

**Revisions to Transportation Safety Requirements and Harmonization with International Atomic Energy Agency
Transportation Requirements; Including Corrections 10 CFR Part 71
(80 FR 33987, Published June 12, 2015 and 80 FR 48683, Published August 14, 2015) RATS ID: 2015-3
Effective Date: July 13, 2015 / Date Due for State Adoption: July 13, 2018**

Change to NRC Section	Title	Compatibility Category	Summary of Change to CFR	Different Yes/No	Comment and State Section
§71.0(d)(1) Revised	Purpose and Scope	D	In 71.0, paragraph (d)(1), remove the reference “71.20 through 71.23” and add, in its place, the reference “71.21 through 71.23”.	N/A	This change does not apply to Washington State.
§71.4 New	Definition: Contamination	[B]	In 71.4, add the definition of “contamination” to read as follows: Contamination means the presence of a radioactive substance on a surface in quantities in excess of 0.4 Bq/cm ² (1x10 ⁻⁵ µCi/cm ²) for beta and gamma emitters and low toxicity alpha emitters, or 0.04 Bq/cm ² (1x10 ⁻⁶ µCi/cm ²) for all other alpha emitters. (1) Fixed contamination means contamination that cannot be removed from a surface during normal conditions of transport. (2) Non-fixed contamination means contamination that can be removed from a surface during normal conditions of transport.	No	Washington is proposing to adopt this change in WAC 246-231-010(9).
§71.4 Revised	Definition: Criticality Safety Index (CSI)	[B]	In 71.4, revise the definition of “Criticality Safety Index (CSI)” to read as follows: Criticality Safety Index (CSI) means the dimensionless number (rounded up to the next tenth) assigned to and placed on the label of a fissile material package, to designate the degree of control of accumulation of packages, overpacks or freight containers containing fissile material during transportation. Determination of the criticality safety index is described in 71.22, 71.23, and 71.59. The criticality safety index for an overpack, freight container, consignment or conveyance containing fissile material packages is the arithmetic sum of the criticality safety indices of all the fissile material packages contained within the overpack, freight container, consignment or conveyance.	No	Washington is proposing to adopt this change in WAC 246-231-010(11).

Change to NRC Section	Title	Compatibility Category	Summary of Change to CFR	Different Yes/No	Comment and State Section
§71.4 Revised	Definition: Low Specific Activity (LSA) material	[B]	<p>In 71.4, revise the definition of “Low Specific Activity (LSA) material” to read as follows: Low Specific Activity (LSA) material means radioactive material with limited specific activity which is nonfissile or is excepted under §71.15, and which satisfies the descriptions and limits set forth in the following section. Shielding materials surrounding the LSA material may not be considered in determining the estimated average specific activity of the package contents. The LSA material must be in one of three groups:</p> <p>(1) LSA-I.</p> <p>(i) Uranium and thorium ores, concentrates of uranium and thorium ores, and other ores containing naturally occurring radionuclides that are intended to be processed for the use of these radionuclides;</p> <p>(ii) Natural uranium, depleted uranium, natural thorium or their compounds or mixtures, provided they are unirradiated and in solid or liquid form;</p> <p>(iii) Radioactive material other than fissile material, for which the A_2 value is unlimited; or</p> <p>(iv) Other radioactive material in which the activity is distributed throughout and the estimated average specific activity does not exceed 30 times the value for exempt material activity concentration determined in accordance with appendix A.</p> <p>(2) LSA-II.</p> <p>(i) Water with tritium concentration up to 0.8 TBq/liter (20.0 Ci/liter); or</p> <p>(ii) Other radioactive material in which the activity is distributed throughout and the estimated average specific activity does not exceed 10^{-4} A_2/g for solids and gases, and 10^{-5} A_2/g for liquids.</p>	No	Washington is proposing to adopt this change in WAC 246-231-010(18)

