



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

March 19, 2024

Ronald J. Parsons, Manager
Tennessee Department of Environment
and Conservation
Division of Radiological Health
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243

**SUBJECT: TENNESSEE LEGALLY BINDING REQUIREMENTS FOR WASTE
PROCESSORS**

Dear Ronald Parsons:

We have reviewed the Tennessee legally binding requirements for waste processors for both standard and non-standard conditions received by our office on April 18, 2023. These requirements were compared to the equivalent U.S. Nuclear Regulatory Commission (NRC) rules as identified in the enclosed State Regulation Status (SRS) Data Sheet, the NRC's current list of standard license conditions, and specific NRC regulations. We discussed our review of the legally binding requirements with you on March 15, 2024.

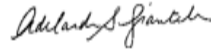
As a result of our review, we are providing four comments on the "standard license conditions" and "non-standard license conditions" identified in Enclosure 1. We have concluded that if these requirements are revised to incorporate our comments and no additional significant changes are made that these legally binding requirements 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."

In accordance with NMSS Procedure SA-201, Review of State Regulatory Requirements," a copy of the revised legally binding requirements should be provided to the NRC for review once the NRC's comments have been reviewed and addressed. When providing the updated document, please highlight any changes made in accordance with the guidance provided in SA-201.

The SRS Data Sheet in Enclosure 2 summarizes our knowledge of the status of other Tennessee 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: <https://www.nrc.gov/agreement-states>.

If you have any questions regarding the review, the compatibility and health and safety categories, or any of the NRC regulations used in the review, please contact my staff at AgreementStateRegs.Resource@nrc.gov.

Sincerely,



Signed by Giantelli, Adelaide
on 03/19/24

Adelaide S. Giantelli, Chief
State Agreement and Liaison Programs Branch
Division of Materials Safety, Security, State,
and Tribal Programs
Office of Nuclear Material Safety
and Safeguards

Enclosures:

1. Compatibility Comments
2. Tennessee SRS Data Sheet

COMMENTS ON TENNESSEE LEGALLY BINDING REQUIREMENTS FOR WASTE PROCESSORS

STANDARD LICENSE CONDITIONS	SUBJECT and COMMENTS
<p>1 35. The licensee is authorized to store containers which previously contained radioactive material (empty containers) outside of the in accordance with statements, representations, and procedures contained in application Each empty container in outside storage shall:</p> <ol style="list-style-type: none"> 1. Be emptied of contents as far as practical; 2. Contain no hazardous material or standing liquid; 3. Be in unimpaired condition and securely closed so that there will be no leakage under conditions normally incident to transportation or storage; 4. Have no external contamination in excess of the definition of contamination in 49 CFR 173.403; 5. Have no non-fixed external contamination in excess of 10% of the definition of contamination in 49 CFR 173.403; 6. Have no internal non-fixed contamination exceeding: Beta and gamma emitters 2200 dpm/cm² and low toxicity alpha emitters*; All other alpha emitters 220 dpm/cm² (* As defined by USDOT 49 CFR 173.403) 7. Have any labels previously applied removed, obliterated, or covered and an "Empty" label affixed; 8. Be stored on a paved (asphalt or concrete) surface; and 9. Be arranged such that the containers can be visually inspected on all sides. 	<p>This condition discusses the requirements of storage for "empty containers" which includes references to DOT regulations contained in Title 49 of the Code of Federal Regulations. However, DOT has a specific definition for empty packaging or containers (49 CFR 173.428), and while some of the requirements in this condition align with the DOT version, the contamination requirements are not in alignment. To avoid confusion and conflict with DOT regulations, Tennessee should either:</p> <ol style="list-style-type: none"> (a) refer directly to the DOT regulations regarding empty packaging. If Tennessee would like to provide more stringent requirements, the condition should clearly state that these requirements are in excess of the DOT requirement; or (b) use different terminology in the license condition that would not be confused with DOT regulations.
<p>2 37. No radioactive material or radioactive waste may be stored so as to exceed the following stacking limits: Container Type Stacking Limit</p> <ol style="list-style-type: none"> 1. Drums 3 high 2. B-25 Boxes 3 high 3. B-12 Boxes 5 high 4. Sea-Land Cont. 1 high 5. Intermodal containers 1 high 6. QC Boxes 2 high 7. Any other strong 10 feet nominal unless the natural height of the tight container exceeds 10 feet 	<p>This condition appears to define stacking limits for specific containers of radioactive material or radioactive waste. It is not clear whether the stacking limits are intended to be applied to containers being stored temporarily by the processor prior to performing disposal actions or for containers being stored permanently (or both). It is recommended that Tennessee provide additional clarity for this condition.</p>

