



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

September 16, 2016

Mr. Earl Fordham, Deputy Director
Office of Radiation Protection
Washington Department of Health
P.O. Box 47827
Olympia, WA 98504-7827

Dear Mr. Fordham:

We have reviewed the proposed revisions to the Washington Radiological Health Rules, received by our office on August 16, 2016. These regulations were reviewed by comparison to the equivalent U.S. Nuclear Regulatory Commission (NRC) rules and the requirements of Regulation Amendment Tracking System Identification Numbers (RATS IDs) 2015-3 and 2015-5 as identified in the enclosed State Regulation Status (SRS) Data Sheet. We discussed our review of the regulations with Curt Demaris on September 15, 2016.

As a result of our review, we have eight 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. Under our current procedure, a finding that the Washington regulations meet the compatibility and health and safety categories of the equivalent NRC regulation may only be made based on a review of the final Washington regulations. However, we have determined that if your proposed regulations were adopted, incorporating our comments and without other significant change, they would meet the compatibility and health and safety categories established in the Office of Nuclear Material Safety and Safeguards (NMSS) Procedure SA-200, "Compatibility Categories and Health and Safety Identification for NRC Regulations and Other Program Elements."

We request that when the proposed regulations are adopted and published as final regulations, a copy of the "as published" regulations be provided to us for review. As requested in NMSS Procedure SA-201, "Review of State Regulatory Requirements," please highlight the final changes, and provide a copy to Division of Material Safety, State, Tribal, and Rulemaking Programs, NMSS.

The SRS Data Sheet summarizes our knowledge of the status of other Washington regulations, as indicated. Please let us know if you note any inaccuracies, or have any comments on the information contained in the SRS Data Sheet. This letter, including the SRS Data Sheet, is posted on the NMSS State Communication Portal: <https://scp.nrc.gov/rulemaking.html>.

E. Fordham

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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 Michelle Beardsley, State Regulation Review Coordinator, at (267) 884-2305 (Michelle.Beardsley@nrc.gov).

Sincerely,

/RA/

PMichalak for PHenderson

Pamela J. Henderson, Deputy Director
Division of Material Safety, State, Tribal
and Rulemaking Programs
Office of Nuclear Material Safety
and Safeguards

Enclosures:

1. Compatibility Comments
2. Washington SRS Data Sheet

COMPATIBILITY COMMENTS ON WASHINGTON PROPOSED REGULATIONS

STATE SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
1	246-231-010(9)	71.4	2015-3	[B]	<p>Definition: Contamination</p> <p>Washington's proposed definition of "contamination" states: <i>"Contamination</i> means the presence of a radioactive substance on a surface in quantities in excess of 0.4 Bq/cm² (1x10⁻⁵ μCi/cm²) for beta and gamma emitters and low toxicity alpha emitters, or 0.04 Bq/cm² (1.10x10⁻⁶ μCi/cm²) for all other alpha emitters". 10 CFR 71.4 states "1x 10⁻⁶".</p> <p>Washington needs to correct their definition of "contamination" as indicated above in order to meet the Compatibility Category [B] designation assigned to 10 CFR 71.4.</p>

STATE SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
2	246-231-010(18)	71.4	2015-3	[B]	<p>Definition: Low Specific Activity (LSA) material</p> <p>Washington’s proposed definition of “Low Specific Activity material” state:</p> <p>“(a) LSA-I. (i) Uranium and thorium ores, concentrates of uranium and thorium ores, and other ores containing naturally occurring radionuclides that are not intended to be processed for the use of these radionuclides; or”.</p> <p>10 CFR 71.4 states, “...are intended to be processed for the use of these radionuclides;”.</p> <p>Washington needs to delete the words “not” and “or” in their definition of “Low Specific Activity materials” as indicated above in order to meet the Compatibility Category [B] designation assigned to 10 CFR 71.4.</p>
3	246-231-040(4)	71.14(a)(1) – (a)(3)	2015-3	[B]	<p>Exemption for low-level materials</p> <p>Washington’s regulations do not reference Table A-3.</p> <p>Washington needs to include a reference to Table A-3 in order to meet the Compatibility Category [B] designation assigned to 10 CFR 71.14(a)(1) – (a)(3).</p>
4	246-231-136(1)(a)	71.91(b)	2015-3	NRC	<p>Reports</p> <p>Washington’s regulations include this</p>

