



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

April 4, 2001

Vick Cooper, Chief
Department of Health and Environment
Bureau of Air and Radiation
Forbes Field, Building 283
Topeka, KS 66620-0001

Dear Mr. Cooper:

A periodic meeting with Kansas was held on March 22, 2001. The purpose of this meeting was to review and discuss the status of Kansas' Agreement State Program. The NRC was represented by myself and Lloyd Bolling from the NRC's Office of State and Tribal Programs.

I have completed and enclosed a general meeting summary, including any specific actions that will be taken as a result of the meeting.

If you feel that our conclusions do not accurately summarize the meeting discussion, or have any additional remarks about the meeting in general, please contact me at (817) 860-8143 or e-mail VHC@NRC.GOV to discuss your concerns.

Sincerely,

A handwritten signature in black ink, reading "Vivian H. Campbell", is written over a horizontal line.

Vivian H. Campbell
Regional State Agreements Officer

Enclosures:

1. Agreement State Periodic Meeting Summary for Kansas
2. Section 5 of Kansas' 1998 Final IMPEP Report
3. Section 3 of Kansas' 1999 Follow-Up Final Report
4. Regulatory Assessment Tracking System Data Sheet

cc w/enclosures:
Paul Lohaus, Director, OSTP

AGREEMENT STATE PERIODIC MEETING SUMMARY FOR KANSAS

DATE OF MEETING: March 22, 2001

ATTENDEES:

NRC

Vivian Campbell, Regional State Agreements Officer
Lloyd Bolling, Office of State and Tribal Programs

State of Kansas

Vick Cooper, Chief, Bureau of Air and Radiation
Thomas Conley, Supervisor, X-Ray & Radioactive Materials

DISCUSSION:

The following is a summary of the meeting held in Topeka, Kansas, on March 22, 2001, between representatives of the NRC and the State of Kansas. During the meeting, the topics suggested in a letter dated January 17, 2001, from Ms. Campbell to Mr. Cooper were discussed. The discussion pertaining to each topic is summarized below.

1. Action on Previous IMPEP Review Findings

The previous Integrated Materials Performance Evaluation Program (IMPEP) review was conducted during the period June 15 -19, 1998. A follow-up review was conducted June 15-17, 1999, of the common performance indicator, Technical Quality of Licensing Actions. The status of the recommendations and suggestions outlined in Section 5.0 of the final IMPEP report were discussed at the follow-up review. (A copy of Section 5.0 of the final IMPEP report is enclosed for reference.) Recommendations 10, 11, and 12 were considered closed. However, one new recommendation was generated as a result of the review of Recommendation 11. Recommendations 1, 3, 4, 5, 6, 15, 16, 17, and 18 were recommended for closure at the next IMPEP review during the follow-up review. Recommendations 2, 13, and 14 were recommended to be verified at the next IMPEP. (A copy of Section 3.0 of the follow-up final IMPEP report is enclosed for reference.) The proposed status of the four recommendations remaining open are summarized below.

- a. **Recommendation 7 (Section 3.3):** The review team recommends that the State document a training and qualifications program equivalent to that contained in the "NRC/OAS Training Working Group Recommendations for Agreement State Training Programs," as appropriate, assess the current training needs of all radioactive materials staff, and provide the necessary training to ensure that all staff are properly trained to complete assigned tasks.

Current Status: The State has assessed the training needs of the staff and developed a matrix documenting the status of the required inspection and licensing training for each staff member. The staff receive training in health physics, inspection procedures, licensing procedures, diagnostic and therapeutic nuclear medicine, teletherapy and brachytherapy, industrial radiography, well logging, transportation, and emergency response, as well as several specialty training courses. One specialty training course that the State developed is intravascular brachytherapy. This course consisted of lectures and demonstrations from medical physicists.

Although not all staff have attended every course, the State has developed an on-the-job training program for some disciplines to broaden staff experience until formal courses are available. On-the-job training consists of sending staff to a licensee's facility for approximately one week to directly observe licensed activities for a specific discipline. The staff is then allowed to work with senior staff and under the guidance of the Supervisor and the Bureau Chief until appropriate training and experience is received, and until it is decided that the individual is proficient and can inspect the specific discipline independently.

It is recommended that this item be closed at the next IMPEP review.

