



STATE OF NEW HAMPSHIRE
DEPARTMENT OF HEALTH AND HUMAN SERVICES
DIVISION OF PUBLIC HEALTH SERVICES

John A. Stephen
Commissioner

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Mary Ann Cooney
Director

March 22, 2005

Mr. Paul H. Lohaus, Director
Office of State and Tribal Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Lohaus:

As part of our on-going communications regarding the status of New Hampshire's progress on implementing program improvements in response to the Integrated Materials Performance Evaluation Program (IMPEP) review of the state's program conducted in 2004, please find enclosed an updated program improvement plan/status report.

In addition to actions taken as described in the report, activities to address workforce issues, business operations, and adequacy and compatibility issues have continued. The following are updates on the ongoing issues we are addressing in these areas:

- The Radiological Health Section's health physics positions remain fully staffed, and training of the newest staff members in radioactive materials licensing and inspections continues. Program health physicists Rick D'Alarcao and Debanond Chakraborty continue to strengthen their skills as license reviewers and material inspectors, and still anticipate conducting accompaniments with Wayne Mallock of Maine's Radiation Control Program.
- Through an arrangement between this office and the Massachusetts Radiation Control Program, health physicist Asish Banerjee, who holds degrees in engineering, participated in on-site training in conducting sealed source and device (SS&D) reviews at the Massachusetts RCP offices on February 3 and 4, 2005. A letter from Kenath Traegda, Licensing Manager with Mass RCP certifies that that Mr. Banerjee should be qualified to independently conduct SS&D reviews.
- The Division is renewing its contract with Vicki Jeffs, Kentucky's former radioactive materials program manager, for conducting license application reviews on behalf of the radiation control program. Likewise, the Division is renewing its contract with Mario Iannaccone, for conducting inspections of licensees on behalf of the program. We expect the Governor and Council will approve the contract with Ms. Jeffs at their May meeting and the contract for Mr. Iannaccone no later than June.

The Division continues to seek a qualified individual to fill the position of Administrator (Radiation Health Physicist V) of the Radiological Health Section. At this time, three candidates have been interviewed, and an offer was made to one of them, who declined it. A formal request has been made to the NH Division of Personnel to revise the minimum qualifications to widen the applicant pool. The requested revision is to allow years of experience as a manager in a radiation regulatory program to substitute for a Master's degree.

- Dennis O'Dowd continues to serve as acting administrator and meets with me on a bi-weekly basis. During this time, we review the program's progress, and discuss the prioritizing of work assignments.
- Mr. O'Dowd continues to work aggressively to update radiation control rules needed for full compatibility with NRC. With the assistance of the NH DHHS Administrative Rules Unit, the program is on track with the timelines set out in the milestones document provided in our letter dated January 5, 2005. As an interim measure and where applicable, additional efforts have been made to appropriately amend licenses to incorporate necessary regulatory revisions as legally binding license conditions. In this regard, incorporation of the so-called "constraint rule" as a legally binding license condition into all relevant New Hampshire radioactive material licenses (i.e., approximately 30 licensees) has been completed, and a letter requesting review and approval of this has been submitted to the Office of State and Tribal Programs. We are awaiting your written letter of confirmation that this action is acceptable for the purposes of compatibility.
- There are currently no overdue radioactive material license inspections, and the number of pending license application reviews is within routine operational parameters.
- The program has hired a new administrative support clerk to assist with program operations, including its rulemaking effort. This person will start work on April 1st. In addition, the Division is actively recruiting a new radiation scientist to work in the radioanalytical laboratory in direct support of the radioactive materials programs, and in field activities as a health physics technician.

I hope it is clear the state is implementing its plans to address the issues raised in the 2004 IMPEP report. Please feel free to call me with any questions. I may be reached directly at 603-271-4524 or via e-mail at abruning@dhhs.state.nh.us. I look forward to our next conference call.

