



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 28, 2024

Ira Schneider, Chief
Radiologic Health Branch
California Department of Public Health
Radiologic Health Branch
Environmental Management
PO Box 997414, MS 7610
Sacramento, CA 95899-7414

SUBJECT: 2024 CALIFORNIA IMPEP SCHEDULING LETTER AND QUESTIONNAIRE

Dear Ira Schneider:

The U.S. Nuclear Regulatory Commission (NRC) uses the Integrated Materials Performance Evaluation Program (IMPEP) for the evaluation of Agreement State programs. Per our previous discussion, I will be the team leader for the IMPEP review of the California Agreement State Program scheduled for November 4-8, 2024. The review team will include Randy Erickson, NRC Region IV, Huda Akhavannik, NRC Office of Nuclear Material Safety and Safeguards, Latischa Hanson, NRC Region IV, Keisha Corneilus, State of Oklahoma, Nancy Stanley, State of New Jersey, Tyler Kruse, State of Minnesota, Ron Parsons, State of Tennessee, and Anjan Bhattacharyya, Commonwealth of Kentucky.

Enclosed is the "Integrated Materials Performance Evaluation Program Questionnaire." The questionnaire was previously provided to you electronically on August 13, 2024. I ask that you provide your responses via email to sherrie.flaherty@nrc.gov by October 21, 2024. The questionnaire was sent in advance of this IMPEP review scheduling letter in order to provide time for you to allocate the staff resources necessary to complete the document by the requested date. Please incorporate your responses into the questionnaire.

Also included with the questionnaire is the document "Materials Requested to Be Available for the On-Site Portion of an IMPEP Review." We encourage States to have the items listed prepared and to the extent possible, uploaded with the questionnaire responses prior to the commencement of the IMPEP review

Please set up an appointment with the appropriate State Senior Managers to discuss the results of the IMPEP review of the California Agreement State Program on Friday, November 8, 2024.

I. Schneider

-2-

If your Program experiences any difficulties, or delays in preparing for this IMPEP review, please let me know as soon as possible.

If you have any questions, please email me at sherrie.flaherty@nrc.gov.

Sincerely,



Signed by Flaherty, Sherrie
on 08/28/24

Sherrie Flaherty
Senior Intergovernmental Liaison Project Manager
State Agreement and Liaison Programs Branch
Division of Materials Safety, Security, State, and
Tribal Programs
Office of Nuclear Material Safety and Safeguards

Enclosure:
2024 IMPEP Questionnaire

cc: David Hochschild, Chair
California Energy Commission
1516 North Street MS-32
Sacramento, CA 95814

INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM
QUESTIONNAIRE

California Agreement State Program

Reporting Period: October 25, 2019, through November 8, 2024

Note: If there has been no change in the response to a specific question since the last IMPEP questionnaire, the State or Region may copy the previous answer, if appropriate.

A. GENERAL

1. Please prepare a summary of the status of the State's or Region's actions taken in response to each of the open recommendations from previous IMPEP reviews.

B. COMMON PERFORMANCE INDICATORS

I. Technical Staffing and Training

2. Please provide the following organization charts, including names and positions:
 - (a) A chart showing positions from the Governor down to the Radiation Control Program Director;
 - (b) A chart showing positions of the radiation control program, including management; and
 - (c) Equivalent charts for sealed source and device evaluation, low-level radioactive waste and uranium recovery programs, if applicable.
3. Please provide a staffing plan, or complete a listing using the suggested format below, of the professional (technical) full-time equivalents (FTE) applied to the radioactive materials program by individual. Include the name, position, and, for Agreement States, the fraction of time spent in the following areas: administration, materials licensing and compliance, emergency response, low-level radioactive waste, uranium recovery, and other. If these regulatory responsibilities are divided between offices, the table should be consolidated to include all personnel contributing to the radioactive materials program.

¹Estimated burden per response to comply with this voluntary collection request: 53 hours. Forward comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e mail to Infocollects.Resource@nrc.gov, and to the OMB reviewer at: OMB Office of Information and Regulatory Affairs (3150 0183), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street, NW Washington, DC 20503. The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.