- b. **Recommendation 8 (Section 3.4):** The review team recommends that program management consider increasing supervisory oversight to ensure that all pertinent items are adequately and properly addressed during the review process to provide quality assurance and to improve the technical quality of licenses.

Current Status: The State has increased supervisory oversight by developing a 2-tier supervisory review. The staff completes the technical review and prepares the licensing actions. The first level supervisor reviews the completed actions. The Chief then conducts a final review and approves all completed licensing actions.

It is recommended that this item be closed at the next IMPEP review.

- c. **Recommendation 9 (Section 3.4):** The review team also recommends that the State begin a self-evaluation of all existing licenses to determine the technical quality and to identify potential health and safety issues. This evaluation should be accomplished as soon as possible to identify and correct other possible license deficiencies. In addition, the State should ask the licensee to supply copies of any missing documents that should be included with the application.

Current Status: A comprehensive review of all licenses has been completed. Minor inconsistencies and errors were identified and corrected. The State noted that no health and safety issues were identified.

It is recommended that this item be closed at the next IMPEP review.

- d. **New Recommendation 11 (Section 2.1):** The review team recommends that the State complete a thorough review as well as a supervisory or quality assurance review of all licensing actions to ensure that each license is complete in accordance with Kansas guidance.

Current Status: The State has developed a 2-tier supervisory review of all licensing actions as described above.

It is recommended that this item be closed at the next IMPEP review.

2. Strengths and Weaknesses of the Program

Some of the program strengths discussed were:

- a. Experienced staff with no recent turnover.
- b. Updated procedures for licensing and inspection (Inspection Guidelines, License Review Procedures, RAM Inspection Priority, and Enforcement) that communicate expectations to the staff.
- c. Updated licensing guides that are published on the Program Web Page.
- d. Development of a database that allows tracking of all activities, including license actions, inspections, and reciprocity.
- e. The use of automated license templates and macros to streamline the licensing process and produce consistent licensing documents.
- f. Development of a local version of the NMED database to track all investigations and allegations.
- g. Elimination of the license action backlog. The State currently completes >95% of new licenses and amendments in < 90 days and completes 100% of renewals in < 180 days.
- h. Management support in authorizing the funds needed to obtain specialized equipment and computer upgrades.

Some of the program weaknesses discussed were:

- a. Adequate staffing level to maintain the routine technical workload; however, insufficient staff to develop regulations to maintain compatibility with NRC requirements.
- b. Funding for staff training in new technologies.

- c. Frequency of reciprocity inspections approximately 20%. The State acknowledges that the goals of IMC 1220 are not being met. However, most reciprocity is conducted in portions of the state requiring significant travel (> 5 hours). The combination of the transient nature of reciprocity work and the long travel distance make it difficult to inspect these licensees in the field.
- d. Timeliness of completing final closeout documentation of investigations. The State has increased supervisory oversight in order to improve the timeliness of this documentation. The State noted that the investigations were being conducted in a timely manner.

3. State Feedback on NRC's Program

The State believes that the reciprocity inspection goals specified in IMC 1220 are not reasonable and cannot be achieved. The State requests that NRC review the frequency requirement for reciprocity inspections. The RSAO informed the State that NRC was currently evaluating this issue and discussed the recent issuance of the Temporary Instruction for reciprocity inspections. The ASPO will discuss the State's comments with OSTP management.

4. Recent or Pending State Program Changes

There are no pending State program changes. The Bureau has 324 licensees. The Division has provided adequate funding for regular training and instrumentation.

5. NRC Program or Policy Changes That Could Impact Agreement States

The All Agreement State letters STP-00-083 on the license termination rule and STP-00-81 on event reporting were discussed. The State has responded to both letters.

A copy of the Region IV organization was provided to the State. State assignments between the Regional State Agreements Officers (RSAO), the status of the National Materials Program and the current Working Groups were also discussed.

6. Internal Program Audits or Self Assessments

The State has completed a thorough two year review of all license files which included license and inspection documents for completeness, accuracy, and consistency, and health and safety issues. The review identified no health and safety issues. Minor inconsistencies and errors were identified and corrected.

7. Status of Allegations Referred by NRC to the State

The NRC referred two allegations to the State during the period and both have been closed.

8. Compatibility of Kansas Rules and Regulations

Management focused resources on improving the licensing and inspection program and developing their database system, in lieu of adopting regulations required for compatibility purposes. Management has provided an individual from legal services on a part time basis to assist the Bureau in drafting new regulations. The Bureau is currently using legally binding license conditions until the rules are promulgated.