Sincerely,

Alice Bruning
Chief, Bureau of Prevention Services

cc: Josephine Piccone, Deputy Director, State and Tribal Programs, NRC
George Pangburn, Region 1 Director, Division Of Nuclear Materials Safety, NRC
Sheri Minnick, Region 1, Regional States Agreement Officer, NRC
John Wallace, Associate Commissioner, DHHS
Mary Ann Cooney, Director of DHHS-DPHS
Members of the State Radiation Advisory Committee [via e-mail]

MILESTONES FOR ADOPTING NRC REGULATIONS REQUIRED FOR COMPATABILITY

(Regulations that are currently overdue)

(March 2005)

RULE AMENDMENT TITLE	NH RULE TO BE AMENDED	DEADLINE FOR COMPLETING DRAFT AND SUBMITTING TO DHHS ADMINISTRATIVE RULES UNIT (ARU)	EARLIEST DATE FOR RETURN FROM ARU	DEADLINE FOR INCORPORATING SUGGESTED REVISIONS PROPOSED BY ARU AND FOR SUBMITTING DRAFT FOR COMMENT TO NRC	DEADLINE FOR SUBMITTING FISCAL IMPACT STATEMENT (FIS) INFORMATION TO LBA	DEADLINE FOR SUBMITTING RULEMAKING NOTICE TO OLS	DATE OF RULEMAKING REGISTER IN WHICH PROPOSED RULE WILL BE PUBLISHED	EARLIEST DATE FOR ORAL HEARING	EARLIEST WRITTEN COMMENTS DEADLINE IS 10 DAYS AFTER PUBLIC HEARING	LAST DATE TO REQUEST AMENDED FIS	DEADLINE FOR FINAL PROPOSAL TO OLS FOR COMMITTEE REVIEW	JLCAR MEETING. EARLIEST DATE FOR COMMITTEE REVIEW AND APPROVAL (ADOPTION)
Timeliness in Decommissioning of Materials Facilities	He-P 4003, New 4024 He-P 4030	02/04/05	02/25/05	03/18/05	03/25/05	04/08/05	04/15/05	05/06/05	05/16/05	05/27/05	06/03/05	06/17/05
Termination or Transfer of Licensed Activities: Recordkeeping Requirements	He-P 4003, 4020, 4021, 4022, 4023, 4030	02/04/05	02/25/05	03/18/05	03/25/05	04/08/05	04/15/05	05/06/05	05/16/05	05/27/05	06/03/05	06/17/05
Recognition of Agreement State Licenses in Areas Under Exclusive Federal Jurisdiction Within an Agreement State	He-P 4030.18	02/04/05	02/25/05	03/18/05	03/25/05	04/08/05	04/15/05	05/06/05	05/16/05	05/27/05	06/03/05	06/17/05
Criteria for the Release of Individuals Administered Radioactive Material	He-P 4003, (de) & (dr); He-P 4020, 4021, 4022	02/04/05	02/25/05	03/18/05	03/25/05	04/08/05	04/15/05	05/06/05	05/16/05	05/27/05	06/03/05	06/17/05
Radiological Criteria for License Termination	He-P 4003, 4020, 4021, 4022, 4023, New 4024	02/04/05	02/25/05	03/18/05	03/25/05	04/08/05	04/15/05	05/06/05	05/16/05	05/27/05	06/03/05	06/17/05
Deliberate Misconduct by Unlicensed Persons	He-P 4030	02/04/05	02/25/05	03/18/05	03/25/05	04/08/05	04/15/05	05/06/05	05/16/05	05/27/05	06/03/05	06/17/05
Criteria for the Release of Individuals Administered Radioactive Material	He-P 4003, 4020, 4021, 4022	02/04/05	02/25/05	03/18/05	03/25/05	04/08/05	04/15/05	05/06/05	05/16/05	05/27/05	06/03/05	06/17/05
Minor Corrections, Clarifying Changes, and a Minor Policy Change	He-P 4020, 4021, 4022, 4023, 4035	02/04/05	02/25/05	03/18/05	03/25/05	04/08/05	04/15/05	05/06/05	05/16/05	05/27/05	06/03/05	06/17/05
Respiratory Protection and Controls to Restrict Internal Exposures	He-P 4003, 4022, 4095	02/04/05	02/25/05	03/18/05	03/25/05	04/08/05	04/15/05	05/06/05	05/16/05	05/27/05	06/03/05	06/17/05
Requirements for Certain Generally Licensed Industrial Devices Containing Byproduct Material	He-P 4030, 4031, 4032	02/04/05	02/25/05	03/18/05	03/25/05	04/08/05	04/15/05	05/06/05	05/16/05	05/27/05	06/03/05	06/17/05

MILESTONES FOR ADOPTING NRC REGULATIONS REQUIRED FOR COMPATABILITY

(Addressed by Legally Binding License Condition)

(March 2005)

The following rules have been or will be incorporated as legally binding license conditions, and therefore, adoption into New Hampshire rules are not necessary at this time. Nevertheless, adoption is still being pursued, in accordance with the following timetable.

