

**Regulation Review Report
of Illinois Administrative Code Title 32: Energy
Chapter II: Department of Nuclear Safety
Subchapter b: Radiation Protection
Parts 310 and 340
Prepared for the Nuclear Regulatory Commission
Office of State Programs**

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**REGULATION REVIEW REPORT OF
32 ILLINOIS ADMINISTRATIVE CODE, CHAPTER II,
SUBCHAPTER b: RADIATION PROTECTION
PARTS 310 AND 340**

I. Introduction

The State of Illinois regulates the control of radiation at 32 Ill. Adm. Code Chapter II, Subchapter b: Radiation Protection. The regulations contained in Subchapter b: Radiation Protection Parts 310 and 340 are generally equivalent to the Suggested State Regulations (SSR). This review examined Part 310, which is modeled after Part A of the SSR; Part 340, which is modeled after Part D of the SSR; and Sections 1052, 1055, and 1057 of Part 340, which are equivalent to SSR Appendix E to Part D. Illinois incorporates by reference all appendices to 10 CFR Part 20, effective January 1, 1994, including corrections and amendments.

In order to assist the reader in utilizing the summary report and the internal review report, three aids are provided in this introduction: first, Section II provides an explanation of "consistent" and "inconsistent" as these terms are applied in this review; second, Section III describes the major points regarding the Illinois regulations; and third, Section IV provides some general comments explaining issues that appear frequently throughout the report. The issues addressed in the general comments are insignificant and do not affect the consistency of the regulations. They will not be specifically noted in the summary report. For specific instances refer to the Internal Regulatory Review.

Section V is the summary table, which follows the order of the 10 CFR Part 20 text, including definitions. The terms used in the definitions section come directly from the CFR. When the SSR or Illinois uses a different term, the report so indicates. Three regulatory charts and a health physics chart are included within the summary table. The first chart contains comments on the Illinois text for which there is equivalent 10 CFR Part 20 and SSR text. Comments on the appendices follow this chart. The second chart contains comments on text which appears in the SSR and the Illinois regulations but not 10 CFR Part 20. The third chart contains comments on additional Illinois text for which there is no equivalent in either the SSR or the CFR.

II. Consistency and Inconsistency Definitions:

- A. As applied in the Illinois review and letter report, the definition of consistency is comprised of the following elements:
1. The text under review, including language and punctuation, is similar or identical to the SSR or CFR, whichever is applicable; or
 2. Where the text is not similar, the meaning is nevertheless equivalent, accordant, congruous, and/or not contradictory; and
 3. In both instances, where the text is similar or not similar, the mandatory requirements of the SSR or CFR, whichever is applicable, are incorporated, and the incorporated text is in accordance with the SSR or CFR, whichever is applicable; and
 4. The scope and applicability are equivalent, accordant, congruous, and/or not

contradictory; or

5. Because Illinois models its regulations after the SSR and encompasses non-Atomic Energy Act (AEA) activities and materials, the scope and applicability may be broader than the scope and applicability of 10 CFR Part 20. This permissible broader scope and applicability includes non-AEA sources of radiation such as naturally occurring or accelerator-produced radioactive material (NARM) and medical sources or uses, registered materials, registrations, registrants and related units of exposure.

B. As used in this review, inconsistency is based on the following elements:

1. The text under review, including language and punctuation, is neither similar nor identical to the SSR or the CFR, whichever is applicable; or
2. Even though the text under review is similar, it contradicts the SSR or 10 CFR Part 20, whichever is applicable; or
3. The mandatory requirements of the SSR or the CFR either have not been incorporated or are contradictory to the SSR or the CFR, whichever is applicable; or
4. Additional mandatory exceptions or exemptions are included or existing exceptions and exemptions are broader than either the exceptions or exemptions in the SSR or the CFR, whichever is applicable.

C. In addition, where prior inconsistency determinations in the Final Regulation Review Report of the SSR were made that are applicable to this review, the ORNL staff have incorporated those determinations as "Notes" to the comments.

III. Major Points

- A. Point 1. Illinois frequently omits the SSR references to registrants, registrations and registered materials from its Regulations for Control of Radiation. These omissions are generally inconsistent with the SSR because, by omitting these terms, Illinois excludes registrants, registrations and registered material from the requirements of the regulations although they are covered by the SSR and some provisions of 32 Ill. Adm. Code, Ch. II, Subchapter b, including the Purpose and Scope (Sec. 340.10 and 340.20). However, there are instances where the omission may be consistent with the SSR due to permissive language of the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. ORNL staff will specifically cite these omissions in the summary report.
- B. Point 2. Illinois frequently omits references to "controlled areas" from the regulations and refers only to "restricted" or "unrestricted (or uncontrolled)" areas. Both the SSR and 10 CFR Part 20 define and regulate "controlled areas." Illinois' omission of "controlled areas" from its regulations excludes areas regulated by the SSR and 10 CFR Part 20 from the application of the Illinois radiation protection regulations. From a legal viewpoint, this is inconsistent with the SSR and 10 CFR Part 20.

From a health physics viewpoint, this omission is not significant. While an area is deemed "restricted" for purposes of limiting radiation exposure, "controlled areas" serve no direct role in limiting radiation exposure or in health physics. (HP)

- C. Point 3. Illinois incorporates by reference Appendices A, B, C, and F of 10 CFR §§20.1001 to 20.2402, effective January 1, 1994. Although Illinois models its rules after the SSR, this incorporation of the CFR appendices is consistent with the SSR because Agreement States may model their regulations after either the SSR or 10 CFR part 20.
- D. Point 4. Illinois uses formulas such as " $H[T]$ " instead of the SSR formula " H_T ." This is inconsistent with the SSR. The Illinois regulations use non-standard symbols for these quantities. Characters set off in brackets are apparently to be read as subscripts although the text does not alert the reader to this convention. (HP)
- E. Point 5. Illinois occasionally omits SSR footnotes designated by number. According to the CRCPD "Policies and Procedures for Preparation and Publication of the SSR for Control of Radiation" January 1991 document, footnotes designated by number are intended to be part of the regulations. Therefore, this omission is inconsistent with the SSR.

IV. General Comments

A. Comment 1. Substitutions of Agreement State terminology for SSR terms.

- 1. The Illinois substitution of "this part" for "Part D" is appropriate and therefore, consistent with the SSR.
- 2. If Illinois IDNS Forms 4 and 5 are equivalent to SSR Agency Forms Y and Z respectively, then these substitutions are consistent with the SSR.
- 3. The Illinois substitution of the citation "32 Ill. Adm. Code Chapter II, Subchapter b and d" for the phrase "these regulations" is appropriate for Illinois and therefore, consistent with the SSR.
- 4. The Illinois substitution of citations for SSR citations is consistent with the SSR because these are appropriate substitutions for Illinois to make when drafting their own regulations.
- 5. Illinois' substitution of "Department" for "Agency" is consistent with the SSR because Agreement States may tailor their regulations to correspond to established state offices.

B. Comment 2. Insertion of the date "January 1, 1994."

The Illinois insertion of the date "January 1, 1994" where the SSR directs Agreement States to "insert the effective date of these regulations" is consistent with the SSR if January 1, 1994, is the effective date of the Illinois regulations.

C. Comment 3. Omission of SSR footnotes designated by asterisks.

The Illinois omission of SSR footnotes designated by asterisks is consistent with the SSR

because the CRCPD document titled "Policies and Procedures for the Preparation and Publication of the Suggested State Regulations for Control of Radiation" (January 1991) states that SSR footnotes designated by asterisks provide only information intended to assist States in drafting their regulations and should not be incorporated as part of the state regulations.

However, Illinois' inclusion of some footnotes or incorporation of text from the SSR footnotes designated by asterisks is also consistent with the SSR because these footnotes are merely informational and the additional text does not change the regulatory requirements of the Illinois sections.

- D. Comment 4. Use of the word "any" instead of the words "an," "a," or "the."

Although by using the word "any" instead of the words "an," "a," or "the," Illinois is more specific than the SSR, this is consistent with the SSR.

- E. Comment 5. Use of parenthetical phrases identifying equivalent terms.

In the definitions in Illinois Sections 310.20 and 340.30, Illinois uses a parenthetical phrase after the term being defined instead of a sentence at the end of the definition to identify what terms may have equivalent meanings. For example, to inform the reader that the terms "nonstochastic effect" and "deterministic effect" have the same meaning within the Illinois regulations, Illinois uses the phrase "(deterministic effect)" instead of the SSR sentence "For purposes of these regulations, 'deterministic effect' is an equivalent term". This is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant.

- F. Comment 6. Use of the E-notation.

The SSR uses the E-notation when denoting doses, dose limits, and dose equivalents in the text of the regulations and accompanying tables and appendices. Illinois does not use the E-notation. For example, where the SSR uses the number "980 E+6," Illinois uses the number "980 x 10⁶." Illinois is consistent with the SSR because these numbers are equivalent.

- G. Comment 7. References to the Illinois Radiation Protection Act of 1990.

In many of the definitions and sections in Illinois Part 310, Illinois italicizes most or all of the text and, following the italicized text, refers to the Illinois Radiation Protection Act. For example, after the definition of "Radiation Installation," Illinois adds the phrase "(See Section 4(g) of the Act.)." This convention is consistent with the SSR because it is merely meant to inform the reader that the text in the Illinois regulations is identical to that of the Radiation Protection Act of 1990 and does not change the meaning in any way.

- H. Comment 8. Incorporation of CFR appendices.

Illinois frequently adds the phrase "to 10 CFR 20.1001-20.2401, effective January 1, 1994, exclusive of subsequent amendments or editions" following references to appendices. This addition is appropriate for Illinois and, therefore, consistent with the SSR because Illinois incorporates by reference CFR appendices A, B, C and F.

V. Summary of ORNL Regulatory Review

A. Illinois text for which there are equivalent 10 CFR Part 20 and SSR citations.

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.1001, Purpose.	Sec. D.1	340.10	1. Illinois' addition of the phrase "in an emergency" is inconsistent with the SSR because, by adding this phrase, Illinois limits additional actions to those necessary in an emergency instead of including all actions generally necessary to protect health and safety. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.10(b).]
§ 20.1002, Scope.	Sec. D.2	340.20	1. This is consistent with the SSR.
§ 20.1003, Definitions.	Sec. A.2 and Sec. D.3	310.20 and 340.30	
	1. Sec. A.2	1. 310.20	1. Absorbed dose - Consistent.
	2. Sec. A.2	2. 310.20	2. Act - Consistent. Illinois substitutes "the Radiation Protection Act of 1990 (the Act) (Ill. Rev. Stat. 1991, ch. 111½, par. 210-1 et seq., including P.A. 87-1024 and 87-1166) [420 ILCS 40, including P.A. 87-1024, effective September 6, 1992 and P.A. 87-1166, effective September 18, 1992]" for "[cite State Radiation Control Act]." This substitution is appropriate and consistent with the SSR because the Agreement States regulate their radiation protection programs pursuant to state law(s).
	3. Sec. A.2	3. 310.20	3. Activity - Consistent.
	4. Sec. A.2	4. 310.20	4. Adult - Consistent.
	5. Sec. A.2	5. 310.20	5. Airborne radioactive material - Consistent.
	6. Sec. A.2	6. 310.20	6. Airborne radioactivity area - Inconsistent. Illinois' addition of the word "operating" is inconsistent with the SSR because, by adding this word, Illinois limits the scope of this definition to "operating areas" instead of all areas. Illinois' addition of the phrase "composed wholly or partly of licensed material" is consistent with the SSR. The additional language is somewhat informative without a change in significance. (HP)
	7. Sec. A.2	7. 310.20	7. ALARA - Consistent.
	8. Sec. D.3	8. 340.30	8. Annual limit on intake (ALI) - Consistent.
	9. Sec. A.2	9. 310.20	9. Background radiation - Inconsistent. Although Illinois' use of the word "radiation" instead of the phrase "sources of radiation" is inconsistent with the SSR, it is probably more accurate. The SSR's use of the phrase "source of radiation" in this context is confusing and may be an error. This issue requires further evaluation by the OSP.
	10. Sec. A.2	10. 310.20	10. Bioassay (radiobioassay) - Consistent.
	11. Sec. A.2	11. 310.20	11. Byproduct material - Consistent. Illinois' omission of the phrase "uranium or thorium" is consistent with the SSR. The deletion of the second use of the phrase "uranium or thorium" does not change the meaning of this definition. The deletion is editorial in nature. (HP) Illinois' addition of the word "underground" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant.

CFR Citations	SSR Citations	Illinois Citations	Comments
	12. Sec. D.3	12. 340.30	12. Class (or lung class or inhalation class) - Consistent.
	13. Sec. A.2	13. 310.20	13. Collective dose - Consistent.
	14. Omitted.	14. Omitted.	14. Commission - Omitted. This omission is consistent with the SSR. The SSR substitutes "Agency" for "Commission" and instructs the Agreement States to cite their appropriate state agencies.
	15. Sec. A.2	15. 310.20	15. Committed dose equivalent ($H_{T,50}$) - Inconsistent. Illinois' use of the symbol " $(H[T,50])$ " instead of " $(H_{T,50})$ " is inconsistent with the SSR. The Illinois regulations use non-standard symbols for the dose quantities. Characters set off in brackets are apparently to be read as subscripts although the text does not alert the reader to this convention. (HP). See Major Point 4.
	16. Sec. A.2	16. 310.20	16. Committed effective dose equivalent - Inconsistent. Illinois' use of the symbols " $(H[E,50])$ " and " $(H[E,50] = \sum w[T]H[T,50])$ " instead of " $(H_{E,50})$ " and " $(H_{E,50} = \sum w_T H_{T,50})$ " is inconsistent with the SSR. The Illinois regulations use non-standard symbols for the dose quantities. Characters set off in brackets are apparently to be read as subscripts although the text does not alert the reader to this convention. (HP). See Major Point 4.
	17. Sec. A.2	17. Omitted.	17. Controlled area - Omitted. From a legal viewpoint, this is inconsistent with the SSR because Illinois excludes controlled from the scope of its regulations an area regulated by the SSR and 10 CFR Part 20. In health physics, an area is deemed a "restricted area" for purposes of limiting radiation exposure. "Controlled areas" serve no direct role in health physics. From a health physics viewpoint, there is no significance to Illinois' omission of this definition. (HP)
	18. Sec. D.3	18. 340.30	18. Declared pregnant woman - Inconsistent. Illinois' omission of the phrase "and the estimated date of conception" is inconsistent with the SSR because the meaning of this definition has been changed.
	19. Sec. A.2	19. 310.20	19. Deep-dose equivalent - Inconsistent. Illinois' use of the term " $(H[d])$ " instead of the term " (H_d) " is inconsistent with the SSR. The Illinois regulations use non-standards symbols. Characters set off in brackets are apparently to be read as subscripts although the text does not alert the reader to this convention. (HP) See Major Point 4. Illinois' use of the phrase "from external whole-body exposure" instead of the phrase "which applies to external whole body exposure" is consistent with the SSR. The term "Deep dose equivalent" is only used with respect to external radiation exposure under the presumed condition of a uniform or whole-body exposure. (HP)
	20. Sec. A.2	20. 310.20	20. Department - Consistent. Illinois's substitution of "Department" for "Agency" is consistent with the SSR.
	21. Sec. D.3	21. 340.30	21. Derived air concentration (DAC) - Consistent.

