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

February 22, 2016

Ms. Ruth E. McBurney
Executive Director
Conference of Radiation Control
Program Directors, Inc.
1030 Burlington Lane, Suite 4B
Frankfort, KY 40601

Dear Ms. McBurney:

We have reviewed the final changes to Part E, *Radiation Safety Requirements for Industrial Radiographic Operations,* received by our office on February 2, 2016. These regulations were reviewed by comparison to the equivalent Nuclear Regulatory Commission rules in 10 CFR Part 34. We discussed our review of the regulations with Bruce Hirschler on February 17, 2016.

As a result of our review, we have no comments related to compatibility. Please note that we have limited our review to regulations required for compatibility and/or health and safety. However, as discussed in our letter dated November 13, 2015, we provided four editorial comments and as noted in the enclosure, three of these comments still need to be addressed. Nonetheless, we have determined that the regulations, as adopted, meet the compatibility and health and safety categories established in the Office of Federal and State Materials and Environmental Management Programs' Procedure SA-200, "Compatibility Categories and Health and Safety Identification for NRC Regulations and Other Program Elements." This letter is posted on the NMSS State Communication Portal: https://scp.nrc.gov/rulemaking.html.

If you have any questions regarding the review results, the compatibility and health and safety categories, or any of the NRC regulations used in the review, please contact Michelle Beardsley State Regulation Review Coordinator, at (267) 884-2305 (Michelle.Beardsley@nrc.gov) or Joe O'Hara at (301) 415-6854 (Joe.OHara@nrc.gov).

Sincerely,

/RA/

Daniel S. Collins, Director
Division of Material Safety, State, Tribal
and Rulemaking Programs
Office of Nuclear Material Safety
and Safeguards

Enclosure:
Editorial comments

cc: Bruce Hirschler, OED, CRCPD
William Irwin, Chairman, CRCPD

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Enclosure:
Editorial Comments

cc: Bruce Hirschler, OED, CRCPD
William Irwin, Chairman, CRCPD

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OFFICE	ASPB	ASPB/SSR	OGC	ASPB:BC	MSTR:D
NAME	JOHara	MBeardsley	AGendelman	PMichalak	DCollins
DATE	2/09/2016	2/09/2016	2/17/2016	2/19/2016	2/22/2016

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EDITORIAL COMMENTS NOT RELATED TO COMPATIBILITY ON CRCPD PART E FROM NRC LETTER DATED NOVEMBER 13, 2015/ML15273A297

SSR SECTIO		NRC SECTION	RATS ID	CATEGORY	SUBJECT and COMMENTS
The following comments are editorial in nature.					
1	E.3 E.8	10 CFR 34.3 10 CFR 34.23	N/A	B	**Definitions: Associated Equipment and Exposure Head. Locking of radiographic exposure devices, storage containers and source changers.** Footnotes should match with a superscript number at the end of the sentence referencing the source. Begin with 1 and continue numerically throughout the paper. CRCPD needs to replace the footnotes by asterisk with numeric footnotes. In accordance with the SSRCR Style Manual, a numerical designation should be used for footnotes intended to be part of the regulations. The asterisk should be replaced by a numerical designation since the intent is for the footnote to be part of the regulation. **COMMENT STANDS.**
2	E.5(h)	10 CFR 34.13(h)	N/A	C	**Licensing and Registration Requirements for Industrial Radiography Operations.** E.5h. does not include the following text: "and the qualifications of the person(s) authorized to do the leak testing." NOTE: This issue is described in CR-02-02. This has not been resolved in rulemaking or in NUREG-1556 Vol 2. Per CR-02-02, this is not a significant issue and will be judged as compatible. **COMMENT STANDS**

Enclosure

3	E.17(c)(ii)	10 CFR 34.43(c)(ii)	N/A	B	**Training.** E.17(c)(ii) has a typographical error. Previously this section allowed for an oral or written examination for a radiographer's assistant whereas 10 CFR 34.43(c) specifies a written test. The sentence states "written or examination." The "or" should be removed; it should refer to a written examination. **COMMENT STANDS**