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			<p>(3) LSA-III. Solids (e.g., consolidated wastes, activated materials), excluding powders, that satisfy the requirements of §71.77, in which:</p> <p>(i) The radioactive material is distributed throughout a solid or a collection of solid objects, or is essentially uniformly distributed in a solid compact binding agent (such as concrete, bitumen, ceramic, etc.);</p> <p>(ii) The radioactive material is relatively insoluble, or it is intrinsically contained in a relatively insoluble material, so that even under loss of packaging, the loss of radioactive material per package by leaching when placed in water for 7 days will not exceed 0.1 A₂; and</p> <p>(iii) The estimated average specific activity of the solid, excluding any shielding material, does not exceed 2×10^{-3} A₂/g.</p>		
§71.4 Revised	Definition: Special form radioactive material	[B]	<p>In 71.4, revise the definition of “Special form radioactive material” to read as follows: Special form radioactive material means radioactive material that satisfies the following conditions:</p> <p>(1) It is either a single solid piece or is contained in a sealed capsule that can be opened only by destroying the capsule;</p> <p>(2) The piece or capsule has at least one dimension not less than 5 mm (0.2 in); and</p> <p>(3) It satisfies the requirements of 71.75. A special form encapsulation designed in accordance with the requirements of §71.4 in effect on June 30, 1983 (see 10 CFR part 71, revised as of January 1, 1983), and constructed before July 1, 1985; a special form encapsulation designed in accordance with the requirements of 71.4 in effect on March 31, 1996 (see 10 CFR part 71, revised as of January 1, 1996), and constructed before April 1, 1998; and special form material that was successfully tested before September 10, 2015 in accordance with the requirements of 71.75(d) of this section in effect</p>	No	Washington is proposing to adopt this change in WAC 246-231-010(27).

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			before September 10, 2015 may continue to be used. Any other special form encapsulation must meet the specifications of this definition.		
§71.4 Revised	Definition: Uranium – natural, depleted, enriched	[B]	In 71.4, revise the definition of “Uranium— natural, depleted, enriched” to read as follows: Uranium – natural, depleted, enriched. (1) Natural uranium means uranium (which may be chemically separated) with the naturally occurring distribution of uranium isotopes (approximately 0.711 weight percent uranium-235 and the remainder by weight essentially uranium-238). (2) Depleted uranium means uranium containing less uranium-235 than the naturally occurring distribution of uranium isotopes. (3) Enriched uranium means uranium containing more uranium-235 than the naturally occurring distribution of uranium isotopes.	No	Washington is proposing to adopt this change in WAC 246-231-010(37)
§71.6 Revised	Information Collection Requirements: OMB Approval	D	In 71.6, revise paragraph (b) to read as follows: (b) The approved information collection requirements contained in this part appear in 71.5, 71.7, 71.9, 71.12, 71.17, 71.19, 71.22, 71.23, 71.31, 71.33, 71.35, 71.37, 71.38, 71.39, 71.41, 71.47, 71.85, 71.87, 71.89, 71.91, 71.93, 71.95, 71.97, 71.101, 71.103, 71.105, 71.106, 71.107, 71.109, 71.111, 71.113, 71.115, 71.117, 71.119, 71.121, 71.123, 71.125, 71.127, 71.129, 71.131, 71.133, 71.135, 71.137, and appendix A, paragraph II.	N/A	This change does not apply to Washington State.
§71.14(a)(1) – (a)(3) Revised, New	Exemption for low-level materials	[B]	In 71.14, revise paragraphs (a)(1) and (2), and add paragraph (a)(3) to read as follows: (a) * * * (1) Natural material and ores containing naturally occurring radionuclides that are either in their natural state, or have only been processed for purposes other than for the extraction of the radionuclides, and which are not intended to be processed for the use of these radionuclides, provided the activity concentration of the material does not exceed 10 times the applicable	No	Washington is proposing to adopt this change in WAC 246-231-040(4).