CFR Citations	SSR Citations	Illinois Citations	Comments
	22. Sec. D.3	22. 340.30	22. Derived air concentration-hour - Inconsistent. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this definition although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1.
	23. Sec. A.2	23. 310.20	23. Dose or radiation dose - Consistent. Illinois' omission of the phrase "is a generic term that" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant.
	24. Sec. A.2	24. 310.20	24. Dose equivalent (H_T) - Inconsistent. Illinois' use of the symbol " $H[T]$ " instead of " H_T " is inconsistent with the SSR. The Illinois regulations use non-standard symbols for the dose quantities. Characters set off in brackets are apparently to be read as subscripts although the text does not alert the reader to this convention. (HP). See Major Point 4. Illinois' addition of the phrase "(e.g., a distribution factor for non-uniform deposition)" is inconsistent with the SSR. The modifying factors, such a distribution factor, are no longer considered in determining dose equivalent. (HP)
	25. Sec. D.3	25. 340.30	25. Dosimetry processor - Consistent.
	26. Sec. A.2	26. 310.20	26. Effective dose equivalent - Inconsistent. Illinois' use of the symbols " $H[E]$," " $H[T]$," " $W[T]$ " and the equation " $H[E] = \sum w[T]H[T]$ " instead of " H_E ," " H_T ," " w_T " and " $H_E = \sum w_T H_T$ " is inconsistent with the SSR. The Illinois regulations use non-standard symbols for the dose quantities. Characters set off in brackets are apparently to be read as subscripts although the text does not alert the reader to this convention. (HP). See Major Point 4.
	27. Sec. A.2	27. 310.20	27. Embryo/fetus - Consistent.
	28. Sec. A.2	28. 310.20	28. Entrance or access point - Inconsistent. This definition is inconsistent with the SSR because, by omitting the phrase "or registered," Illinois excludes registered material from the scope of this definition although it is covered of other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1.
	29. Sec. A.2	29. 310.20	Note: The SSR includes the following phrase which does not appear in 10 CFR Part 20: "or extremity of an individual." This SSR addition is inconsistent with the CFR. Therefore, even though Illinois is consistent with the SSR in including this phrase, it is nevertheless inconsistent with 10 CFR Part 20. 29. Exposure - Inconsistent. Illinois adds the following sentence: "AGENCY NOTE: The context makes clear which is the appropriate definition." This is inconsistent with the SSR because the context does not adequately clarify which definition of "exposure" is being used given the clear distinction made by the SSR between these two definitions.

CFR Citations	SSR Citations	Illinois Citations	Comments
	30. Sec. A.2	30. 310.20	30. External dose - Consistent.
	31. Sec. A.2	31. 310.20	31. Extremity - Consistent.
	32. Sec. A.2	32. 310.20	32. Eye dose equivalent - Consistent.
	33. Sec. A.2	33. 310.20	33. Generally applicable environmental radiation standards - Omitted. This omission is inconsistent with the SSR because Illinois uses this term in Illinois Sec. 340.1230 without defining it.
	34. Omitted	34. Omitted	34. Government agency - Omitted. This omission is consistent with the SSR because the SSR omits this definition.
	35. Sec. A.2	35. 310.20	35. Gray - Consistent.
	36. Sec. A.2	36. 310.20	36. High radiation area - Consistent.
	37. Sec. A.2	37. 310.20	37. Individual - Consistent.
	38. Sec. A.2	38. 310.20	38. Individual monitoring - Consistent.
	39. Sec. A.2	39. 310.20	39. Individual monitoring devices (individual monitoring equipment) - Inconsistent. Illinois' addition of the phrase "and electronic dosimeters (e.g., silicon diode dosimeters)" is inconsistent with the SSR. The significance is Illinois' consideration that "electronic dosimeters" can serve as the dosimeter of record. The possible use of electronic dosimeters is under consideration, but has not been given blanket approval. (HP)
	40. Sec. A.2	40. 310.20	40. Internal dose - Consistent.
	41. Sec. A.2	41. 310.20	41. License - Consistent.
	42. Sec. A.2	42. 310.20	42. Licensed material - Inconsistent. Illinois omits the SSR phrases "[or registered]" and "[or registration]." Although the SSR brackets indicate that these phrases are optional, Illinois' omissions of these phrases are inconsistent with the SSR because Illinois includes registered material within the scope of its radiation protection standards. (See SSR Sec. D.2 and Illinois 340.20.) See Major Point I.
	43. Sec. A.2	43. 310.20	43. Licensee - Inconsistent. Illinois' substitution of "32 Ill. Adm. Code: Chapter II, Subchapters b and d" for "these regulations and the Act" is inconsistent with the SSR because Illinois does not provide an equivalent citation for its radiation protection act.
	44. Sec. A.2	44. 310.20	44. Limits (dose limits) - Omitted. Illinois omits the SSR reference to the definition of "Dose Limits." This is consistent with the SSR.
	45. Sec. A.2	45. 310.20	45. Lost or missing licensed material - Consistent. Illinois' omission of the phrase "licensed [or registered]" is consistent with the SSR because, by using this phrase, Illinois is broader than the SSR. Illinois' addition of the phrase "but is not limited to" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. Illinois' use of the phrase "radioactive material" instead of the phrase "licensed [or registered] material" is consistent with the SSR even though, by using this phrase, Illinois is broader than the SSR.

CFR Citations	SSR Citations	Illinois Citations	Comments
	46. Sec. A.2	46. 310.20	46. Member of the public - Inconsistent. Illinois' omission of the phrase "in a controlled or unrestricted area" is consistent with the SSR because the scope and applicability of the definition have not been changed. SSR uses the following sentence: "However, an individual is not a member of the public during any period in which the individual receives an occupational dose." Illinois uses the phrase "except an individual who is performing assigned duties for the licensee or registrant involving exposure to sources of radiation." This language difference is inconsistent with the SSR. The phrase "for the licensee or registrant" changes the scope and meaning of the definition. (See definition for "occupational dose")
	47. Sec. A.2	47. 310.20	47. Minor - Consistent.
	48. Sec. A.2	48. 310.20	48. Monitoring (radiation monitoring, radiation protection monitoring) - Consistent.
	49. Sec. D.3	49. 340.30	49. Nonstochastic effect - Consistent.
	50. Sec. A.2	50. 310.20	50. NRC - Consistent.
	51. Sec. A.2	51. 310.20	51. Occupational dose - Inconsistent. Illinois' omission of the phrase "in a restricted area or" is inconsistent with the SSR because it narrows the scope of the definition by excluding doses received by individuals in a restricted area. Illinois' addition of the phrase "for the licensee or registrant" is inconsistent with the SSR because it narrows the scope of the definition. By adding this phrase, Illinois excludes from the scope of this definition the dose received by individuals engaged in activities which are their assigned duties, but which may not be duties for the licensee or registrant. Illinois' omission of the phrase "whether in the possession of the licensee, registrant, or other person" is consistent with the SSR because the scope and applicability of this definition have not been changed.
	52. Sec. A.2	52. 310.20	52. Person - SSR uses the phrase "[but shall not include federal government agencies]", Illinois uses the phrase "other than the United States Nuclear Regulatory Commission, or any successor thereto, and other than federal government agencies licensed by the United States Nuclear Regulatory Commission, or any successor thereto." By placing the phrase "but shall not include federal government agencies" in brackets, the SSR wanted to allow states that exercise authority at federal installations for x-rays machines or technologists the option of changing the definition. If Illinois is correctly addressing this narrow scope with the substituted language, then this is consistent with the SSR. Note: Although the SSR phrase "but shall not include federal government agencies" is designated as optional, adoption of this language by an Agreement State is inconsistent with the 10 CFR Part 20. The CFR includes government agencies as a "Person" except for the NRC and Department of Energy in certain instances. By adding this phrase, the SSR excludes all government agencies from the definition; therefore, this is inconsistent with the CFR.
	53. Sec. D.3	53. 340.30	53. Planned special exposure - Consistent.
	54. Sec. A.2	54. 310.20	54. Public dose - Consistent. Illinois' omission of the phrase "exposure to" is consistent with the SSR because the omission of the phrase is appropriate for public dose since one has no control over the actions of members of the public. Usage of "exposure to" might suggest that one might take actions to limit the contact with the radiation source. (HP) Illinois's use of the phrase "from licensed or registered operations" instead of "either within licensee's or registrant's controlled area or in unrestricted areas" is consistent with the SSR because the scope and applicability of this definition have not been changed. This difference in wording is not significant from a health physics perspective. (HP)
	55. Sec. A.2	55. 310.20	55. Quality Factor (Q) - Consistent

CFR Citations	SSR Citations	Illinois Citations	Comments
	57. Sec. A.2	57. 310.20	57. Rad (see § 20.1004) - Consistent.
	58. Sec. A.2	58. 310.20	58. Radiation - Consistent. SSR uses the phrase "alpha particles, beta particles, gamma rays, x rays, neutrons, high-speed electrons, high-speed protons, and other particles capable of producing ions"; Illinois uses the phrase " <i>gamma rays and x-rays, alpha and beta particles, high-speed electrons, neutrons, protons, and other nuclear particles.</i> " This phrase is consistent with the SSR. Both phrases include unspecified "other particles." (HP) SSR uses the following sentence: "Radiation, as used in these regulations, does not include non-ionizing radiation, such as radiowaves or microwaves, visible, infrared, or ultraviolet light." Illinois uses the phrase "but not sound or radio waves, or visible, infrared or ultraviolet light." This is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant.
	59. Sec. A.2	59. 310.20	59. Radiation area - Consistent.
	60. Sec. D.3	60. 340.30	60. Reference man - Consistent.
	61. Sec. A.2	61. 310.20	61. Rem - Consistent.
	62. Sec. D.3	62. 340.30	62. Respiratory protective device - Consistent. The SSR and Illinois use the term "respiratory protective equipment."
	63. Sec. A.2	63. 310.20	63. Restricted area - Consistent. Illinois' use of the word "shall" instead of the word "does" is consistent with the SSR even though "shall" is mandatory in effect and "does" communicates a statement of fact.
	64. Sec. D.3	64. 340.30	64. Sanitary sewerage - Inconsistent. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this definition although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1.
	65. Sec. A.2	65. 310.20	65. Shallow-dose equivalent - Inconsistent. Illinois' use of the term "(H[S])" instead of "(H _s)" is inconsistent with the SSR. The Illinois regulations use non-standard symbols. Characters set off in brackets are apparently to be read as subscripts although the text does not alert the reader to this convention. (HP) See Major Point 4.
	66. Sec. A.2	66. 310.20	66. Sievert - Consistent.
	67. Sec. A.2	67. Omitted.	67. Site boundary - Omitted. If Illinois uses this term in its radiation protection regulations, then this omission is inconsistent with the SSR.

CFR Citations	SSR Citations	Illinois Citations	Comments
	68. Sec. A.2	68. 310.20	68. Source material - Consistent. Illinois' use of the word "thereof" instead of the phrase "of uranium or thorium" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant.
	69. Sec. A.2	69. 310.20	69. Special nuclear material - Consistent. Although, by omitting the phrase "pursuant to the provisions of section 51 of the Atomic Energy Act of 1954, as amended," Illinois omits the source of the NRC' authority to make a determination of "special nuclear material," this omission is consistent with the SSR.
	70. Sec. D.3	70. 340.30	70. Stochastic effect - Consistent.
	71. Sec. A.2	71. 310.20	71. Survey - Consistent. Illinois' omission of the phrase "When appropriate" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. Illinois' omission of the phrase "tests, physical examinations, and" and addition of the phrases "or calculations" and "or quantities" are consistent with the SSR because Illinois does not change the regulatory requirements of this definition; it merely modifies the examples. Note: The SSR substitutes the phrase "but is not limited to, tests and physical examinations" for the CFR phrases "a physical survey of the location of radioactive material," "or calculation," and "or quantities." These SSR substitutions are inconsistent with the CFR because the terms are not synonymous. Therefore, even though Illinois is consistent with the SSR in substituting the phrase stated above, it is nevertheless inconsistent with 10 CFR Part 20.
	72. Sec. A.2	72. 310.20	72. Total Effective Dose Equivalent - Consistent.

CFR Citations	SSR Citations	Illinois Citations	Comments
	73. Sec. A.2	73. 310.20	73. Unrestricted area - Inconsistent. Illinois' addition of the phrase "for purposes of protection of individuals from exposure to radiation and radioactive material, and any area used for residential quarters" is inconsistent with the SSR because the meaning has been changed. Illinois narrows the scope of this definition from an area unrestricted for all purposes to an area unrestricted for radiation protection and residential quarters. Illinois omits the following sentence: "For purposes of these regulations, 'uncontrolled area' is an equivalent term." This omission is consistent with the SSR so long as Illinois does not use the term "uncontrolled area" in its radiation protection standards.
	74. Omitted.	74. Omitted.	74. Uranium fuel cycle - Omitted. This omission is consistent with the SSR. It is not necessary for Illinois to include this definition in its rules because Illinois does not use this terminology.
	75. Sec. D.3	75. 340.30	75. Very high radiation area - Consistent.
	76. Sec. A.2	76. 310.20	76. Week - Consistent.
	77. Sec. D.3	77. 340.30	77. Weighting factor w_T - Inconsistent. Illinois' use of the symbol " $w[T]$ " instead of the symbol " w_T " is inconsistent with the SSR. The Illinois regulations use non-standard symbols for the weighting factor. Characters set off in brackets are apparently to be read as subscripts although the text does not alert the reader to this convention. (HP) See Major Point 4. Illinois' omission of the table heading "ORGAN DOSE WEIGHTING FACTORS" is consistent with the SSR because the regulatory contents of the table have not been changed. Illinois omits the following sentence: "The use of other weighting factors for external exposure will be approved on a case-by-case basis until such time as specific guidance is issued." Although by omitting this sentence, Illinois does not allow the use of other weighting factors, this is consistent with the SSR. Illinois' omission of the phrase "for an organ or tissue" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant.
	78. Sec. A.2	78. 310.20	78. Whole body - Consistent.
	79. Sec. A.2	79. 310.20	79. Working level - Consistent.
	80. Sec. A.2	80. 310.20	80. Working level month - Consistent.
	81. Sec. A.2	81. 310.20	81. Year - Inconsistent. Illinois' addition of the phrase "the decision to make" is inconsistent with the SSR because, by adding this phrase, Illinois changes the activity being limited from the actual change in the starting date to the decision to make the change. Illinois' addition of the phrase "If a licensee or registrant changes a year, the licensee or registrant shall assure" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant.
§ 20.1004, Units of radiation dose.	Only certain paragraphs from Section A.13, Units of Exposure and Dose, are equivalent: A.13b., A.13c., A.13d., and Tables I and II	310.140(b), 140(c), 140(d), and Tables I and II	1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.140(d).] 2. Illinois denotes the E-notation with parentheses but the SSR does not. The Illinois notation is consistent with the SSR. However, Illinois should define their notation. A footnote should be given indicating that 24E(8) is to be read as 24×10^8 . In neutron quality factor tabulation, it appears that the notation is used in an excessive manner. This issue requires further evaluation by the OSP. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.140 Table II.]

