

**2021
Rationale for Revisions**

**Part W
Radiation Safety Requirements for Well Logging Operations and Subsurface Tracer Studies**

Part W was last published in 1991. It was reviewed and extensively edited in 2014. The 2014 draft was sent to the NRC for a compatibility review. In a January 30, 2015 letter, the NRC detailed the results of their review that included 13 compatibility comments and 5 general comments. There is no record that the NRC comments were addressed. Since the last review there has been one change made to 10 CFR 39 that require changes to Part W to remain compatible with federal regulations. These changes were outlined in RATS 2020-1 (85 FR 15347).

This revision incorporates the draft changes from the 2014 review, changes suggested by the NRC in the 2015 letter, and changes to address RATS 2020-1.

This rationale does not address changes made during the 2014 review or revisions based on NRC comments.

W.203.a Revised to be compatible with changes outlined in RATS 2020-1.
Reworded paragraph and removed the phrase “that is processed and evaluated by an accredited National Voluntary Laboratory Accreditation Program (NVLAP) processor”.