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			<p>radionuclide activity concentration values specified in appendix A, Table A-2, or Table A-3 of this part.</p> <p>(2) Materials for which the activity concentration is not greater than the activity concentration values specified in appendix A, Table A-2, or Table A-3 of this part, or for which the consignment activity is not greater than the limit for an exempt consignment found in appendix A, Table A-2, or Table A-3 of this part.</p> <p>(3) Non-radioactive solid objects with radioactive substances present on any surfaces in quantities not in excess of the levels cited in the definition of contamination in §71.4.</p>		
§71.15(d) Revised	Exemption from classification as fissile material	[B]	<p>In 71.15, revise paragraph (d) to read as follows:</p> <p>(d) Uranium enriched in uranium-235 to a maximum of 1 percent by weight, and with total plutonium and uranium-233 content of up to 1 percent of the mass of uranium-235, provided that the mass of any beryllium, graphite, and hydrogenous material enriched in deuterium constitutes less than 5 percent of the uranium mass, and that the fissile material is distributed homogeneously and does not form a lattice arrangement within the package.</p>	No	Washington is proposing to adopt this change in WAC 246-231-040(5).
§71.17 Revised, Removal of Brackets on Compatibility Category.	General license: NRC approved package	B Note: The Compatibility Category for §71.17 has changed from [B] to B.	<p>The Compatibility Category for all of 71.17 has changed from [B] to B signifying that Agreement States should ensure that they have regulations compatible with this section that are collocated with their transportation regulations. In 71.17, revise paragraph (c) to read as follows:</p> <p>(a) A general license is issued to any licensee of the Commission to transport, or to deliver to a carrier for transport, licensed material in a package for which a license, certificate of compliance (CoC), or other approval has been issued by the NRC.</p> <p>(b) This general license applies only to a licensee who has a quality assurance program approved</p>	No	Washington is proposing to adopt this change in WAC 246-231-060.

Change to NRC Section	Title	Compatibility Category	Summary of Change to CFR	Different Yes/No	Comment and State Section
			<p>by the Commission as satisfying the provisions of subpart H of this part.</p> <p>(c) Each licensee issued a general license under paragraph (a) of this section shall—</p> <p>(1) Maintain a copy of the Certificate of Compliance, or other approval of the package, and the drawings and other documents referenced in the approval relating to the use and maintenance of the packaging and to the actions to be taken before shipment;</p> <p>(2) Comply with the terms and conditions of the license, certificate, or other approval, as applicable, and the applicable requirements of subparts A, G, and H of this part; and</p> <p>(3) Submit in writing before the first use of the package to: ATTN: Document Control Desk, Director, Division of Spent Fuel Storage and Transportation, Office of Nuclear Material Safety and Safeguards, using an appropriate method listed in 71.1(a), the licensee's name and license number and the package identification number specified in the package approval.</p> <p>(d) This general license applies only when the package approval authorizes use of the package under this general license.</p> <p>(e) For a Type B or fissile material package, the design of which was approved by NRC before April 1, 1996, the general license is subject to the additional restrictions of 71.19.</p>		
§71.19 Revised	Previously approved package	NRC	<p>In 71.19, redesignate paragraphs (b) through (e) as paragraphs (a) through (d), and revise newly redesignated paragraph (b)(2) to read as follows:</p> <p>(b) * * *</p> <p>(2) A package used for a shipment to a location outside the United States is subject to multilateral approval as defined in the DOT's regulations at 49 CFR 173.403.</p>	N/A	This change does not apply to Washington State.
§71.21 Revised,	General license: Use of foreign approved package	B Note: The Compatibility	The Compatibility Category for all of 71.21 has changed from [B] to B signifying that Agreement States should ensure that they have regulations	No	Washington is proposing to adopt this change in WAC 246-231-090.

