

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

July 11, 2023

Brian D. Goretzki, Chief Bureau of Radiation Control Arizona Department of Health Services 4814 South 40th St Phoenix, AZ 85040

Dear Brian Goretzki:

We have reviewed the proposed revisions to the Arizona legislation House Bill 2001 (HB2001), received by our office on March 30, 2023. This legislation was reviewed by comparison to the Office of Nuclear Material Safety and Safeguards (NMSS) Procedure SA-700 Handbook, "Processing an Agreement," the Council of State Governments, Suggested State Legislation, 1983, Volume 42, and policy statement "Criteria for Guidance of States and the NRC in Discontinuance of NRC Regulatory Authority and Assumption Thereof by States Through Agreement" (Criteria Policy Statement). We discussed our review of the legislation with you on June 8, 2023.

As a result of our review, we have one comment that has been identified in Enclosure 1. Please note that we limited our review to identifying whether the proposed legislation would create duplications, gaps, or conflicts with regulations required for compatibility and/or health and safety. We request that if there are any subsequent changes to the proposed legislation, as it makes its way through the committee process, we are provided the legislation for review.

The State Regulation Status (SRS) Data Sheet provided in Enclosure 2 summarizes our knowledge of the status of other Arizona regulations, as indicated. Please let us know if you note any inaccuracies, or have any comments on the information contained in the SRS Data Sheet. This letter, including the SRS Data Sheet, is posted on the Arizona Agreement State Information Web page: https://www.nrc.gov/agreement-states.html.

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If you have any questions regarding the comments or the Suggested State Legislation used in the review, please contact my staff at AgreementStateRegs.Resource@nrc.gov.

Sincerely,

Adularly Sparath Signed by Giantelli, Adelaide on 07/11/23

Adelaide S. Giantelli, Chief State Agreement and Liaison Programs Branch Division of Materials Safety, Security, State, and Tribal Programs Office of Nuclear Material Safety and Safeguards

Enclosures:

- Comment on Arizona Proposed Legislation
- 2. Arizona SRS Data Sheet

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SUBJECT: ARIZONA PROPOSED LEGISLATION DATE July 11, 2023

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ADAMS Accession No. ML23093A159 pkg and ML23192A279 letter

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DATE	07/11/2023	07/11/2023	06/06/23	07/11/2023

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COMMENT ON ARIZONA PROPOSED LEGISLATION

STA	TE SECTION	STATE SUGGESTED LEGISLATION SECTION	SUBJECT and COMMENTS
1	HB2001, Section 1.B.9.	Section 16	Arizona's proposed legislation HB2001 Sec. 1.B.9 describes that the department may not require more training and experience for persons using sources of radiation with respect to the hazards of excessive exposure to radiation than is required by the centers for Medicare and Medicaid services. Section 16 of the Suggested State Legislation describes that ordinances or regulations hereafter in effect shall not be superseded provided they are consistent with the provisions of the State Suggested Legislation. Please clarify the proposed limitation on training and experience requirements related to centers for Medicare and Medicaid services requirements and how this law will not cause a conflict with NRC regulations required for compatibility and/or health and safety.

STATE REGULATION STATUS

State: Arizona Tracking Ticket Number: 23-22
Date: July 11, 2023

[amendment(s) reviewed identified by a * at the beginning of the equivalent NRC requirement.]