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.1005, Units of Radioactivity.	Sec. A.14	310.150	1. This is consistent with the SSR.
§ 20.1006, Interpretations.	Sec. A.11	Omitted.	<p>1. This omission is consistent with the SSR because SSR Section A.11 is optional for Agreement States to adopt as indicated by the brackets. [See SSR Sec. A.11.]</p> <p>Note: The omission of this section is inconsistent with 10 CFR § 20.1006 which addresses the appropriate body authorized to make binding interpretations. [See SSR Sec. A.11.]</p>
§ 20.1007, Communications.	Sec. A.12	310.110	1. Illinois' substitution of "1035 Outer Park Drive, Springfield, Illinois, 62704" for "[insert appropriate address]" is appropriate for Illinois and, therefore, consistent with the SSR because the bracketed language directs the Agreement States to insert the address of the appropriate state agency.
§ 20.1008, Implementation.	Sec. D.4	340.40	<p>1. Illinois' omission of the phrase "or registration" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrations from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.40(a), (b) and (c).]</p> <p>Note: Even though Illinois Section 340.40 is consistent with SSR Sec. D.4, it is nevertheless inconsistent with 10 CFR Part 20 because it omits the mandatory requirements in 10 CFR § 20.1008(b). The last sentence in this CFR paragraph contains a condition which, if met, requires a licensee to comply with 10 CFR Part 20, unless exempted by § 20.1008(d). [See SSR Sec. D.4a. and Illinois 340.40(a).]</p> <p>2. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.40(b).]</p> <p>3. Illinois' omission of the phrase "on or" is consistent with the SSR. By omitting the phrase "on or," Illinois limits the number of exemptions from Part 340 Standards for Protection Against Radiation. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.40(b).]</p> <p>4. Illinois' addition of the phrase "as revised effective January 1, 1994" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.40(b) and (c).]</p> <p>5. Although by adding the phrase "until there is an amendment or renewal of the license that modifies or removes the condition," Illinois specifies the conditions under which the condition will no longer exempt the licensee or registrant from the requirements of this part, this addition is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.40(b).]</p>
§ 20.1009, Reporting, recording, and application requirements: OMB approval.	Omitted	Omitted.	1. This omission is consistent with the SSR.

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.1101, Radiation protection Programs.	Sec. D.101	340.110	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.110(c).]</p> <p>2. Illinois' addition of subsection (d) is consistent with the SSR because Agreement States may provide additional requirements for licensees or registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.110(d).]</p>
§ 20.1201, Occupational dose limits for adults.	Sec. D.201	340.210	<p>1. Illinois' omission of the phrase "determined as follows" is inconsistent with the SSR because the meaning has been changed." [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.210(c).]</p> <p>Note: Although Illinois is inconsistent with the SSR, it is nevertheless consistent with the CFR. The SSR adds the words "determined as follows," which changes the meaning of the paragraph from the meaning of the equivalent CFR paragraph. The SSR is not a true statement assuming there are other ways to determine deep dose and shallow dose equivalents besides those named in SSR paragraph i. and Illinois 340.210(d). [See SSR Sec. D.201c. and Illinois 340.210(c).]</p> <p>2. Although Illinois 340.250(a) is actually equivalent to SSR Sec. D.205a., Illinois' substitution of "Section 340.250(a) and (d)" for "D.205e." is consistent with the SSR because 340.250(d) also deals with measuring occupational dose. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.210(g).]</p> <p>3. Illinois' addition of the Agency Note is consistent with the SSR because this note is a statement of purpose; it does not provide any additional regulatory requirements. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.210(g).]</p>
§ 20.1202, Compliance with requirements for summation of external and internal doses.	Sec. D.202	340.220	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.220(a), (c) and (d).]</p> <p>2. Illinois' addition of the phrase "individual occupational dose" is consistent with the SSR because SSR Section D.502a. and b. deal with individual occupational dose. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.220(a).]</p> <p>3. Illinois' omission of the word "appropriate" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.220(b)(3).]</p> <p>4. Illinois' use of the symbols "w_T," "$H_{T,50}$," and "$w_T H_{T,50}$" instead of the symbols "w_T," "$H_{T,50}$," "H_{50}," and "$w_T H_{T,50}$" is inconsistent with the SSR. The Illinois regulations use non-standard symbols. Characters set off in brackets are apparently to be read as subscripts although the text does not alert the reader to this convention. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.220(b)(3).]</p> <p>Note: Illinois is also inconsistent with 10 CFR Part 20. Where the SSR uses the symbol "H_{50}" 10 CFR §20.1202(b)(3) uses the symbol "$H_{T,50}$." [See SSR Sec. D.202b.iii. and 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.220(b)(3).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.1203, Determination of external dose from airborne radioactive material.	Sec. D.203	340.230	1. Illinois' omission of the phrase "or registrants" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.230(a).]
§ 20.1204, Determination of internal exposure.	Sec. D.204	340.240	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.240(a), (b) and (c)(1).]</p> <p>2. Although Illinois is less specific than the SSR, Illinois' omission of the phrase "suitable and timely" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.240(a).]</p> <p>3. Illinois' addition of the phrase "during the conditions of operations" is inconsistent with the SSR because the meaning has been changed.</p> <p>Although the additional language is largely irrelevant from a health physics viewpoint, it could be misleading. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.240(a).]</p> <p>4. Illinois' addition of the phrase "after exposure to materials that could result in an intake" is inconsistent with the SSR because the meaning has been changed. From a health physics viewpoint, although the additional language is largely irrelevant, it could be misleading. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.240(a).]</p> <p>5. Illinois' omission of the phrase "or registrant" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.240(c), (d), (g), (g)(1), (h)(1) and (h)(2).]</p>
§ 20.1205 [Reserved]	Omitted	Omitted	1. This omission is consistent with the SSR.
§ 20.1206, Planned special exposures.	Sec. D.206	340.260	<p>1. Illinois' omission of the phrase "or registrant" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.260, (a), (b), (c), (d), (f) and (g).]</p> <p>2. Illinois' addition of the phrase "The management official of" is consistent with the SSR even though Illinois designates an agent of the licensee the authority to authorize the planned special exposure. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.260(b).]</p> <p>3. Although, by omitting the phrase "for each individual involved," Illinois is less specific than the SSR, Illinois' omission of this phrase is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.260(d).]</p> <p>4. Illinois' use of the word "need" instead of the word "shall" is inconsistent with the SSR because the meaning has been changed. Illinois' substitution of "need" for "shall" removes the mandatory effect of the SSR language. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.260(g).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.1207, Occupational dose limits for minors.	Sec. D.207	340.270	1. This is consistent with the SSR.
§ 20.1208, Dose to an embryo/fetus.	Sec. D.208	340.280	<p>1. Illinois' addition of the phrase "Except as otherwise provided in subsections (d) and (e) below" is inconsistent with the SSR because the SSR does not allow for any exceptions to the requirements of this section. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.280(a).]</p> <p>2. Illinois' addition of the phrase "of the allowed dose" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.280(c).]</p> <p>3. Illinois' addition of the phrase "during a declared pregnancy" is consistent with the SSR because the phrase is implied in the SSR text. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.280(c).]</p> <p>4. Although Illinois is more explicit than the SSR, Illinois' addition of the phrase "during the entire pregnancy" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.280(b)(1) and (2).]</p> <p>5. Illinois' addition of subsection (d) is consistent with the SSR because Agreement States may provide additional requirements for licensees or registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.280(d).]</p> <p>6. Illinois' use of the phrase "informs the licensee or registrant of the estimated date of conception" instead of the phrase "declares pregnancy to the licensee or registrant" is inconsistent with the SSR because it does not require the licensee to begin monitoring the dose to the embryo/fetus until notified of the date of conception, even if the pregnant woman has already declared her pregnancy. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.280(e).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.1301, Dose limits for individual members of the public.	Sec. D.301	340.310	<p>1. Illinois' omission of the phrase "1 mSv (0.1 rem) in a year" is consistent with the SSR. The numerical limit is stated in paragraph B. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.310(a)(2).]</p> <p>2. Illinois' omission of the phrase "or registrant's" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.310(a)(2).]</p> <p>3. Illinois adds the phrase "5 mSv (0.5 rem) in any year at locations within facilities where sources of radiation were installed before January 1, 1994, and the use if the source of radiation does not change on or after January 1, 1994, or B) 1 mSv (0.1 rem) in any year at locations with facilities where sources of radiation are installed or where the source of radiation or its use changes on or after January 1, 1994." The additional paragraphs embody the "grandfathered" footnote and the dose limit in the text. This is an appropriate modification of the text and, from a health physics perspective, consistent with the SSR. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.310(a)(2)(A) and (B).]</p> <p>Note 1: The SSR footnote provides an exemption for certain situations that do not exist in the CFR. In light of the broader scope of the SSR, the footnote allows a higher dose level to the general public. This is inconsistent with the CFR. [See SSR Sec. D.301a.i. and Illinois 340.310(a)(2).]</p> <p>4. Illinois' addition of the Agency Note is inconsistent with the SSR. This note offers the option to design and operate facilities at the higher dose limit. No closure data on the note is stated and thus it appears that designs after January 1, 1994, can be based on the higher limit and the agency has the intent to operate such facilities. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.310(a)(2).]</p> <p>5. Illinois' omission of SSR Sec. D.301b. is inconsistent with the SSR. Given the definition of "occupational dose," this language is necessary to clarify the status of people with access to restricted areas, but whose assigned duties do not involve exposure to radiation. The omitted text is not necessary from a health physics viewpoint. The omitted text states that a member of the public is a member of the public even if within controlled areas. (HP) [See SSR Sec. D.301b.]</p> <p>6. Illinois' omission of the phrase "or registration" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.310(b).]</p> <p>7. Illinois' addition of Sec. 340.310(c) is consistent with the SSR because Agreement States may provide additional requirements for licensees or registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.310(c).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
continued	continued	continued	<p>8. The SSR places brackets around Sec. D.301d. signifying that the Agreement States have the option of adopting this paragraph. Therefore, Illinois' omission of SSR Sec. D.301d. is consistent with the SSR as long as Illinois does not regulate uranium milling. [See SSR Sec. D.301d.]</p> <p>Note 2: By allowing the states the option of adopting paragraph D.301d., the SSR may be inconsistent with 10 CFR Part 20 because the CFR paragraph contains a mandatory requirement that must be adopted by the Agreement States that regulate uranium milling. Therefore, if Illinois regulates uranium milling, then this omission is inconsistent with 10 CFR Part 20. [See SSR Sec. D.301d.]</p> <p>9. Illinois' omission of SSR Sec. D.301e. is consistent with the SSR because D.301e. is an optional subsection as indicated by the brackets. [See SSR Sec. D.301e.]</p>
§ 20.1302, Compliance with dose limits for individual members of the public.	Sec. D.302	340.320	<p>1. From a legal viewpoint, Illinois's omission of the phrase "and controlled" is inconsistent with the SSR because the omission of the phrase excludes controlled areas from the scope of this section even though they are regulated by the SSR and 10 CFR Part 20. In health physics, an area is deemed a "restricted area" for purposes of limiting radiation exposure. Because "controlled areas" serve no direct role in health physics, there is no significance to Illinois' omission of this phrase from a health physics viewpoint. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.320(a).]</p> <p>Note: The SSR and Illinois omit the phrase "as appropriate" used in the CFR text following "licensee shall make or cause to be made..." This omission probably changes the meaning of the paragraph, making it inconsistent with the CFR. This issue requires further evaluation by the OSP. [See SSR Sec. D.302(a) and 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.320(a).]</p> <p>2. Illinois's addition of the phrase "In addition, licensees shall survey" is inconsistent with the SSR because by failing to include registrants in this phrase, Illinois excludes registrants from the requirement of surveying radioactive materials in effluents released to unrestricted areas. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.320(a).]</p> <p>3. Illinois' omission of the phrase "or registrant" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.320(c).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.1501, General.	Sec. D.501	340.510	<p>Note 1: The SSR uses the phrase "are necessary" instead of the CFR phrase "may be necessary." This is inconsistent with the CFR because the scope of the CFR paragraph is broader than the SSR paragraph. [See SSR Sec. D.501a.i. and Illinois 340.510(a)(1).]</p> <p>Note 2: Because the CFR requires surveys that are merely "reasonable" and the SSR requires surveys that are "necessary," the SSR has changed the meaning of this paragraph. This is inconsistent with the CFR. [See SSR Sec. D.501a.ii. and Illinois 340.510(a)(2).]</p> <p>1. Illinois adds the phrase "or at alternative intervals specified in regulations of the Department, an Agreement State, a Licensing State or the Nuclear Regulatory Commission." The Illinois language allows for the possibility of longer intervals between calibrations. The SSR does not allow this kind of variance from the calibration schedule provided in this section. Therefore, this is inconsistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.510(b).]</p> <p>2. Although, Illinois' omission the word "All" is less specific than the SSR, this omission is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.510(c).]</p> <p>3. Illinois' omission of the phrase "or registration" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrations from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.510(c).]</p> <p>4. Illinois' addition of the word "qualified" is consistent with the SSR because, by adding the word "qualified," Illinois narrows the description of those persons or organizations that can be recognized as "dosimeter processors" under these regulations. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.510(c).]</p> <p>5. Illinois' use of the phrase "by NVLAP for the type of radiation or radiations" instead of the phrase "in this accreditation process for the type of radiation or radiations included in the NVLAP program" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.510(c)(2).]</p>
§ 20.1502, Conditions requiring individual monitoring of external and internal occupational dose.	Sec. D.502	340.520	<p>1. Illinois' use of the word "doses" instead of the word "exposures" is consistent with the SSR. As it is dose that is actually being monitored or assessed, this change in language is appropriate. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.520.]</p> <p>2. Illinois' use of the phrase "dose from sources of radiation" instead of the phrase "exposure to radiation" is consistent with the SSR. As it is dose that is actually being monitored or assessed, this change in language is appropriate. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.520(a).]</p> <p>3. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.520(b).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.1601. Control of access to high radiation areas.	Sec. D.601	340.610	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.610(a), (d), (e) and (f).]</p> <p>2. Illinois' addition of the word "or" after the phrase "source of radiation" is inconsistent with the SSR because the meaning has been changed. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.610(a)(1).]</p> <p>Note: The SSR omits the word "or" after the CFR phrase "radiation source." This is inconsistent with 10 CFR Part 20 because the SSR omission of the word "or" changes the meaning of the subsection. Therefore, even though Illinois is inconsistent with the SSR in adding the word "or," it is nevertheless consistent with 10 CFR Part 20. [See SSR Sec D.601a.i. and Illinois 340.610(a)(1).]</p> <p>3. Illinois' omission of the phrase "or registrant" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.610(b) and (c).]</p> <p>4. Illinois' use of the phrase "to enable action to be taken to prevent" instead of the phrase "that is capable of preventing" is judged to be inconsistent with the SSR. The Illinois language appears to imply a passive blocking of entry while the SSR language suggests a surveillance system capable of blocking entry. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.610(b).]</p> <p>5. If 32 Ill. Adm. Code 335 is consistent with the SSR, then Illinois' addition of the phrase "as required by 32 Ill. Adm. Code 335" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.610(f).]</p> <p>6. Illinois' omission of the phrase "or registrant's" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.610(f).]</p> <p>7. Although Illinois uses mandatory language and the SSR uses conditional language, Illinois' use of the word "shall" instead of the phrase "is not required" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.610(g).]</p> <p>8. Illinois' use of the phrase "in accordance with the requirements" instead of the phrase "if the registrant has met all the specific requirements" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.610(g).]</p> <p>9. If 32 Illinois Adm. Code 350 is equivalent to SSR Part E, then Illinois's substitution of "32 Ill. Adm. Code 350" for "Part E" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.610(g).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
continued	continued	continued	<p>10. If 32 Illinois Adm. Code 360 is equivalent to SSR Part F, then Illinois' substitution of "32 Ill. Adm. Code 360" for "Part F" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.610(g).]</p> <p>11. If 32 Illinois Adm. Code 390 is equivalent to SSR Part I, then Illinois' substitution of "32 Ill. Adm. Code 390" for "Part I" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.610(g).]</p>
§ 20.1602, Control of access to very high radiation areas.	Sec. D.602	340.620	<p>1. Illinois omits the following sentence: "This requirement does not apply to rooms or areas in which diagnostic x-ray systems are the only source of radiation, or to non-self-shielded irradiators." Although, by omitting this sentence, Illinois does not provide exceptions to this section for areas where diagnostic x-rays are the only source of radiation or for non-self-shielded irradiators, this omission is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.620.]</p> <p>2. Although, by omitting SSR Sec. D.602b., Illinois requires registrants to comply with the requirements of this section in addition to the requirements of the Illinois equivalents to SSR Parts E, F, and I, this omission is consistent with the SSR. [See SSR Sec. D.602b.]</p>
§ 20.1603, Control of access to very high radiation areas-irradiators.	Sec. D.603	340.630	<p>1. Illinois' omission of the phrase "of radiation" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.630(a).]</p> <p>2. SSR uses the phrase "high levels of radiation"; Illinois uses the phrase "a radiation level of 5 Gy (500 rad) or more in 1 hour at 1 meter." The Illinois phrase corresponds to the radiation levels identified in the SSR section and thus this change in language has no health physics implications. The text is consistent with the SSR. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.630(a).]</p> <p>3. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.630(b)(4).]</p> <p>4. Illinois' use of the phrase "sealed sources" instead of the phrase "radioactive material" is inappropriate and inconsistent with the SSR. Whatever a "loose sealed source" might represent, it does not appear to represent the material lost from sealed sources. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.630(b)(11).]</p> <p>5. Illinois' omission of the phrase "or registrations" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrations from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.630(c).]</p>
§ 20.1701, Use of process or other engineering controls.	Sec. D.701	340.710	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.710.]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.1702, Use of other controls.	Sec. D.702	340.720	1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.720.]
§ 20.1703, Use of individual respiratory protection equipment.	Sec. D.703	340.730	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.730(a), (a)(1), (a)(2), (a)(3), (a)(4), (a)(5), (a)(6), (c) and (d).]</p> <p>2. SSR uses the phrase "the licensee or registrant shall submit"; Illinois uses the phrase "provided the licensee has submitted to the Department and the Department has approved." Illinois' requirement that an application be submitted by the licensee and approved by the Department prior to use of uncertified equipment is consistent with the SSR requirement that an application be submitted by the licensee or registrant. However, Illinois' omission of registrants from this requirement is inconsistent with the SSR. Therefore, Illinois' use of the phrase "provided the licensee has submitted to the Department and the Department has approved" is inconsistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.730(a)(2).]</p> <p>3. Illinois' omission of the word "reliable" is inconsistent with the SSR because, by omitting this word, Illinois allows submission of any test information whereas the SSR requires submission of reliable test information. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.730(a)(2).]</p> <p>4. Illinois' omission of the word "sufficient" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.730(a)(3)(A).]</p> <p>Note: The SSR adds the phrase "equipment manufacturer's expressed" to D.703a.vi. This is inconsistent with 10 CFR Part 20 because the SSR, by being specific, only requires the equipment to be used within the manufacturer's express limitations and fails to cover any other types of limitations. Therefore, even though Illinois is consistent with the SSR, it is nevertheless inconsistent with 10 CFR Part 20. [See SSR Sec. D.703a.vi. and Illinois 340.730(a)(6).]</p> <p>5. Illinois' omission of the phrase "or registrant" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.730(b), (b)(1) and (b)(2).]</p> <p>6. Although Illinois uses mandatory language instead of the permissive language used by the SSR, Illinois' use of the word "shall" instead of the word "may" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.730(b)(2).]</p> <p>7. Illinois' omission of the phrase "In an emergency" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.730(c).]</p>
§ 20.1704, Further restrictions on the use of respiratory equipment.	Omitted.	Omitted.	1. Although Illinois follows the SSR in omitting this section, this omission is consistent with the CFR because the CFR section contains no mandatory requirements and uses only permissive language.

