



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

January 22, 2021

Mr. Jeffrey Semancik  
Director, Radiation Division  
Bureau of Air Management  
Connecticut Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127

Dear Mr. Semancik:

We have reviewed the proposed revisions to the Connecticut legislation in the Agency Legislative Proposal – 2021 Session, received by our office on December 17, 2020. This legislation was reviewed by comparison to the Council of State Governments Suggested State Legislation (SSL), 1983, Volume 42, and NMSS procedure SA-700, *Processing an Agreement*. We discussed our review of the legislation with you and members of your staff on January 21, 2021.

As a result of our review, we have 71 comments that have been identified in the enclosure.

If you have any questions regarding the comments, or the State Suggested Legislation used in the review, please contact Michelle Beardsley, State Regulation Review Coordinator, at 301-415-0275 ([michelle.beardsley@nrc.gov](mailto:michelle.beardsley@nrc.gov)) or Stephen Poy at 301-415-7135 ([stephen.poy@nrc.gov](mailto:stephen.poy@nrc.gov)).

Sincerely,

Brian C. Anderson, 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. Comment table
2. Connecticut SRS Data Sheet

SUBJECT: LETTER TO J. SEMANCIK RE: CONNECTICUT PROPOSED LEGISLATION  
DATE January 22, 2021

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Connecticut File

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## COMPATIBILITY COMMENTS ON CONNECTICUT PROPOSED LEGISLATION

STATE SECTION		STATE SUGGESTED LEGISLATION SECTION	SUBJECT and COMMENTS
1	<p>Section 22a-5.</p> <p>Section 22a-148 et seq.</p> <p>16a-100</p> <p>22a-161 for LLRW Atlantic Compact</p>	Section 2	<p><b>Declaration of Policy</b></p> <p>Connecticut omits the term “sources of ionizing and nonionizing radiation”</p> <p>Connecticut needs to delete the delete the phrase “as nearly as may be,” from Section 16a-100.and “to the extent deemed practicable by said department” from 22a-148(b). Connecticut also needs to change the sentence “on the regulations of the United States Atomic Energy Commission to the United States Nuclear Energy Commission, issued under authority granted to said commission by the Atomic Energy Act of 1954, ... and subsequent amendments. Connecticut also needs to delete the later part of the sentence “or, if such regulations should be deemed inappropriate by the Commissioner of Energy and Environmental Protection, on the latest recommendations of the National Committee on Radiation, as published by the United States Department of Commerce, National Bureau of Standards.”</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
2	<p>Section 22a-5.</p> <p>Section 22a-148 et seq.</p> <p>16a-100</p>	Section 3	<p><b>Purpose</b></p> <p>Connecticut omits the term “sources of radiation”</p> <p>Connecticut omits Section 3.2 of the SSL.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
3	<p>Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2</p>	Section 4	<p><b>Definitions Byproduct Material</b></p> <p>The definition does not include “The tailings or wastes produced by the extraction or concentration of uranium or thorium from any ore processed primarily for its source material content.” The reference to 42 U.S.C. 2014 also includes definitions not mentioned in the SSL. The reference to 42 U.S.C. 2014 defines (1)(i) again. The definition in Sec.22a-151 references US Atomic Energy Commission.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>

STATE SECTION		STATE SUGGESTED LEGISLATION SECTION	SUBJECT and COMMENTS
	Section 16a-101		
4	<p>Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2</p> <p>Section 16a-101</p>	Section 4	<p><b>Definitions Civil Penalty</b></p> <p>Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
5	<p>Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2</p> <p>Section 16a-101</p>	Section 4	<p><b>Definitions Closure or Site Closure</b></p> <p>Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
6	<p>Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2</p> <p>Section 16a-</p>	Section 4	<p><b>Definitions Decommissioning</b></p> <p>Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>

STATE SECTION		STATE SUGGESTED LEGISLATION SECTION	SUBJECT and COMMENTS
	101		
7	<p>Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2</p> <p>Section 16a-101</p>	Section 4	<p><b>Definitions Disposal of low-level radioactive waste</b></p> <p>Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
8	<p>Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2</p> <p>Section 16a-101</p>	Section 4	<p><b>Definitions High-level radioactive waste</b></p> <p>Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
9	<p>Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2</p> <p>Section 16a-101</p>	Section 4	<p><b>Definitions General license</b></p> <p>Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
10	Definitions	Section 4	<b>Definitions Specific license</b>

