

Agreement State Regulations Status (as of 3/10/05)

State	Number of Amendments Overdue	Amendment Identification (Significant items appear in bold)	Notes on implementation of significant items
Alabama	2	2000-2 New Dosimetry, 2000-1 Well Logging	Two-person Rule: State does not require both qualified individuals to maintain visual surveillance. One radiographer may be in the darkroom.
Arizona	1	2001-1 GL Rule	LTR: State uses 15 mrem per year TEDE.
Arkansas	2	2000-2 New Dosimetry, 2001-1 GL Rule	
California	12	12 overdue amendments include: 2001-1 GL Rule, 1997-6 License Termination Rule	
Colorado	1	2000-1 Well Logging	
Florida	5	1998-6 Manifest Rule , 1993-3 Respiratory Protection Rule, 2000-1 Well Logging, 2000-2 New Dosimetry, 2001-1 GL Rule	
Georgia	0		Two-person Rule: State allows one radiographer to be in the darkroom if the high radiation area can be controlled by the other radiographer.
Illinois	14	14 overdue amendments include: 2001-1 GL Rule, 1998-6 Manifest Rule, 1997-6 License Termination Rule	Two-person Rule: State does not require both qualified individuals to maintain visual surveillance. One radiographer may be in the darkroom.

State	Number of Amendments Overdue	Amendment Identification (Significant items appear in bold)	Notes on implementation of significant items
Iowa	0		Two-person Rule: Both qualified individuals must be present during initial boundary surveys, adjustments to boundaries and security maintenance situations.
Kansas	21	21 overdue amendments include: 2001-1 GL Rule, 1998-6 Manifest Rule, 1997-6 License Termination Rule	
Kentucky	5	1998-5 Minor Corrections, 1999-3 Respiratory Protection Rule, 2000-1 Well Logging, 2000-2 New Dosimetry, 2001-1 GL Rule	
Louisiana	0		Two-person Rule: The State enforces the NRC interpretation of the rule for compatibility reasons; however, the State is in favor of allowing the second radiographer work in the darkroom during operations to reduce the burden on licensees.
Maine	0		
Maryland	2	2000-2 New Dosimetry, 2001-1 GL Rule	
Massachusetts	0		
Mississippi	1	2001-1 GL Rule	
Nebraska	0		
Nevada	2	1997-1 Dual Regulation Airborne Rule, 2001-1 GL Rule	
New Hampshire	11	11 overdue amendments include: 2001-1 GL Rule, 1998-6 Manifest Rule, 1997-6 License Termination Rule	

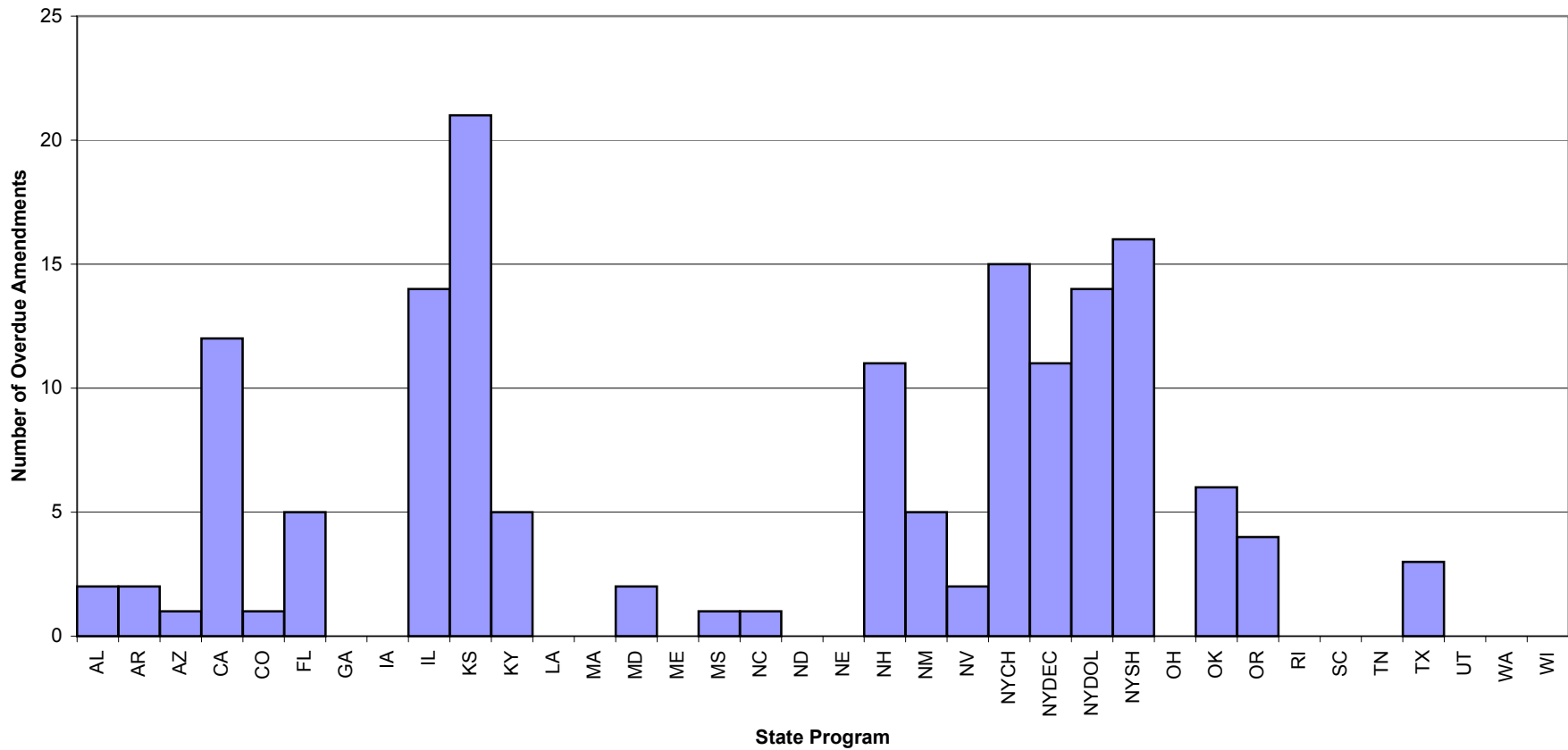
State	Number of Amendments Overdue	Amendment Identification (Significant items appear in bold)	Notes on implementation of significant items
New Mexico	5	1997-2 Part 150 Reciprocity Rule, 1999-3 Respiratory Protection Rule, 2000-1 Well Logging, 2000-2 New Dosimetry, 2001-1 GL Rule	
New York City Health Department ¹	15	15 overdue amendments include: 1998-6 Manifest Rule, 1997-6 License Termination Rule	LTR: Currently in house for review, submitted with eight other amendments on 3/10/05.
New York State Environment Department	11	11 overdue amendments include: 1998-6 Manifest Rule, 1997-6 License Termination Rule	
New York State Health Department	16	16 overdue amendments include: 1998-6 Manifest Rule, 1997-6 License Termination Rule	
New York State Labor Department	14	14 overdue amendments include: 2001-1 GL Rule, 1998-6 Manifest Rule, 1997-6 License Termination Rule	
North Carolina	1	1998-4 Radiography Safety Rule	
North Dakota	0		
Ohio	0		
Oklahoma	6	1997-7 Medical C-14 Rule, 1998-1 Deliberate Misconduct, 1998-4 Radiography Safety Rule, 1998-5 Minor Corrections, 1998-6 Manifest Rule, 2001-1 GL Rule	
Oregon	4	1999-3 Respiratory Rule, 2000-1 Well Logging, 2000-2 New Dosimetry, 2001-1 GL Rule	