STATE SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
					<p>requirement. As 10 CFR 71.91(b) is reserved to the NRC, it should not be adopted by the States.</p> <p>Washington needs to delete this requirement from their regulations in order to meet the Compatibility Category NRC designation assigned to 10 CFR 71.91(b).</p>
5	246-231-136 (3)	71.91(c) and (d)	2015-3	C	<p>Records</p> <p>Washington's proposed regulation does not include having records required by this part available for inspection to their department in addition to the NRC.</p> <p>Washington needs to include their department as indicated above in 246-231-136 (3), in order to meet the Compatibility Category C designation assigned to 10 CFR 71.91(c) and (d).</p>
6	246-231-200 Appendix A	Part 71 Appendix A	2015-3	[B]	<p>Determination of A1 and A2</p> <p>Washington's proposed regulations in Section 246-231-200 (4)(d) and (e) state:</p> <p>"...where f(i) is the fraction of activity for radionuclide I in the mixture and A₁ . A₂(i) is the appropriate A₁ , A₂ for radionuclide I". 10 CFR 71, Appendix A, has a lower case "i" in both of those places.</p> <p>Washington needs to correct both 4(d) and (e) as indicated above in order to meet the Compatibility Category [B] designation assigned to 10 CFR 71, Appendix A.</p>

STATE SECTION		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
7	246-231-200 Table A-1	Part 71, Appendix A Table A-1	2015-3	[B]	<p>A1 and A2 Values for Radionuclides</p> <p>Washington's proposed regulations in Table A-1 contain the following errors:</p> <ol style="list-style-type: none"> For Cf-252 the A₁(TBq) value should be 1.0x10⁻¹, not 1.0x10, and the A₂ (Ci) value should be 8.1x10⁻², not 8.1x10; For Kr-79, the A₁(Ci) value should be 1.1x10², not 1.0x10², and the TBq/g value should be 4.2x10⁴, not 4.2x10¹ Does not contain the footnote: "A₂ = 0.74 TBq (20 Ci) for Mo-99 for domestic use". <p>Washington needs to make the corrections to Table A-1 as indicated above in order to meet the Compatibility Category [B] designation assigned to 10 CFR 71, Appendix A, Table A-1.</p>
8	246-231-200 Table A-3	Part 71 Appendix A Table A-3	2015-3	[B]	<p>General Values for A1 and A2</p> <p>Washington's proposed regulations in Table A-3 omit the footnote notation (i.e., "a") in the "Contents" column, first row.</p> <p>Washington needs to add the footnote notation as noted above in order to meet the Compatibility Category [B] designation assigned to 10 CFR 71, Appendix A, Table A-3.</p>

**EDITORIAL/TYPOGRAPHICAL COMMENTS
ON WASHINGTON PROPOSED REGULATIONS**

246-231-010(18)	71.4	2015-3	<p>Definition-Low Specific Activity Material</p> <p>WA regulations (2)(ii) state : "activity does not exceed 1E-4 A2/g for solids and gases, and</p>
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			<p>1E-5 A2/g for liquids” regulations state: “activity does not exceed 10⁻⁴ A2/g for solids and gases, and 10⁻⁵ A2/g for liquids.”</p> <p>Although the quantity is the same, the format is inconsistent from NRC regulations and throughout Washington’s regulations as well.</p> <p>Washington omits the word “of” in its equivalent regulation to 71.4(3).</p>
246-231-040(4)	71.14 (a)(1) – (a) (3)	2015-3	<p>Exemption for low-level materials</p> <p>Washington’s regulations say “concentrations”; should say “concentration”; they also say “purposed”, should say “purposes”.</p>
246-231	Part 71	2015-3	<p>Washington does not capitalize the term “Certificate of Compliance” throughout their equivalent regulations to Part 71.</p> <p>Washington should capitalize the term “Certificate of Compliance” where applicable.</p> <p>Washington’s regulations interchange the use of the term “licensee” and “certificate holder” in 246-231-106. Washington should use one term consistently throughout its regulations.</p>
246-231-150(1)	71,101(a)	2015-3	<p>Quality assurance requirements</p> <p>Washington’s regulations in</p>