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.1801, Security of stored material.	Sec. D.801	340.810	<p>1. Illinois' addition of the phrase "and Control" to the section heading is consistent with the SSR because the regulatory requirements of this section have not been changed. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810.]</p> <p>2. Illinois' omission of the word "Stored" from the section heading is consistent with the SSR because the regulatory requirements of this section have not been changed. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810.]</p> <p>3. Illinois' addition of the phrase "Licensed or Registered" to the heading is consistent with the SSR because licensed and registered material are covered in the SSR subheading and the text of this section. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(a).]</p> <p>4. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(a).]</p> <p>5. Illinois' omission of the phrase "or registered" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registered material from the requirements of this subsection although it is covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(a).]</p> <p>6. Illinois' use of the phrase "radioactive material" instead of the phrase "sources of radiation" is inconsistent with the SSR because the SSR phrase "sources of radiation" is broader than "radioactive material" and encompasses other sources of radiation such as radiation machines. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(a).]</p> <p>7. Illinois' omission of the phrase "that are stored in controlled or unrestricted areas" is consistent with the SSR because, by omitting this phrase, Illinois applies this section to all radioactive material instead of radioactive material in storage. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(a).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.1802, Control of material not in storage.	Sec. D 802	340.810(b), (c) and (d)	<p>1. Illinois' addition of the phrase "Security and" to the section heading is consistent with the SSR because the regulatory requirements of this section have not been changed. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810.]</p> <p>2. Illinois' omission of the phrase "not in Storage" from the section heading is consistent with the SSR because the regulatory requirements of this section have not been changed. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810.]</p> <p>3. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(b).]</p> <p>4. Illinois' omission of the phrase "controlled and" is inconsistent with the SSR because, by omitting this phrase, Illinois only requires maintenance of constant surveillance instead of control and surveillance. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(b).]</p> <p>5. Illinois' addition of the phrase "and use devices or administrative procedures to prevent unauthorized use" is consistent with the SSR because Agreement States may provide additional requirements for licensees or registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(b).]</p> <p>6. Illinois' omission of the phrase "or registered" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registered material from the requirements of this subsection although it is covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810.]</p> <p>7. From a legal viewpoint, Illinois' omission of the phrase "controlled or" is inconsistent with the SSR because the omission of the phrase "controlled or," excludes controlled areas from the scope of this section even though they are regulated by the SSR and 10 CFR Part 20. In health physics, an area is deemed a "restricted area" for purposes of limiting radiation exposure. Because "controlled areas" serve no direct role in health physics, there is no significance to Illinois's omission of this phrase from a health physics viewpoint (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(b).]</p> <p>8. Although by omitting the phrase "in a patient," Illinois does not exclude sources of radiation in patients from the requirements of this section, this omission is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(b).]</p> <p>Note: The SSR adds the phrase "or in a patient." There is a question as to the consistency of this phrase with 10 CFR Part 20. This issue requires further evaluation by the OSP. [See SSR Sec. D.802a. and Illinois 340.810(b).]</p> <p>9. Illinois' use of the word "secure" instead of the phrase "maintain control" is inconsistent with the SSR because the meaning has been changed. While securing machines may be an aspect of maintaining control of them, maintaining control may also include other actions, such as preventing unauthorized or incorrect use. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(c).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
continued	continued	continued	<p>10. Illinois' addition of the word "registered" is inconsistent with the SSR because, by adding the word, Illinois narrows the scope of this subsection to include only registered radiation machines instead of all radiation machines. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(c).]</p> <p>11. Illinois' omission of the phrase "that are in a controlled or unrestricted area and that are not in storage" is consistent with the SSR because, by omitting this phrase, Illinois applies the requirements of this subsection to all radiation machines regardless of location. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(c).]</p> <p>12. Illinois' addition of the phrase "from unauthorized removal" is inconsistent with the SSR because this phrase limits the registrant's responsibility to preventing unauthorized removal but does not address other ways of securing or maintaining control over the machines, such as unauthorized use or tampering. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(c).]</p> <p>13. Illinois' addition of subsection 340.810(d) is consistent with the SSR because Agreement States may provide additional requirements for licensees or registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.810(d).]</p>
§ 20.1901, Caution Signs.	Sec. D.901	340.910	<p>1. Although the Illinois reference to "this Part" includes more than the Illinois equivalent to SSR D.901, Illinois' substitution of "this Part" for "D.901" is appropriate for Illinois and, therefore, consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.910(a).]</p> <p>2. Illinois' omission of SSR paragraphs D.901a.1. and a.2. are inconsistent with the SSR because inclusion of these paragraphs is not optional. [See SSR Sec. D.901a.1. and a.2.]</p> <p>3. Illinois' use of the word "may" instead of the word "shall" is inconsistent with the SSR because Illinois' use of the word "may" is permissive in effect. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.910(b).]</p> <p>4. Although by omitting this phrase, Illinois is less specific than the SSR, Illinois' omission of the phrase "as appropriate" and the comma after the word "appropriate" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.910(c).]</p>
§ 20.1902, Posting requirements.	Sec. D.902	340.920	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.920(d) and (e).]</p> <p>2. Illinois' omission of the phrase "or registered" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registered material from the requirements of this subsection although it is covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.920(e).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.1903, Exceptions to posting requirements.	Sec. D.903	340.930	<p>1. If the requirements of Illinois 32 Ill. Adm. Code 335.5030(a)(4) or 335.7030(b) are equivalent to SSR Sec. G.26, then Illinois's substitution of the phrase "requirements of 32 Ill. Adm. Code 335.5030(a)(4) or 335.7030(b) are met" for "patient could be released from confinement pursuant to G.26 of these regulations" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.930(b).]</p> <p>2. Illinois' addition of subsection 340.930(c) is inconsistent with the SSR because, by adding this subsection, Illinois creates an exception to the posting requirements not found in the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.930(c).]</p>
§ 20.1904, Labeling containers.	Sec. D.904	340.940	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.940(a) and (b).]</p> <p>2. Illinois' omission of the phrase "or registered" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registered material from the requirements of this subsection although it is covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.940(a).]</p> <p>3. Illinois' omission of the word "conspicuous" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.940(c).]</p>
§ 20.1905, Exemptions to labeling requirements.	Sec. D.905	340.950	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.950 and 340.950(a).]</p> <p>2. Illinois' omission of the phrase "or registered" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registered material from the requirements of this subsection although it is covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.950(b).]</p> <p>3. Illinois' addition of the phrase "provided the containers are" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.950(d).]</p> <p>4. Illinois' addition of the phrase "current as October 1, 1991, exclusive of subsequent amendments or editions" is inconsistent with the SSR because the CFR regulations in effect as of October 1, 1991 may not be equivalent to the CFR regulations presently in effect. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.950(d).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.1906, Procedures for receiving and opening packages.	Sec. D.906	340.960	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.960(a), (b), (c), (d) and (e).]</p> <p>2. Illinois' use of the phrase "is authorized" instead of the word "expects" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.960(a).]</p> <p>3. If 32 Ill. Adm. Code 341.20 as of September 29, 1988 is equivalent to SSR Sec. T.2 and Appendix A of Part T, then Illinois' substitution of "32 Ill. Adm. Code 341.20, as listed in 48 CFR 173.435 revised as of September 29, 1988, or as derived from 49 CFR 173.433 revised as of March 19, 1985" for "T.2 and Appendix T of Part T of these regulations" is consistent with the SSR. [See Illinois 340.960(a) and (b)(2).]</p> <p>4. Illinois' addition of the phrase "current as of October 1, 1991, exclusive of subsequent amendments or editions" is inconsistent with the SSR because the CFR regulations in effect as of October 1, 1991 may not be equivalent to the CFR regulations currently in effect. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.960(b)(1).]</p> <p>5. Illinois' omission of the SSR footnote designated by number is inconsistent with the SSR. According to the CRCPD "Policies and Procedures for Preparation and Publication of the SSR for Control of Radiation" January 1991 document, footnotes designated by number are intended to be part of the regulations. See Major Point 5. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.960(b)(2).]</p> <p>6. Illinois' omission of the phrase "or registrant's" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.960(c).]</p> <p>7. Illinois' addition of the phrase "or if there is evidence of degradation of package integrity, such as a package that is crushed, wet or damaged" is consistent with the SSR because Agreement States may provide additional requirements for licensees and registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.960(c).]</p> <p>8. Illinois' addition of the phrase "and has no evidence of degradation of package integrity" is consistent with the SSR because Agreement States may provide additional requirements for licensees and registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.960(c).]</p> <p>9. If 32 Ill. Adm. Code 341.150(h) is equivalent to SSR Sec. T.15h., then Illinois's substitution of "32 Ill. Adm. Code 341.150(h)" for "T.15h. of these regulations" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.960(d)(1).]</p>
continued	continued	continued	<p>10. If 32 Ill. Adm. Code 341.150(i) and (j) are equivalent to SSR Sec. T.15i. and j., then Illinois's substitution of "32 Ill. Adm. Code 340.150(i) and (j)" for "T.15i. and j. of these regulations" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.960(d)(2).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.2001, General requirements.	Sec. D.1001	340.1010	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this section although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1010(a).]</p> <p>2. Illinois' omission of the phrase "or registered" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registered material from the requirements of this subsection although it is covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1010(a) and (b).]</p> <p>3. If 32 Ill. Adm. Code 330, 332, and 601 are equivalent to SSR Parts C, M, and U, then Illinois's substitution of "Ill. Adm. Code 330, 332 or 601" for "Parts C, M, or U of these regulations" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1010(a)(1).]</p> <p>4. Although by omitting this subsection, Illinois does not permit disposal of waste by decay in storage, Illinois' omission of SSR Sec. D.1001a.ii. is consistent with the SSR. [See SSR Sec. D.1001a.ii.]</p> <p>5. Illinois' use of the phrase "point of generation" instead of the word "persons" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1010(b).]</p> <p>6. Illinois' omission of SSR Sec. D.1001b.iii. is inconsistent with the SSR. By omitting this subsection, Illinois does not require persons to be licensed or registered to receive waste for decay in storage. [See SSR Sec. D.1001b.iii.]</p> <p>7. If 32 Ill. Adm. Code 601 is equivalent to SSR Part M, then Illinois's substitution of "32 Ill. Adm. Code 601" for "Part M of these regulations" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1010(b)(3).]</p> <p>8. Illinois' omission of the phrase "storage or" is consistent with the SSR because Illinois limits the types of facilities authorized to receive transferred licensed material. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1010(b)(4).]</p> <p>Note: The SSR adds paragraph b.v. containing an additional condition requiring licensing. This is inconsistent with the CFR and needs further evaluation. Therefore, even though Illinois is consistent with the SSR in adding the paragraph, it is nevertheless inconsistent with 10 CFR Part 20. [See SSR Sec. D.1001b.v. and Illinois 340.1010(b)(4).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.2002, Method of obtaining approval of proposed disposal procedures.	Sec. D.1002	340.1020	<p>1. Illinois' omission of the phrase "or registrant" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1020.]</p> <p>2. Illinois' omission of the phrase "or registration" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1020.]</p> <p>3. Illinois' omission of the phrase "or registered" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1020 and 1020(a).]</p> <p>4. Illinois' omission of the phrase "or registrant's" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1020(a).]</p>