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1991-1	Safety Requirements for Radiographic Equipment Part 34 55 FR 843 (Superceded by 1997-5)	01/10/1994	Final ML042370896	No Comments 11/10/2004 ML043200721	Arizona has adopted final regulations equivalent to RATS ID 1997-5.
1991-2	ASNT Certification of Radiographers Part 34 56 FR 11504 (Superceded by 1997-5)	none	Final ML042370896	No Comments 11/10/2004 ML043200721	Arizona has adopted final regulations equivalent to RATS ID 1997-5.
1991-3	Standards for Protection Against Radiation Part 20 56 FR 23360; 56 FR 61352; 57 FR 38588; 57 FR 57877; 58 FR 67657; 59 FR 41641; 60 FR 20183	01/01/1994	Final	No Comments 09/22/1997	
1991-4	Notification of Incidents Parts 20, 30, 31, 34, 39, 40 and 70 56 FR 64980	10/15/1994	Final ML042370896	No Comments 11/10/2004 ML043200721	
1992-1	Quality Management Program and Misadministrations Part 35 56 FR 34104 (Superceded by 2002-2)	01/27/1995	License Condition	No Comments 01/15/1999	Arizona has not yet adopted equivalent regulations to RATS ID 2002-2.
1992-2	Eliminating the Recordkeeping Requirements for Departures from Manufacturer's Instructions Parts 30 and 35 57 FR 45566	none	Not required	Not required	These regulation changes are not required to be adopted for purposes of Compatibility.

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1993-1	Decommissioning Recordkeeping and License Termination: Documentation Additions [Restricted areas and spill sites] Parts 30 and 40 58 FR 39628	10/25/1996	Proposed ML15267A799	No Comments 11/06/2015 ML15267A795 No Comments 06/03/2016 ML16113A212	
1993-2	Licensing and Radiation Safety Requirements for Irradiators Part 36 58 FR 7715	07/01/1996	Not Applicable ⁱ	Not Applicable	Arizona does not have any licensees subject to these regulations (See SECY-95-112)
1993-3	Definition of Land Disposal and Waste Site QA Program Part 61 58 FR 33886	07/22/1996	Not Applicable ⁱⁱ	Not Applicable	Arizona does not have any licensees subject to these regulations (See SECY-95-112)
1994-1	Self-Guarantee as an Additional Financial Mechanism Parts 30, 40 and 70 58 FR 68726; 59 FR 1618	none	Not Required	Not Required	These regulation changes are not required to be adopted for purposes of Compatibility.
1994-2	Uranium Mill Tailings Regulations: Conforming NRC Requirements to EPA Standards Part 40 59 FR 28220	07/01/1997	Not Applicable	Not Applicable	Arizona does not have authority to regulate this material under its Agreement.
1994-3	Timeliness in Decommissioning Material Facilities Parts 30, 40 and 70 59 FR 36026	08/15/1997	Final ML032750051	No Comments 11/20/2003 ML033240189	
1995-1	Preparation, Transfer for Commercial Distribution, and Use of Byproduct Material for Medical Use Parts 30, 32 and 35 59 FR 61767; 59 FR 65243; 60 FR 322	01/01/1998	Final ML092590750	No Comments 11/12/2009 ML092870448	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1995-2	Frequency of Medical Examinations for Use of Respiratory Protection Equipment Part 20	03/13/1998	Proposed ML15267A799	No Comments 11/06/2015 ML15267A795	
	60 FR 7900		Final ML16113A289	No Comments 06/03/2016 ML16113A212	
1995-3	Low-Level Waste Shipment Manifest Information and Reporting Parts 20 and 61 60 FR 15649; 60 FR 25983	03/01/1998	Final ML092590750	No Comments 11/12/2009 ML092870448	
1995-4	Performance Requirements for Radiography Equipment Part 34 60 FR 28323 (Superceded by 1997-5)	06/30/1998	Final ML042370896	No Comments 11/10/2004 ML043200721	Arizona has adopted final regulations equivalent to RATS ID 1997-5.
1995-5	Radiation Protection Requirements: Amended Definitions and Criteria Parts 19 and 20 60 FR 36038	08/14/1998	Final ML032750051	No Comments 11/20/2003 ML033240189	
1995-6	Clarification of Decommissioning Funding Requirements Parts 30, 40 and 70 60 FR 38235	11/24/1998	Final ML032750051	No Comments 11/20/2003 ML033240189	
1995-7	Medical Administration of Radiation and Radioactive Materials Parts 20 and 35 60 FR 48623 (Superceded by 2002-2 and 2005-2)	10/20/1998	Proposed	No Comments 10/5/2000	Arizona has not yet adopted equivalent regulations to RATS IDs 2002-2 and 2005-2.

