

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 2, 2015

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 regulations WAC 246-237, received by our office on September 2, 2015. These regulations were reviewed by comparison to the equivalent U.S. Nuclear Regulatory Commission (NRC) rules and the requirements of the three amendments identified in the enclosed State Regulation Status (SRS) Data Sheet. We discussed our review of the regulations with you on November 2, 2015.

As a result of our review, we have ten comments that are related to compatibility and three comments that are not related to compatibility but should be addressed. These 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.

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 (610) 337-6942 (Michelle.Beardsley@nrc.gov) or Lizette Roldán-Otero, Ph.D. at (817) 200-1596 (Lizette.Roldan@nrc.gov).

Sincerely,

/RA/ LDimmick for CEinberg

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

E. Fordham -2-

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

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<u>DISTRIBUTION</u>: SP 08 DIR RF 15-70 Randy Erickson, RSAO Washington File

OFFICE	ASPB	ASPB	OGC	ASPB:BC	MSTR:DD
NAME	LRoldán-Otero	MBeardsley	IIrvin for	LDimmick for	LDimmick for
			JOImstead	CEinberg	PHenderson
DATE	9/30/15	9/30/15	11/2/15	11/02/15	11/02/15

ML15274A349 OFFICIAL RECORD COPY Package ML 15252A322

COMPATIBILITY COMMENTS ON WASHINGTON PROPOSED REGULATIONS

STA	TE SECTION	NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
1	246-237- 023(4), (5), & (7)	37.23(d), (e), & (g)	2013-1	В	Determination bases for access authorization program requirements WA needs to replace the word "section" with the word "chapter" in 246-237-023(4), (5), and (7). WA needs to make the above changes in order to meet the Compatibility Category B designation assigned to 10 CFR 37.23(d), (e), & (g).
2	246-237- 029(1)(j)	37.29(a)(10)	2013-1 2015-2	В	Relief from fingerprinting, identification, and criminal history records checks and other elements of background investigations for designated categories of individuals permitted unescorted access to certain radioactive materials WA omits the phrase "category 1 and" in the middle of the sentence for this regulation. WA needs to include this phrase in Section 246-237-029(1)(j) as follows: "Commercial vehicle drivers for road shipments of category 1 and category 2 quantities of radioactive material;" WA needs to revise Section 246-237-029(1)(j) as indicated above in order to meet the Compatibility Category B designation assigned to 10 CFR 37.29(a)(10).
3	246-237- 043(4)(a) – (h)	37.43 (d)(1) – (8)	2013-1	С	General security program requirements, protection of information. WA included the words "Except as provided in WAC 246-237-043(4)(i)" at the beginning of the section. The reference is to 37.43(d)(9) which was removed in 2015-2.

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SIA	TE SECTION	NRC SECTION	RATS ID	CATEGORY	WA needs to remove the words indicated above in order to meet the Compatibility Category C designation assigned to 10 CFR 37.43.
4	246-237- 043(4)(i)	37.43(d)(9)	2015-2	NRC	General security program requirements WAC 246-237-043(4)(i) is equivalent to 37.43(d)(9) which prior to being removed from NRC regulations was a Compatibility Category NRC. WA needs to remove WAC 246-237-043(4)(i) from its regulations, and the reference to the aforementioned regulation in WAC 246-237-043(4)(a). WA needs to remove the regulation and reference to the regulation as indicated above in order to meet the Compatibility Category NRC designation assigned to 10 CFR 37.43(d)(9).
5	246-237- 071(1)-(3)	37.71, (a)-(c)	2013-1	В	Additional requirements for transfer of category 1 and category 2 quantities of radioactive material WA eliminated the language "instead of those listed in § 30.34(d) of this chapter." WA has adopted a similar provision at 246-232-080(4) and should insert it at that location. WA needs to insert the language "instead of those listed in 246-232-080(4) of this chapter" in order to meet the Compatibility Category B designation assigned to 10 CFR 37.71.
6	246-237- 075(1)-(4)	37.75(a)-(d)	2013-1	В	Preplanning and coordination of shipment of category 1 or category 2 quantitie sof radioactive material Section 246-237-075(4) WA needs to replace the words "paragraph (1)" for "paragraph (2)".

STA	TE SECTION	NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
					WA needs to replace the words indicated above in order to meet the Compatibility Category B designation assigned to 10 CFR 37.75(d)
7	246-237- 077(1)-(4)	37.77, (a)-(d)	2013-1	В	Advance notification of shipment of category 1 quantities of radioactive material. WA needs to update its regulations in section 246-237-077(1)(a) to revise the address for the request of the contact information address in the third sentence to "Director, Division of Material Safety, State, Tribal and Rulemaking Programs, Office of Nuclear Material Safery and Safeguards, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001." WA needs to make this update in order to meet the Compatibility
					Category B designation assigned to 10 CFR 37.77.
8	246-237-057	37.57	2013-1	С	Reporting of events WA eliminates the reference to 10 CFR 37.7 concerning contact with the NRC. WA needs to include a reference to 10 CFR 37.7 concerning reporting to
					NRC in order to meet the Compatibility Catagory C designation assigned to 10 CFR 37.57.
9	246-237- 081(7) and (8)	37.81(g) and (h)	2013-1	С	Reporting of events WA eliminates the reference to 10 CFR 37.7 concerning contact with the NRC. WA needs to include a reference to 10 CFR 37.7 concerning reporting to NRC in order to meet the Compatibility Catagory C designation
10	246-237-077	37.77(f)	2015-2	С	assigned to 10 CFR 37.81. Advance notification of shipment