The State also expressed interest in having NRC staff on rotational assignment to assist the State in drafting regulations, similar to the EPA's Interagency Personnel Assignment (IPA) program. The NRC staff agreed to refer this request to OSTP for consideration.

The State provided an updated Regulation Assessment Tracking System Data Sheet, copy enclosed. The Bureau Chief was informed that, in accordance with OSTP procedures, all draft and final regulations should be sent to the OSTP Director with a cover letter requesting review and comment regarding compatibility. The procedure also requests that the regulations be forwarded electronically or on a diskette and that amended or new text be highlighted. The NRC staff would particularly like to receive any regulations that have been finalized since the last IMPEP review.

9. Nuclear Material Events Database (NMED)

There have been no significant issues with the NMED system. The State sends event information to the INEEL contractor according to procedure.

10. Action Items

The following actions items were developed during the meeting:

- a. The State believes that NRC's reciprocity inspection goals specified in IMC 1220 are not reasonable and cannot be achieved. The State requested that NRC review the frequency requirement for reciprocity inspections. The ASPO will discuss the State's comments with OSTP management.
- b. The State expressed interest in having NRC staff on rotational assignment to assist the State in drafting regulations, similar to EPA's IPA program. The ASPO will discuss this issue with OSTP management.

11. Schedule for next IMPEP Review

The next IMPEP is tentatively scheduled for May 2002.

5.0 SUMMARY

As noted in Sections 3 and 4 above, the MRB found that Kansas' performance with respect to the performance indicators, Technical Quality of Inspections, Response to Incidents and Allegations, and Legislation and Program Elements Required for Compatibility, were satisfactory. The State's performance with respect to the performance indicators, Status of Materials Inspection Program, Technical Staffing and Training, and Technical Quality of Licensing Actions, were found satisfactory with recommendations for improvement.

The team recommended and the MRB concurred, in finding the Kansas Agreement State Program adequate, but needs improvement and compatible with NRC's program. The team also recommended placing the Kansas program on heightened oversight, a process that would involve monthly teleconferences with the State and bimonthly written progress reports from the State. A follow-up review was recommended for FY 1999. The MRB directed that a follow-up review focusing on Kansas' licensing program be completed in 1 year, and did not place the State into heightened oversight status.

Below is a summary list of suggestions and recommendations, as mentioned in earlier sections of the report, for evaluation and implementation, as appropriate, by the State.

RECOMMENDATIONS:

1. Based on the record of overdue inspections during the review period, the review team recommends: (1) that Kansas heighten its management oversight of the inspection due dates of core licenses (Priority 1, 2, and 3 licensees) to ensure inspections are performed at the required frequencies; and (2) that the new inspection tracking system currently under development include provisions for flagging initial inspections at an early date to ensure they are inspected within 6 months of date of license issuance. In addition, Kansas should consider updating procedure RHS-7 to incorporate procedures on initial inspections as stated in IMC 2800, Section 04.03 a. (Section 3.1)
2. The review team recommends that the State's "Inspection Priority System" be revised for reciprocity inspections to correspond to the inspection goals in IMC 1220. (Section 3.1)
3. The review team recommends the State conduct reciprocity inspections at intervals equal to those stated in IMC 1220. (Section 3.1)
4. The review team recommends that the inspection report form be strengthened by including names of individuals contacted and interviewed in greater detail. (Section 3.2)
5. The review team recommends that Kansas provide direction to the inspection staff to help them identify poor licensee performance, identify when licensee root cause evaluations should be conducted, and to help them assess licensee root cause evaluations. Staff members' skills could also be improved by attending a training course that teaches these techniques as part of the inspector qualification process. (Section 3.2)