§ 20.2003, Disposal by release into sanitary sewerage.	Sec. D.1003	340.1030	<p>1. Illinois' omission of the phrase "or registrant" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1030(a), (a)(2), (a)(2)(A) and (a)(4).]</p> <p>2. Illinois' omission of the phrase "or registered" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1030(a), (a)(2), and (a)(4).]</p> <p>Note: The SSR uses the phrase "registered radioactive material" instead of the CFR phrase "other radioactive material." The SSR is inconsistent with 10 CFR Part 20 because it does not address all other radioactive material. Illinois omits this phrase, and therefore, is inconsistent with the SSR. This issue requires further evaluation by the OSP. [See SSR Sec. D.1003a.ii. and D.1003a.iv., and Illinois 340.1030(a)(2) and (a)(4).]</p> <p>3. Illinois' addition of 340.1030(a)(5) is consistent with the SSR because this subsection does not provide additional regulatory requirements or effect those contained in the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1030(a)(5).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.2004, Treatment or disposal by incineration.	Sec. D.1004	340.1040	<p>1. Illinois' omission of the phrase "or registrant" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1040.]</p> <p>2. Illinois' omission of the phrase "or registered" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1040.]</p> <p>Note: The SSR uses the phrase "amounts and forms" instead of the CFR phrase "form and concentration." The SSR is inconsistent with 10 CFR Part 20 because the meaning has been changed. Therefore, even though Illinois is consistent with the SSR in using the phrase stated above, it is nevertheless inconsistent with 10 CFR Part 20. [See SSR Sec. D.1004 and Illinois 340.1040.]</p>
§ 20.2005, Disposal of specific wastes.	Sec. D.1005	340.1050	<p>1. Illinois' omission of the phrase "or registrant" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1050(a), (b) and (c).]</p> <p>2. Illinois' omission of the phrase "or registered" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1050(a).]</p> <p>3. Illinois' use of the letter "u" instead of the symbol "μ" is inconsistent with the SSR because these terms are not equivalent. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1050(a)(1) and (a)(2).]</p> <p>4. Illinois' addition of the phrase "or iodine-125" is inconsistent with the SSR because, by adding this phrase, Illinois creates an additional exception to the waste disposal requirements of these regulations not found in the SSR. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1050(a)(1) and (a)(2).]</p> <p>5. Illinois' omission of the word "liquid" appears to be of no significance since a liquid medium is used in scintillation counting of these nuclides. Therefore, this is consistent with the SSR. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1050(a)(1).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.2006, Transfer for disposal and manifests.	Sec. D.1006	340.1060	<p>1. Illinois' omission of SSR Sec. D.1006a. is consistent with the SSR. The SSR subsection is merely a statement of purpose. It does not contain any regulatory requirements. [See SSR D.1006a.]</p> <p>2. Illinois' omission of the phrase "designated for disposal" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1060(a).]</p> <p>3. Illinois' addition of the word "land" is consistent with the SSR because the change in language does not change the disposal options in Illinois. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1060(a).]</p> <p>4. The SSR uses the phrase "as specified in Section I for Appendix D." Illinois incorporates the text from SSR Appendix D to Part D pertaining to shipment manifests. This is consistent with the SSR because the additional Illinois text is consistent with SSR Appendix D, Section I. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1060(a), (b) and (c).]</p> <p>5. The SSR uses the phrase "as specified in Section II of Appendix D." Illinois uses the following and includes text from SSR Appendix D to Part D: "that the materials being transported are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the USDOT and the Department. An authorized representative of the waste generator shall sign and date the manifest." This is consistent with the SSR because the additional text is consistent with SSR Appendix D, Section II.</p> <p>6. Illinois omits the following sentence: "Each person involved in the transfer of waste for disposal or in the disposal of waste, including the waste generator, waste collector, waste processor, and disposal facility operator, shall comply with the requirements specified in Section III of Appendix D." This omission is consistent with the SSR because the relevant requirements of D.1006 may be found elsewhere in the Illinois regulations. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1060(d).]</p> <p>7. Illinois' addition of text from SSR Appendix D to Part D is consistent with the SSR because the additional Illinois text is consistent with SSR Appendix D, Section III. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1060(d), (e), (f), (g) and (h).]</p>
§ 20.2007, Compliance with environmental and health protection regulations.	Sec. D.1007	340.1070	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this section although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1070.]</p> <p>2. Illinois' addition of the word "pursuant" is consistent with the SSR because the SSR omission of "pursuant" is probably a typographical error. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1070.]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.2101, General provisions.	Sec. D.1101	340.1110	<p>Note 1: The SSR adds the phrase "SI units: becquerel, gray, sievert and coulomb per kilogram, or the special units." These SSR additions are inconsistent with the CFR language requiring special reporting to the NRC. Therefore, even though Illinois is consistent with the SSR in adding the phrase stated above, it is nevertheless inconsistent with 10 CFR Part 20. [See SSR Sec. D.1101a. and Illinois 340.1110(a).]</p> <p>Note 2: Although Illinois follows the SSR in adding the term "total organ dose equivalent," there is a question as to its consistency with 10 CFR Part 20. This issue requires further evaluation by the OSP. [See SSR Sec. D.1101b. and Illinois 340.1110(b).]</p> <p>1. Illinois' addition of Sec. 340.1110(c) is consistent with the SSR because Agreement States may provide additional requirements for licensees and registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1110(c).]</p>
§ 20.2102, Records of radiation protection programs.	Sec. D.1102	340.1120	<p>1. Illinois' addition of the phrase "required pursuant to Section 340.110" is consistent with the SSR because Section 340.110 deals with the development of radiation protection programs. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1120(a).]</p> <p>2. Illinois' use of the number "5" instead of the number "3" is consistent with the SSR because Agreement States may provide additional requirements for licensees or registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1120(b).]</p>
§ 20.2103, Records of surveys.	Sec. D.1103	340.1130	<p>1. Illinois' use of the number "5" instead of the number "3" is consistent with the SSR because Agreement States may provide additional requirements for licensees or registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1130(a).]</p> <p>2. Illinois' omits SSR Sec. 1103c. The SSR Working Group developed this language for those states which require transfer of certain records to the State Regulatory Agency upon termination of Agency related activities. If Illinois does not require transfer to the Agency of certain records after the termination of activities regulated by the Agency, then this omission is consistent with the SSR. [See SSR Sec. 1103c.]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.2104, Determination of prior occupational dose.	Sec. D.205	340.250	<p>1. From a legal viewpoint, Illinois' omission of the phrase "or controlled" is inconsistent with the SSR because the omission of the phrase "or controlled," excludes controlled areas from the scope of this section even though they are regulated by the SSR and 10 CFR Part 20. In health physics, an area is deemed a "restricted area" for purposes of limiting radiation exposure. Because "controlled areas" serve no direct role in health physics, there is no significance to Illinois's omission of this phrase from a health physics viewpoint. (HP) See Major Point 2. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.250(a).]</p> <p>2. Although Illinois more specifically states the appropriate time at which to determine occupational dose, Illinois' addition of the phrase "prior to allowing such individual to enter a restricted area" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.250(a).]</p> <p>3. Illinois' addition of the phrase "Licensees and registrants also should" is inconsistent with the SSR because Illinois omits the mandatory language "shall" used in the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.250(a).]</p> <p>4. Illinois' omission of the word lifetime is inconsistent with the SSR. However, the omission is consistent with 10 CFR Part 20 (see Note 1). [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.250(a).]</p> <p>Note 1: The word "lifetime" is redundant with "cumulative" and was deleted from 10 CFR Part 20 (57 Fed. Reg. 57877, December 8, 1992). [See SSR Sec. D.205a.ii. and D.205b.iii., and Illinois 340.250(a) and (b)(1).]</p> <p>5. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.250(b).]</p> <p>Note 2: SSR Section D.205b.iii. and Illinois 340.250(b)(1) add a requirement not appearing in 10 CFR Part 20. This addition requires further evaluation by the OSP. [See SSR Sec. D.205b.iii. and Illinois 340.250(b)(1).]</p> <p>6. Illinois' additions of paragraphs 340.250(b)(1)(A) and (B) are consistent with the SSR because Agreement States may provide additional requirements for licensees or registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.250(b)(1)(A) and (b)(1)(B).]</p> <p>7. Illinois' use of the phrase "may have received" instead of the word "received" is consistent with the SSR because Illinois includes doses that may have been received in addition to those actually received. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.250(b).]</p> <p>Note 3: The SSR is inconsistent with 10 CFR Part 20. Because it uses "received," where the CFR and Illinois use "may have received," the CFR meaning has been changed. While the CFR and Illinois include any occupational dose that the individual "may" have received, the SSR includes only the occupational dose the individual actually received. [See SSR Sec D.205c.i. and Illinois 340.250(b).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
continued	continued	continued	<p>8. Illinois adds the following sentence: "To accomplish this, a licensee or registrant may use the Illinois Department of Nuclear Safety (IDNS) Form 5." Although, by adding this sentence, Illinois allows licensees and registrants to use Illinois Department of Nuclear (IDNS) Form 5, this is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.250(b).]</p> <p>9. Illinois' omission of SSR D.205c.ii. and c.iii. is inconsistent with the SSR because inclusion of this paragraphs is not optional. [See SSR D.205c.ii and iii.]</p> <p>Note 4: The CFR uses the plural form of equivalent and is probably more accurate. [See SSR Sec. D.205c.iii.]</p> <p>10. Illinois' use of the phrase "sources of radiation" instead of the phrase "radiation or radioactive material" is consistent with the SSR even though Illinois' use of the phrase "sources of radiation" is broader than the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.250(c).]</p> <p>11. Illinois' use of the phrase "the exposure history" instead of the phrase "Agency Form Y or equivalent" is consistent with the SSR because the SSR provides that Agency Form Y is to be used to records the exposure history. Illinois simply refers to the information to be included in the form instead of the form itself. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.250(c).]</p> <p>12. Illinois' omission of the phrase "on Agency Form Y or equivalent" is consistent with the SSR because the use of such forms is implied. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.250(c)(2).]</p> <p>Note 5: The first sentence of the equivalent to SSR Sec. D.205d.ii. was amended by the 10 CFR Part 20 (57 Fed. Reg. 57877, December 8, 1992) to make it clearer that licensees do not have to partition doses received prior to implementing the new 10 CFR Part 20 into external dose equivalents and internal committed dose equivalents. The SSR and Illinois have not adopted the amended CFR language. [See SSR Sec. D.205d.ii. and Illinois 340.250(c)(2).]</p> <p>13. Illinois' addition of the word "calendar" is inconsistent with the SSR because the SSR terms "quarter" and "calendar quarter" are defined differently. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.250(d)(1).]</p> <p>14. Illinois' use of the phrase "Shall not authorize the individual to receive any" instead of the phrase "That the individual is not available for" is consistent with the SSR even though the Illinois language is more preemptory than the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.250(d)(2).]</p> <p>15. SSR uses the following sentences: "The licensee or registrant shall retain the records on Agency Form Y or equivalent until the Agency terminates each pertinent license or registration requiring this record. The licensee or registrant shall retain records used in preparing Agency Form Y or equivalent for 3 years after the record is made." Illinois uses the following sentence: "Records shall be retained in accordance with the requirements of Section 340.1140(a)." This is consistent with the SSR because the requirements of SSR Sec. D.205f. are equivalent to the requirements of Illinois Section 340.1140(a). [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.250(e).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.2105, Records of planned special exposures.	Sec. D.1106	340.1150	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1150(a) and (b).]</p> <p>2. Illinois' omission of the phrase "or registration" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrations from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1150(b) and (c).]</p> <p>3. Although, by omitting this phrase, Illinois does not allow licensees or registrants the option of permanently storing records of doses, Illinois' omission of the phrase "the licensee or registrant shall permanently store" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1150(c).]</p> <p>4. Although Illinois refers to the information contained in the form instead of the form itself, Illinois' use of the phrase "the records of doses received during planned special exposure" instead of the phrase "records on Agency Form Y or equivalent" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1150(c).]