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1996-1	Compatibility with the International Atomic Energy Agency Part 71 60 FR 50248; 61 FR 28724 (Superceded by 2004-1)	04/01/1999	Final ML042370896	Comments 11/10/04 ML043200721	Arizona has adopted final regulations equivalent to RATS ID 2004-1.
1996-2	One Time Extension of Certain Byproduct, Source and Special Nuclear Materials Licenses Parts 30, 40 and 70 61 FR 1109	02/15/1999	Not required	Not required	These regulation changes are not required to be adopted for purposes of Compatibility.
1996-3	Termination or Transfer of Licensed Activities: Record keeping Requirements Parts 20, 30, 40, 61 and 70 61 FR 24669	06/17/1999	Final ML032750051	No Comments 11/20/2003 ML033240189	
1997-1	Resolution of Dual Regulation of Airborne Effluents of Radioactive Materials; Clean Air Act Part 20 61 FR 65120	01/9/2000	Final ML032750051	No Comments 11/20/2003 ML033240189	
1997-2	Recognition of Agreement State Licenses in Areas Under Exclusive Federal Jurisdiction Within an Agreement State Part 150 62 FR 1662	02/27/2000	Final ML042370896	No Comments 11/10/2004 ML043200721	
1997-3	Criteria for the Release of Individuals Administered Radioactive Material Parts 20 and 35 62 FR 4120	05/29/2000	Final ML092590750	No Comments 11/12/2009 ML092870448	
1997-4	Fissile Material Shipments and Exemptions Part 71 62 FR 5907 (Superceded by 2004-1)	02/10/2000	Not required	Not required	These regulation changes are not required to be adopted for purposes of Compatibility. (See STP-97-078)

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1997-5	Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiography Operations Parts 30, 34, 71 and 150 62 FR 28947	06/27/2000	Final ML042180385	No Comments 11/10/2004 ML043200721	
1997-6	Radiological Criteria for License Termination Parts 20, 30, 40 and 70 62 FR 39057	08/20/2000	Final ML032930364	No Comments 11/06/2003 ML033160544	
1997-7	Exempt Distribution of a Radioactive Drug Containing One Microcurie of Carbon-14 Urea Part 30 62 FR 63634	01/02/2001	Final ML032930364	No Comments 11/06/2003 ML033160544	
1998-1	Deliberate Misconduct by Unlicensed Persons Parts 30, 40, 61, 70, 71 and 150 63 FR 1890; 63 FR 13773	02/12/2001	Final ML042370896	No Comments 11/10/2004 ML043200721	
1998-2	Self-Guarantee of Decommissioning Funding by Nonprofit and Non-Bond-Issuing Licensees Parts 30, 40 and 70 63 FR 29535	07/01/2001	Not required	Not required	These regulations are not required to be adopted for purposes of Compatibility.
1998-3	License Term for Medical Use Licenses Part 35 63 FR 31604 (Superceded by 2002-2)	07/10/2001	Not required	Not required	These regulations are not required to be adopted for purposes of Compatibility. (See STP-98-074)