RULE AMENDMENT TITLE	NH RULE TO BE AMENDED	DEADLINE FOR COMPLETING DRAFT AND SUBMITTING TO DHHS ADMINISTRATIVE RULES UNIT (ARU)	EARLIEST DATE FOR RETURN FROM ARU	DEADLINE FOR INCORPORATING SUGGESTED REVISIONS PROPOSED BY ARU AND FOR SUBMITTING DRAFT FOR COMMENT TO NRC	DEADLINE FOR SUBMITTING FISCAL IMPACT STATEMENT (FIS) INFORMATION TO LBA	DEADLINE FOR SUBMITTING RULEMAKING NOTICE TO OLS	DATE OF RULEMAKING REGISTER IN WHICH PROPOSED RULE WILL BE PUBLISHED	EARLIEST DATE FOR ORAL HEARING	EARLIEST WRITTEN COMMENTS DEADLINE IS 10 DAYS AFTER PUBLIC HEARING	LAST DATE TO REQUEST AMENDED FIS	DEADLINE FOR FINAL PROPOSAL TO OLS FOR COMMITTEE REVIEW	JLCAR MEETING. EARLIEST DATE FOR COMMITTEE REVIEW AND APPROVAL
Resolution of Dual Regulation of Airborne Effluents of Radioactive Materials; Clean Air Act NOTE: Incorporated as legally binding license condition for all applicable licenses, as of 01/07/05.	He-P 4003, He-P 4020.04 He-P 4021.14	02/04/05	02/25/05	03/18/05	03/25/05	04/08/05	04/15/05	05/06/05	05/16/05	05/27/05	06/03/05	06/17/05
Criteria for the Release of Individuals Administered Radioactive Material NOTE: Currently being incorporated as legally binding license condition for all applicable licenses.	He-P 4035 portion only	06/20/05	07/01/05	07/22/05	07/29/05	08/12/05	08/19/05	09/09/05	09/19/05	09/30/05	10/07/05	10/21/05
New Dosimetry Technology NOTE: Incorporated as legally binding license condition for all applicable licenses, and adopted by reference in He-P 4036 and 4039. Accepted by NRC 10/25/04	He-P 4034	08/10/05	09/01/05	09/17/05	09/23/05	10/07/05	10/14/05	11/04/05	11/14/05	11/25/05	12/02/05	12/16/05

MILESTONES FOR ADOPTING NRC REGULATIONS REQUIRED FOR COMPATABILITY

(Not Currently Overdue)

(March 2005)

The following rules are not currently overdue, but will be processed in accordance with the following schedule.

RULE AMENDMENT TITLE	NH RULE TO BE AMENDED	DEADLINE FOR COMPLETING DRAFT AND SUBMITTING TO DHHS ADMINISTRATIVE RULES UNIT (ARU)	EARLIEST DATE FOR RETURN FROM ARU	DEADLINE FOR INCORPORATING SUGGESTED REVISIONS PROPOSED BY ARU AND FOR SUBMITTING DRAFT FOR COMMENT TO NRC	DEADLINE FOR SUBMITTING FISCAL IMPACT STATEMENT (FIS) INFORMATION TO LBA	DEADLINE FOR SUBMITTING RULEMAKING NOTICE TO OLS	DATE OF RULEMAKING REGISTER IN WHICH PROPOSED RULE WILL BE PUBLISHED	EARLIEST DATE FOR ORAL HEARING	EARLIEST WRITTEN COMMENTS DEADLINE IS 10 DAYS AFTER PUBLIC HEARING	LAST DATE TO REQUEST AMENDED FIS	DEADLINE FOR FINAL PROPOSAL TO OLS FOR COMMITTEE REVIEW	JLCAR MEETING. EARLIEST DATE FOR COMMITTEE REVIEW AND APPROVAL
Revision to the Skin Dose Limit	He-P 4020, 4021, 4022, 4023	02/04/05	02/25/05	03/18/05	03/25/05	04/08/05	04/15/05	05/06/05	05/16/05	05/27/05	06/03/05	06/17/05
Medical Use of Byproduct Material	He-P 4020, 4032, 4035	06/20/05	07/01/05	07/22/05	07/29/05	08/12/05	08/19/05	09/09/05	09/19/05	09/30/05	10/07/05	10/21/05
Financial Assurance for Materials Licenses	He-P 4030	08/10/05	09/01/05	09/17/05	09/23/05	10/07/05	10/14/05	11/04/05	11/14/05	11/25/05	12/02/05	12/16/05
Compatibility with IAEA Transportation Safety Standards (TS-R-1) and Other Safety Amendments	He-P 4037	08/10/05	09/01/05	09/17/05	09/23/05	10/07/05	10/14/05	11/04/05	11/14/05	11/25/05	12/02/05	12/16/05