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Removal of Brackets on Compatibility Category		Category for §71.21 has changed from [B] to B.	<p>compatible with this section that are collocated with their transportation regulations. In 71.21, revise paragraphs (a) and (d) to read as follows:</p> <p>(a) A general license is issued to any licensee of the Commission to transport, or to deliver to a carrier for transport, licensed material in a package, the design of which has been approved in a foreign national competent authority certificate, that has been revalidated by the DOT as meeting the applicable requirements of 49 CFR 171.23.</p> <p>(b) Except as otherwise provided in this section, the general license applies only to a licensee who has a quality assurance program approved by the Commission as satisfying the applicable provisions of subpart H of this part.</p> <p>(c) This general license applies only to shipments made to or from locations outside the United States.</p> <p>(d) Each licensee issued a general license under paragraph (a) of this section shall—</p> <p>(1) Maintain a copy of the applicable certificate, the revalidation, and the drawings and other documents referenced in the certificate, relating to the use and maintenance of the packaging and to the actions to be taken before shipment; and</p> <p>(2) Comply with the terms and conditions of the certificate and revalidation, and with the applicable requirements of subparts A, G, and H of this part.</p>		
§71.31(b) Revised	Contents of application	NRC	In 71.31, paragraph (b), remove the reference “71.13” and add, in its place, the reference “71.19.”	N/A	This change does not apply to Washington State.
§71.38 Retitled, Revised	Renewal of a certificate of compliance	NRC	<p>Revise 71.38 to read as follows:</p> <p>71.38 Renewal of a certificate of compliance.</p> <p>(a) Except as provided in paragraph (b) of this section, each Certificate of Compliance expires at the end of the day, in the month and year stated in the approval.</p>	N/A	This change does not apply to Washington State.

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			<p>(b) In any case in which a person, not less than 30 days before the expiration of an existing Certificate of Compliance issued pursuant to the part, has filed an application in proper form for renewal, the existing Certificate of Compliance for which the renewal application was filed shall not be deemed to have expired until final action on the application for renewal has been taken by the Commission.</p> <p>(c) In applying for renewal of an existing Certificate of Compliance, an applicant may be required to submit a consolidated application that is comprised of as few documents as possible. The consolidated application should incorporate all changes to its certificate, including changes that are incorporated by reference in the existing certificate.</p>		
§71.70 New	Incorporations by reference	NRC	<p>Add 71.70 to subpart F to read as follows: 71.70 Incorporations by reference.</p> <p>(a) The materials listed in this section are incorporated by reference in the corresponding sections noted and made a part of the regulations in part 71. These incorporations by reference were approved by the Director of the Federal Register under 5 U.S.C. 552(a) and 1 CFR part 51. These materials are incorporated as they exist on the date of the approval. A notice of any changes made to the material incorporated by reference will be published in the Federal Register, and the material must be available to the public. The materials can be examined, by appointment, at the NRC's Technical Library, which is located at Two White Flint North, 11545 Rockville Pike, Rockville, Maryland 20852; telephone: 301-415-7000; email: Library.Resource@nrc.gov. The materials are also available from the sources listed below. All approved material is available for inspection at the National Archives and Records Administration (NARA). For information on the</p>	N/A	This change does not apply to Washington State.

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			<p>availability of this material at NARA, call 1-202-741-6030 or go to http://www.archives.gov/federal-register/cfr/ibr-locations.html.</p> <p>(b) International Organization for Standardization, ISO Central Secretariat, Chemin de Blandonnet 8 CP 401, 1214 Vernier, Geneva, Switzerland; email: central@iso.org; phone: +41 22 749 01 11; Web site: http://www.iso.org.</p> <p>(1) ISO 9978:1992(E), "Radiation protection—Sealed radioactive sources—Leakage test methods," First Edition (February 15, 1992), incorporation by reference approved for 71.75(a), is available for purchase from the American National Standards Institute, 25 West 43rd Street, 4th Floor, New York, NY 10036, 212-642-4900, http://www.ansi.org, or info@ansi.org.</p> <p>(2) ISO 2919:1999(E), "Radiation protection—Sealed radioactive sources—General requirements and classification," Second Edition (February 15, 1999), incorporation by reference approved for 71.75(d), is available on http://www.amazon.com.</p>		
§71.75 Revised	Qualification of special form radioactive material	NRC	<p>In 71.75, revise paragraphs (a)(5), (b)(2)(ii), (b)(2)(iii), (d)(1), and (d)(2) to read as follows:</p> <p>(a) * * *</p> <p>(5) A specimen that comprises or simulates radioactive material contained in a sealed capsule need not be subjected to the leaktightness procedure specified in this section, provided it is alternatively subjected to any of the tests prescribed in ISO 9978:1992(E), "Radiation protection—Sealed radioactive sources—Leakage test methods" (incorporated by reference, see 71.70).</p> <p>(b) * * *</p> <p>(2) * * *</p> <p>(ii) The flat face of the billet must be 25 millimeters (mm) (1 inch) in diameter with the</p>	N/A	This change does not apply to Washington State.