	This condition also includes "waste radioactive material" generated under the authority of this license.
NON-STANDARD LICENSE CONDITIONS	SUBJECT AND COMMENTS
<p>3 3. The licensee is authorized to stage containers of radioactive material in areas not covered by financial assurance provided that no individual container is present for more than 12 hours. This authorization is for licensed material for future work, and licensed material that meets surface free release criteria as evidenced by survey. Except for surface contaminated material that meets free release criteria, waste shall be staged in closed containers on paved surfaces with no opening of containers or loading of wastes.</p>	<p>NRC financial assurance requirements are based on concentrations and/or quantities of materials possessed by the licensee. This requirement is not time or location dependent. This Condition appears to be granting an exemption from financial assurance requirements based on a time requirement for areas not covered by financial assurance.</p> <p>The NRC notes that Tennessee has the authority to grant exemptions, however, this needs to be performed on a case-by-case basis and should be clearly denoted as an exemption on the license. Additionally, a license exemption would need additional details that identify which areas are not covered by financial assurance and procedures to be used by the licensee to ensure that material will be safely maintained for less than 12 hours. A blanket license condition that financial assurance is only required for licensed material "present for more than 12 hours" is not compatible with NRC regulations.</p>
<p>4 10. Radioactive material, contaminated equipment, and empty radioactive material containers may be stored in accordance with statements representations, and procedures contained in documents referenced in conditions of this license, provided that radiation levels for unrestricted areas are not exceeded. This material must be stored in either locked DOT intermodal containers as described in Title 49 Code of Federal Regulations (CFR), Part 171.8 or DOT approved strong tight containers. In addition to these requirements the following criteria and restrictions must be adhered to whenever radioactive materials are stored:</p> <p>1. Containers used for outside storage of radioactive materials must be capable of withstanding environmental conditions. Wooden containers are not considered suitable for outside storage.</p>	<p>This condition mentions both "empty containers" and "DOT empty containers," Tennessee should use consistent terminology to avoid confusion.</p> <p>Additionally, the requirement in condition 10.2 that an empty container not exceed a hot spot activity of 2 mR/hr conflicts with 49 CFR 173.428 "Empty Class 7 (radioactive) materials packaging." Specifically, to be considered an empty package "the radiation level at any point on the external surface of the package does exceed 0.5 mrem/h."</p> <p>To prevent conflict with DOT requirements, Tennessee</p>

Materials received in wooden containers may remain outside for a period not to exceed fifteen (15) days, provided the containers are covered with a waterproof tarp so as to prevent the infiltration of rainwater. After 15 days the material must be moved inside or repackaged in a container suitable for outside storage.

2. Radiation levels from stored empty containers shall not exceed an average of 0.5 mR/hr, and hot spot activity shall not exceed 2 mR/hr.

3. Outside storage of containers with radioactive waste and/or DOT Empty containers is only permitted in paved (asphalt or concrete) areas. Storage on grass, dirt, or gravel of containers with radioactive waste and/or DOT Empty containers is specifically prohibited.

4. Soil samples must be collected and analyzed at least quarterly along the edges of outside asphalt or concrete pads where radioactive materials are stored and along the perimeter fence to ensure that there is no buildup of radioactive contamination. Data from these samples must be maintained for inspection by the Department.