			<p>150(1) say “apply”, should say “applying”.</p> <p>Washington’s regulations say “subpart” however they are by chapters. Washington should use the term “chapter” to be consistent with the format of their regulations.</p>
246-231-174	71.106	2015-3	<p>Changes to quality assurance program</p> <p>In Washington’s equivalent regulations to 71.106(b)(2), they say “titles”, should say “title”.</p>

STATE REGULATION STATUS

State: Washington

Tracking Ticket Number: 16-86

Date: xx/xx/2016

[2 amendment(s) reviewed identified by a *at the beginning of the equivalent NRC requirement.]

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1991-1	Safety Requirements for Radiographic Equipment Part 34 55 FR 843 (Superceded by 1997-5)	01/10/1994	Final	No Comments 07/14/1998	Washington has adopted Final Regulations equivalent to RATS ID: 1997-5.
1991-2	ASNT Certification of Radiographers Part 34 56 FR 11504 (Superceded by 1997-5)	none	Not Required	Not Required	Washington has adopted Final Regulations equivalent to RATS ID: 1997-5.
1991-3	Standards for Protection Against Radiation Part 20 56 FR 23360; 56 FR 61352; 57 FR 38588; 57 FR 57877; 58 FR 67657; 59 FR 41641; 60 FR 20183	01/01/1994	Final	No Comments 06/03/1998 12/15/1998	
1991-4	Notification of Incidents Parts 20, 30, 31, 34, 39, 40 and 70 56 FR 64980	10/15/1994	Final	No Comments 08/30/1999	
1992-1	Quality Management Program and Misadministrations Part 35 56 FR 34104 (Superceded by 2002-2)	01/27/1995	Final	No Comments 06/29/1999	Washington has adopted Final Regulations equivalent to RATS ID: 2002-2.

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1992-2	Eliminating the Recordkeeping Requirements for Departures from Manufacturer's Instructions Parts 30 and 35 57 FR 45566	none	Not Required	Not Required	These regulation changes are not required to be adopted for purposes of Compatibility.
1993-1	Decommissioning Recordkeeping and License Termination: Documentation Additions [Restricted areas and spill sites] Parts 30 and 40 58 FR 39628	10/25/1996	Final	No Comments 05/28/1997	
1993-2	Licensing and Radiation Safety Requirements for Irradiators Part 36 58 FR 7715	07/01/1996	Not Applicable ⁱ	Not Applicable	Washington does not have any licensees subject to these regulations. (See SECY-95-112)
1993-3	Definition of Land Disposal and Waste Site QA Program Part 61 58 FR 33886	07/22/1996	Final	No Comments 10/13/1998	
1994-1	Self-Guarantee as an Additional Financial Mechanism Parts 30, 40 and 70 58 FR 68726; 59 FR 1618	none	Not Required	Not Required	These regulation changes are not required to be adopted for purposes of Compatibility.
1994-2	Uranium Mill Tailings Regulations: Conforming NRC Requirements to EPA Standards Part 40 59 FR 28220	07/01/1997	Final	No Comments 10/13/1998	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1994-3	Timeliness in Decommissioning Material Facilities Parts 30, 40 and 70 59 FR 36026	08/15/1997	Final	No Comments 05/28/1997	
1995-1	Preparation, Transfer for Commercial Distribution, and Use of Byproduct Material for Medical Use Parts 30, 32 and 35 59 FR 61767; 59 FR 65243; 60 FR 322	01/01/1998	Final	No Comments 06/29/1999	
1995-2	Frequency of Medical Examinations for Use of Respiratory Protection Equipment Part 20 60 FR 7900	03/13/1998	Final	No Comments 06/29/1999	
1995-3	Low-Level Waste Shipment Manifest Information and Reporting Parts 20 and 61 60 FR 15649; 60 FR 25983	03/01/1998	Final	No Comments 10/13/1998	
1995-4	Performance Requirements for Radiography Equipment Part 34 60 FR 28323 (Superceded by 1997-5)	06/30/1998	Final	No Comments 07/26/1999	Washington has adopted Final Regulations equivalent to RATS ID: 1997-5.
1995-5	Radiation Protection Requirements: Amended Definitions and Criteria Parts 19 and 20 60 FR 36038	08/14/1998	Final	No Comments 06/15/2000	