If consultants were used to carry out the program's radioactive materials responsibilities, include their efforts. The table heading should be:

<u>Name</u>	<u>Position</u>	<u>Area of Effort</u>	<u>FTE%</u>
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4. Please provide a listing of all new professional personnel hired into your radioactive materials program since the last review, and if possible, who they are replacing if a recently vacated position is being filled (please indicate how long the position remained vacant). Please indicate the date of hire; the degree(s) they received, if applicable; additional training; and years of experience in health physics or other disciplines, as appropriate.
5. Please list all professional staff who have not yet met the qualification requirements for a radioactive materials license reviewer or inspector. For each, list the courses or equivalent training/experience they need and a tentative schedule for completion of these requirements.
6. Please provide copies of the Program's training procedures.
7. Identify any changes to your qualification and training procedure that occurred during the review period.
8. Please identify the technical staff that left your radioactive materials program during the review period and indicate the date they left.
9. List any vacant positions in your radioactive materials program, the length of time each position has been vacant, and a brief summary of efforts to fill the vacancy.
10. For Agreement States, does your program have an oversight board or committee which provides direction to the program and is composed of licensees and/or members of the public? If so, please describe the procedures used to avoid any potential conflict of interest.

II. Status of Materials Inspection Program

11. Please identify individual licensees or categories of licensees the State is inspecting less frequently than called for in NRC's Inspection Manual Chapter (IMC) 2800 and explain the reason for the difference. The list only needs to include the following information: license category or licensee name and license number, your inspection interval, and rationale for the difference.
12. Please provide the number of routine inspections of Priority 1, 2, and 3 licensees, as defined in IMC 2800 and the number of initial inspections that were completed during each year of the review period.
13. Please submit a table, or a spreadsheet, that identifies inspections of Priority 1, 2, and 3 licensees and initial inspections that were conducted overdue.

At a minimum, the list should include the following information for each inspection that was conducted overdue during the review period:

- (1) Licensee Name
- (2) License Number
- (3) Program Codes
- (4) Priority (IMC 2800)
- (5) Last inspection date or license issuance date, if initial inspection
- (6) Date Due

- (7) Date Performed
- (8) Amount of Time Overdue
- (9) Date inspection findings issued

- 14. Please submit a table or spreadsheet that identifies any Priority 1, 2, and 3 licensees and initial inspections that are currently overdue, per IMC 2800. At a minimum, the list should include the same information for each overdue inspection provided for Question 12 plus your action plan for completing the inspection. Also include your plan for completing the overdue inspections.
- 15. Please provide the number of reciprocity licensees that were candidates for inspection per year as described in IMC 1220 and indicate the number of reciprocity inspections of candidate licensees that were completed each year during the review period.
- 16. Please provide copies of the Program's reciprocity procedure.

III. Technical Quality of Inspections

- 17. Please provide copies of the Program's inspection procedure(s), or a confirmation that Program is using the NRC's inspection procedures.
- 18. What, if any, changes were made to your written inspection procedures during the reporting period?
- 19. Prepare a table showing the number and types of supervisory accompaniments made during the review period. Include:

<u>Inspector</u>	<u>Supervisor</u>	<u>License Category</u>	<u>Date</u>
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- 20. Describe or provide an update on your instrumentation, methods of calibration, and laboratory capabilities. Are all instruments properly calibrated at the present time? Were there sufficient calibrated instruments available throughout the review period?

IV. Technical Quality of Licensing Actions

- 21. How many specific radioactive material licenses does your program regulate at this time?
- 22. Please provide a list of licensing actions completed during the review period, including program code, license reviewer, and license type (e.g., medical, academic, commercial, R&D, industrial radiography, gauges, etc).
- 23. Please indicate whether the licensing records are stored electronically, or in paper files, or in a combination of both.
- 24. Please identify any major, unusual, or complex licenses which were issued, received a major amendment, were terminated, decommissioned, submitted a bankruptcy notification or renewed in this period.
- 25. Please provide copy of the Program's licensing procedure(s) or a confirmation that the Program is using NRC's NUREG-1556.
- 26. Discuss any variances in licensing policies and procedures or exemptions from the regulations granted during the review period.
- 27. What, if any, changes were made in your written licensing procedures (new procedures, updates, policy memoranda, etc.) during the reporting period?

28. Please indicate which revision(s) of the Risk-Significant Radioactive Materials Checklist and Pre-Licensing Guidance were used by the Program during this review period.
29. Identify by licensee name and license number any renewal applications that have been pending for one year or more. Please indicate why these reviews have been delayed and describe your action plan to reduce the backlog.

V. Technical Quality of Incident and Allegation Activities

30. For Agreement States, please provide a list of any reportable incidents not previously submitted to NRC (See Procedure SA-300, *Reporting Material Events*, for additional guidance, OMB clearance number 3150-0178). The list should be in the following format:

<u>Licensee Name</u>	<u>License #</u>	<u>Date of Incident/Report</u>	<u>Type of Incident</u>
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31. Provide a list of allegations that were closed during the review period and any allegations that remain open.
32. Provide copies of the Program's Incident and Allegation procedures.
33. Identify any changes to your procedures for responding to incidents and allegations that occurred during the period of this review.