5. Each designated outside storage area shall be equipped with identifiable markers (sign postings) at each corner to clearly identify the boundary. In addition, the space between these markers shall be painted on the surface of the asphalt/concrete or otherwise marked to further identify the storage areas.

6. EnergySolutions Empty containers (loose surface contamination levels less than 1000 dpm/100 cm² beta/gamma and less than 100 dpm/100 cm² alpha external and internal) are permitted to be stored on any surface (e.g. paved, grass, dirt, or gravel) within any area that is routinely monitored by the environmental sampling program for radioactivity within the licensed property.

The combined authorizations for storage under this license and R-73008-D24 shall be in accordance with the Bear Creek Operations Radioactive Material/Waste Container Storage Plan REV 12. The combined authorizations for storage granted by this license shall not exceed a total of 414,061.2 square feet.

should ensure license conditions are in alignment with DOT requirements or use different terminology.

This same condition was also provided as Condition 18.

STATE REGULATION STATUS

State: Tennessee

Tracking Ticket Number: 23-30

Date: March 19, 2024

[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	Not Required	Not Required	Tennessee 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	Tennessee has adopted Final Regulations equivalent to RATS ID: 1997-5.

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
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 ML062130090	No Comments 09/01/2006 ML062490270	
1991-4	Notification of Incidents Parts 20, 30, 31, 34, 39, 40 and 70 56 FR 64980	10/15/1994	Final	No Comments 12/02/1996	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1992-1	Quality Management Program and Misadministrations Part 35 56 FR 34104 (Superseded by 2002-2)	01/27/1995			
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 ML113550088	No Comments 02/03/2012 ML120090004	1997-current LBR adequate per MRB
1993-2	Licensing and Radiation Safety Requirements for Irradiators Part 36 58 FR 7715	07/01/1996	Not Applicable ¹	Not Applicable	Tennessee 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 12/02/1996	
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.

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1994-2	Uranium Mill Tailings Regulations: Conforming NRC Requirements to EPA Standards Part 40 59 FR 28220	07/01/1997	Not Applicable	Not Applicable	Tennessee does not have the authority to regulate this material under its Agreement.
1994-3	Timeliness in Decommissioning Material Facilities Parts 30, 40 and 70 59 FR 36026	08/15/1997	Final ML071560152	No Comments 07/11/2007 ML071920135	
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 ML020320229	No Comments 02/01/2002 ML020360223	
1995-2	Frequency of Medical Examinations for Use of Respiratory Protection Equipment Part 20 60 FR 7900	03/13/1998	Final ML020320229	No Comments 02/01/2002 ML020360223	
1995-3	Low-Level Waste Shipment Manifest Information and Reporting Parts 20 and 61 60 FR 15649; 60 FR 25983	03/01/1998	Final ML020320229	No Comments 02/01/2002 ML020360223	
1995-4	Performance Requirements for Radiography Equipment Part 34 60 FR 28323 (Superceded by 1997-5)	06/30/1998	Final ML020320229	No Comments 02/01/2002 ML020360223	Tennessee 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 ML020320229	No Comments 02/01/2002 ML020360223	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1995-6	Clarification of Decommissioning Funding Requirements Parts 30, 40 and 70 60 FR 38235	11/24/1998	Final ML113550088	No Comments 02/03/2012 ML120090004	
1995-7	Medical Administration of Radiation and Radioactive Materials Parts 20 and 35 60 FR 48623 (Superceded by 2002-2 and 2005-2)	10/20/1998	Final ML040980538	No Comments 05/06/2004 ML041270512	
1996-1	Compatibility with the International Atomic Energy Agency Part 71 60 FR 50248; 61 FR 28724 (Superceded by 2004-1)	04/01/1999	Final ML020320229	No Comments 02/01/2002 ML020360223	
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 ML113550088	No Comments 02/03/2012 ML120090004	
1997-1	Resolution of Dual Regulation of Airborne Effluents of Radioactive Materials; Clean Air Act Part 20 61 FR 65120	01/9/2000	Final ML020320229	No Comments 02/01/2002 ML020360223	
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 ML020320229	No Comments 02/01/2002 ML020360223	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1997-3	Criteria for the Release of Individuals Administered Radioactive Material Parts 20 and 35 62 FR 4120	05/29/2000	Final ML020320229	No Comments 02/01/2002 ML020360223	
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 ML020320229	No Comments 02/01/2002 ML020360223	
1997-6	Radiological Criteria for License Termination Parts 20, 30, 40 and 70 62 FR 39057	08/20/2000	Final ML113550088	No Comments 02/03/2012 ML120090004	
1997-7	Exempt Distribution of a Radioactive Drug Containing One Microcurie of Carbon-14 Urea Part 30 62 FR 63634	01/02/2001	Final ML020320229	No Comments 02/01/2002 ML020360223	
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 ML020320229	No Comments 02/01/2002 ML020360223	
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.