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
1998-4	Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiographic Operations Part 34 63 FR 37059	07/09/2001	Final ML042370896	No Comments 11/10/2004 ML043200721	
1998-5	Minor Corrections, Clarifying Changes, and a Minor Policy Change Parts 20, 32, 35, 36 and 39 63 FR 39477; 63 FR 45393	10/26/2001	Final ML032750051	No Comments 11/20/2003 ML033240189	
1998-6	Transfer for Disposal and Manifests: Minor Technical Conforming Amendment Part 20 63 FR 50127	11/20/2001	Final ML032750051	No Comments 11/20/2003 ML033240189	
1999-1	Radiological Criteria for License Termination of Uranium Recovery Facilities Part 40 64 FR 17506	06/11/2002	Not Required	Not Required	These regulations are not required to be adopted for purposes of Compatibility.
1999-2	Requirements for Those Who Possess Certain Industrial Devices Containing Byproduct Material to Provide Requested Information Part 31 64 FR 42269	10/04/2002	Not Required	Not Required	These regulations are not required to be adopted for purposes of Compatibility.
1999-3	Respiratory Protection and Controls to Restrict Internal Exposure Part 20 64 FR 54543; 64 FR 55524	02/02/2003	Final ML032930364	No Comments 11/06/2003 ML033160544	
2000-1	Energy Compensation Sources for Well Logging and Other Regulatory Clarifications Part 39 65 FR 20337	05/17/2003	Final ML032930364	No Comments 11/06/2003 ML033160544	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2000-2	New Dosimetry Technology Parts 34, 36, and 39 65 FR 63750	01/08/2004	Final ML042370896	No Comments 11/1/2004 ML043200721	
2001-1	Requirements for Certain Generally Licensed Industrial Devices Containing Byproduct Material Parts 30, 31 and 32 65 FR 79162	02/16/2004	Final ML13101A341	No Comments 04/29/2013 ML13102A005	
2002-1	Revision of the Skin Dose Limit Part 20 67 FR 16298	04/05/2005	Final ML092590750	No Comments 11/12/2009 ML092870448	
2002-2	Medical Use of Byproduct Material Parts 20, 32 and 35 67 FR 20249	10/24/2005	Final ML13101A341	Comments 04/29/2013 ML13102A005	
			Revised Final ML17139D382	No Comments 6/26/2017 ML17139D381	
2003-1	Financial Assurance for Materials Licensees Parts 30, 40 and 70 68 FR 57327	12/03/2006	Final ML092590750	No Comments 11/12/2009 ML092870448	
2004-1	Compatibility With IAEA Transportation Safety Standards and Other Transportation Safety Amendments	10/01/2007	Final ML13101A341	Comments 04/29/2013 ML13102A005	
	Part 71 69 FR 3697		Revised Final ML17139D382	No Comments 6/26/2017 ML17139D381	
2005-1	Security Requirements for Portable Gauges Containing Byproduct Material Part 30 70 FR 2001	07/11/2008	Final ML092590750	No Comments 11/12/2009 ML092870448	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2005-2	Medical Use of Byproduct Material - Recognition of Specialty Boards Part 35 70 FR 16336; 71 FR 1926	04/29/2008	Final ML14232A635	Comments 10/17/2014 ML 14232A317	
	70 FK 10330, 71 FK 1920		Revised Final ML17139D382	No Comments 6/26/2017 ML17139D381	
2005-3	Increased Controls for Risk-Significant Radioactive Sources (NRC Order EA-05-090) 70 FR 72128	12/01/2005	License Condition ML052630048	No Comments 09/21/2005 ML052640467	
2006-1	Minor Amendments Parts 20, 30, 32, 35, 40 and 70 71 FR 15005	03/27/2009	Final ML14232A635	Comments 10/17/2014 ML 14232A317	
			Revised Final ML17139D382	No Comments 6/26/2017 ML17139D381	
2006-2	National Source Tracking System - Serialization Requirements Part 32 with reference to Part 20 Appendix E 71 FR 65685	02/06/2007	Final ML092590750	No Comments 11/12/2009 ML092870448	
2006-3	National Source Tracking System Part 20 71 FR 65685, 72 FR 59162	01/31/2009	Final ML092590750	No Comments 11/12/2009 ML092870448	
2007-1	Medical Use of Byproduct Material - Minor Corrections and Clarifications Parts 32 and 35 72 FR 45147, 54207	10/29/2010	Final ML14232A635	Comments 10/17/2014 ML 14232A317	
			Revised Final ML17139D382	No Comments 6/26/2017 ML17139D381	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2007-2	Exemptions From Licensing, General Licenses, and Distribution of Byproduct Material: Licensing and Reporting Requirements Parts 30, 31, 32 and 150 72 FR 58473	12/17/2010	Final ML13101A341	No Comments 04/29/2013 ML13102A005	
2007-3	Requirements for Expanded Definition of Byproduct Material Parts 20, 30, 31, 32, 33, 35, 61 and 150 72 FR 55864	11/30/2010	Final ML14232A635	No Comments 10/17/2014 ML 14232A317	
2007-4	Order Imposing Fingerprinting Requirements and Criminal History Records Check Requirements for Unescorted Access to Certain Radioactive Material NRC Order EA-07-305 72 FR 70901	06/05/2008	License Condition ML081330218	No Comments 05/28/2008 ML081490633	
2008-1	Occupational Dose Records, Labeling Containers, and Total Effective Dose Equivalent Parts 19 and 20 72 FR 68043	02/15/2011	Final ML14232A635	No Comments 10/17/2014 ML 14232A317	
2009-1	Medical Use of Byproduct Material – Authorized User Clarification Part 35 74 FR 33901	09/28/2012	Final ML14232A635	Comments 10/17/2014 ML 14232A317	
			Revised Final ML17139D382	No Comments 6/26/2017 ML17139D381	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2011-1	Decommissioning Planning Parts 20, 30, 40 and 70 76 FR 35512	12/17/2015	Proposed ML15267A799	Comments 11/06/2015 ML15267A795	
			Final ML16113A289	Comments 06/03/2016 ML16113A212	
			Revised Final ML17139D382	Comments 6/26/2017 ML17139D381	
			Revised Final ML19212A610	No Comments 08/30/2019 ML19212A604	
2011-2	Licenses, Certifications, and Approvals for Materials Licensees Parts 30, 36, 39, 40, 70 and 150 76 FR 56951	11/14/2014	Proposed ML15267A799	Comments 11/06/2015 ML15267A795	
			Final ML16113A289	Comments 06/03/2016 ML16113A212	
			Revised Final ML19212A610	No Comments 08/30/2019 ML19212A604	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2012-1	Change of Compatibility of Parts 31.5 and 31.6 (See RATS ID: 2001-1 for Rule text) 77 FR 3640	01/25/2015	Final ML13101A341	No Comments 04/29/2013 ML13102A005	
			Final ML16113A289	Comments 06/03/2016 ML16113A212	
			Revised Final ML19212A610	No Comments 08/30/2019 ML19212A604	
2012-2	Advance Notification to Native American Tribes of Transportation of Certain Types of Nuclear Waste Part 71 77 FR 34194	08/10/2015	Proposed ML15267A799	No Comments 11/06/2015 ML15267A795	
			Final ML16113A289	Comments 06/03/2016 ML16113A212	
2012-3	Technical Corrections Parts 30, 34, 40 and 71 77 FR 39899	08/06/2015	Proposed ML15267A799	No Comments 11/06/2015 ML15267A795	
			Final ML16113A289	Comments 06/03/2016 ML16113A212	
			Revised Final ML19212A610	No Comments 8/30/2019 ML19212A604	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2012-4	Requirements for Distribution of Byproduct Material Parts 30, 31, 32, 40 and 70 77 FR 43666	10/23/2015	Proposed ML15267A799	Comments 11/06/2015 ML15267A795	
			Final ML16113A289	Comments 06/03/2016 ML16113A212	
			Revised Final ML17139D382	Comments 6/26/2017 ML17139D381	
			Revised Final ML19212A610	No Comments 08/30/2019 ML19212A604	
2013-1	Physical Protection of Byproduct Material, Parts 20, 30, 32, 33, 34, 35, 36, 37, 39 and 71	03/19/2016	Proposed ML15267A799	Comments 11/06/2015 ML15267A795	
	78 FR 16922		Final ML16113A289	Comments 06/03/2016 ML16113A212	Part 37 only
			License Condition ML16042A090	No Comments 03/01/2016 ML16042A088	
			Revised Final ML17139D382	No Comments 6/26/2017 ML17139D381	
2013-2	Distribution of Source Material to Exempt Persons and to General Licensees and Revision of General License and Exemptions, Parts 30, 40 and 70 78 FR 32310	08/27/2016			

