



Harry S. Palmin
President and CEO

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VIA EDGAR

Securities and Exchange Commission
Division of Corporation Finance
450 Fifth Street, N.W.
Washington, D.C. 20549

November 30, 2011

Re: Novelos Therapeutics, Inc.
Registration Statement on Form S-1 (File No. 333-175284)

Ladies and Gentlemen:

Pursuant to Rule 461(a) under the Securities Act of 1933, as amended, Novelos Therapeutics, Inc. (the "Company") hereby requests that the effectiveness of the Company's Registration Statement on Form S-1, as amended (File No. 333-175284) (the "Registration Statement"), be accelerated so that the Registration Statement will become effective at 4:30 p.m., Eastern time, on Wednesday, November 30, 2011, or as soon as practicable thereafter.

The Company acknowledges that:

- should the Commission or the staff, acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;
- the action of the Commission or the staff, acting pursuant to delegated authority, in declaring the filing effective, does not relieve the Company from its full responsibility for the adequacy and accuracy of the disclosure in the filing; and
- the Company may not assert staff comments and the declaration of effectiveness as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

Very truly yours,

Novelos Therapeutics, Inc.

By: /s/ Harry S. Palmin
Harry S. Palmin, President and CEO

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