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
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)
1998-4	Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiographic Operations Part 34 63 FR 37059	07/09/2001	Final ML040980538	No Comments 05/06/2004 ML041270512	
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 ML062130094	No Comments 09/01/2006 ML062490270	
1998-6	Transfer for Disposal and Manifests: Minor Technical Conforming Amendment Part 20 63 FR 50127	11/20/2001	Final ML062130094	No Comments 09/01/2006 ML062490270	
1999-1	Radiological Criteria for License Termination of Uranium Recovery Facilities Part 40 64 FR 17506	06/11/2002	Not Applicable	Not Applicable	Tennessee does not have the authority to regulate this material under its Agreement.
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 ML062130094	No Comments 09/01/2006 ML062490270	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2000-1	Energy Compensation Sources for Well Logging and Other Regulatory Clarifications Part 39 65 FR 20337	05/17/2003	Final ML062130094	No Comments 09/01/2006 ML062490270	
2000-2	New Dosimetry Technology Parts 34, 36 and 39 65 FR 63750	01/08/2004	Final ML062130094	No Comments 09/01/2006 ML062490270	
2001-1	Requirements for Certain Generally Licensed Industrial Devices Containing Byproduct Material Parts 30, 31 and 32 65 FR 79162	02/16/2004	Final ML12255A011	No Comments 09/26/2012 ML12257A288	
2002-1	Revision of the Skin Dose Limit Part 20 67 FR 16298	04/05/2005	Final ML071560152	No Comments 07/11/2007 ML071920135	
2002-2	Medical Use of Byproduct Material Parts 20, 32 and 35 67 FR 20249	10/24/2005	Final ML100840107	No Comments 05/03/2010 ML100980120	
2003-1	Financial Assurance for Materials Licensees Parts 30, 40 and 70 68 FR 57327	12/03/2006	Legally binding requirement ML101580029	No Comments 08/18/2010 ML102010156	
2004-1	Compatibility With IAEA Transportation Safety Standards and Other Transportation Safety Amendments Part 71 69 FR 3697	10/01/2007	Final ML113550088	No Comments 02/03/2012 ML120090004	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2005-1	Security Requirements for Portable Gauges Containing Byproduct Material Part 30 70 FR 2001	07/11/2008	Final ML113550096 License Condition ML081260292	No Comments 02/03/2012 ML120090004 No Comments 05/13/2008 ML081340237	
2005-2	Medical Use of Byproduct Material - Recognition of Specialty Boards Part 35 70 FR 16336; 71 FR 1926	04/29/2008	Final ML100840107	No Comments 05/03/2010 ML100980120	
2005-3	Increased Controls for Risk-Significant Radioactive Sources (NRC Order EA-05-090) 70 FR 72128	12/01/2005	License Condition ML052590043	No Comments 09/19/2005 ML052630474	
2006-1	Minor Amendments Parts 20, 30, 32, 35, 40 and 70 71 FR 15005	03/27/2009	Final ML100840107	No Comments 05/03/2010 ML100980120	
2006-2	National Source Tracking System - Serialization Requirements Part 32 with reference to Part 20 Appendix E 71 FR 65685	02/06/2007	Not Applicable ¹	Not Applicable	Tennessee does not have any licensees subject to these regulations.