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1995-6	Clarification of Decommissioning Funding Requirements Parts 30, 40 and 70 60 FR 38235	11/24/1998	Final	No Comments 07/26/1999	
1995-7	Medical Administration of Radiation and Radioactive Materials Parts 20 and, 35 60 FR 48623 (Superseded by 2002-2 and 2005-2)	10/20/1998	Final	No Comments 06/29/1999	Washington has adopted Final Regulations equivalent to RATS IDs: 2002-2 and 2005-2.
1996-1	Compatibility with the International Atomic Energy Agency Part 71 60 FR 50248; 61 FR 28724 (Superseded by 2004-1)	04/01/1999	Final	No Comments 10/25/1999	Washington has adopted Final Regulations equivalent to RATS ID: 2004-1.
1996-2	One Time Extension of Certain Byproduct, Source and Special Nuclear Materials Licenses Parts 30, 40 and 70 61 FR 1109	02/15/1999	Not Required	Not Required	These regulation changes are not required to be adopted for purposes of Compatibility.
1996-3	Termination or Transfer of Licensed Activities: Record keeping Requirements Parts 20, 30, 40, 61 and 70 61 FR 24669	06/17/1999	Final	No Comments 10/25/1999	
1997-1	Resolution of Dual Regulation of Airborne Effluents of Radioactive Materials; Clean Air Act Part 20 61 FR 65120	01/9/2000	Final ML062960292	No Comments 11/28/2006 ML063250177	

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1997-2	Recognition of Agreement State Licenses in Areas Under Exclusive Federal Jurisdiction Within an Agreement State Part 150 62 FR 1662	02/27/2000	Final	No Comments 10/25/1999	
1997-3	Criteria for the Release of Individuals Administered Radioactive Material Parts 20 and 35 62 FR 4120	05/29/2000	Final	No Comments 06/29/1999	
1997-4	Fissile Material Shipments and Exemptions Part 71 62 FR 5907 (Superceded by 2004-1)	02/10/2000	Not Required	Not Required	These regulation changes are not required to be adopted for purposes of Compatibility. (See STP-97-078)
1997-5	Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiography Operations Parts 30, 34, 71 and 150 62 FR 28947	06/27/2000	Final	No Comments 06/15/2000	
1997-6	Radiological Criteria for License Termination Parts 20, 30, 40 and 70 62 FR 39057	08/20/2000	Final	No Comments 06/09/2000	
1997-7	Exempt Distribution of a Radioactive Drug Containing One Micro curie of Carbon-14 Urea Part 30 62 FR 63634	01/02/2001	Final ML012770299	No Comments 02/22/2002 ML020570410	