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	will be adopted through regulation with authority provided through legislative proposal sec. 2  Section 16a-101		<p>Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
11	Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2  Section 16a-101	Section 4	<p><b>Definitions Low-level radioactive waste</b></p> <p>Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
12	Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2  Section 16a-101	Section 4	<p><b>Definitions Person</b></p> <p>Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
13	Definitions will be adopted	Section 4	<p><b>Definitions Radiation</b></p> <p>Connecticut states that the definitions are not included in the</p>

STATE SECTION		STATE SUGGESTED LEGISLATION SECTION	SUBJECT and COMMENTS
	through regulation with authority provided through legislative proposal sec. 2  Section 16a-101		proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
14	Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2  Section 16a-101	Section 4	<b>Definitions Ionizing radiation</b>  Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
15	Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2  Section 16a-101	Section 4	<b>Definitions Nonionizing radiation</b>  Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
16	Definitions will be adopted through regulation	Section 4	<b>Definitions Radiation generating equipment</b>  Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.

STATE SECTION		STATE SUGGESTED LEGISLATION SECTION	SUBJECT and COMMENTS
	with authority provided through legislative proposal sec. 2  Section 16a-101		Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
17	Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2  Section 16a-101	Section 4	<b>Definitions Radioactive material</b>  Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
18	Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2  Section 16a-101	Section 4	<b>Definitions Registration</b>  Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
19	Definitions will be adopted through regulation with authority	Section 4	<b>Definitions Source material</b>  Source Material is defined in accordance with 42 US Code 2014. The wording is not exact but is open ended with the statement "...in such concentration as the Commission may by regulation determine from time to time. This code defines "Commission" as Atomic Energy Commission rather than U.S. Nuclear Regulatory

STATE SECTION		STATE SUGGESTED LEGISLATION SECTION	SUBJECT and COMMENTS
	provided through legislative proposal sec. 2  Section 16a-101		Commission.  Connecticut needs to delete the statement indicated above, and correct the definition of "Commission" to read, "U.S. Nuclear Regulatory Commission."
20	Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2  Section 16a-101	Section 4	<b>Definitions Source material mill tailings</b>  Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
21	Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2  Section 16a-101	Section 4	<b>Definitions Source material milling</b>  Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
22	Definitions will be adopted through regulation with authority provided through	Section 4	<b>Definitions Sources of radiation</b>  Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.

STATE SECTION		STATE SUGGESTED LEGISLATION SECTION	SUBJECT and COMMENTS
	legislative proposal sec. 2  Section 16a-101		
23	Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2  Section 16a-101	Section 4	<p><b>Definitions Special nuclear material</b></p> <p>Connecticut's definition of special nuclear fuel includes a reference to the Atomic Energy Commission and does not include the phrase, "does not include source material; or any material artificially enriched by any of the foregoing, but does not include source material.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
24	Definitions will be adopted through regulation with authority provided through legislative proposal sec. 2  Section 16a-101	Section 4	<p><b>Definitions Spent nuclear fuel</b></p> <p>Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
25	Definitions will be adopted through regulation with authority provided through legislative proposal	Section 4	<p><b>Definitions Transuranic waste</b></p> <p>Connecticut states that the definitions are not included in the proposed legislation but will be adopted in regulation. However, this definition was omitted from the list.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>

STATE SECTION		STATE SUGGESTED LEGISLATION SECTION	SUBJECT and COMMENTS
	sec. 2  Section 16a-101		
26	22a-5	Section 5	<b>State Radiation Control Agency</b>  Connecticut omits Section 5 (a) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
27	22a-5	Section 5	<b>State Radiation Control Agency</b>  Connecticut omits Section 5(b) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
28	22a-153(c)	Section 5	<b>State Radiation Control Agency</b>  Connecticut omits Section 5 (d) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
29	16a-102(a)	Section 5	<b>State Radiation Control Agency</b>  Connecticut omits Section 5 (e) of the SSL.  Connecticut indicates in their crosswalk that Section 5(e) and (f) are not applicable.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
30	16a-102(a)	Section 5	<b>State Radiation Control Agency</b>  Connecticut omits section 5(f) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
31	Sec. 2 of proposed legislation. (Section	Section 6	<b>Advisory Committee on Radiation</b>  Connecticut omits section 6 (a) of the SSL.