</p> <p>5. Illinois' use of the phrase "shall be transferred to the Department" instead of the phrase "or shall make provision with the Agency for transfer to the Agency" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1150(c).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.2106, Records of individual monitoring results.	Sec. D.1107	340.1160	<p>1. Illinois omits the following sentence: "Assessments of dose equivalent and records made using units in effect before [the effective date of Part D] need not be changed." Illinois adds text equivalent to this sentence as an Agency Note. [See Illinois 340.1160(a)(6).] Therefore, this omission is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1160(a).]</p> <p>Note: The SSR omits the term "body burden." The SSR omission of this term is inconsistent with 10 CFR Part 20. Therefore, even though Illinois is consistent with the SSR in omitting the term stated above, it is nevertheless inconsistent with 10 CFR Part 20. [See SSR Sec. D.1107a ii. and a iii. and Illinois 340.1160(a)(2) and (a)(3).]</p> <p>2. Illinois' use of the term "committed dose equivalent" instead of the term "committed dose" is consistent with the SSR because the meaning has not been changed. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1160(a)(6).]</p> <p>3. Illinois' addition of the Agency Note is consistent with the SSR because this note incorporates text equivalent to the sentence omitted by Illinois in Section 340.1160(a). [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1160(a)(6).]</p> <p>4. Although, by omitting this phrase, Illinois does not allow licensees or registrants the option of permanently storing records of doses, Illinois' omission of the phrase "the licensee or registrant shall permanently store" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1160(f).]</p> <p>5. Although, by using the phrase "the records of doses received by individuals" instead of the phrase "records on Agency Form, Y or equivalent," Illinois refers to the information contained on the Agency form instead of the form itself, this is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1160(f).]</p> <p>6. Illinois' use of the phrase "the records of doses received by individuals shall be transferred to the Department" instead of the phrase "or shall make provision with the Agency for transfer to the Agency" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1160(f).]</p>
§ 20.2107, Records of dose to individual members of the public.	Sec. D.1108	340.1170	<p>1. Illinois' omission of the word "Individual" from the section heading is consistent with the SSR because the regulatory requirements of this section have not been changed. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1170(a).]</p> <p>2. Although Illinois Sections 340.310 and 340.320 are equivalent to SSR Sec. D.302 as well as SSR Sec. D.301, Illinois' substitution of "Sections 340.310 and 340.320" for "D.301" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1170(a).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.2108, Records of waste disposal.	Sec. D.1109	340.1180	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1180(a) and (b).]</p> <p>2. Illinois' omission of the phrase "or registered" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registered material from the requirements of this subsection although it is covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1180(a).]</p> <p>3. If January 28, 1981 is the date authorization of disposal by burial without specific Agency authorization was removed, then Illinois' substitution of "January 28, 1981" for "[insert effective date of rule that removed the authorization]" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1180(a).]</p> <p>4. If 10 CFR 20.304 was the federal regulations authorizing disposal by burial without specific Agency authorization, then Illinois' addition of the phrase "pursuant to 10 CFR 20.304" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1180(a).]</p> <p>5. Although Illinois is less specific than the SSR, Illinois' use of the phrase "the U.S. Nuclear Regulatory Commission" instead of the phrase "A previous D 304" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1180(a).]</p> <p>6. If January 28, 1981 is the date of the rule removing the authorization to dispose of waste in this manner, then Illinois' substitution of the phrase "Prior to January 28, 1981" for "before [date of rule that removed authorization]" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1180(a).]</p> <p>7. Illinois adds the following sentence: "This was authorized pursuant to 10 CFR 20.304." If 10 CFR 20.304 was the federal regulation authorizing burial of small amounts of licensed materials without specific Agency authorization, then this is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1180(a).]</p> <p>8. Illinois' omission of the phrase "or registration" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrations from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1180(b).]</p>
§ 20.2109, Records of testing entry control devices for very high radiation areas.	Sec. D.1110	340.1190	<p>1. This is consistent with the SSR.</p>
§ 20.2110, Form of records.	Sec. D.1111	340.1195	<p>1. Illinois' use of the phrase "shall be" instead of the word "is" is consistent with the SSR even though the phrase "shall be" is more forceful than the word "is." [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1195.]</p> <p>2. Illinois' addition of the phrase "or registrant" is consistent with the SSR because, by adding this phrase, Illinois broadens the application of this section to include registrants. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1195.]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.2201, Reports of theft or loss of licensed material.	Sec. D.1201	340.1210	<p>1. Illinois' omission of the phrase "Licensed or Registered" from the section heading is consistent with the SSR because, by omitting this phrase, Illinois broadens the scope of this section to include all stolen, lost or missing sources of radiation. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1210(a).]</p> <p>2. Illinois' use of the phrase "each stolen, lost or missing source of radiation immediately after its absence becomes known to the licensee or registrant" instead of the phrase "as follows" is consistent with the SSR because Illinois requires more than the SSR, i.e., that all stolen, lost, or missing sources of radiation be reported immediately regardless of potential damage. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1210(a).]</p> <p>3. Illinois adds the following sentence: "This requirement does not apply to sources of radiation that are not required to be licensed or registered." This addition is consistent with the SSR because SSR Sec. D.1201 applies only to licensed or registered sources of radiation. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1210(a).]</p> <p>4. Illinois' omission of SSR paragraphs D.1201a.i., ii., and iii. is consistent with the SSR because Illinois encompasses all materials and requirements of these paragraphs in Illinois 340.1210(a). [See SSR paragraphs D.1201a.i., ii., and iii.]</p> <p>Note: The SSR adds the term "aggregate." This is inconsistent with the CFR. This issue requires further evaluation by the OSP. [See SSR Sec. D.1201a.ii.]</p> <p>5. Illinois' omission of the phrase "licensed or registered" is consistent with the SSR because, by omitting this phrase, Illinois applies this subsection to all sources of radiation instead of simply licensed or registered sources of radiation. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1210(b)(1), (b)(3) and (b)(6).]</p> <p>6. Illinois' omission of the phrase "and maximum energy of radiation emitted" is inconsistent with the SSR because, by omitting this phrase, Illinois does not require the licensee or registrant to provide the maximum energy of radiation emitted by radiation machines in the written reports required by this section. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1210(b)(1).]</p>
§ 20.2202, Notification of incidents.	Sec. D.1202	340.1220	<p>Note: Although Illinois follows the SSR in adding the term "total organ dose equivalent," there is a question as to its consistency with 10 CFR Part 20. This issue requires further evaluation by the OSP. [See SSR Sec. D.1202a.i.(3) and D.1202b.i.(3), and Illinois 340.1220(a)(1)(C) and (b)(1)(C).]</p> <p>1. Illinois' omission of the word "occupational" is consistent with the SSR. This ALI quantity has only been defined for occupational workers. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1220(a)(2).]</p> <p>2. Although Illinois is more specific than the SSR, Illinois' addition of the word "written" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1220(d).]</p> <p>3. Although, by adding these phrases, Illinois requires the licensee or registrant to make a report by telephone in addition to one of the other methods, Illinois' additions of the phrases "by initial contact" and "and shall confirm initial contact by" are consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1220(c).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.2203, Reports of exposures, radiation levels, and concentrations of radioactive material exceeding limits.	Sec. D.1203	340.1230	<p>1. Illinois' omission of the phrase "or registration" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrations from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1230(a)(2)(E), (a)(3)(A) and (b)(1)(D).]</p> <p>2. Illinois' omission of the phrase "or registrations" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrations from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1230(a)(3)(B).]</p> <p>3. Illinois' addition of the phrase "effective July 1, 1990" is inconsistent with the SSR because 40 CFR 190 standards currently in effect may not be equivalent to those in effect July 1, 1990. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1230(a)(4).]</p> <p>4. Illinois' use of the mandatory verb "shall" instead of the word "should, which is mainly suggestive, is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1230(b)(2).]</p> <p>5. Illinois' omission of SSR Sec. D.1203c. is inconsistent with the SSR because Illinois does not require licensees or registrants to submit reports in writing to the Department. [See SSR Sec. D.1203c.]</p>
§ 20.2204, Reports of planned special exposures.	Sec. D.1204	340.1240	1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1240.]
§ 20.2205, [Reserved]	Sec. D.1205 [Reserved]	Omitted.	1. Illinois does not reserve this subsection. This is consistent with the SSR.
§ 20.2206, Reports of individual monitoring.	Sec. D.1206	Omitted.	1. If Illinois does not regulate the sources of radiation designated by this section, then, Illinois' omission of this section is consistent with the SSR. [See SSR D.1206.]
§ 20.2301 Applications for exemptions.	Sec. A.3a.	310.30	<p>1. This is consistent with the SSR.</p> <p>Note: The SSR adds to 10 CFR Part 20 the phrase "or exceptions" which allows state agencies to grant "exceptions" as well as exemptions. This is inconsistent with the CFR. Therefore, even though Illinois is consistent with the SSR in substituting the phrase stated above, it is nevertheless inconsistent with 10 CFR Part 20. [See SSR Sec. A.3a. and Illinois 310.30(a).]</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
§ 20.2302, Additional requirements.	Sec. A.7	310.70	<p>1. Illinois' addition of Section 310.70(a) is consistent with the SSR because Agreement States may provide the appropriate state agency with the authority to inspect and investigate the premises, operations and personnel of radiation installations. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.70(a).]</p> <p>2. Illinois' omission of the phrase "by rule, regulation, or order" is inconsistent with the SSR because, by omitting this phrase, Illinois does not provide the methods by which the Department can impose additional requirements. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.70(b).]</p> <p>3. Illinois' omission of the phrase "appropriate or" is inconsistent with the SSR because, by omitting the phrase "appropriate or," Illinois excludes circumstances under which additional requirements could be imposed. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.70(b).]</p> <p>4. Illinois' omission of the word "property" is inconsistent with the SSR because, by omitting this word, Illinois omits danger to property as a condition warranting imposition of additional requirements. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.70(b).]</p> <p>5. Illinois' addition of the phrase "the environment" is consistent with the SSR because, by adding this phrase, Illinois includes danger to the environment as a condition warranting imposition of additional requirements. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.70(b).]</p>
§ 20.2401, Violations.	Sec. A.8	310.80	<p>1. Illinois uses the phrase "such person may be enjoined from continuing such violation as hereinafter provided" instead of the following sentence: "An injunction or other court order may be obtained prohibiting any violation of any provision of the Act or any regulations or order issued thereunder." This is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.80(a).]</p> <p>2. Illinois uses the phrase "Any person who shall violate any of the provisions of, or who fails to perform any duty imposed by this Act, or who violates any determination or order of the Department promulgated pursuant to the Act, is guilty of a Class A misdemeanor" instead of the following sentence: "Any person who willfully violates any provision of the Act or any regulation or order issued thereunder may be guilty of a [felony, misdemeanor or crime] and, upon conviction, may be punished by fine or imprisonment or both, as provided by law." This is consistent with the SSR. By omitting the word "willful," Illinois expands the scope of this section. Illinois expands the culpable mental state to include all recognized levels: negligent, reckless, knowing and willful. The SSR specifically limits the punishable mental state to only the most egregious, i.e., willful. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.80(a).]</p> <p>3. Illinois' addition of the phrase "provided each day during which violation continues shall constitute a separate offense; and in addition thereto" is consistent with the SSR because Agreement States may punish violations of their radiation protection regulations according to State law. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.80(a).]</p> <p>4. Illinois' additions of subsections 310.80(b) and (c) are consistent with the SSR because Agreement States may punish violations of their radiation protection regulations according to state law. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.80(b) and (c).]</p>
§ 20.2402, Criminal penalties.	Omitted.	Omitted.	<p>1. The SSR and Illinois omit this section. This omission is consistent with the SSR and CFR because Agreement States may provide for sanctions independently.</p>

