

January 16, 2020

Kevin Williams, Deputy Director  
Division of Materials Safety, Security, State and Tribal Programs (MSST)  
Office of Nuclear Material Safety and Safeguards (NMSS)  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dear Mr. Williams:

Enclosed is a copy of the proposed revisions to the State of Iowa Radiological Health Rules, Iowa Administrative Code (IAC) 641-37(136C) Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material; 641-38(136C) General Provisions for Radiation Machines and Radioactive Materials; 641-39(136C) Registration of Radiation Machine Facilities, Licensure of Radioactive Materials, and Transportation of Radioactive Materials; 641-40(136C) Standards for Protection Against Radiation; 641-41.2(136C) Use of Radionuclides in the Healing Arts; 641-41.5 (136C) Radiation Safety Requirements for Industrial Radiographic Operations. The proposed revisions were made available for public comment on January 15, 2020 with a request for comments by February 4, 2020. We request NRC comments by March 4, 2020. The proposed regulations are identified by line-in/line-out text and correspond to the following equivalent amendments to NRC Regulations.

The revisions are intended to incorporate RATS IDs 2018-1, 2018-2, 2018-3 (corrected), 2019-1, and 2019-2. Please note, while we examined compatibility D and NRC categories, unless changes were made, they will not be identified in the tables below. All compatibility A, B, C and H&S are included in tables below.

**NO ASSOCIATED RATS ID**

<u>ITEM</u>	<u>NRC 10 CFR PART</u>	<u>State Sections</u>
1	N/A	37.1(4)
6	N/A	38.1(2)
7	32.2	38.2
9	35.2	38.2
10	N/A	38.6
11	N/A	38.8(2)
12	N/A	38.8(12)
13	N/A	38.9(1)
14	N/A	39.1(3)
15	N/A	38.3(2)"a"
16	40.2(c)	39.4(21)"a"(3)
17	31.5(13)(i)	39.4(22)"d"(13)
22	N/A	40.1(5)
23	20.1202(a)	40.16(1)

**NO ASSOCIATED RATS ID (continued)**

<u>ITEM</u>	<u>NRC 10 CFR PART</u>	<u>State Sections</u>
24	N/A	40.37(3)
25	N/A	41.2(1)"b"
27	35.2	41.2(2)
28	N/A	41.2(2)
32	35.3045(c)-(g)	41.2(14)
33	N/A	41.2(17)"e"
35	N/A	41.2(32)
37	N/A	41.2(36)
40	N/A	41.2(39)
41	N/A	41.2(40)
43	N/A	41.2(42)
45	N/A	41.2(48)
48	N/A	41.2(53)
49	N/A	41.2(54)
57	N/A	45
58	N/A	45.1(1)"b"
59	34.101	45.1(18)

<u>ITEM</u>	<u>RATS ID</u>	<u>NRC 10 CFR PART</u>	<u>State Sections</u>
21	2018-1	30.34(g)	39.4(32)"e"
18	2018-1	32.72(a)(4)	39.4(29)"j"(1)4
19	2018-1	32.72(b)(5)(i)	39.4(29)"j"(2)5
20	2018-1	32.72(d)-(e)	39.4(29)"j"(3)-(4)
26	2018-1	35.2	41.2(2)
8	2018-1	35.2	38.2
29	2018-1	35.13	41.2(4)
29	2018-1	35.14	41.2(5)
29	2018-1	35.15	41.2(4)"b"
29	2018-1	35.15	41.2(5)"d"
30	2018-1	35.24 (b)&(c)	41.2(10) "b"&"c"
55	2018-1	35.40	41.2(87)
50	2018-1	35.50	41.2(65)
51	2018-1	35.51	41.2(74)
52	2018-1	35.55	41.2(78)
51	2018-1	35.57	41.2(75)
34	2018-1	35.65	41.2(20)

<b><u>ITEM</u></b>	<b><u>RATS ID</u></b>	<b><u>NRC 10 CFR PART</u></b>	<b><u>State Sections</u></b>
50	2018-1	35.190	41.2(67)
36	2018-1	35.204	41.2(34) "a"-"c"
50	2018-1	35.290	41.2(68)
38	2018-1	35.300	41.2(37)
50	2018-1	35.390	41.2(69)
53	2018-1	35.392	41.2(81)
53	2018-1	35.394	41.2(82)
56	2018-1	35.396	41.2(89)
44	2018-1	35.400	41.2(43)
54	2018-1	35.433	41.2(85)
50	2018-1	35.490	41.2(70)
50	2018-1	35.491	41.2(71)
42	2018-1	35.500	41.2(41)
50	2018-1	35.590	41.2(72)
46	2018-1	35.600	41.2(49)
47	2018-1	35.610	41.2(52)
50	2018-1	35.655(a)	41.2(64)
50	2018-1	35.690	41.2(73)
39	2018-1	35.2310	41.2(38)"c"
44	2018-1	35.2310	41.2(44)"c"
47	2018-1	35.2310	41.2(52)"f"
50	2018-1	35.2655	41.2(64)"c"
8	2018-1	35.3045	38.2
36	2018-1	35.3204	41.2(34)"e"
5	2018-2	37.77	37.77
No Change to Iowa Rules	2018-2	37.81(g)	37.81(7)
No Change to Iowa Rules	2018-2	70.32	39.4(32)
N/A	2018-2	71.97	39.5
N/A	2018-3 (corrected)	34.101(c)	45.1(18)
2	2018-3 (corrected)	37.23(b)(2)	37.23(2)"b"
4	2018-3 (corrected)	37.43(d)	37.43(4)
No Change to Iowa Rules	2018-3 (corrected)	37.45(b)	37.45(2)
5	2018-3 (corrected)	37.77(a)(1)	37.77(1)"a"(1)
No Change to Iowa Rules	2019-1	37.23(b)(2)	37.23(2)"b"
3	2019-1	37.27(c) (1)&(2)	37.27(3) "a"&"b"
N/A	2019-2	71.17(c)(3)	39.5
N/A	2019-2	71.101	39.5

We believe that adoption of these revisions satisfies the compatibility and health and safety categories established in the Office of Nuclear Material Safety and Safeguards (NMSS) Procedure SA-200.

The IAC rules may be found at <https://idph.iowa.gov/radioactivematerials/rules>.

If you have any questions, please feel free to contact my staff by phone, Stuart Jordan at 515-281-0403 or Derek Elling at 515-380-8752; or by email, [IowaRAM@idph.iowa.gov](mailto:IowaRAM@idph.iowa.gov).

Sincerely,

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DDE/rd

cc: Michelle Beardsley, State Regulation Review Coordinator