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1998-1	Deliberate Misconduct by Unlicensed Persons Parts 30, 40, 61, 70, 71 and 150 63 FR 1890; 63 FR 13773	02/12/2001	Final ML012770299	No Comments 02/22/2002 ML020570410	
1998-2	Self-Guarantee of Decommissioning Funding by Nonprofit and Non-Bond-Issuing Licensees Parts 30, 40 and 70 63 FR 29535	07/01/2001	Not Required	Not Required	These regulation changes are not required to be adopted for purposes of Compatibility.
1998-3	License Term for Medical Use Licenses Part 35 63 FR 31604 (Superseded by 2002-2)	07/10/2001	Not Required	Not Required	These regulation changes are not required to be adopted for purposes of Compatibility. (See STP-98-074) Washington has adopted Final Regulations equivalent to RATS ID: 2002-2.
1998-4	Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiographic Operations Part 34 63 FR 37059	07/09/2001	Final	No Comments 06/15/2000	
1998-5	Minor Corrections, Clarifying Changes, and a Minor Policy Change Parts 20, 32, 35, 36 and 39 63 FR 39477; 63 FR 45393	10/26/2001	Final ML012770291	No Comments 02/22/2002 ML020570410	
1998-6	Transfer for Disposal and Manifests: Minor Technical Conforming Amendment Part 20 63 FR 50127	11/20/2001	Final	No Comments 07/28/1999	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1999-1	Radiological Criteria for License Termination of Uranium Recovery Facilities Part 40 64 FR 17506	06/11/2002	Final ML022410086	No Comments 09/17/2002 ML022630066	
1999-2	Requirements for Those Who Possess Certain Industrial Devices Containing Byproduct Material to Provide Requested Information Part 31 64 FR 42269	10/04/2002	Not Required	Not Required	These regulation changes are not required to be adopted for purposes of Compatibility.
1999-3	Respiratory Protection and Controls to Restrict Internal Exposure Part 20 64 FR 54543; 64 FR 55524	02/02/2003	Final ML012770291	No Comments 02/22/2002 ML020570410	
2000-1	Energy Compensation Sources for Well Logging and Other Regulatory Clarifications Part 39 65 FR 20337	05/17/2003	Final ML030830470	No Comments 04/18/2003 ML031110100	
2000-2	New Dosimetry Technology Parts 34, 36 and 39 65 FR 63750	01/08/2004	Final ML030830470	No Comments 04/18/2003 ML031110100	
2001-1	Requirements for Certain Generally Licensed Industrial Devices Containing Byproduct Material Parts 30, 31 and 32 65 FR 79162	02/16/2004	Final ML13345A414	No Comments 02/20/2014 ML13345A370	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2002-1	Revision of the Skin Dose Limit Part 20 67 FR 16298	04/05/2005	Final ML043510236	No Comments 12/29/2004 ML043650051	
2002-2	Medical Use of Byproduct Material Parts 20, 32 and 35 67 FR 20249	10/24/2005	Final ML061790303	No Comments 07/17/2006 ML061990221	
2003-1	Financial Assurance for Materials Licensees Parts 30, 40 and 70 68 FR 57327	12/03/2006	Final ML0707170180	No Comments 02/01/2007 ML070310005	
2004-1	Compatibility With IAEA Transportation Safety Standards and Other Transportation Safety Amendments Part 71 69 FR 3697	10/01/2007	Final ML101930066	No Comments 08/05/2010 ML102010129	
2005-1	Security Requirements for Portable Gauges Containing Byproduct Material Part 30 70 FR 2001	07/11/2008	Final ML071580618	No Comments 01/23/2008 ML080230413	
2005-2	Medical Use of Byproduct Material - Recognition of Specialty Boards Part 35 70 FR 16336; 71 FR 1926	04/29/2008	Final ML061790303	No Comments 07/17/2006 ML061990221	
2005-3	Increased Controls for Risk-Significant Radioactive Sources (NRC Order EA-05-090) 70 FR 72128	12/01/2005	License Condition ML053220233	No Comments 11/18/2005 ML053220464	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2006-1	Minor Amendments Parts 20, 30, 32, 35, 40 and 70 71 FR 15005	03/27/2009	Final ML101930066	No Comments 08/05/2010 ML102010129	
2006-2	National Source Tracking System - Serialization Requirements Part 32 with reference to Part 20 Appendix E 71 FR 65685	02/06/2007	Final ML090680060	No Comments 04/28/2009 ML090970038	
2006-3	National Source Tracking System Part 20 71 FR 65685, 72 FR 59162	01/31/2009	Final ML090680060	No Comments 04/28/2009 ML090970038	
2007-1	Medical Use of Byproduct Material - Minor Corrections and Clarifications Parts 32 and 35 72 FR 45147, 54207	10/29/2010	Final ML090680060	No Comments 04/28/2009 ML090970038	