STA	TE SECTION	NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
					of category 1 quantities of radioactive material.
					WA regulations do not contain an equivalent to 10 CFR 37.77(f).
					WA needs to revise its regulations to include an equivalent regulation to 10 CFR 37.77(f) in order to meet the Compatibility Catagory C designation assigned to 10 CFR 37.77.
					NOTE: This regulation (10 CFR 37.77(f)) was amended and changed from Compatibility Category NRC to Compatibility Catogory C as part of RATS ID 2015-2; see 79 FR 58664

COMMENTS NOT RELATED TO COMPATIBILITY

STA	TE SECTION	NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
1	246-237- 023(1)	37.23(a)	2013-1	В	Access authorization program requirements WA should consider moving 246-237-023(1)(a)(i) to 246-237-023(1)(b) to maintain consistent regulatory structure.
2	246-237- 029(2)	37.29(b)	2013-1	В	Relief from fingerprinting, identification, and criminal history records checks and other elements of background investigations for designated categories of individuals permitted unescorted access to certain radioactive materials WA lists the Customs and Border Protection's Free and Secure Trade (FAST) Program at 246-237-029(8). This should be moved in to 246-237-029(2)(f).
3	246-237- 073(5)	37.73(e)	2013-1	D	Applicability of physical protection of category 1 and category 2 quantities of radioactive material during transit WA added an incorrect reference at the end of the sentence "WAC 246-237-081(2), (4), (5), (7), and (8). The reference should be changed from (5) to (6).

STATE REGULATION STATUS

State: Washington Tracking Ticket Number: 15-70 Date: 11/02/2015

[3 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, 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.
1992-2	Eliminating the Recordkeeping Requirements for Departures from Manufacturer's Instructions Parts 30, 35 57 FR 45566	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
1993-1	Decommissioning Recordkeeping and License Termination: Documentation Additions [Restricted areas and spill sites] Parts 30, 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 ¹	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, 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	
1994-3	Timeliness in Decommissioning Material Facilities Parts 30, 40, 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, 35 59 FR 61767; 59 FR 65243; 60 FR 322	01/01/1998	Final	No Comments 06/29/1999	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
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, 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, 20 60 FR 36038	08/14/1998	Final	No Comments 06/15/2000	
1995-6	Clarification of Decommissioning Funding Requirements Parts 30, 40, 70 60 FR 38235	11/24/1998	Final	No Comments 07/26/1999	
1995-7	Medical Administration of Radiation and Radioactive Materials Parts 20, 35 60 FR 48623 (Superceded 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 (Superceded by 2004-1)	04/01/1999	Final	No Comments 10/25/1999	Washington has adopted Final Regulations equivalent to RATS ID: 2004-1.

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1996-2	One Time Extension of Certain Byproduct, Source and Special Nuclear Materials Licenses Parts 30, 40, 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, 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	
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, 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, 150 62 FR 28947	06/27/2000	Final	No Comments 06/15/2000	

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1997-6	Radiological Criteria for License Termination Parts 20, 30, 40, 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	
1998-1	Deliberate Misconduct by Unlicensed Persons Parts 30, 40, 61, 70, 71, 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, 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 (Superceded 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, 39 63 FR 39477; 63 FR 45393	10/26/2001	Final ML012770291	No Comments 02/22/2002 ML020570410	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
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	
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, 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, 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, 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, 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	
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	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
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, 150 72 FR 58473	12/17/2010	Final ML13345A414 Revised Final ML14316A422 Revised Final	Comments 02/20/2014 ML13345A370 No Comments 12/19/2014 ML14316A106 No Comments	
			ML15037A538	03/06/2015 ML15037A522	
2007-3	Requirements for Expanded Definition of Byproduct Material Parts 20, 30, 31, 32, 33, 35, 61, 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	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2008-1	Occupational Dose Records, Labeling Containers, and Total Effective Dose Equivalent Parts 19, 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, 70 76 FR 35512	12/17/2015	Proposed ML14316A422	No Comments 12/19/14 ML14316A106	
			Final ML15037A538	No Comments 03/06/2015 ML15037A522	
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	No Comments 12/19/14 ML14316A106	
	70 FR 30931		Final ML15037A538	No Comments 03/06/2015 ML15037A522	
2012-1	Change of Compatibility of 10 CFR 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	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2012-3	Technical Corrections Part 30, 34, 40 and 71 77 FR 39899	08/06/2015			
2012-4	Requirements for Distribution of Byproduct Material Parts 30, 31, 32, 40 and 70 77 FR 43666	10/23/2015			
*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	Comments 11/02/2015 ML15252A322	Part 37 only
2013-2	Distribution of Source Material to Exempt Persons and to General Licensees and Revision of General License and Exemptions, 10 CFR Parts 30, 40, and 70 78 FR 32310	08/27/2016			
2015-1	Domestic Licensing of Special Nuclear Material – Written Reports and Clarifying Amendments Part 70 79 FR 57721, 80 FR 143	01/26/2018			
*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	Comments 11/02/2015 ML15252A322	Part 37 only
2015-3	Revisions to Transportation Safety Requirements and Harmonization with International Atomic Energy Agency Transportation Requirements Part 71 80 FR 33987	07/13/2018			

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
*2015-4	Miscellaneous Corrections, Parts 37 and 40 80 FR 45841	09/02/2018	Proposed ML15273A326	No Comments 11/02/2015 ML15252A322	Part 37 only
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.