2006-3	National Source Tracking System Part 20 71 FR 65685, 72 FR 59162	01/31/2009	Final ML100840107 License Condition ML082880040	No Comments 05/03/2010 ML100980120 No Comments 10/21/2008 ML082880288	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2007-1	Medical Use of Byproduct Material - Minor Corrections and Clarifications Parts 32 and 35 72 FR 45147, 54207	10/29/2010	Final ML100840107	No Comments 05/03/2010 ML100980120	
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 ML113550096	No Comments 02/03/2012 ML120090004	
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 ML113550096	No Comments 02/03/2012 ML120090004	
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 ML080840479	No Comments 04/14/2008 ML081050443	
2008-1	Occupational Dose Records, Labeling Containers, and Total Effective Dose Equivalent Parts 19 and 20 72 FR 68043	02/15/2011	Final ML113550096	No Comments 02/03/2012 ML120090004	
2009-1	Medical Use of Byproduct Material – Authorized User Clarification Part 35 74 FR 33901	09/28/2012	Final ML113550096	No Comments 02/03/2012 ML120090004	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2011-1	Decommissioning Planning Parts 20, 30, 40 and 70 76 FR 35512	12/17/2015	Proposed ML15149A063 Final ML17285A382	Comments 07/01/2015 ML15149A061 Comments 11/27/2017 ML17285A381	
2011-2	Licenses, Certifications, and Approvals for Materials Licensees Parts 30, 36, 39, 40, 70 and 150 76 FR 56951	11/14/2014	Proposed ML14059A053 Final ML16074A346	No Comments 04/30/2014 ML14059A044 No Comments 04/08/2016 ML16074A342	
2012-1	Change of Compatibility of Parts 31.5 and 31.6 (See RATS ID: 2001-1 for Rule text) 77 FR 3640	01/25/2015	Final ML12255A011	No Comments 09/26/2012 ML12257A288	
2012-2	Advance Notification to Native American Tribes of Transportation of Certain Types of Nuclear Waste Part 71 77 FR 34194	08/10/2015	Proposed ML14059A053 Final ML16047A346	Comments 04/30/2014 ML14059A044 Comment 04/08/2016 ML16047A342	
2012-3	Technical Corrections Parts 30, 34, 40 and 71 77 FR 39899	08/06/2015	Proposed ML14059A053 Final ML16047A346	No Comments 04/30/2014 ML14059A044 No Comments 04/08/2016 ML16047A342	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2012-4	Requirements for Distribution of Byproduct Material Parts 30, 31, 32, 40 and 70 77 FR 43666	10/23/2015	Proposed ML15118A549 Final ML17285A382	Comments 06/18/2015 ML15118A549 Comments 11/27/2017 ML17285A381	
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 ML15230A076 Proposed License Condition ML15292A555 Final ML17285A382	Comments 09/21/2015 ML15230A069 No Comments 11/03/2015 ML15292A553 No Comments 11/27/2017 ML17285A381	Part 37 only
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	Final ML17244A699	Comments 10/25/2017 ML17244A677	
2015-1	Domestic Licensing of Special Nuclear Material – Written Reports and Clarifying Amendments Part 70 79 FR 57721, 80 FR 143	01/26/2018	Final ML17244A699	No Comments 10/25/2017 ML17244A677	
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	Final ML17244A699	No Comments 10/25/2017 ML17244A677	