2007-2	Exemptions From Licensing, General Licenses, and Distribution of Byproduct Material: Licensing and Reporting Requirements Parts 30, 31, 32 and 150 72 FR 58473	12/17/2010	Final ML13345A414 Revised Final ML14316A422 Revised Final ML15037A538	Comments 02/20/2014 ML13345A370 No Comments 12/19/2014 ML14316A106 No Comments 03/06/2015 ML15037A522	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2007-3	Requirements for Expanded Definition of Byproduct Material Parts 20, 30, 31, 32, 33, 35, 61 and 150 72 FR 55864	11/30/2010	Final ML12216A122	No Comments 09/05/2012 ML12228A415	
2007-4	Order Imposing Fingerprinting Requirements and Criminal History Records Check Requirements for Unescorted Access to Certain Radioactive Material NRC Order EA-07-305 72 FR 70901	06/05/2008	License Condition ML080430011	No Comments 02/26/2008 ML080560453	
2008-1	Occupational Dose Records, Labeling Containers, and Total Effective Dose Equivalent Parts 19 and 20 72 FR 68043	02/15/2011	Final ML13352A110	No Comments 01/23/2014 ML13352A103	
2009-1	Medical Use of Byproduct Material – Authorized User Clarification Part 35 74 FR 33901	09/28/2012	Final ML14062A117	No Comments 04/14/2014 ML14062A109	
2011-1	Decommissioning Planning Parts 20, 30, 40 and 70 76 FR 35512	12/17/2015	Proposed ML14316A422 Final ML15037A538	No Comments 12/19/14 ML14316A106 No Comments 03/06/2015 ML15037A522	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2011-2	Licenses, Certifications, and Approvals for Materials Licensees Parts 30, 36, 39, 40, 70 and 150 76 FR 56951	11/14/2014	Proposed ML14316A422 Final ML15037A538	No Comments 12/19/14 ML14316A106 No Comments 03/06/2015 ML15037A522	
2012-1	Change of Compatibility Parts 31.5 and 31.6 (See RATS ID: 2001-1 for Rule text) 77 FR 3640	01/25/2015	Final ML13345A414	No Comments 02/20/2014 ML13345A370	
2012-2	Advance Notification to Native American Tribes of Transportation of Certain Types of Nuclear Waste Part 71 77 FR 34194	08/10/2015	Final ML14062A117	No Comments 04/14/2014 ML14062A109	
2012-3	Technical Corrections Parts 30, 34, 40 and 71 77 FR 39899	08/06/2015	Proposed ML16125A484	No Comments 6/13/2016 ML16125A478	
2012-4	Requirements for Distribution of Byproduct Material Parts 30, 31, 32, 40 and 70 77 FR 43666	10/23/2015	Proposed ML16125A484	Comments 6/13/2016 ML16125A478	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2013-1	Physical Protection of Byproduct Material, 10 CFR Parts 20, 30, 32, 33, 34, 35, 36, 37, 39 and 71 78 FR 16922	03/19/2016	Proposed ML15252A335 Proposed ML16125A484	Comments 11/02/2015 ML15252A322 Comments 6/13/2016 ML16125A478	Part 37 only All Parts
2013-2	Distribution of Source Material to Exempt Persons and to General Licensees and Revision of General License and Exemptions, Parts 30, 40 and 70 78 FR 32310	08/27/2016	Proposed ML16125A484	Comments 6/13/2016 ML16125A478	
2015-1	Domestic Licensing of Special Nuclear Material – Written Reports and Clarifying Amendments Part 70 79 FR 57721, 80 FR 143	01/26/2018	Proposed ML16125A484	No Comments 6/13/2016 ML16125A478	
2015-2	Safeguards Information - Modified Handling Categorization, Change for Materials Facilities Parts 30, 37, 73 and 150 79 FR 58664, 80 FR 3865	01/28/2018	Proposed ML15273A326 Proposed ML16125A484	Comments 11/02/2015 ML15252A322 No Comments 6/13/2016 ML16125A478	Part 37 only All Parts

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
*2015-3	Revisions to Transportation Safety Requirements and Harmonization with International Atomic Energy Agency Transportation Requirements Part 71 80 FR 33987	07/13/2018	Proposed ML16230A483	Comments 09/16/2016 ML16230A481	
2015-4	Miscellaneous Corrections, Parts 37 and 40 80 FR 45841	09/02/2018	Proposed ML15273A326 Proposed ML16125A484	No Comments 11/02/2015 ML15252A322 Comment 6/13/2016 ML16125A478	Part 37 only All Parts
*2015-5	Miscellaneous Corrections, Parts 19, 20, 30, 32, 37, 40, 61, 70, 71 and 150 80 FR 74974	12/31/2018	Proposed ML16230A483	No Comments 09/16/2016 ML16230A481	
N/A	10 CFR Part 20.1003	N/A	Proposed ML13122A287	No Comments 01/12/2015 ML15007A232	

¹ IMPEP Team: verify that Washington does not have any licensees subject to these regulations during each review.