COLORADO
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February 11, 2016

Pamela J. Henderson, Deputy Director
Division Material Safety, State, Tribal
and Rulemaking Programs
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
T8-E24
Washington, D.C. 20555-0001

Dear Ms. Henderson:

Enclosed is a copy of the revisions to the proposed Colorado *Rules and Regulations Pertaining to Radiation Control*, 6 CCR 1007-1, Part 16, *Radiation Safety Requirements for Wireline Service Operations and Subsurface Tracer Studies*. The proposed revisions will be made available for public comment with a request for comments by April 10, 2016. The proposed regulatory changes are identified by strike-out and bold text.

The proposed changes to Part 16 are intended to align the language of the rule with the wording and requirements of 10 CFR Part 39. Additionally, Table 1 of Attachment 1 identifies two Regulatory Action Tracking System (RATS) items specific to RATS 2011-2 and 2013-1 which have been incorporated into the draft rule. Refer to the side-margin notes in the attached draft rule for further details.

In NRC's correspondence dated September 29, 2015, NRC commented that Colorado omitted the general requirements equivalent to 10 CFR 39.13 regarding specific licenses for well logging. In Section 16.3 of the proposed rule, Colorado has incorporated requirements equivalent to those found in 10 CFR 39.13.

We believe that adoption of the proposed amendments to Part 16 rule satisfies the compatibility and health and safety categories established in the Office of Federal and State Materials and Environmental Programs (FSME) Procedure SA-200.

If you have any questions, please feel free to contact me at 303-692-3403 or James Jarvis of my staff at 303-692-3454 or james.jarvis@state.co.us.

Sincerely,

Jennifer T. Opila

Jennifer T. Opila, MPA
Radiation Program Manager

Enclosures:
Attachment 1 (1 page);
Colorado Part 16 draft rule (Draft B, dated 01/05/16)

Cc: Michelle Beardsley, Senior Project Manager, Office of Office of Federal and State Materials and Environmental Management Programs, U.S. Nuclear Regulatory Commission, T8-E24, Washington, D.C. 20555-0001 (Sent via email on February 11, 2016)

Attachment 1
Pamela J. Henderson, Deputy Director
U.S. Nuclear Regulatory
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Table 1. Specific RATS items addressed in the proposed rule.

RATS ID	CFR Title	State Section(s)
2011-2	Specific licenses for well logging. 10 CFR 39.13(a)	16.3 The proposed rule adds section 16.3, which is equivalent to 10 CFR 39.13.
2013-1	Purpose and scope. 10 CFR 39.1	16.1.4 The proposed rule adds a cross-reference to Colorado Part 22 (Part 22 is Colorado's equivalent to 10 CFR Part 37).