6. The review team recommends that the State continue to maintain management oversight of the inspection program. (Section 3.2)
7. The review team recommends that the State document a training and qualifications program equivalent to that contained in the "NRC/OAS Training Working Group Recommendations for Agreement State Training Programs," as appropriate, assess the current training needs of all radioactive materials staff, and provide the necessary training to ensure that all staff are properly trained to complete assigned tasks. (Section 3.3)
8. The review team recommends that program management consider increasing supervisory oversight to ensure that all pertinent items are adequately and properly addressed during the review process to provide quality assurance and to improve the technical quality of licenses. (Section 3.4)
9. The review team also recommends that the State begin a self-evaluation of all existing licenses to determine the technical quality and to identify potential health and safety issues. This evaluation should be accomplished as soon as possible to identify and correct other possible license deficiencies. In addition, the State should ask the licensee to supply copies of any missing documents that should be included with the application. (Section 3.4)
10. The review team recommends that RCP update the license guidance to address and parallel the current Kansas Radiation Protection Regulations to assist in the consistency and accuracy of the license review process. (Section 3.4)
11. The review team recommends that licensing check lists be developed, used, and retained in the file to ensure that all elements of the application have been submitted and that the license is complete. (Section 3.4)
12. The review team recommends that the State place documentation of any pre-licensing visits in the appropriate licensing file. (Section 3.4)
13. The team recommends that the State revise their incident response procedure to conform with OSP procedure, SA-300, including medical events. (Section 3.5)
14. The review team recommends that a system be established to track the progress of incident investigations and to verify that each investigation is evaluated by management, that all reporting requirements are met, that follow-up actions and close-out information are documented. (Section 3.5)
15. The review team recommends that the inspection procedure be revised to include narrative documentation of the inspector's review of incidents and description of the licensee's corrective actions. (Section 3.5)
16. The review team recommends the State send copies of final close-out reports to the NRC in accordance with the OSP procedure, "Reporting Material Events - SA-300." (Section 3.5)

17. The review team recommends that the State review and amend all remaining industrial radiography licenses with license conditions necessary to meet the "Safety Requirements for Industrial Radiographic Equipment" requirement, and expedite adoption of the rule which was due January 10, 1994. (Section 4.1.2)
18. The review team recommends that the State compare the Kansas regulations involved with the "Low-Level Waste Shipment Manifest Information and Reporting" and "Radiation Protection Requirements: Amended Definitions and Criteria" amendments against the final NRC rules and make any necessary changes to ensure compatibility. (Section 4.1.2)

SUGGESTIONS:

1. The review team suggests that the State continue to adhere to their policy of annual supervisory inspector accompaniments. (Section 3.2)
2. The review team suggests that the State assess whether the radioactive materials program staffing level was a contributing factor to the program deficiencies during the review period and evaluate the impact of the open positions in the RCP on radioactive materials staff to determine if added staffing or reassignment of duties is necessary. (Section 3.3)

3.0 SUMMARY

The follow-up review team found Kansas' performance in responding to and resolving the five recommendations involving the common performance indicator, Technical Quality of Licensing Actions, to be acceptable with the exception of Recommendations 8 and 9.

Recommendations 8 and 9 discussed the need to complete a self-evaluation of all existing licenses and for continued management oversight of the licensing program as new staff take over the responsibilities. A new recommendation was made involving completing supervisory or quality assurance reviews of licensing actions to ensure thoroughness.

The follow-up review team concludes that the licensing program has made progress, but it was noted that the technical quality of licensing actions is still in need of improvement. The use of a thorough supervisory or quality assurance review should further increase the technical quality of licensing actions. The follow-up review team recommends that the Kansas Agreement State program receive a full IMPEP review in FY 2002. The State suggested and the team agreed that the next periodic meeting could take place in June 2000. At that time, the status of the State's actions to train new staff and to complete the self evaluation of the remaining licenses can be discussed.

Below is a summary list of open recommendations from the 1998 report involving the technical quality of licensing actions and one new recommendation from this follow-up review.

Recommendations involving the Technical Quality of Licensing Actions:

Recommendation 8, Section 3.4 of the 1998 report

The review team recommends that program management consider increasing supervisory oversight to ensure that all pertinent items are adequately and properly addressed during the review process to provide quality assurance and to improve the technical quality of licenses.

Recommendation 9, Section 3.4 of the 1998 report

The review team also recommends that the State begin a self-evaluation of all existing licenses to determine the technical quality and to identify potential health and safety issues. This evaluation should be accomplished as soon as possible to identify and correct other possible license deficiencies. In addition, the State should ask the licensees to supply copies of any missing documents that should be included with the application.

New recommendation from Section 2.1

The review team recommends that the State complete a thorough review as well as a supervisory or quality assurance review of all licensing actions to ensure that each license is complete in accordance with Kansas guidance.