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	22a-153(b) and (c))		Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
32	Sec. 2 of proposed legislation. (Section 22a-153(b) and (c))	Section 6	<b>Advisory Committee on Radiation</b>  Connecticut omits Section 6 (b) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
33	Sec. 3 of proposed legislation. (Section 22a-154)	Section 7	<b>Licensing and Registration of Sources of Radiation</b>  Connecticut omits the phrase “radioactive material not under the authority of the U.S. Nuclear Regulatory Commission”  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
34	Sec. 3 of proposed legislation. (Section 22a-154)	Section 7	<b>Licensing and Registration of Sources of Radiation</b>  Connecticut omits Alternative I Section 7 (b) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
35	Sec. 2 of proposed legislation. (Section 22a-153(b) and (c))	Section 7	<b>Licensing and Registration of Sources of Radiation</b>  Connecticut omits Alternative I Section 7 (d) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
36	Sec. 3 of proposed legislation. (Section 22a-153)	Section 7	<b>Licensing and Registration of Sources of Radiation</b>  Alternative II(a)  Connecticut omits the phrase “radioactive material not under the authority of the U.S. Nuclear Regulatory Commission”  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
37	Sec. 3 of proposed legislation. (Section	Section 7	<b>Licensing and Registration of Sources of Radiation</b>  Connecticut omits Alternative II Section 7 (b) of the SSL.

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	22a-153)		Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
38	Sec. 2 (b)(5) and 3 of proposed legislation.	Section 7	<b>Licensing and Registration of Sources of Radiation</b>  Connecticut omits Alternative II Section 7 (d) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
39	Sec. 3 of proposed legislation. (Section 22a-153)	Section 8	<b>Source Material Processing and Related [Byproduct Material] [Mill Tailings]</b>  Connecticut omits Section 8 (a) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
40	Sec. 3 of proposed legislation. (Section 22a-153)	Section 8	<b>Source Material Processing and Related [Byproduct Material] [Mill Tailings]</b>  Connecticut omits Section 8 (b) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
41	22a-159	Section 9	<b>Low-level Radioactive Waste Disposal</b>  Connecticut omits Section 9 (b) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
42	22a-159	Section 9	<b>Low-level Radioactive Waste Disposal</b>  Connecticut omits Section 9 (c) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
43	Sec. 2 (a) of proposed legislation.	Section 9	<b>Low-level Radioactive Waste Disposal</b>  Connecticut omits Section 9 (d) of the SSL.  Connecticut does not specifically have requirements for the disposal of low-level waste.

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			Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
44	Sec. 3 (a) of proposed legislation.	Section 9	<b>Low-level Radioactive Waste Disposal</b>  Connecticut omits Section 9 (e) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
45	Sec. 2 and 3 of the proposed legislation.	Section 11	<b>Surety Requirements</b>  Connecticut omits Section 11 (a) of the SSL.  Connecticut does not have language that specifically states the following:  “establish by rule or regulation standards and procedures to ensure that the licensee will provide an adequate surety or other financial arrangement to permit the completion of all requirements established by the agency for the decontamination, closure, decommissioning and reclamation of sites, structures and equipment used in conjunction with such licensed activity, in case the licensee should default for any reason in performing such requirements.”  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
46	Sec. 2 and 3 of the proposed legislation.  Section 6. for authority for remedial action.	Section 11	<b>Surety Requirements</b>  Connecticut omits Section 11 (b) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
47	Sec. 2 and 3 of the proposed legislation.  Section 6. for authority	Section 11	<b>Surety Requirements</b>  Connecticut omits Section 11 (c) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.

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	for remedial action.		
48	<p>Sec. 2 and 3 of the proposed legislation.</p> <p>Section 6. for authority for remedial action.</p>	Section 11	<p><b>Surety Requirements</b></p> <p>Connecticut omits Section 11 (d) of the SSL.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
49	<p>Sec. 2 and 3 of the proposed legislation.</p> <p>Section 6. for authority for remedial action.</p>	Section 11	<p><b>Surety Requirements</b></p> <p>Connecticut omits Section 11 (e) of the SSL.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
50	<p>Sec. 2 and 3 of the proposed legislation.</p> <p>Section 6. for authority for remedial action.</p>	Section 11	<p><b>Surety Requirements</b></p> <p>Connecticut omits Section 11 (f) of the SSL.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
51	<p>Sec. 2 and 3 of the proposed legislation.</p> <p>Section 6. for authority for remedial action.</p>	Section 11	<p><b>Surety Requirements</b></p> <p>Connecticut omits Section 11 (g) of the SSL.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
52	<p>Sec. 2 and 3 of the proposed legislation.</p>	Section 11	<p><b>Surety Requirements</b></p> <p>Connecticut omits Section 11 (h) of the SSL.</p>