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	Final ML17244A699	Comments 10/25/2017 ML17244A677	
2015-4	Miscellaneous Corrections, Parts 37 and 40 80 FR 45841	09/02/2018	Final ML17244A699	Comments 10/25/2017 ML17244A677	
2015-5	Miscellaneous Corrections, Parts 19, 20, 30, 32, 37, 40, 61, 70, 71 and 150 80 FR 74974	12/31/2018	Final ML17244A699	Comments 10/25/2017 ML17244A677	
2018-1	Medical Use of Byproduct Material – Medical Event Definitions, Training and Experience, and Clarifying Amendments, 10 CFR Parts 30, 32 and 35	01/14/2022	Proposed ML21300A321	Comments 11/16/2021 ML21300A267	
2018-2	Miscellaneous Corrections - Organizational Changes 10 CFR Parts 37, 40, 70 and 71	12/21/2021	Proposed ML21300A321	Comments 11/16/2021 ML21300A267	
2018-3	Miscellaneous Corrections 10 CFR Parts 1, 2, 34, 37, 50, 71, 73, and 140	07/30/2022	Proposed ML21300A321	Comments 11/16/2021 ML21300A267	
2019-1	Miscellaneous Corrections 10 CFR Parts 2, 21, 37, 50, 52, 73, and 110	12/18/2022	Proposed ML21300A321	No Comments 11/16/2021 ML21300A267	
2019-2	Organizational Changes and Conforming Amendments 10 CFR Parts 1, 2, 37, 40, 50, 51, 52, 55, 71, 72, 73, 74, 100, 140, and 150	12/30/2022	Proposed ML21300A321	No Comments 11/16/2021 ML21300A267	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2020-1	Individual Monitoring Devices 10 CFR Parts 34, 36, and 39	06/16/2023	Proposed ML21300A321	Comments 11/16/2021 ML21300A267	
2020-2	Social Security Number Fraud Prevention 10 CFR Parts 9 and 35	08/17/2023	Proposed ML21300A321	No Comments 11/16/2021 ML21300A267	
2020-3	Miscellaneous Corrections 10 CFR Parts 1, 2, 19, 20, 21, 30, 34, 35, 40, 50, 51, 52, 60, 61, 62, 63, 70, 71, 72, 73, 74, 75, 76, 110, and 140	11/16/2023	Proposed ML21300A321	No Comments 11/16/2021 ML21300A267	
2021-1	Miscellaneous Corrections 10 CFR Parts 2, 11, 20, 25, 32, 35, 37, 50, 52,55, 70, 72, 73, 95, and 110	09/08/2024	Final ML23191A873	No Comments 08/11/2023 ML23191A869	
2021-2	Miscellaneous Corrections 10 CFR Parts 9, 37, 40, 50, 51, 52, 55, 71, 73, and 110	12/30/2024	Final ML23191A873	No Comments 08/11/2023 ML23191A869	
2022-1	Miscellaneous Corrections 10 CFR 1, 2, 20, 30, 40, 50, 55, 70, 73, and 170	none			Provisions are not required for compatibility.
2022-2	Miscellaneous Corrections 10 CFR Parts 20, 35, 50, 51, 52, 72, 73, 110, and 150	none			Provisions are not required for compatibility.
NA	Legally Binding Requirement providing an exemption from Tennessee "State Regulations for Protection Against Radiation" 0400-20-07-.34(1)	NA	Proposed ML23103A336	Comments 06/23/2023 ML23103A318	
NA	Other provisions not associated with a RATS ID	NA	Final ML23191A873	No Comments 08/11/2023 ML23191A869	
* NA	Legally Binding Requirements for waste processors for both standard and non-standard conditions	NA	Proposed ML23123A146	Comments 03/19/2024 ML23123A139	

TENNESSEE LEGALLY BINDING REQUIREMENTS FOR WASTE PROCESSORS DATE March 20, 2024

DISTRIBUTION: DIR RF 23-30, SP 05

TC Clark, NMSS/MSST

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AGiantelli, NMSS/MSST/SMPB

ABolger, R-IV/DNMS/MIB

SSahle, NMSS/REFS/RRPB

ADAMS Accession No.: ML23304A254

OFFICE	R-IV/DNMS/MIB	NMSS/REFS/RRPB	NMSS/MSST/SMPB	
NAME	ABolger	ABSSahle	SSAGiantelli	AG
DATE	Mar 19, 2024	Mar 19, 2024	Mar 19, 2024	

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