposed rule regarding the expanded definition of byproduct material. We fully support the proposed rulemaking. This should have been done a long time ago. It will make the regulation of radioactive material consistent regardless of its method of production. It will also make the regulation of radioactive material more consistent among different states. Many licensees have sites in multiple states. Mobile licensees, including medical licensees utilizing PET radiopharmaceuticals, cross many state lines. The inconsistencies currently in place require multiple licenses in some states and different license conditions in different states. This results in additional license fees, extra manpower to apply for and maintain multiple licenses plus the difficulties and confusion resulting from different license conditions in different states. The proposed rulemaking should ease these issues markedly.

Upon reviewing the proposed rulemaking, we do not see the need to make any changes for the final rule. We see no significant changes resulting in the agreement states other than a few definitions.

Sincerely,

  
David Close, CHP

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