NEW HAMPSHIRE DEPARTMENT OF HEALTH and HUMAN SERVICES

DIVISION OF PUBLIC HEALTH SERVICES/BUREAU OF PREVENTION SERVICES/RADIOLOGICAL HEALTH SECTION

PROGRAM IMPROVEMENT PLAN

Revision 03/21/2005

<u>Recommendation</u>	<u>Tasks</u>	<u>Milestones</u>	<u>Assignments</u>	<u>Anticipated Completion Date</u>	<u>Status</u>	<u>Completion Date</u>
	Fill vacant Radiological Health Administrator position	Upgrade position	MAC	N/A	Completed	06/23/2004
		Seek applicants by posting notices in local and national forums, including DHHS website, state Division of Personnel website, "RadRap" listserver, RadSafe listserver, NECHPS website, CRCPD listserver, New England Radiological Health Committee announcement, and regional newspaper listing.	AB/DOD		Completed	9/30/2004 (1st); 1/31/05 (2nd)
		Interview applicants	AB/DOD	May - June 2005	Three applications received; interviews conducted; Job offer made to one of the applicants, who declined the offer; Currently seeking to modify the job spec to allow years of radiation program management experience to substitute for Master's degree, in order to widen applicant pool.	
	Continue to examine and as necessary, modify business processes of the Section to improve the effectiveness and efficiency of the program	Continue bi-weekly 1:1 meetings between Acting Administrator and Bureau Chief, tracking progress.	AB/DOD	On-going	On-going	On-going
		Continue pursuing contracts with outside health physics support to aid program while fast-tracking training of new health physicists.	MAC/AB	05/04/2005	HP contract for VJ currently back in process through system for G&C approval. Target date-05/04/05; contract for MI in preparation.	
	Establish plan for new staff to promptly complete all training and qualification requirements in order to be qualified as independent license reviewers and inspectors.	Initiate training in radioactive materials program	DOD	11/01/2004	Both new HP staff members fully qualified for Priority 5 industrial-type inspections; Full Priority 5 qualifications to include medical to be completed by end of April.	10/15/2004
		Facilitate additional training opportunities utilizing assistance from Maine RCP and Massachusetts RCP.	DOD	01/31/2005	Medical use inspection accompaniments with Maine RCP on 11/18/2004; awaiting Maine RCP availability for additional opportunities.	

NEW HAMPSHIRE DEPARTMENT OF HEALTH and HUMAN SERVICES

DIVISION OF PUBLIC HEALTH SERVICES/BUREAU OF PREVENTION SERVICES/RADIOLOGICAL HEALTH SECTION

PROGRAM IMPROVEMENT PLAN

Revision 03/21/2005

<u>Recommendation</u>	<u>Tasks</u>	<u>Milestones</u>	<u>Assignments</u>	<u>Anticipated Completion Date</u>	<u>Status</u>	<u>Completion Date</u>
		Complete qualification requirements for Inspection Priority 5 for both health physicists by 11/30/04; Priority 3 by 03/31/05; for Priorities 1 & 2 by 7/31/05.	DOD	06/30/2005	Training actively underway; DC & RD qualified for non-medical Priority 5 inspections; currently in training for licensing reviews.	