¹

Nine amendments were submitted to the Office of State and Tribal Programs for review on March 10, 2005.

State	Number of Amendments Overdue	Amendment Identification (Significant items appear in bold)	Notes on implementation of significant items
Rhode Island	0		
South Carolina	0		
Tennessee	0		
Texas (both programs)	3	1998-1 Deliberate Misconduct, 1997-7 Medical C-14 Rule, 1997-2 Part 150 Reciprocity Rule	Two-person Rule: State provides flexibility to licensees to determine when one radiographer can safely observe licensed operations and prevent intrusions while the other radiographer engages in other job-related activities.
Utah	0		
Washington	0		
Wisconsin	0		

Status of Rule Adoption by Agreement States



Number of States with no regulations overdue = 14
 Number of States with 1-2 regulations overdue = 8

Number of States with 3-7 regulations overdue = 7
 Number of States with more than 7 regulations overdue = 4

Table Comparing IAEA Category II to Part 30 and 31 limits

Limits for Radionuclides of Concern (04/29/2005)								
Radionuclide	Threshold Qty ¹ TBq(Ci)	Source Tracking Qty ¹ TBq(Ci)	Specific License Required?	General License (GL) Registration Qty Tbq (Ci)	GL Subject to Reg.?	Is there an SSD certificate authorizing a GL to possess a device containing the radionuclide listed at the following activity?		
						> 0?	\$ ^{Source} Tracking Qty?	\$ ^{Threshold} Qty?
Am-241	0.6 (16)	0.6 (16)	YES ²	3.7x10 ⁻⁵ (10 ⁻⁶)	YES	YES	YES	YES
Am-241/Be	0.6 (16)	0.6 (16)				YES	NO	NO
Cf-252	0.2 (5.4)	0.2 (5.4)				YES	NO	NO
Cm-244	0.5 (14)	0.5 (14)				YES	YES	YES
Co-60	0.3 (8.1)	0.3 (8.1)	YES ³	3.7x10 ⁻⁴ (10 ⁻⁵)	NO ⁴	YES	YES	YES
Cs-137	1 (27)	1 (27)				YES	YES	YES
Gd-153	10 (270)	10 (270)		YES		NO	NO	
Ir-192	0.8 (22)	0.8 (22)		NO		NO	NO	
Pm-147	400 (11,000)	400 (11,000)				YES	NO	NO
Pu-238	0.6 (16)	0.6 (16)	YES ⁵	3.7x10 ⁻⁵ (10 ⁻⁶)	YES	YES	NO	NO
Pu-239/Be	0.6 (16)	0.6 (16)				YES	NO	NO
Se-75	2 (54)	2 (54)	YES ³	N/A	NO ⁴	NO	NO	NO
Sr-90 (Y-90)	10 (270)	10 (270)		3.7x10 ⁻⁶ (10 ⁻⁷)	YES	YES	NO	NO
Tm-170	200 (5400)	200 (5400)		N/A	NO ⁴	NO	NO	NO
Yb-169	3 (81)	3 (81)		N/A	NO ⁴	NO	NO	NO

¹ The threshold quantity is the IAEA Cat 2 quantity above which we will track sources at a given location. The source quantity is also Cat 2.

² These radionuclides do not have a limit in Part 30, Schedule A or B, below which they are exempt. Possession of any quantity requires a license.

³Possession of the source tracking quantity of these radionuclides exceeds the Schedule B exempt quantity. A license is required to possess it.

⁴These radionuclides are not required to be registered per 10 CFR 31.5(c)(13).

⁵All Pu is SNM and requires a Part 70 license if above 5 : Ci quantity.