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			<p>edge rounded off to a radius of 3 mm ± 0.3 mm (0.12 in ± 0.012 in);</p> <p>(iii) The lead must be hardness number 3.5 to 4.5 on the Vickers scale and not more than 25 mm (1 inch) thick, and must cover an area greater than that covered by the specimen;</p> <p>* * * * *</p> <p>(d) * * *</p> <p>(1) The impact test and the percussion test of this section, provided that the specimen is:</p> <p>(i) Less than 200 grams and alternatively subjected to the Class 4 impact test prescribed in ISO 2919:1999(E), “Radiation protection—Sealed radioactive sources—General requirements and classification” (incorporated by reference, see 71.70); or</p> <p>(ii) Less than 500 grams and alternatively subjected to the Class 5 impact test prescribed in ISO 2919:1999(E), “Radioactive protection—Sealed radioactive sources—General requirements and classification” (incorporated by reference, see 71.70); and</p> <p>(2) The heat test of this section, provided the specimen is alternatively subjected to the Class 6 temperature test specified in ISO 2919:1999(E), “Radioactive protection—Sealed radioactive sources—General requirements and classification” (incorporated by reference, see 71.70).</p>		
§71.85(a) – (c) Revised, Compatibility Change	Preliminary determinations	NRC Note: The Compatibility Category for §71.85(a) – (c) has changed from [B] to NRC.	<p>In 71.85, revise paragraphs (a), (b), and (c) to read as follows:</p> <p>(a) The certificate holder shall ascertain that there are no cracks, pinholes, uncontrolled voids, or other defects that could significantly reduce the effectiveness of the packaging;</p> <p>(b) Where the maximum normal operating pressure will exceed 35 kPa (5 lbf/in²) gauge, the certificate holder shall test the containment system at an internal pressure at least 50 percent higher than the maximum normal operating</p>	N/A	This change does not apply to Washington State.

Change to NRC Section	Title	Compatibility Category	Summary of Change to CFR	Different Yes/No	Comment and State Section
			pressure, to verify the capability of that system to maintain its structural integrity at that pressure; (c) The certificate holder shall conspicuously and durably mark the packaging with its model number, serial number, gross weight, and a package identification number assigned by the NRC. Before applying the model number, the certificate holder shall determine that the packaging has been fabricated in accordance with the design approved by the Commission; and		
§71.85(d) New	Preliminary determinations	B	In 71.85, add paragraph (d) to read as follows: (d) The licensee shall ascertain that the determinations in paragraphs (a) through (c) of this section have been made.	No	Washington is proposing to adopt this change in WAC 246-231-106.
§71.91(a) Revised, Compatibility Change	Records	C Note: The Compatibility Category for 71.91(a) has changed from D to C.	In 71.91, in paragraph (a) introductory text, remove the reference “71.10” and add, in its place, the reference “71.14.”	No	Washington is proposing to adopt this change in WAC 246-231-136.
§71.91(b) Compatibility Change	Records	NRC Note: The Compatibility Category for 71.91(b) has changed from D to NRC.	The Compatibility Category has changed. b) Each certificate holder shall maintain, for a period of 3 years after the life of the packaging to which they apply, records identifying the packaging by model number, serial number, and date of manufacture.	N/A	This change does not apply to Washington State.
§71.91(c) and (d) Compatibility Change	Records	C Note: The Compatibility Category for § 71.91(c) and (d) has changed from D to C.	The Compatibility Category has changed. (c) The licensee, certificate holder, and an applicant for a CoC, shall make available to the Commission for inspection, upon reasonable notice, all records required by this part. Records are only valid if stamped, initialed, or signed and dated by authorized personnel, or otherwise authenticated. (d) The licensee, certificate holder, and an applicant for a CoC shall maintain sufficient written records to furnish evidence of the quality of packaging. The records to be maintained	No	Washington State has this language in WAC 246-231-136.