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2015-1	Domestic Licensing of Special Nuclear Material – Written Reports and Clarifying Amendments Part 70 79 FR 57721, 80 FR 143	01/26/2018	Proposed ML17139D382 Final ML19212A610	Comments 6/26/2017 ML17139D381 Comment 08/30/2019 ML19212A604	
2015-2	Safeguards Information - Modified Handling Categorization, Change for Materials Facilities Parts 30, 37, 73 and 150 79 FR 58664, 80 FR 3865	01/28/2018	Proposed ML17139D382 Final ML19212A610	No Comments 6/26/2017 ML17139D381 No Comments 08/30/2019 ML19212A604	
2015-3	Revisions to Transportation Safety Requirements and Harmonization with International Atomic Energy Agency Transportation Requirements Part 71 80 FR 33987	07/13/2018	Proposed ML17139D382 Final ML19212A610	Comments 6/26/2017 ML17139D381 Comments 08/30/2019 ML19212A604	
2015-4	Miscellaneous Corrections, Parts 37 and 40 80 FR 45841	09/02/2018	Proposed ML17139D382 Final ML19212A610	No Comments 6/26/2017 ML17139D381 No Comments 08/30/2019 ML19212A604	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2015-5	Miscellaneous Corrections, Parts 19, 20, 30, 32, 37, 40, 61, 70, 71 and 150 80 FR 74974	12/31/2018	Proposed ML17139D382	No Comments 6/26/2017 ML17139D381	
			Final ML19212A610	No Comments 08/30/2019 ML19212A604	
2018-1	Medical Use of Byproduct Material – Medical Event Definitions, Training and Experience, and Clarifying Amendments, Parts 30, 32 and 35	01/14/2022			
2018-2	Miscellaneous Corrections -Organizational Changes Parts 37, 40. 70 and 71	12/21/2021			
2018-3	Miscellaneous Corrections Parts 1,2,34, 37, 50, 71, 73, and 140	07/30/2022			
2019-1	Miscellaneous Corrections Parts 2, 21, 37, 50, 52, 73, and 110	12/18/2022			
2019-2	Organizational Changes and Conforming Amendments Parts 1, 2, 37, 40, 50, 51, 52, 55, 71, 72, 73, and 74,	12/30/2022			
2020-1	Individual Monitoring Devices 10 CFR Parts 34, 36, and 39	06/16/2023			
2020-2	Social Security Number Fraud Prevention 10 CFR Parts 9 and 35	08/17/2023			