NEW HAMPSHIRE DEPARTMENT OF HEALTH and HUMAN SERVICES
 DIVISION OF PUBLIC HEALTH SERVICES/BUREAU OF PREVENTION SERVICES/RADIOLOGICAL HEALTH SECTION

PROGRAM IMPROVEMENT PLAN

Revision 03/21/2005

<u>Recommendation</u>	<u>Tasks</u>	<u>Milestones</u>	<u>Assignments</u>	<u>Anticipated Completion Date</u>	<u>Status</u>	<u>Completion Date</u>
	Modify staff training and qualifications program to include requirements for individuals to evaluate SS&D applications and sign registration sheets.	Modification completed	DOD	11/30/2004	Completed	12/30/2004
	Establish plan for health physicist staff member with degrees in engineering to promptly complete all training and qualification requirements in order to be qualified to conduct SS&D reviews.	Assign self-study program for staff member, utilizing SS&D program manuals and NRC NUREG 1556	DOD/AsB	12/31/2004	Completed	12/14/2004
		Facilitate training opportunities utilizing assistance from Massachusetts RCP.	DOD	12/31/2004	Completed	02/04/2005
	Rules Revision (See rule revision chart attached)	Re-adopt 10 CFR 39 equivalent "Well Logging" (by reference)	DOD	Completed	Completed	11/19/2004
		Adopt 10 CFR 36 equivalent "Irradiators" (by reference)	DOD	Completed	Completed	11/19/2004
		Where appropriate and applicable, incorporate license conditions as legally binding requirements to address revised regulations	DOD/HP Staff	12/31/2004	"Constraint rule" incorporation completed	01/07/2005
Draft rules based on NRC regulations in accordance with compatibility criteria		DOD with HP staff input	As per milestones	In process		
Hire additional clerk to assist in rules revision		MAC/AB/DOD/HR	06/30/2004	New clerk to begin on 04/01/05		

NEW HAMPSHIRE DEPARTMENT OF HEALTH and HUMAN SERVICES
 DIVISION OF PUBLIC HEALTH SERVICES/BUREAU OF PREVENTION SERVICES/RADIOLOGICAL HEALTH SECTION

PROGRAM IMPROVEMENT PLAN

Revision 03/21/2005

<u>Recommendation</u>	<u>Tasks</u>	<u>Milestones</u>	<u>Assignments</u>	<u>Anticipated Completion Date</u>	<u>Status</u>	<u>Completion Date</u>
Abbreviations Key						
MAC: Mary Ann Cooney, Director, Division of Public Health Services (DPHS), NH Department of Health and Human Services (DHHS)						
AB: Alice Bruning, Chief, Bureau of Prevention Services (BPS), DPHS, DHHS						
DOD: Dennis O'Dowd, Acting Administrator, Radiological Health Section (RHS), BPS, DPHS, DHHS						
AsB: Asish Banerjee, Health Physicist, RHS, BPH, DPHS, DHHS						
HR: Human Resources, DHHS						
MRB: NRC's Management Review Board						
G&C: Governor & Council						
SS&D: Sealed Source and Device						
NECHPS: New England Chapter of the Health Physics Society						
CRCPD: Conference of Radiation Control Program Directors, Inc.						
RCP: Radiation Control Program						

NRC REGULATIONS REQUIRED FOR COMPATIBILITY (OVERDUE)
- STATUS REPORT -
(March 2005)

TITLE	REGULATORY REFERENCE Title 10 Code of Federal Regulations (10 CFR)	FEDERAL REGISTER REFERENCE(S)	EFFECTIVE DATE ¹	STATUS
Timeliness in Decommissioning of Materials Facilities	Parts 30, 40, 70	59 FR 36026	August 15, 1994	ARU AND RHS working together to complete FIS for 3/25/05 submittal
Termination or Transfer of Licensed Activities: Recordkeeping Requirements	Parts 20, 30, 40, 61, 70	61 FR 24669	June 17, 1996	ARU AND RHS working together to complete FIS for 3/25/05 submittal
Recognition of Agreement State Licenses in Areas Under Exclusive Federal Jurisdiction Within an Agreement State	Part 150	62 FR 1662	February 27, 1997	ARU AND RHS working together to complete FIS for 3/25/05 submittal
Criteria for the Release of Individuals Administered Radioactive Material	Parts 20 and 35	62 FR 4120 ²	May 29, 1997	ARU AND RHS working together to complete FIS for 3/25/05 submittal
Radiological Criteria for License Termination	Parts 20, 30, 40, 70	62 FR 39057 ³	August 20, 1997	ARU AND RHS working together to complete FIS for 3/25/05 submittal
Deliberate Misconduct by Unlicensed Persons	Parts 30, 40, 61, 70, 71, 150	63 FR 1890; 63 FR 13733	February 12, 1998	ARU AND RHS working together to complete FIS for 3/25/05 submittal
Minor Corrections, Clarifying Changes, and a Minor Policy Change	Parts 20, 35, 36	63 FR 39477; 63 FR 45393 ⁴	October 26, 1998	ARU AND RHS working together to complete FIS for 3/25/05 submittal
Respiratory Protection and Controls to Restrict Internal Exposures	Part 20	64 FR 54543; 64 FR 55524 ⁵	February 2, 2000	ARU AND RHS working together to complete FIS for 3/25/05 submittal
Requirements for Certain Generally Licensed Industrial Devices Containing Byproduct Material	Parts 30, 31, 32	65 FR 79162 ⁶	February 16, 2001	ARU AND RHS working together to complete FIS for 3/25/05 submittal