Other recommendations the team considers open (see Appendix B):

Recommendation 7, Section 3.3 of the 1998 report

The review team recommends that the State document a training and qualifications program equivalent to that contained in "NRC/OAS Training Working Group Recommendations for Agreement State Training Programs," as appropriate, assess the current training needs of all radioactive materials staff, and provide the necessary training to ensure that all staff are properly trained to complete assigned tasks.

REGULATION ASSESSMENT TRACKING SYSTEM
RATS DATA SHEET

State: Kansas

Tracking Ticket Number:

Date:

[Number of proposed/final amendments (date) reviewed are identified by a ★ at the beginning of each equivalent NRC regulation.]

NRC Chronology Identification	FR Notice (State Due Date)	RATS ID	Proposed/ Final- Comment (Y/N) ¹	NRC Review Date	Final State Regulation ² (Effective Date)
Standards for Protection Against Radiation- Part 20	56 FR 23360 plus others (1/1/94)	1991-3			10/17/94
Safety Requirements for Radiographic Equipment-Part 34	55 FR 843 (1/10/94)	1991-1			10/17/94
ASNT Certification of Radiographers-Part 34	56 FR 11504 (none)	1991-2			Not required ³
Notification of Incidents-Parts 20, 30, 31, 34, 39, 40, 70	56 FR 64980 (10/15/94)	1991-4			10/17/94
Quality Management Program and Misadministrations-Part 35	56 FR 34104 (1/27/95)	1992-1			10/17/94 (Misadministr ation)
Eliminating the Recordkeeping Requirements for Departures from Manufacturer's Instructions-Parts 30,35	57 FR 45566 (none)	1992-2			Not required ³
Licensing and Radiation Safety Requirements for Irradiators-Part 36	58 FR 7715 (7/1/96)	1993-2			Not applicable SECY-95- 112 ⁴
Definition of Land Disposal and Waste Site QA Program-Part 61	58 FR 33886 (7/22/96)	1993-3			Not applicable SECY-95- 112 ⁴
Decommissioning Recordkeeping and License Termination: Documentation Additions [Restricted areas and spill sites]-Parts 30, 40	58 FR 39628 (10/25/96)	1993-1			11/1/96
Self-Guarantee as an Additional Financial Mechanism- Parts 30, 40, 70	58 FR 68726 59 FR 1618 (none)	1994-1			Not required ³
					Not required ³

NRG Chronology Identification	FR Notice (State Due Date)	RATS ID	Proposed/ Final- Comment (Y/N) ¹	NRC Review Date	Final State Regulation ² (Effective Date)
Uranium Mill Tailings Regulations: Conforming NRC Requirements to EPA Standards-Part 40	59 FR 28220 (7/1/97)	1994-2			
Timeliness in Decommissioning Material Facilities-Parts 30, 40, 70	59 FR 36026 (8/15/97)	1994-3			See 28-35-231a
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 (1/1/98)	1995-1			See 28-35-181m
Frequency of Medical Examinations for Use of Respiratory Protection Equipment-Part 20	60 FR 7900 (3/13/98)	1995-2			10/17/94
Low-Level Waste Shipment Manifest Information and Reporting-Parts 20, 61	60 FR 15649 60 FR 25983 (3/1/98)	1995-3			10/17/94 (See IMPEP Follow up Report)
Performance Requirements for Radiography Equipment- Part 34	60 FR 28323 (6/30/98)	1995-4			11/1/96
Radiation Protection Requirements: Amended Definitions and Criteria-Parts 19, 20	60 FR 36038 (8/14/98)	1995-5			10/17/94 (See IMPEP Follow up Report)
Clarification of Decommissioning Funding Requirements-Parts 30, 40, 70	60 FR 38235 (11/24/98)	1995-6			11/1/96
Medical Administration of Radiation and Radioactive Materials-Parts 20, 35	60 FR 48623 (10/20/98)	1995-7			10/17/94
10 CFR Part 71: Compatibility with the International Atomic Energy Agency-Part 71	60 FR 50248 61 FR 28724 (4/1/99)	1996-1			All transportation regulations are incorporated by reference.
One Time Extension of Certain Byproduct, Source and Special Nuclear Materials Licenses-Parts 30, 40, 70	61 FR 1109 (none)	1996-2			Not required ³
Termination or Transfer of Licensed Activities:	61 FR	1996-3			11/1/96