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	Section 6. for authority for remedial action.		Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
53	Sec. 2 and 3 of the proposed legislation.  Section 6. for authority for remedial action.	Section 11	<b>Surety Requirements</b>  Connecticut omits Section 11 (i) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
54	Section 2 (a)(2) of the proposed legislation.	Section 12	<b>Inspection</b>  Connecticut omits Section 12 of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
55	Section 2 (a)(6) of the proposed legislation.	Section 13	<b>Records</b>  Connecticut omits Section 13 of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
56	Section 2 (a)(1) of the proposed legislation.  22a-152	Section 14	<b>Federal-State Agreements</b>  Connecticut needs to revise Section 22a-152 to clarify the difference between discontinuance of NRC's authority and relinquishing of NRC's authority with regard to programs and the Agreement.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
57	Section 2 (a)(7) of the proposed legislation regarding reciprocal agreements.	Section 14	<b>Federal-State Agreements</b>  Connecticut omits Section 14 (b) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.

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58	Section 2 (a)(1) of the proposed legislation	Section 15	<p><b>Inspection Agreements and Training Programs</b></p> <p>Connecticut omits the phrase, “under Section 274i of the Atomic Energy Act of 1954.”</p> <p>Connecticut needs to clarify the specific statutory authority in this proposed legislation.</p> <p>Connecticut needs to provide all language involving cooperation with other government entities.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
59	Section 2 (a)(5) of the proposed legislation	Section 15	<p><b>Inspection Agreements and Training Programs</b></p> <p>Connecticut omits Section 15 (b) of the SSL.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
60	Section 2 (a)(5) of the proposed legislation.	Section 16	<p><b>Conflicting Laws</b></p> <p>Connecticut omits Section 16 of the SSL.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
61	Section 2 (a)(5) of the proposed legislation.	Section 17	<p><b>Administrative Procedure and Judicial Review</b></p> <p>Connecticut omits Section 17 (a) of the SSL.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
62	Section 2 (a)(5) of the proposed legislation.	Section 17	<p><b>Administrative Procedure and Judicial Review</b></p> <p>Connecticut omits Section 17 (b) of the SSL.</p> <p>Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.</p>
63	Section 2 (a)(5) of the proposed legislation.	Section 17	<p><b>Administrative Procedure and Judicial Review</b></p> <p>Connecticut omits Section 17 (c) of the SSL.</p> <p>Connecticut needs to provide an explanation or justification as to</p>

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			the reason for the omissions; or supply the missing information.
64	Section 2 (a)(5) of the proposed legislation.	Section 17	<b>Administrative Procedure and Judicial Review</b>  Connecticut omits Section 17 (d) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
65	Section 2 (a)(5) of the proposed legislation.	Section 17	<b>Administrative Procedure and Judicial Review</b>  Connecticut omits Section 17 (e) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
66	Sec. 6 (a) of the proposed legislation.	Section 17	<b>Administrative Procedure and Judicial Review</b>  Connecticut omits Section 17 (f) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
67	Sec. 4 of the proposed legislation.	Section 17	<b>Administrative Procedure and Judicial Review</b>  Connecticut omits Section 17 (g) of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
68	Sec. 4 of the proposed legislation.	Section 18	<b>Injunction Proceedings</b>  Connecticut omits the following language:  “a permanent or temporary injunction, restraining order, or other order may be granted.”  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
69	Section 5 of the proposed legislation.	Section 19	<b>Prohibited Uses</b>  Connecticut omits the following language:  “distribute, sell, install, repair, receive, and...” from Section 5. Section 22a-157) of the proposed legislation.

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			Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
70	Sec. 2(c)(3) of the proposed legislation.	Section 20	<b>Impounding</b>  Connecticut omits Section 20 of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information.
71	Sec. 6. of the proposed legislation	Section 21	<b>Penalties</b>  Connecticut uses the term “civil penalty” in Section 4(a) of the proposed legislation.  Connecticut needs to clarify civil penalties in their legislation.  Connecticut omits Section 12(b) provisions of the SSL.  Connecticut needs to provide an explanation or justification as to the reason for the omissions; or supply the missing information including whether these provisions cover NRC or other agreement state licensees working in Connecticut.  .