Change to NRC Section	Title	Compatibility Category	Summary of Change to CFR	Different Yes/No	Comment and State Section
			include results of the determinations required by 71.85; design, fabrication, and assembly records; results of reviews, inspections, tests, and audits; results of monitoring work performance and materials analyses; and results of maintenance, modification, and repair activities. Inspection, test, and audit records must identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted. These records must be retained for 3 years after the life of the packaging to which they apply.		
§71.101(a) Revised, Compatibility Change	Quality assurance requirements	C** Note: The Compatibility Category for § 71.101(a) has changed from D or C to only C. ** See last page for additional note.	In 71.101, revise paragraph (a) to read as follows: (a) Purpose. This subpart describes quality assurance requirements applying to design, purchase, fabrication, handling, shipping, storing, cleaning, assembly, inspection, testing, operation, maintenance, repair, and modification of components of packaging that are important to safety. As used in this subpart, “quality assurance” comprises all those planned and systematic actions necessary to provide adequate confidence that a system or component will perform satisfactorily in service. Quality assurance includes quality control, which comprises those quality assurance actions related to control of the physical characteristics and quality of the material or component to predetermined requirements. Each certificate holder and applicant for a package approval is responsible for satisfying the quality assurance requirements that apply to design, fabrication, testing, and modification of packaging subject to this subpart. Each licensee is responsible for satisfying the quality assurance requirements that apply to its use of a packaging for the shipment of licensed material subject to this subpart.	No	Washington is proposing to adopt this change in WAC 246-231-150(1).
§71.101(b) and (c)(1) Compatibility Change	Quality assurance requirements	C**	The Compatibility Category has changed.	No	Washington is proposing to adopt this change in WAC 246-231-150.

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		<p>Note: The Compatibility Category for §71.101(b) and (c)(1) has changed from D or C to only C.</p> <p>** See last page for additional note.</p>	<p>(b) Establishment of program. Each licensee, certificate holder, and applicant for a CoC shall establish, maintain, and execute a quality assurance program satisfying each of the applicable criteria of 71.101 through 71.137 and satisfying any specific provisions that are applicable to the licensee's activities including procurement of packaging. The licensee, certificate holder, and applicant for a CoC shall execute the applicable criteria in a graded approach to an extent that is commensurate with the quality assurance requirement's importance to safety.</p> <p>(c) Approval of program. (1) Before the use of any package for the shipment of licensed material subject to this subpart, each licensee shall obtain Commission approval of its quality assurance program. Using an appropriate method listed in 71.1(a), each licensee shall file a description of its quality assurance program, including a discussion of which requirements of this subpart are applicable and how they will be satisfied, by submitting the description to: ATTN: Document Control Desk, Director, Division of Spent Fuel Management, Office of Nuclear Material Safety and Safeguards.</p>		
§71.101(c)(2) Revised	Quality assurance requirements	NRC	<p>In 71.101, revise paragraphs (c)(2) to read as follows:</p> <p>(c) * * *</p> <p>(2) Before the fabrication, testing, or modification of any package for the shipment of licensed material subject to this subpart, each certificate holder, or applicant for a Certificate of Compliance shall obtain Commission approval of its quality assurance program. Each certificate holder or applicant for a CoC shall, in accordance with 71.1, file a description of its quality assurance program, including a discussion of which requirements of this subpart are applicable and how they will be satisfied.</p>	N/A	This change does not apply to Washington State.