NRC Chronology Identification	FR Notice (State Due Date)	RATS ID	Proposed/ Final- Comment (Y/N) ¹	NRC Review Date	Final State Regulation ² (Effective Date)
Recordkeeping Requirements-Parts 20, 30, 40, 61, 70	24669 (6/17/99)				
Resolution of Dual Regulation of Airborne Effluents of Radioactive Materials; Clean Air Act-Part 20	61 FR 65119 (1/9/00)	1997-1			Compatible regulations are being prepared.
Fissile Material Shipments and Exemptions-Part 71	62 FR 5907 (none)	1997-4			Not required ³
Recognition of Agreement State Licenses in Areas Under Exclusive Federal Jurisdiction Within an Agreement State-Part 150	62 FR 1662 (2/27/00)	1997-2			This regulation does not apply since Kansas does not have authority to grant use of radioactive material in areas under exclusive federal jurisdiction
Criteria for the Release of Individuals Administered Radioactive Material-Parts 20, 35	62 FR 4120 (5/29/00)	1997-3			Implemented by license condition
Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiography Operations-Parts 30, 34, 71, 150	62 FR 28948 (6/27/00)	1997-5			Current regulations are compatible except for the two man rule. If compatible regulations are not in place by 3 years after the implementation of the 2 man rule then the rule will be implemented by license condition July 1, 2001. An information notice has

NRC Chronology Identification	FR Notice (State Due Date)	RATS ID	Proposed/ Final- Comment (Y/N) ¹	NRC Review Date	Final State Regulation ² (Effective Date)
					been sent notifying licensees of the change.
Radiological Criteria for License Termination- Parts 20, 30, 40, 70	62 FR 39057 (8/20/00)	1997-6			Currently implemented by generic legally binding documents upon request for termination.
Exempt Distribution of a Radioactive Drug Containing One Microcurie of Carbon-14 Urea-Part 30	62 FR 63634 (1/02/01)	1997-7			Being included in latest revisions
Deliberate Misconduct by Unlicensed Persons- Parts 30, 40, 61, 70, 150	63 FR 1890 63 FR 13773 (2/12/01)	1998-1			Being included in latest revisions
Self-Guarantee of Decommissioning Funding by Nonprofit and Non-Bond-Issuing Licensees- Parts 30, 40, 70	63 FR 29535 (none)	1998-2			Not required ³
License Term for Medical Use Licenses- Part 35	63 FR 31604 (none)	1998-3			Not required ³
Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiographic Operations-Part 34	63 FR 37059 (7/9/01)	1998-4			Being included in latest revisions
Minor Corrections, Clarifying Changes, and a Minor Policy Change-Parts 20, 35, 36	63 FR 39347 63 FR 45393 (10/26/01)	1998-5			Being included in latest revisions
Transfer for Disposal and Manifests: Minor Technical Conforming Amendment-Part 20	63 FR 50127 (11/20/01)	1998-6			Being included in latest revisions
Radiological Criteria for License Termination of Uranium Recovery Facilities-Part 40	64 FR 17506	1999-1			Not required ⁴

NRC Chronology Identification	FR Notice (State Due Date)	RATS ID	Proposed/ Final- Comment (Y/N) ¹	NRC Review Date	Final State Regulation ² (Effective Date)
	(6/11/02)				
Requirements for Those Who Possess Certain Industrial Devices Containing Byproduct Material to Provide Requested Information- Part 31	64 FR 42269 (none)	1999-2			Not required ³
Respiratory Protection and Controls to Restrict Internal Exposure - Part 20	64 FR 54543 64 FR 55525 (2/2/03)	1999-3			Being included in latest revisions
Energy Compensation Sources for Well Logging and Other Regulatory Clarifications - Part 39	65 FR20337 (5/17/03)	2000-1			Being included in latest revisions
New Dosimetry Technology-Parts 34, 36, 39	65 FR63749 (1/8/04)	2000-2			Being included in latest revisions

- (Y/N) Y means "Yes," there are comments in the review letter that the State needs to address. N means "No," there are no comments in the review letter.
- Or other generic Legally Binding Requirement.
- Not required means these regulations are not required for purposes of compatibility.
- A State need not adopt a specific regulation if the State has no licensees that would be subject to that regulation. See: "Final Policy Statement on Adequacy and Compatibility of Agreement State Programs," III.1. Time Frame for Adoption of Compatible State Regulations, p. 6, SECY-95-112, May 3, 1995.