

November 9, 2020

Kevin Williams, Deputy Director  
Division of Materials Safety, Security, State,  
and Tribal Programs  
Office of Nuclear Material Safety  
and Safeguards  
U.S. Nuclear Regulatory Commission  
T8-E18  
Washington, D.C. 20555-0001  
(via email)

Dear Mr. Williams:

Enclosed is a copy of the final revisions to the Colorado Rules and Regulations Pertaining to Radiation Control, 6 CCR 1007-1, Part 17 (Transportation of radioactive material), and Part 22 (Physical protection of category 1 and category 2 quantities of radioactive material). These rule changes were adopted by the Colorado Board of Health on August 19, 2020 and became effective October 15, 2020. For your information, we have also included the redline/strikeout version as provided to the Board of Health on August 19.

Colorado's [final adopted regulations](#) correspond to the following equivalent amendments to NRC's regulations:

RATS ID	Title	State Section(s) <b>6 CCR 1007-1</b>
*2015-3	NRC comment 1 in correspondence dated March 8, 2018 NRC comment 1 in correspondence dated April 24, 2020.	Part 17, Section 17.7  Part 17, Section 17.7.2 Part 17, Section 17.8.2
*2015-5	NRC comment 2 in correspondence dated March 8, 2018.	No longer applicable - Updated AState notes in RATS 2018-3 negates direction in the NRC's March 8, 2018 correspondence to CO.
2018-2	Miscellaneous corrections - organizational changes 10 CFR Parts 37, 40, 70, and 71	Part 17, Section 17.11.4 Part 17, Section 17.11.7
2018-3	Miscellaneous corrections 10 CFR Parts 1, 2, 34, 37, 50, 71, 73, and 140	Part 22, Section 22.9.2 Part 22, Section 22.16.4 Part 22, Section 22.27.1 Part 17, Section 17.11
2019-1	Miscellaneous corrections 10 CFR Parts 2, 21, 37, 50, 52, 73, and 110	Part 22, Section 22.9.2 **Part 22, Section 22.11.3
2019-2	Organizational changes and conforming amendments 10 CFR Parts 1, 2, 37, 40, 50, 51, 52, 55, 71, 73, 74, 100, 140, and 150	Part 17, Section 17.7.3 Part 17, Section 17.10

\*NOTE 1: The final Part 17 rule changes specific to RATS 2015-3, and 2015-5 were previously submitted to and reviewed by NRC in 2018. The 2020 final Part 17 rule amendment addresses applicable comment(s) for these RATS items.

\*\*NOTE 2: The final Part 22 rule also reflects the recently revised mailstop for submission of fingerprints per NRC correspondence dated September 25, 2020 in STC-20-0067.

We believe that adoption of these revisions satisfies the compatibility and health and safety categories established in the Office of Nuclear Material Safety and Safeguards (NMSS) Procedure SA-200. The applicable final rule amendments will implement all requirements and comments (as applicable) pertaining to NRC RATS 2018-2, 2018-3, 2019-1, and 2019-2.

To aid in the review of the final regulations, we have also enclosed an annotated copy of RATS 2015-3, 2015-5, 2018-2, 2018-3, 2019-1, and 2019-2 which identifies each specific section in the final Colorado rules corresponding to the amended federal rule change.

If you have any questions, please feel free to contact me at 303-692-3371 or James Jarvis of my staff at (303) 692-3454 or [james.jarvis@state.co.us](mailto:james.jarvis@state.co.us).

Sincerely,

Jim Grice, Radiation Program Manager  
Hazardous Materials & Waste Management Division

Enclosures:

6 CCR 1007-1, Part 17 (Final rule effective October 15, 2020)  
6 CCR 1007-1, Part 22 (Final rule effective October 15, 2020)  
6 CCR 1007-1, Part 17 (Draft 2 dated 07/31/2020)  
6 CCR 1007-1, Part 22 (Draft 2 dated 07/30/2020)  
Annotated RATS 2018-2  
Annotated RATS 2018-3  
Annotated RATS 2019-1  
Annotated RATS 2019-2

Cc:

Michelle Beardsley, U.S. NRC, Regulatory Review Coordinator (via email)  
Randy Erickson, U.S. NRC, State Agreements Officer (via email)