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§71.101(g) Compatibility Note Revised	Quality assurance requirements	C** ** See last page for note.	The Compatibility Category note has been revised. (g) Radiography containers. A program for transport container inspection and maintenance limited to radiographic exposure devices, source changers, or packages transporting these devices and meeting the requirements of 34.31(b) of this chapter or equivalent Agreement State requirement, is deemed to satisfy the requirements of 71.17(b) and 71.101(b).	No	Washington is proposing to adopt this change in WAC 246-231-150(4).
§71.103(a) Revised, Compatibility Change	Quality assurance organization	C** Note: The Compatibility Category for §71.103(a) has changed from D or [C] to only C. ** See last page for additional note.	In 71.103, revise paragraph (a) to read as follows: (a) The licensee, certificate holder, and applicant for a Certificate of Compliance shall be responsible for the establishment and execution of the quality assurance program. The licensee, certificate holder, and applicant for a Certificate of Compliance may delegate to others, such as contractors, agents, or consultants, the work of establishing and executing the quality assurance program, or any part of the quality assurance program, but shall retain responsibility for the program. These activities include performing the functions associated with attaining quality objectives and the quality assurance functions.	No	Washington State has this language in WAC 246-231-160(1).
§71.103(b) Compatibility Note Revised	Quality assurance organization	C** ** See last page for note.	The Compatibility Category note has been revised. (b) The quality assurance functions are-- (1) Assuring that an appropriate quality assurance program is established and effectively executed; and (2) Verifying, by procedures such as checking, auditing, and inspection, that activities affecting the functions that are important to safety have been correctly performed.	No	Washington State has this language in WAC 246-231-160(2).
§71.106 New	Changes to quality assurance program	C	Add 71.106 to subpart H to read as follows: 71.106 Changes to quality assurance program. (a) Each quality assurance program approval holder shall submit, in accordance with 71.1(a), a description of a proposed change to its NRC-	No	Washington is proposing to adopt this change in WAC 246-231-174.

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			<p>approved quality assurance program that will reduce commitments in the program description as approved by the NRC. The quality assurance program approval holder shall not implement the change before receiving NRC approval.</p> <p>(1) The description of a proposed change to the NRC-approved quality assurance program must identify the change, the reason for the change, and the basis for concluding that the revised program incorporating the change continues to satisfy the applicable requirements of subpart H of this part.</p> <p>(2) [Reserved]</p> <p>(b) Each quality assurance program approval holder may change a previously approved quality assurance program without prior NRC approval, if the change does not reduce the commitments in the quality assurance program previously approved by the NRC. Changes to the quality assurance program that do not reduce the commitments shall be submitted to the NRC every 24 months, in accordance with 71.1(a). In addition to quality assurance program changes involving administrative improvements and clarifications, spelling corrections, and non-substantive changes to punctuation or editorial items, the following changes are not considered reductions in commitment:</p> <p>(1) The use of a quality assurance standard approved by the NRC that is more recent than the quality assurance standard in the certificate holder's or applicant's current quality assurance program at the time of the change;</p> <p>(2) The use of generic organizational position titles that clearly denote the position function, supplemented as necessary by descriptive text, rather than specific titles, provided that there is no substantive change to either the functions of the position or reporting responsibilities;</p>		

