



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

August 6, 2014

Ms. Ruth E. McBurney  
Executive Director  
Conference of Radiation Control  
Program Directors, Inc.  
Office of Executive Director  
1030 Burlington Lane, Suite 4B  
Frankfort, KY 40601

Dear Ms. McBurney:

We have reviewed the proposed revision to Part E, *Radiation Safety Requirements for Industrial Radiographic Operations*, of the Suggested State Regulations (SSR), received by our office on June 3, 2014. These regulations were reviewed by comparison to the equivalent U.S. Nuclear Regulatory Commission (NRC) rules in 10 CFR Part 34. We discussed our review of the regulations with Bruce Hirschler on August 5, 2014.

As a result of our review, we have four comments that have been identified in the enclosure. Please note that we have limited our review to regulations required for compatibility and/or health and safety. We have determined that if these regulations are revised, incorporating our comments and without other significant change, they would meet the compatibility and health and safety categories established in the Office of Federal and State Materials and Environmental Management Programs (FSME) Procedure [SA-200](#).

In performing our review of Part E, we examined the documents that were received by our office on June 3, 2014. Our staff identified that the documents titled "Draft SR-E," in redline/strikeout format, and "Draft SR-E w/o redline/strikeout," in "draft final" format, were not consistent. On June 6, 2014, a revised version of the redline/strikeout document was provided to NRC for review. This is the document that was reviewed by our office and for which our comments are based. Our staff noted that the revised redline/strikeout document was still not consistent with the "draft final" format of the document that had been submitted on June 3, 2014.

The Conference of Radiation Control Program Directors (CRCPD) will need to resubmit Part E to address changes necessary for the implementation of this amendment. We are not able to provide federal concurrence until the comments have been addressed.

We request that when you revise your regulations to address our comments, a copy of the "as published" regulations be provided to us for review. As requested in FSME Procedure [SA-201](#), "Review of State Regulatory Requirements," please highlight the location of any changes made by the CRCPD, in response to our comments and provide a copy to FSME.

R. McBurney

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If you have any questions regarding the comments, the compatibility and health and safety categories, or any of the NRC regulations used in the review, please contact Ms. Kathleen Schneider, State Regulation Review Coordinator, at (301) 415-2320 ([Kathleen.Schneider@nrc.gov](mailto:Kathleen.Schneider@nrc.gov)) or Dr. Janine F. Katanic, CHP, at (817) 200-1151 ([Janine.Katanic@nrc.gov](mailto:Janine.Katanic@nrc.gov)).

Sincerely,

***/RA/***

Laura A. Dudes, Director  
Division of Materials Safety and State Agreements  
Office of Federal and State Materials  
and Environmental Management Programs

Enclosure:  
Compatibility Comments

cc: Bruce Hirschler, CRCPD  
Joseph DeMan, PA  
Cheryl Rogers, WI

**COMPATIBILITY COMMENTS ON PROPOSED REVISION TO  
CRCPD PART E**

SSR SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
1	E.17	10 CFR 34.43(c)	N/A	B	<p><b>Training.</b></p> <p>E.17c.i. needs to include a reference to Part C, similar to E.17b.i., so that the compatible reference to 10 CFR 30.10 will be included in the instruction.</p> <p>E.17c.ii. allows for an oral or written examination for a radiographer's assistant whereas 10 CFR 34.43(c) specifies a written test. E.17c.ii. needs to delete the option for an oral examination.</p> <p>CRCPD SSR Part E, E.17, needs to make the above changes in order to meet the Compatibility Category B designation assigned to 10 CFR 34.43(c).</p>
2	E.23	10 CFR 34.53	N/A	C	<p><b>Posting.</b></p> <p>E.23. refers to "Part D.902" and "D.903" but should be corrected to reference "D.1902" and "D.1903," respectively.</p> <p>CRCPD SSR Part E, E.23., needs to make the above changes in order to meet the Compatibility Category C designation assigned to 10 CFR 34.53.</p>
3	E.37	10 CFR 34.89	N/A	C	<p><b>Location of documents and records.</b></p> <p>E.37b.x. Refers to Part D.1103 but there is no such reference in Part D. This should be corrected for the proper reference.</p> <p>CRCPD SSR Part E, E.37., needs to make the above change in order to meet the Compatibility Category C designation assigned to 10 CFR 34.89.</p>

