



April 1, 2020

Kevin Williams, Deputy Director  
 Division of Materials Safety, Security, State,  
 and Tribal Programs  
 Office of Nuclear Material Safety  
 and Safeguards  
 U.S. Nuclear Regulatory Commission  
 T8-E18  
 Washington, D.C. 20555-0001

Dear Mr. Williams:

Enclosed is a copy of the proposed revisions to the Colorado Rules and Regulations Pertaining to Radiation Control, 6 CCR 1007-1, Part 17 (Transportation of radioactive material), and Part 22 (Physical protection of category 1 and category 2 quantities of radioactive material). The proposed revisions will be made available for public comment on or about April 7, 2020 with a request for comments on or before May 8, 2020. We request NRC’s comments by May 22, 2020 in preparation for a June rulemaking request before the Colorado Board of Health. The proposed regulations are identified by strike-out/bold text and correspond to the following equivalent amendments to NRC’s regulations.

RATS ID	Title	State Section
*2015-3	NRC comment(s) dated March 8, 2018 pertaining to: Revisions to transportation safety requirements and harmonization with International Atomic Energy Agency Transportation requirements; Including corrections 10 CFR Part 71	Part 17 Provision 17.7.1
*2015-5	NRC comment(s) dated March 8, 2018 pertaining to: Miscellaneous corrections 10 CFR Parts 19, 20, 30, 32, 37, 40, 61, 70, 71, and 150	Part 22 Provision 22.27.1.A.1
2018-2	Miscellaneous corrections - organizational changes 10 CFR Parts 37, 40, 70, and 71	No changes are applicable to CO regulations
2018-3	Miscellaneous corrections 10 CFR Parts 1, 2, 34, 37, 50, 71, 73, and 140	Part 17 Part 22
2019-1	Miscellaneous corrections 10 CFR Parts 2, 21, 37, 50, 52, 73, and 110	Part 22
2019-2	Organizational changes and conforming amendments 10 CFR Parts 1, 2, 37, 40, 50, 51, 52, 55, 71, 73, 74, 100, 140, and 150	Part 17

\*The final rules specific to RATS 2015-3, and 2015-5 were previously submitted to and reviewed by NRC in 2018. The 2020 rule amendment will addresses remaining comment(s) for these RATS items.

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.

To aid in the review of the proposed draft regulations, we have also enclosed an annotated copy of RATS 2018-2, 2018-3, 2019-1, and 2019-2 which identifies each applicable section in the Colorado proposed rules corresponding to the amended federal rule change.





**COLORADO**  
Department of Public  
Health & Environment

If you have any questions, please feel free to contact me at 303-692-3371 or James Jarvis of my staff at (303) 692-3454 or [james.jarvis@state.co.us](mailto:james.jarvis@state.co.us).

Sincerely,

Jim Grice, Radiation Program Manager  
Hazardous Materials & Waste Management Division

Enclosures:

6 CCR 1007-1, Part 17 (Draft B dated 03/27/2020)  
6 CCR 1007-1, Part 22 (Draft B dated 03/27/2020)  
Annotated RATS 2018-2 to proposed Colorado rule matrix  
Annotated RATS 2018-3 to proposed Colorado rule matrix  
Annotated RATS 2019-1 to proposed Colorado rule matrix  
Annotated RATS 2019-2 to proposed Colorado rule matrix

Cc: Michelle Beardsley, U.S. NRC, Regulatory Review Coordinator (via email)