CFR Citations	SSR Citations	Illinois Citations	Comments
APPENDIX A TO §§ 20.1001-20.2402 - PROTECTION FACTORS FOR RESPIRATORS*		Incorporated by reference at 340.15	1. This is consistent with the SSR.
APPENDIX B TO §§ 20.1001-20.2402-ANNUAL LIMITS ON INTAKE (ALIs) AND DERIVED AIR CONCENTRATIONS (DACs) OF RADIONUCLIDES FOR OCCUPATIONAL EXPOSURE; EFFLUENT CONCENTRATIONS; CONCENTRATIONS FOR RELEASE INTO SEWERAGE		Incorporated by reference at 340.15	1. This is consistent with the SSR.
APPENDIX F TO §§ 20.1001-20.2402-REQUIREMENTS FOR LOW-LEVEL-WASTE TRANSFER FOR DISPOSAL AT LAND DISPOSAL FACILITIES AND MANIFESTS		Incorporated by reference at 340.15	1. This is consistent with the SSR.

B. The text in the following chart appears in the SSR and the Illinois Code only. These sections or definitions have no corresponding 10 CFR Part 20 text.

SSR Citation	Illinois Citation	Comments
Sec. A.1 Scope.	310.10	1. Illinois' substitution of "this Part" for "these regulations" is inconsistent with the SSR because the phrase "these regulations" encompasses all of the SSR whereas Illinois' use of the phrase "this Part" only refers to the Illinois equivalent to SSR Part A.
Sec. A.2 Definitions.	310.20	<p>1. A₁ - Omitted. If Illinois uses the term "A₁" in its radiation protection regulations, then this omission is inconsistent with the SSR.</p> <p>2. Accelerator - Consistent.</p> <p>3. Accelerator-produced material - Consistent.</p> <p>4. Agency - Omitted. Illinois's omission of the definition for "Agency" is consistent with the SSR because Illinois substitutes "Department" for "Agency" throughout its radiation protection regulations.</p> <p>5. Agreement State - If 73 Stat. 689 and 42 U.S.C. 2021(b) et seq. are equivalent citations, then Illinois' use of the citation "(42 U.S.C. 2021(b) et seq.)" instead of "(73 Stat. 689)" is consistent with the SSR.</p> <p>6. Becquerel - Consistent.</p>

SSR Citation	Illinois Citation	Comments
continued	continued	<p>7. Brachytherapy - Consistent. Illinois' use of the phrase "less than 6 centimeters" instead of the phrase "up to a few centimeters" is consistent with the SSR. The specification of a "few centimeters" to be less than 6 centimeters does not change the definition in any substantial manner. (HP)</p> <p>8. Calendar quarter - Consistent.</p> <p>Note: The 10 CFR Part 20 definition for "quarter" provides that the beginning of the first quarter of the year coincide with the starting date of the year. By merely providing that the first calendar quarter of each year begin in the month of January, the SSR Part A definition of "calendar quarter" has a different meaning from the CFR definition of "quarter." The SSR definition is inconsistent with the CFR. Therefore, although the Illinois definition of "calendar quarter" is consistent with the SSR, it is nevertheless inconsistent with 10 CFR Part 20.</p> <p>9. Calibration - Consistent. Illinois's use of the word "or" instead of the letter "o" is consistent with the SSR because the word "or" is a correction for a typographical error in the SSR.</p> <p>10. CFR - Consistent.</p> <p>11. Chelating agent - Inconsistent. Illinois' additions of the phrases "(e.g., EDTA, DTPA)" and "(e.g., citric acid, carbolic acid, and glucinic acid)" are consistent with the SSR because these additions are appropriate examples and the explanatory inclusion does not alter the definition. (HP) However, although the Illinois substitution of the phrase "glucinic acid" for "gluconic acid" is probably a typographical error, this is inconsistent with the SSR because these acids are not the same.</p> <p>12. Curie - Consistent. Illinois' addition of the term "disintegrations" is consistent with the SSR because the terms "disintegrations" and "transformations" are equivalent. (HP) Illinois' addition of the phrase "dps or" is consistent with the SSR because the terms "dps" and "tps" are equivalent. (HP)</p> <p>13. Depleted uranium - Consistent.</p> <p>14. Dose limits - Consistent.</p>

SSR Citation	Illinois Citation	Comments
continued	continued	<p>15. Explosive material - Omitted. If Illinois regulates the use of explosive materials or uses the term in its radiation protection regulations, then this omission is inconsistent with the SSR.</p> <p>16. <u>Exposure</u> rate - Inconsistent. Illinois' use of the word "Exposure" instead of the word "<u>Exposure</u>" is inconsistent with the SSR because the context does not adequately clarify which definition of "exposure" is being used, given the clear distinction made by the SSR between these two definitions.</p> <p>17. Former U.S. Atomic Energy Commission (AEC) or U.S. Nuclear Regulatory Commission (NRC) licensed facilities - Consistent.</p> <p>18. Hazardous waste - Omitted. If Illinois uses the term "hazardous waste" in its radiation protection regulations, then this omission is inconsistent with the SSR.</p> <p>19. Healing arts - Consistent. Illinois's insertion of a definition for "Healing arts" is consistent with the SSR because the SSR bracketed language directs the Agreement States to insert their own definition.</p> <p>20. Human use - Consistent.</p> <p>21. Inspection - Consistent.</p> <p>22. Interlock - Consistent.</p> <p>23. Licensing State - Inconsistent. Illinois' use of the phrase "which reviews state regulations to establish equivalency with the Suggested State Regulations and ascertains whether a state has an effective program for control of naturally occurring or accelerator-produced radioactive material (NARM)" instead of the phrase "with regulations equivalent to the Suggested State Regulations for Control of Radiation relating to, and an effective program for, the regulatory control of NARM" is inconsistent with the SSR because Illinois has failed to adequately provide the requirements for designation as a "Licensing State." Instead Illinois has described the functions of the Conference of Program Directors. Illinois' use of the phrase "which has been provisionally or finally designated as such by the Conference of Radiation Control Program Directors, Inc." instead of the phrase "and which has been granted final designation by the Conference of Radiation Control Program Directors, Inc." is inconsistent with the SSR because, by adding the phrase "provisionally or," Illinois includes states that have not been granted final designation by the Conference of Radiation Control Program Directors, Inc. in this definition. Illinois adds the following sentence: "The Conference will designate as licensing states those states with regulations for control of radiation relating to, and an effective program for the regulatory control of (NARM)." This is inconsistent with the SSR because the SSR definition states that licensing states have "regulations equivalent to the Suggested State Regulations for Control of Radiation" and not merely "regulations for control of radiation."</p>

SSR Citation	Illinois Citation	Comments
continued	continued	<p>24. Major processor - Inconsistent. Illinois' use of the word "person" instead of the word "user" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. Illinois' use of the phrase "who is licensed to process, handle, or manufacture radioactive material" instead of the phrase "processing, handling, or manufacturing radioactive material" is consistent with the SSR because the meaning has not been changed. (HP) Illinois' use of the phrase "as unsealed sources in quantities exceeding the quantities specified in Appendix C to 10 CFR 20.1001 - 20.2401, effective January 1, 1994, exclusive of subsequent amendments or editions, by a factor of at least 10^5, or radioactive material as sealed sources in quantities exceeding the quantities specified in Appendix C to 10 CFR 20.1001 - 20.2401 by a factor of at least 10^{10}" instead of the phrase "exceeding Type A quantities as unsealed sources or material, or exceeding 4 times Type B quantities as sealed sources" is inconsistent with the SSR because Illinois changes the basis for the numerical values. (HP) Illinois' use of the phrase "other than medical programs, universities, industrial radiography services, or wireline service operations" instead of the phrase "but does not include nuclear medicine programs, universities, industrial radiographers, or small industrial programs" is inconsistent with the SSR because Illinois introduces a new undefined term, "wireline service operations" as an exception to this definition. (HP) At the same time, Illinois omits "small industrial programs" from the list of exceptions. Illinois omits the following sentence: "Type A and B quantities are defined in T.2 of these regulations." This omission is consistent with the SSR because the terms "Type A" and "Type B" quantities are not used in Illinois' definition of "Major processor."</p> <p>25. NARM - Consistent</p> <p>26. Natural radioactivity - Consistent</p> <p>27. Package - Consistent</p> <p>28. Pharmacist - Consistent</p> <p>29. Physician - Consistent. Illinois inserts its own definition. This is consistent with the SSR because the SSR directs the Agreement States to insert their own definition of "physician."</p> <p>30. Pyrophoric liquid - Omitted. This omission is inconsistent with the SSR because Illinois uses this term in its radiation protection regulations without defining it.</p> <p>31. Qualified expert - Omitted. This omission is consistent with the SSR because the definition is optional as indicated by the brackets.</p> <p>32. Radiation machine - Consistent. Illinois' use of the phrase "which produce radiation only from radioactive materials" instead of the phrase "with radioactive material as the only source of radiation" is consistent with the SSR although the wording differs. (HP)</p>

SSR Citation	Illinois Citation	Comments
continued	continued	<p>33. Radiation safety officer - Consistent. Illinois' addition of the phrase "and has been assigned such responsibility by the licensee or registrant" is consistent with the SSR because, by adding the phrase, Illinois clarifies the source of the Radiation safety officer's responsibility to apply radiation protection regulations.</p> <p>34. Radioactive material - Consistent.</p> <p>35. Radioactivity - Consistent. Illinois' addition of the word "disintegration" is consistent with the SSR because "transformation" and "disinte ration" are equivalent terms. (HP)</p> <p>36. Registrant - Inconsistent. Illinois' substitution of "the Radiation Installation Act (Ill. Rev. Stat. 1991, ch. 111½, par. 195 et seq.) [420 ILCS 30] and 32 Ill. Adm. Code 320.10" for the phrase "these regulations and the Act" is inconsistent with the SSR because Illinois 32 Ill. Adm. Code 320.10 is not equivalent to the SSR.</p> <p>37. Registration - Consistent. If 32 Ill. Adm. Code 320.10 is the correct citation in the Illinois radiation protection regulations dealing with registration with the Department, then Illinois' substitution of "32 Ill. Adm. Code 320.10" for "the regulations adopted by the Agency" is consistent with the SSR.</p> <p>38. Regulations of the U.S. Department of Transportation - Inconsistent. If 49 CFR Parts 100-189 have been amended or edited since October 1, 1991, then Illinois' addition of the phrase "revised as of October 1, 1991, exclusive of any subsequent amendments or editions" is inconsistent with the SSR.</p> <p>39. Research and development - Consistent.</p> <p>40. Roentgen - Illinois' omission of the phrase "of air" is consistent with the SSR. The phrase "of air" has nothing to do with units of measure. Hence the unit is technically (C/kg) as stated in the definition. (HP) Illinois' use of the word "Exposure" instead of the word "<u>Exposure</u>" is consistent with the SSR so long as Illinois is using "Exposure" as a special unit of measure and not the general usage (see the definition of "Exposure").</p>

SSR Citation	Illinois Citation	Comments
continued	continued	<p>41. Sealed source - Consistent. SSR uses the definition "radioactive material that is permanently bonded or fixed in a capsule or matrix designed to prevent release and dispersal of the radioactive material under the most severe conditions which are likely to be encountered in normal use and handling"; Illinois uses the definition <i>"any device containing radioactive material to be used as a source of radiation which has been constructed in such a manner as to prevent the escape of any radioactive material"</i> Illinois' definition of this term is consistent with the SSR even though the wording of the Illinois definition is quite different. (HP)</p> <p>42. SI - Consistent.</p> <p>43. Source material milling - Omitted. If Illinois regulates source material milling or uses this term in its radiation protection regulations, then this omission is inconsistent with the SSR.</p> <p>44. Source of radiation - Consistent.</p> <p>45. Special form radioactive material - Inconsistent. Illinois' use of the term "(0.197 inch)" instead of the term "(0.2 inch)" is inconsistent with the SSR because the Illinois value, reported to three significant digits, should be reported to only one significant digit like the SSR. (HP) Illinois uses the phrase "except that special form radioactive material designed or constructed prior to July 1, 1985 need only meet the requirements of 10 CFR 71.75 and 71.77 in effect on June 30, 1983" instead of the following sentence: "A special form encapsulation designed in accordance with the U.S. Nuclear Regulatory Commission requirements in effect on June 30, 1983, and constructed prior to July 1, 1985, may continue to be used." This is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. Illinois omits the following sentence: "A special form encapsulation either designed or constructed after June 30, 1985, must meet requirements of this definition applicable at the time of its design or construction." This omission is consistent with the SSR because it is implied in the text that if constructed after July 1, 1985, a special form encapsulation must meet the requirements of the definition applicable at the time of construction or design.</p> <p>46. Special nuclear materials in quantities not sufficient to form a critical mass - Consistent. Illinois' addition of the phrase "except source material" is consistent with the SSR because the definition of special nuclear material does not include source material (see definition of "Special nuclear material").</p> <p>47. Test - Consistent.</p> <p>48. These regulations - Omitted. This omission is consistent with the SSR because Illinois does not use this term in its radiation protection regulations.</p>

SSR Citation	Illinois Citation	Comments
continued	continued	<p>49. Total organ dose equivalent (TODE) - Consistent.</p> <p>Note: Although 10 CFR Part 20 does not use this term, according to NRC RG 8.7 Rev. 1, June 1992, its meaning is the same as the reportable quantity specified in 10 CFR § 20.2106(a)(6). There is a question as to the consistency of the SSR addition of this term with the CFR. This issue requires further evaluation by the OSP.</p> <p>50. U.S. Department of Energy - Consistent.</p> <p>51. Unrefined and unprocessed ore - Consistent.</p> <p>52. Waste - Omitted. If Illinois uses this special definition of "Waste," in addition to the general usage of the word in its radiation protection regulations, then this omission is inconsistent with the SSR.</p> <p>53. Waste handling licensees - Inconsistent. Although Illinois' use of the phrase "radioactive wastes for storage, treatment, or both storage and treatment" instead of the phrase "and store radioactive wastes" broadens this definition to include persons who treat waste prior to disposal as well as persons who store waste prior to disposal, this is consistent with the SSR. Illinois' use of the phrase "as well as any" instead of the term "and/or" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. Illinois' use of the phrase "receive radioactive waste for disposal away from the point of generation" instead of the phrase "dispose of radioactive waste" is inconsistent with the SSR because Illinois changes the activity being regulated to receipt of radioactive waste instead of disposal of radioactive waste.</p> <p>54. Worker - Consistent.</p>
Sec. A.3b. Exemptions.	310.30	1. Illinois' use of the phrase "otherwise appropriate" instead of the phrase "authorized by law" is inconsistent with the SSR. By using this phrase, Illinois increases the number of possible exemptions from the requirements of 32 Ill. Adm. Code: Chapter II, Subchapters b and d beyond those authorized by law. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.30(b)(4)(B).]
Sec. A.4 Records.	310.40	1. Illinois' addition of the phrase "use, storage" is consistent with the SSR because Agreement States may provide additional requirements for licensees or registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20. By adding "use" and "storage," Illinois requires records to be kept of the use and storage of sources of radiation as well as receipt, transfer and disposal. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.40.]
Sec. A.5 Inspections.	310.50	<p>1. Illinois' use of the word "person" instead of the phrase "licensee or registrant" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.50(a) and (b).]</p> <p>2. Illinois' addition of the phrase "radiation installations and" is consistent with the SSR because Agreement States may provide that the appropriate state agency be afforded the opportunity for reasonable inspection of radiation installations and facilities where sources of radiation are used and stored. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.50(b).]</p> <p>3. Illinois' addition of subsection (c) is consistent with the SSR because Agreement States may provide the appropriate state agency the authority to inspect premises in order to determine if there is compliance with or violations of the state radiation protection standards. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.50(c).]</p>
Sec. A.6 Tests.	310.60	1. Illinois' use of the word "installations" instead of the word "facilities" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.60(b).]