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2020-3	Miscellaneous Corrections 10 CFR Parts 1, 2, 19, 20, 21, 30, 34, 35, 40, 50, 51, 52, 60, 61, 62, 63, 70, 71, 72, 73, 74, 75, 76, 110, and 140	11/16/2023			
2021-1	Miscellaneous Corrections 10 CFR Parts 2, 11, 20, 25, 32, 35, 37, 50, 52,55, 70, 72, 73, 95, and 110	09/08/2024			
2021-2	Miscellaneous Corrections 10 CFR Parts 9, 37, 40, 50, 51, 52, 55, 71, 73, and 110	12/30/2024			
2022-1	Miscellaneous Corrections 10 CFR 1, 2, 20, 30, 40, 50, 55, 70, 73, and 170	none			Provisions are not required for compatibility.
2022-2	Miscellaneous Corrections 10 CFR Parts 20, 35, 50, 51, 52, 72, 73, 110, and 150	none			Provisions are not required for compatibility.
N/A	Other provisions not associated with a RATS ID Parts 35.190, 35.290, and 71.13	N/A	Final ML19212A610	No Comments 08/30/2019 ML19212A604	
*N/A	Revisions to House Bill 2001	N/A	Proposed ML23093A179	Comment 07/11/2023 ML23093A159	

i IMPEP Team: verify that Arizona does not have any licensees subject to these regulations during each review. ii IMPEP Team: verify that Arizona does not have any licensees subject to these regulations during each review.