Change to NRC Section	Title	Compatibility Category	Summary of Change to CFR	Different Yes/No	Comment and State Section
			<p>(3) The use of generic organizational charts to indicate functional relationships, authorities, and responsibilities, or alternatively, the use of descriptive text, provided that there is no substantive change to the functional relationships, authorities, or responsibilities;</p> <p>(4) The elimination of quality assurance program information that duplicates language in quality assurance regulatory guides and quality assurance standards to which the quality assurance program approval holder has committed to on record; and</p> <p>(5) Organizational revisions that ensure that persons and organizations performing quality assurance functions continue to have the requisite authority and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations.</p> <p>(c) Each quality assurance program approval holder shall maintain records of quality assurance program changes.</p>		
§71.135 Revised, Compatibility Change	Quality assurance records	<p>C**</p> <p>Note: The Compatibility Category for § 71.135 has changed from D or C to only C.</p> <p>** See last page for additional note.</p>	<p>Revise 71.135 to read as follows:</p> <p>The licensee, certificate holder, and applicant for a Certificate of Compliance shall maintain sufficient written records to describe the activities affecting quality. These records must include changes to the quality assurance program as required by 71.106, the instructions, procedures, and drawings required by 71.111 to prescribe quality assurance activities, and closely related specifications such as required qualifications of personnel, procedures, and equipment. The records must include the instructions or procedures that establish a records retention program that is consistent with applicable regulations and designates factors such as duration, location, and assigned responsibility. The licensee, certificate holder, and applicant for a Certificate of Compliance shall retain these records for 3 years beyond the</p>	No	Washington is proposing to adopt this change in WAC 246-246-231-186.

Change to NRC Section	Title	Compatibility Category	Summary of Change to CFR	Different Yes/No	Comment and State Section
			date when the licensee, certificate holder, and applicant for a Certificate of Compliance last engage in the activity for which the quality assurance program was developed. If any portion of the quality assurance program, written procedures or instructions is superseded, the licensee, certificate holder, and applicant for a Certificate of Compliance shall retain the superseded material for 3 years after it is superseded.		
Appendix A Revised	Determination of A1 and A2	[B]	In appendix A to part 71, revise paragraphs IV.a. and IV.b., redesignate paragraphs IV.c. through IV.f. as paragraphs IV.d. through IV.g., add new paragraph IV.c., revise newly redesignated paragraphs IV.d. through IV.g., redesignate paragraph V. as paragraph V.a., and add new paragraph V.b. Revisions detailed below under “Appendix A to Part 71 — Determination of A1 and A2.”	No	Washington is proposing to adopt this change in WAC 246-231-200 Appendix A.
Appendix A, Table A-1 Revised	A1 and A2 Values for Radionuclides	[B]	In Table A-1 of Appendix A, add an entry for Kr-79 in alphanumeric order; revise the entries for Cf 252, Ir-192, Kr-81, and Mo 99; revise footnotes a and c; remove footnote h; and redesignate footnote i as footnote h. Revisions detailed below under “Table A-1—A1 and A2 VALUES FOR RADIONUCLIDES.”	No	Washington is proposing to adopt this change in WAC 246-231-200 Appendix A, Table 1.
Appendix A, Table A-2 Revised	Exempt Material Activity Concentrations and Exempt Consignment Activity Limits for Radionuclides.	[B]	In Table A-2 of Appendix A, add the entry for Kr-79 in alphanumeric order, revise the entries for Kr 81 and Te 121m, and revise footnote b. Revisions detailed below under “Table A-2—EXEMPT MATERIAL ACTIVITY CONCENTRATIONS AND EXEMPT CONSIGNMENT ACTIVITY LIMITS FOR RADIONUCLIDES.”	No	Washington is proposing to adopt this change in WAC 246-231-200, Appendix A, Table 2.
Appendix A, Table A-3 Revised	General Values for A1 and A2	[B]	In Table A-3 of Appendix A, revise the second and third entries and add a new footnote a. Revisions detailed below under “TABLE A-3—GENERAL VALUES FOR A1 and A2.”	No	Washington is proposing to adopt this change in WAC 246-231-200, Appendix A, Table A-3

** Note: 71.101(g) indicates that QA programs for industrial radiography Type B package users are covered by 34.31(b). It also indicated that this section satisfies 71.17(b) and therefore will satisfy those sections referenced in this provision (71.101 through 71.137).