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

DOCKETED
USNRC

January 6, 2011

January 10, 2011 (3:45 pm)

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

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Re: Comments to Proposed Rule to Physical Protection of Byproduct Material. Docket ID
NRC-2008-0120

Marshfield Clinic and Ministry St. Joseph's Hospital respectfully submit the comments below on
the above referenced proposed rule to Physical Protection of Byproduct Material.

Section 37.25(a)(6) requires credit history evaluation to include review and evaluation of all
information that is provided by a national credit-reporting agency about the individual's credit
history including financial responsibilities from countries other than the United States.

Marshfield Clinic and Ministry St. Joseph's Hospital respectfully disagree with conducting credit
history checks. What information from a credit history is relevant to approving whether an
employee is deemed trustworthy and reliable to have unescorted access? How do we interpret
and evaluate the credit history? Will there be guidelines on how to obtain this information from
other countries assuming credit histories are available and reliable? Would the cost of obtaining
such records truly justify the information that would be received? We believe not. Deeming an
individual unreliable and untrustworthy based off a credit history doesn't seem justifiable for a
patient care setting. During the difficult economic times over the past several years, a credit
history may not truly reflect a person's trustworthy and reliability status. Furthermore, we do not
perform credit checks on any other staff who also hold important roles in the organizations.
Marshfield Clinic and Ministry St. Joseph's Hospital disagree with the use of credit history
checks and believe they should be removed from the proposed rule.

Thank you for the opportunity to comment on the proposed rule changes.

Sincerely,

Ms. Paula Pritzel
Employment Manager
Marshfield Clinic

Mr. Layton Anderson
Director HR & Hospital Operations
Ministry St. Joseph's Hospital

Template = SECY-067

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MARSHFIELD
CLINIC

FAX

To:	U.S. Nuclear Reg. Commission	From:	Rachel Schreiber
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Re:		Date:	January 7, 2011
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