SSR Citation	Illinois Citation	Comments
Sec. A.9 Impounding	310.90	1. Illinois' substitution of its own language to address impounding is consistent with the SSR because Agreement States may respond to violations of their regulations according to state law. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.90.]
Sec. A.10 Prohibited Uses.	310.100	1. Illinois' omission of the phrase "unless it has been listed in the Registry of Sealed Source and Devices or accepted for certification by the U.S. Food and Drug Administration, Center for Devices and Radiological Health" is consistent with the SSR. By omitting this phrase, Illinois prohibits the use of all hand-held fluoroscopic screens with x-ray equipment. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.100.]
Sec. A.13a. Units of <u>Exposure</u> and Dose	310.140	<p>1. Illinois' use of the word "Exposure" instead of the word "<u>Exposure</u>" is inconsistent with the SSR because the context does not adequately clarify which definition of "exposure" is being used, given the clear distinction made by the SSR between these two definitions. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.140(a).]</p> <p>2. Illinois's omission of the phrase "of air" is consistent with the SSR because the term "of air" has nothing to do with units of measure. Hence, the unit technically is (C/kg) as stated in the paragraph (HP). [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.140(a).]</p> <p>3. Illinois' addition of the phrase "or roentgen (R)" is consistent with the SSR because the meaning has not been changed. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 310.140(a).]</p>

SSR Citation	Illinois Citation	Comments
[Sec. D.401 Testing for Leakage or Contamination of Sealed Sources.]	340.410	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.410(a), (a)(1), (a)(4), (b)(6) and (f).]</p> <p>2. Illinois' use of the phrase "pursuant to" instead of the phrase "after evaluation of information specified by" is consistent with the SSR because, although the meaning is changed slightly, the change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.410(a)(2) and (a)(3).]</p> <p>3. If 32 Ill. Adm. Code 330.280(m) is equivalent to SSR C.281 iv. and v., then Illinois' substitution of "32 Ill. Adm. Code 330.280(m)" for "C.281 iv. and v. of these regulations" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.410(a)(2) and (a)(3).]</p> <p>4. Illinois' use of the letter "u" instead of the symbol "μ" is inconsistent with the SSR because these terms are not equivalent. (HP) [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.410(a)(5), (a)(6), (a)(7), (b)(3), (c)(1), (c)(2) and (c)(3).]</p> <p>5. Illinois adds the following sentence: "If setting the source to the 'off' position would disrupt the licensee's activities, test samples may be obtained while the source is in the 'on' position, provided that the dose likely to be received by the individual while obtaining the samples will not be so great as to require monitoring pursuant to Section 340.520(a)." From a health physics viewpoint, this is a very poor addition and is inconsistent with the SSR. (HP) This is also inconsistent with the SSR from a legal viewpoint because Illinois' language modifies this regulation. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.410(a)(5).]</p> <p>6. Illinois' omission of the phrase "or registrant" is generally inconsistent with the SSR. However, there are instances where the omission may be consistent due to permissive language in the text, due to omission within exceptions to legal requirements, or because of the related subject matter. These issues require further evaluation by the OSP. See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.410(b).]</p> <p>7. Illinois' addition of paragraph 340.410(b)(7) is inconsistent with the SSR because, by adding this paragraph, Illinois creates a category of exceptions to the requirements of this section not found in the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.410(b)(7).]</p>
Sec. D.1104 Records of Tests for Leakage or Contamination of Sealed Sources.	340.1135	<p>1. This is consistent with the SSR.</p>
Sec. D.1105 Records of Prior Occupational Dose.	340.1140	<p>1. Although, by omitting the phrase "the licensee or registrant shall permanently store," Illinois does not allow licensees or registrants the option of permanently storing records of prior occupational dose, this omission is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1140(b).]</p> <p>2. Although Illinois refers to the information contained in the form instead of the form itself, Illinois' use of the phrase "of prior occupational dose and exposure history" instead of the phrase "on Agency Form Y, or equivalent" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1140(b).]</p> <p>3. Illinois' use of the phrase "shall be transferred to the Department" instead of the phrase "or shall make provision with the Agency for transfer to the Agency" is consistent with the SSR because, although the meaning is changed slightly, this change is insignificant. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1140(b).]</p>

SSR Citation	Illinois Citation	Comments
Sec. D.1207 Notifications and Reports to Individuals.	340.1250	<p>1. If 32 Ill. Adm. Code 400.130 is equivalent to SSR Sec. J.13, then Illinois' substitution of "32 Ill. Adm. Code 400.130" for "J.13 of these regulations" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1250(a).]</p> <p>2. If 32 Ill. Adm. Code 400.130(a) is equivalent to SSR Sec. J.13a., then Illinois's substitution of "32 Ill. Adm. Code 400.130(a)" for "J.13a. of these regulations" is consistent with the SSR. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1250(b).]</p>
Sec. D.1208 Reports of Leaking or Contaminated Sealed Sources.	340.1260	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 330.1260.]</p>
Sec. D.1301 Vacating Premises.	340.1310	<p>1. Illinois' omission of the phrase "or registrant" is inconsistent with the SSR because, by omitting this phrase, Illinois excludes registrants from the requirements of this subsection although they are covered by other provisions of 32 Ill. Adm. Code: Chapter II, Subchapters b and d, including the Purpose and Scope (Sections 340.10 and 340.20). See Major Point 1. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1310.]</p> <p>2. Illinois omits the following sentence: "When deemed necessary by the Agency, the licensee shall decontaminate the premises in such a manner as the Agency may specify." This omission is inconsistent with the SSR because, by omitting this sentence, Illinois does not authorized the Department to require the licensee to decontaminate premises upon vacating. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1310.]</p>
SSR Appendix E to Part D CLASSIFICATION AND CHARACTERISTICS OF LOW-LEVEL RADIOACTIVE WASTE	340.1052, 340.1055, and 340.1057	<p>1. Assuming that the Illinois citation for "pyrophoric" is correct, Illinois' substitution of "32 Ill. Adm. Code 601" for "A.4 of these regulations" is consistent with the SSR even though the Illinois citation is not equivalent to the SSR citation. The SSR citation of A.4 for the definition of "pyrophoric" is incorrect and should be A.2. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1055(a)(7).]</p> <p>2. Illinois' omission of SSR footnotes a and b is inconsistent with the SSR. By omitting these footnotes, Illinois fails to include important information necessary to use Table I. [See 32 Illinois Adm. Code: Chapter II, subchapters b and d, Section 340.1057 Labeling, Table I.]</p>

C. Illinois additional text for which there is no SSR equivalent text.

Illinois Citation	Comments
<p>310.15 Incorporations by Reference. All rules, standards and guidelines of agencies of the United States or nationally recognized organizations or associations that are incorporated by reference in this Part are incorporated as of the date specified in the reference and do not include any later amendments or editions. Copies of these rules, standards and guidelines that have been incorporated by reference are available for public inspection at the Department of Nuclear Safety, 1035 Outer Park Drive, Springfield, Illinois. AGENCY NOTE: In this Part, the Department has incorporated by reference the appendices to 10 CFR 20, effective as of January 1, 1994. These appendices were originally published at 56 FR 23360 - 23474 (May 21, 1991). Corrections were published at 56 FR 61352 - 61353 (December 3, 1991) and an amendment was published at 57 FR 57877 - 57879 (December 8, 1992). The incorporation includes the 1991 correction and the 1992 amendment.</p>	<p>1. This is an appropriate section to be included in the Illinois regulations and is consistent with the SSR.</p>
<p>310.20 Definitions "Director" means the Director of the Department of Nuclear Safety. (See Section 4(c) of the Act.)</p>	<p>1. This is an appropriate definition to be included in the Illinois regulations and is consistent with the SSR.</p>
<p>"Operator" means any individual, group of individuals, partnership, firm, corporation or association conducting the business or activities carried on within a radiation installation.</p>	<p>1. This is an appropriate definition to be included in the Illinois regulations and is consistent with the SSR.</p>
<p>"Packaging" means the assembly of components necessary to ensure compliance with the packaging requirements of 32 Ill. Adm. Code 341. It may consist of one or more receptacles, absorbent materials, spacing structures, thermal insulation, radiation shielding and devices for cooling or absorbing mechanical shocks. The vehicle, tie down system and auxiliary equipment may be designated as part of the packaging.</p>	<p>1. Although this definition deals with subject matter outside the scope of 10 CFR Part 20, it neither conflicts with or contradicts any language in the SSR or 10 CFR Part 20. Therefore, this is consistent with the SSR.</p>
<p>"Protective apron" means any apron made of radiation attenuating materials, at least 0.25 millimeter lead equivalent, that may be used to reduce exposure to radiation.</p>	<p>1. This is an appropriate definition to be included in the Illinois regulations and is consistent with the SSR.</p>
<p>"Qualified engineering expert" means any person qualified under the Illinois Architecture Practice Act of 1989 (Ill. Rev. Stat. 1991, ch. 111, par. 1301 et seq.) [225 ILCS 305], The Structural Engineering Licensing Act of 1989 (Ill. Rev. Stat. 1991, ch. 111, par. 6601 et seq.) [225 ILCS 340] and/or any required combination thereof.</p>	<p>1. This is an appropriate definition to be included in the Illinois regulations and is consistent with the SSR.</p>

Illinois Citation	Comments
<p>"Radiation Installation" is any location or facility where radiation machines are used or where radioactive material is produced, transported, stored, disposed or used for any purpose. (See Section 4(g) of the Act.) except where such radioactive materials or facility are subject to regulation by the NRC "Director"</p>	<p>1. This is an appropriate definition to be included in the Illinois regulations and is consistent with the SSR.</p>
<p>"Uranium fuel cycle" means the operations of milling of uranium ore, chemical conversion of uranium, isotopic enrichment of uranium, fabrication of uranium fuel, generation of electricity by a light-water-cooled nuclear power plant using uranium fuel and reprocessing of spent uranium fuel to the extent that these activities directly support the production of electrical power for public use. Uranium fuel cycle does not include mining operations, operations at waste disposal sites, transportation of radioactive material in support of these operations and the reuse of recovered non-uranium special nuclear and byproduct materials from the cycle.</p>	<p>1. This is an appropriate definition to be included in the Illinois regulations and is consistent with the SSR.</p>
<p>Section 310.81 Policy for Assessment of Civil Penalties</p>	<p>1. This section deals with subject matter outside the scope of SSR Parts A and D, and 10 CFR Part 20.</p>
<p>Section 310.82 Procedures for Assessment of Civil Penalties</p>	<p>1. This section deals with subject matter outside the scope of SSR Parts A and D, and 10 CFR Part 20.</p>
<p>Section 340.530 Location of Individual Monitoring Devices Each licensee or registrant shall ensure that individuals who are required to monitor occupational doses in accordance with Section 340.520(a) wear individual monitoring devices as follows:</p> <ul style="list-style-type: none"> a) An individual monitoring device used for monitoring dose to the whole body shall be worn at the unshielded location of the whole body likely to receive the highest exposure. When a protective apron is worn, the location of the individual monitoring device is typically at the neck (collar). b) An individual monitoring device used for monitoring device used for monitoring the dose to an embryo/fetus of a declared pregnant woman, pursuant to Section 340.280(a), shall be located at the waist under any protective apron being worn by the woman. c) An individual monitoring device used for monitoring the eye dose equivalent, to demonstrate compliance with Section 340.210(a)(2)(A), shall be located at the neck (collar), outside any protective apron being worn by the monitored individual, or at an unshielded location closer to the eye. d) An individual monitoring device used for monitoring the dose to the extremities, to demonstrate compliance with Section 340.210(a)(2)(B), shall be worn on the extremity likely to receive the highest exposure. Each individual monitoring device shall be oriented to measure the highest dose to the extremity being monitored. 	<p>1. This is consistent with the SSR because Agreement States may provide additional requirements for licensees or registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20.</p>

Illinois Citation	Comments
<p>Section 340.1270 Reports of Missing Waste Shipments Each licensee who conducts a trace investigation pursuant to Section 340.1060 (h) shall file a written report with the Department within 2 weeks after completion of the investigation.</p>	<p>1. This is consistent with the SSR because Agreement States may provide additional requirements for licensees or registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20.</p>
<p>Section 340.1320 Removal of Radioactive Contamination Notwithstanding any exemptions contained in this Part, any person who uses, possesses, or stores radioactive material in such a manner as to cause uncontrolled contamination of any area shall, upon order of the Department, remove or provide for the removal of such contaminants at his own expense through the use of an installation to the lowest practicable level. Unless another value is specified in Section 340. Appendix A may be used as guidelines for this purpose. These values, however, may be modified at specific installations at the discretion of the Department.</p>	<p>1. This is consistent with the SSR because Agreement States may provide additional requirements for licensees or registrants to follow so long as those requirements do not contradict or conflict with the SSR or 10 CFR Part 20.</p>

D. HEALTH PHYSICS REVIEW REPORT ON ILLINOIS STATE REGULATIONS

1. Comparison of Dose Limits. Identify differences between the SSR text pertaining to dose limits and the equivalent text pertaining to dose limits in the Illinois State Regulations.

SSR Citation	Illinois	Comments
Sec. D.201, Occupational dose limits for adults.	340.210	Consistent.
Sec. D.202, Compliance with requirements for summation of external and internal doses.	340.220	Consistent.
Sec. D.203, Determination of external dose from airborne radioactive material.	340.230	Consistent.
Sec. D.204, Determination of internal exposure.	340.240	Consistent.
Sec. D.206, Planned special exposures.	340.260	Consistent.
Sec. D.207, Occupational dose limits for minors.	340.270	Consistent.
Sec. D.208, Dose to an embryo/fetus.	340.280	Consistent.
Sec. D.301, Dose limits for individual members of the public.	340.310	Inconsistent. The Illinois Section 21.301 permits individual members of the public to infrequent exposures to radiation from diagnostic and therapeutic machines to not exceed 0.5 rem (5 mSv). Such an exemption is provided without the benefit of a case-by-case evaluation required in 10 CFR 20.1301(c) and the facilities are allowed to use a previous annual dose limit of 0.5 rem (5 mSv) for individual members of the public.
Sec. D.302, Compliance with dose limits for individual members of the public.	340.320	Consistent.

2. Definitions. Identify differences between the SSR definitions and the definitions pertaining to primary and secondary dose limits in the Illinois State Regulations.

SSR Citation	Illinois	Comments
Sec. A.2	11.1	The Illinois modifies a number of definitions; some in a manner that is inconsistent with the SSR.
Sec. D.3	21.3	Consistent.

3. Appendices and Tables. Identify differences between the text and tables in Appendices A, B and C to Part D of the SSR and the equivalent text and tables pertaining to numerical values and computations in various State of Illinois reports.

CFR or SSR Citation	Illinois	Comments
CFR APPENDIX A TO §§ 20.1001--20.2401 - PROTECTION FACTOR FOR RESPIRATORS	Included by reference.	Direct reference to 10 CFR Part 20.
CFR APPENDIX B TO §§ 20.1001--20.2401 - ALIs AND DACs OF RADIONUCLIDES FOR OCCUPATIONAL EXPOSURE; EFFLUENT CONCENTRATIONS; CONCENTRATIONS FOR RELEASE TO SEWERAGE	Included by reference.	Direct reference to 10 CFR Part 20.
CFR APPENDIX C TO §§ 20.1001--20.2401 - QUANTITIES OF LICENSED MATERIAL REQUIRING LABELING	Part 21, Appendix 21-C.	No differences were found in random checks of the numerical values in the table of this appendix and the equivalent table in Appendix C to the SSR or 10 CFR Part 20.
SSR Appendix E - CLASSIFICATION AND CHARACTERISTICS OF LOW-LEVEL RADIOACTIVE WASTE	Section 340.1052	No differences were found in the numerical values of Tables 1 and 2 of this Section 340.1052 and the equivalent and Tables 1 and 2 of Appendix E to the SSR.
CFR APPENDIX F TO §§ 20.1001--20.2401 - REQUIREMENTS FOR LOW-LEVEL WASTE TRANSFER FOR DISPOSAL AT LAND DISPOSAL FACILITIES AND MANIFESTS.	Included by reference.	Direct reference to 10 CFR Part 20.