

From: [AStrainingandtravel Resource](#)
To: [AgreementStateRegs Resource](#)
Subject: FW: FW: RATS 2018-3
Date: Monday, December 30, 2019 5:39:47 PM
Attachments: [330.900.docx](#)
[337.1020.docx](#)
[337.2020 \(2\).docx](#)
[RATS2018-3 \(2\).docx](#)

Came to my mailbox by accident

From: Vinson, Gibb <Gibb.Vinson@illinois.gov>
Sent: Monday, December 30, 2019 11:06 AM
To: AStrainingandtravel Resource <AStrainingandtravel.Resource@nrc.gov>
Cc: Khayyat, Adnan <Adnan.Khayyat@illinois.gov>; Conway, Louise <louise.conway@illinois.gov>
Subject: [External_Sender] FW: RATS 2018-3

Michelle,

IEMA wishes to submit our **final** versions of 330.900(a) and 337.1020 and **draft** 337.2020 for review against RATS ID 2018-3. These regulations are due for adoption on July 30, 2022. A cross reference sheet is also attached.

For the reference to 34.101(c), we believe that 330.900 (reciprocity) adequately addresses temporary jobsites. IEMA will handle temporary jobsites that exceed 180 days like any other violation of the rules. The NRC and IEMA regulations do not specifically require prior notifications of other violations, and we prefer to keep it that way.

In addition, it appears 34.101(c) cannot actually be met as written. It should say...

“(c) Any licensee conducting radiographic operations or storing radioactive material at any location not listed on the license for a period ~~in excess of~~ **approaching** 180 days in a calendar year, shall notify the appropriate NRC regional office listed in § 30.6(b)(2) of this chapter prior to exceeding the 180 days.

For 337.1020(b)(2), we require that the licensee provide the T/R certification to IEMA for the RO just as NRC does.

Thank you for your consideration in this matter. Please send us confirmation that these rules have been received and accepted. If you have any questions, please feel free to contact me.

Regards, Gibb

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