¹ Agreement States have up to three years from the effective date to adopt compatible regulations.

² Portions of the Part 20 amendment are designated as Category A for compatibility.

³ Parts of this amendment are designated as A or B for compatibility.

⁴ Portions of this amendment are designated as Category A for compatibility.

⁵ Portions of this amendment are designated as Category B for compatibility.

⁶ Portions of this amendment are designated as Category B for compatibility.

**NRC REGULATIONS REQUIRED FOR COMPATABILITY (NOT OVERDUE⁷)
 - STATUS REPORT -
 (March 2005)**

TITLE	REGULATORY REFERENCE Title 10 Code of Federal Regulations (10 CFR)	FEDERAL REGISTER REFERENCE(S)	EFFECTIVE DATE ⁸	STATUS
Revision to the Skin Dose Limit	Part 20	67 FR 16298 ⁹	April 5, 2002	ARU AND RHS working together to complete FIS for 3/25/05 submittal
Medical Use of Byproduct Material	Parts 20, 32, and 35	67 FR 20249) ¹⁰	April 24, 2002	Not yet overdue; plans to begin development in April 2005
Financial Assurance for Materials Licenses	Parts 30, 40, 70	68 FR 57327	December 3, 2003	Not overdue; plans to begin development by Fall 2005
Compatibility with IAEA Transportation Safety Standards (TS-R-1) and Other Safety Amendments	Part 71	69 FR 3698	October 1, 2004	Not overdue - plans to begin development by Fall 2005

⁷ The Section will need to address these four regulations in upcoming rule makings or by adopting alternate legally binding requirements.

⁸ Agreement States have up to three years from the effective date to adopt compatible regulations.

⁹ Portions of this amendment are designated as as either Category A or B for compatibility.

¹⁰ Portions of these amendments are designated as either Category A or B for compatibility.

NRC REGULATIONS REQUIRED FOR COMPATABILITY (COMPLETED)
- STATUS REPORT -
(March 2005)

TITLE	REGULATORY REFERENCE Title 10 Code of Federal Regulations (10 CFR)	FEDERAL REGISTER REFERENCE(S)	EFFECTIVE DATE ¹¹	STATUS
Resolution of Dual Regulation of Airborne Effluents of Radioactive Materials; Clean Air Act	Part 20	61 FR 65120	January 9, 1997	All applicable licenses have been amended incorporating the "constraint rule" requirements by a legally binding license condition.
Recognition of Agreement State Licenses in Areas Under Exclusive Federal Jurisdiction Within an Agreement State	Part 150	62 FR 1662	February 27, 1997	Rule pertaining to out-of-state licensees currently in draft; NH licenses amended to reflect federal jurisdictional issues.
Energy Compensation Sources for Well Logging and Other Regulatory Clarifications	Part 39	65 FR 20337 ¹²	May 17, 2000	Rule adopted 11/19/04
New Dosimetry Technology	Parts 34, 36, 39	65 FR 63749	January 8, 2001	Part 36 eq. regulation adopted 11/19/04; Part 39 eq. regulation adopted 11/19/04; One Part 34 licensee – license amended to incorporate requirement as legally binding license condition (10/25/04).
Licensing, Radiation Safety Requirements for Irradiators	Part 36			Rule adopted 11/19/04

¹¹ Agreement States have up to three years from the effective date to adopt compatible regulations.

¹² Portions of this amendment are designated as Category B for compatibility.