SSR SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
4	E.38	10 CFR 34.101	N/A	C	<p><b>Notifications.</b></p> <p>E.38b. refers to “Part D.1203” but this is an incorrect reference. This should be corrected to be “Part D.2203” as the proper reference.</p> <p>CRCPD SSR Part E, E.38., needs to make the above change in order to meet the Compatibility Category C designation assigned to 10 CFR 34.101.</p>
The following comments are editorial in nature.					
1	E.3	10 CFR 34.3	N/A	N/A	<p><b>Definition: Pill.</b></p> <p>The definition of “pill” refers to the definition of “sealed source.” However, “sealed source” is not a definition in SR-E because it is located in SR-A. The definition of “pill” should be deleted or should reference the definition of “sealed source” in SR-A.</p>
2	E.3 E.8	10 CFR 34.3 10 CFR 34.23	N/A	B	<p><b>Definitions: Associated Equipment and Exposure Head. Locking of radiographic exposure devices, storage containers and source changers.</b></p> <p>The parenthetical in the 10 CFR 34.3 definitions of “Associated equipment” and “Exposure head” are included as footnotes in SR-E.</p> <p>The parentheticals in 10 CFR 34.23 are included as a footnotes in E.8a. and E.8b. in SR-E.</p> <p>The footnotes in the above provisions are denoted by an asterisk designation rather than a numerical designation. In accordance with the SSRCCR Style Manual, a numerical designation should be used for footnotes intended to be part</p>

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					of the regulations. The asterisk designations should be replaced by numerical designations since the intent of SR-E is for the footnotes to be part of the regulations.
3	E.5	10 CFR 34.13	N/A	C	<p><b>Specific licenses for industrial radiography</b></p> <p>Section E.5. contains two subsections identified as “c.” The section should be revised to re-annotate or otherwise correct the annotation of the subsections as appropriate.</p> <p>E.5m. contains a footnote denoted as “1” however there is no referenced footnote at the end of the page.</p>
4	E.3 E.5 E.15 E.17 E.19 E.39 E.40	10 CFR 34.3 10 CFR 34.13 10 CFR 34.41(c) 10 CFR 34.41(c) 10 CFR 34.46 N/A N/A	N/A	B N/A B B B N/A N/A	<p><b>Definitions: Lay-barge radiography, Offshore platform radiography, Radiographer’s assistant, Underwater radiography.</b></p> <p><b>Specific licenses for industrial radiography</b></p> <p><b>Conducting industrial radiographic operations</b></p> <p><b>Training</b></p> <p><b>Supervision of radiographer’s assistants</b></p> <p><b>Application and Examination</b></p> <p><b>Certification Identification Card</b></p> <p>The definitions for “Lay-barge radiography,” “Offshore platform radiography,” “Radiographer’s assistant,” and “Underwater radiography” each include a parenthetical “(for States who authorize this activity).”</p> <p>E.5l., related to underwater radiography, includes a parenthetical “(for States who authorize this activity).”</p> <p>E.5m., related to offshore and lay-barge radiography, does not include a</p>

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					<p>parenthetical reference but is also an optional provision.</p> <p>E.15c., related to lay-barge, offshore platform, and underwater radiography, includes a parenthetical “(for states who authorize this activity).”</p> <p>E.17c., related to radiographer’s assistants, includes a parenthetical “(for states who authorize this activity).”</p> <p>E.19., related to radiographer’s assistants, includes a parenthetical “(for states who authorize this activity).”</p> <p>E.39., related to application and examination for radiography certification, includes a parenthetical “(For States who authorize this activity).”</p> <p>E.40., related to radiographer Certification Identification cards, includes a parenthetical “(For States who authorize this activity).”</p> <p>In accordance with the SSRCR Style Manual, brackets are used to designate optional provisions. The entire provision of the above referenced definitions and regulations should be bracketed to denote that they are optional provisions.</p>
5	E.10	10 CFR 34.27	N/A	C	<p><b>Leak testing and replacement of sealed sources</b></p> <p>In E.10c., the unit becquerel is spelled incorrectly and the parenthetical (0.005 <math>\mu</math>Ci) was not changed to (0.005 microcuries), consistent with the remainder of SR-E.</p>
6	E.17	10 CFR 34.43	N/A	B	<p><b>Training</b></p> <p>The “or” at the end of E.17a.i. should be deleted since E.17a.ii. was deleted.</p>

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7	E.20	10 CFR 34.47	N/A	C	<p><b>Personnel monitoring</b></p> <p>In E.20e., there is an instance of “film badge or TLD” that was not changed to “personnel dosimeter” for consistency with the remainder of SR-E.</p> <p>In E.20g.ii., a closed parenthesis is missing after “500 mrem.”</p>