C. **NON-COMMON PERFORMANCE INDICATORS**

I. Legislation, Regulations, and Other Program Elements

34. Please list all currently effective legislation that affects the radiation control program. Denote any legislation that was enacted or amended during the review period.
35. Are your regulations subject to a "Sunset" or equivalent law? If so, explain and include the next expiration date for your regulations.
36. Please review and verify that the information in the enclosed State Regulation Status (SRS) sheet is correct and provide a status of any outstanding comments. For those regulations that have not been adopted by the State, explain why they were not adopted, and discuss actions being taken to adopt them. If legally binding requirements were used in lieu of regulations and they have not been reviewed by NRC for compatibility, please describe their use.
37. If you have not adopted all amendments within three years from the date of NRC rule promulgation, briefly describe your State's procedures for amending regulations in order to maintain compatibility with the NRC, showing the normal length of time anticipated to complete each step.

D. **OTHER**

38. Is there anything else the IMPEP team should be made aware of while preparing for the IMPEP review?

II. Sealed Source and Device (SS&D) Evaluation Program

39. Prepare a table listing new and amended (including transfers to inactive status) SS&D registrations of sources and devices issued during the review period. The table heading should be:

<u>SS&D Registry Number</u>	<u>Manufacturer, Distributor or Custom User</u>	<u>Product Type or Use</u>	<u>Date Issued</u>	<u>Type of Action</u>
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40. Please include information on the following questions in Section A, as they apply to the SS&D Program:

Technical Staffing and Training - Questions 2-9
Technical Quality of Licensing Actions - Questions 18-22
Technical Quality of Incident and Allegation Activities - Questions 23-24

III. Low-level Radioactive Waste Disposal Program

41. Please include information on the following questions in Section A, as they apply to the Low-Level Radioactive Waste Disposal Program:

Technical Staffing and Training - Questions 2-9
Status of Materials Inspection Program - Questions 10-14
Technical Quality of Inspections - Questions 15-17
Technical Quality of Licensing Actions - Questions 18-22
Technical Quality of Incident and Allegation Activities - Questions 23-24

IV. Uranium Recovery Program

42. Please include information on the following questions in Section A, as they apply to the Uranium Recovery Program:

Technical Staffing and Training - Questions 2-9
Status of Materials Inspection Program - Questions 10-14
Technical Quality of Inspections - Questions 15-17
Technical Quality of Licensing Actions - Questions 18-22
Technical Quality of Incident and Allegation Activities - Questions 23-24

MATERIALS REQUESTED TO BE AVAILABLE FOR
THE ON-SITE PORTION OF AN IMPEP REVIEW

Please have the following information available for use by the IMPEP review team when they arrive at your office:

- List of open license cases, with date of original request, and dates of follow-up actions.
- List of licenses terminated during review period.
- Copy of current log or other document used to track licensing actions.
- List of all licensing actions completed during the review period (sorted by license reviewer, if possible).
- Copy of current log or other document used to track inspections.
- List of all inspections completed during the review period (sorted by inspector, if possible).
- List of inspection frequencies by license type.
- List of all allegations occurring during the review period. Show whether the allegation is open or closed and whether it was referred by NRC.
- List of all licenses that your agency has imposed additional security requirements upon.

ALSO, PLEASE HAVE THE FOLLOWING DOCUMENTS AVAILABLE:

- All State regulations
- Statutes affecting the regulatory authority of the State program
- Standard license conditions
- Technical procedures for licensing, model licenses, review guides
- SS&D review procedures, guides, and standards
- Instrument calibration records
- Inspection procedures and guides
- Inspection report forms
- Documented training plan, if applicable
- Records of results of supervisory accompaniments of inspectors
- Emergency plan and communications list
- Procedures for investigating allegations
- Procedures for investigating incidents
- Enforcement procedures, including procedures for escalated enforcement, severity levels, civil penalties (as applicable)
- Job descriptions

STATE REGULATION STATUS

State: California

Tracking Ticket Number: 24-25

Date:

[# 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	Not Required	Not Required	California 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	Not Required	Not Required	California 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 ML020030346	No Comments 03/18/2002 ML020780186	
1991-4	Notification of Incidents Parts 20, 30, 31, 34, 39, 40 and 70 56 FR 64980	10/15/1994	Final	No Comments 04/01/1998	
1992-1	Quality Management Program and Misadministrations Part 35 56 FR 34104 (Superceded by 2002-2)	01/27/1995	Final ML103050179	No Comments 01/05/2011 ML103340424	
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	Final ML112970300	No Comments 01/20/2012 ML113330808	
1993-2	Licensing and Radiation Safety Requirements for Irradiators Part 36 58 FR 7715	07/01/1996	License Condition ML051670371	No Comments 07/01/2005 ML051810407	
1993-3	Definition of Land Disposal and Waste Site QA Program Part 61 58 FR 33886	07/22/1996	Not Applicable ⁱ	Not Applicable	California 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	Final	No Comments 04/01/1998	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	California 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 ML16034A230	Comments 05/24/16 ML16034A225	
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	No Comments 11/16/1999	

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 60 FR 7900	03/13/1998	Final ML020030346	No Comments 03/18/2002 ML020780186	
1995-3	Low-Level Waste Shipment Manifest Information and Reporting Parts 20 and 61 60 FR 15649; 60 FR 25983	03/01/1998	Final ML020030346	No Comments 03/18/2002 ML020780186	
1995-4	Performance Requirements for Radiography Equipment Part 34 60 FR 28323 (Superceded by 1997-5)	06/30/1998	Not Required	Not Required	California 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 ML020030346	No Comments 03/18/2002 ML020780186	
1995-6	Clarification of Decommissioning Funding Requirements Parts 30, 40 and 70 60 FR 38235	11/24/1998	Final	No Comments 04/01/1998	
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	Final ML103050179 Final ML103550423	No Comments 01/05/2011 ML103340411 No Comments 02/14/2011 ML110120070	Part 35 only Part 20 only

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 ML091240053	No Comments 06/11/2009 ML091470300	California 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 ML020030346	No Comments 03/18/2002 ML020780186	
1997-1	Resolution of Dual Regulation of Airborne Effluents of Radioactive Materials; Clean Air Act Part 20 61 FR 65120	01/9/2000	Final ML020030346	No Comments 03/18/2002 ML020780186	
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 ML111740220	No Comments 08/24/2011 ML112130149	
1997-3	Criteria for the Release of Individuals Administered Radioactive Material Parts 20 and 35 62 FR 4120	05/29/2000	Final ML103050179 Final ML103550423	No Comments 01/05/2011 ML103340411 No Comments 02/14/2011 ML110120070	Part 35 only Part 20 only

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
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)
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	R ⁱⁱ ML14139A065 Final ML15012A519	Comments 08/06/2014 ML14139A060 No Comments 02/09/2015 ML15012A465	
1997-6	Radiological Criteria for License Termination Parts 20, 30, 40 and 70 62 FR 39057	08/20/2000	Final ML16034A230	Comments 05/24/16 ML16034A225	This regulation was previously reviewed and found acceptable (See NRC letter ML 020780186), however it was repealed on August 8, 2002, and CA is currently terminating licenses on a case by case basis
1997-7	Exempt Distribution of a Radioactive Drug Containing One Micro curie of Carbon-14 Urea Part 30 62 FR 63634	01/02/2001	Final ML081080140	No Comments 05/13/2008 ML081340266	
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 ML060340073	No Comments 03/09/2006 ML060670437	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
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 regulation changes 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 regulation changes are not required to be adopted for purposes of Compatibility. (See STP-98-074)
1998-4	Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiographic Operations Part 34 63 FR 37059	07/09/2001	Final ML081160234	No Comments 06/19/2008 ML081710246	
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	R ² ML14139A065 License Condition ML051580164 ML061790298 Final ML15012A519	No Comments 08/06/2014 ML14139A060 No Comments 07/18/2006 ML061990575 No Comments 02/09/2015 ML15012A465	Part 36
1998-6	Transfer for Disposal and Manifests: Minor Technical Conforming Amendment Part 20 63 FR 50127	11/20/2001	Final ML020030346	No Comments 03/18/2002 ML020780186	
1999-1	Radiological Criteria for License Termination of Uranium Recovery Facilities Part 40 64 FR 17506	06/11/2002	Not Applicable	Not Applicable	California does not have authority to regulate this material under its Agreement.

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
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 regulation changes 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 ML062210438	No Comments 08/31/2006 ML062490010	
2000-1	Energy Compensation Sources for Well Logging and Other Regulatory Clarifications Part 39 65 FR 20337	05/17/2003	Final ML070920384	No Comments 04/23/2007 ML071140038	
2000-2	New Dosimetry Technology Parts 34, 36 and 39 65 FR 63750	01/08/2004	Final ML081160234 Final ML070920384 License Condition ML051580164 ML061790298	No Comments 06/19/2008 ML081710246 No Comments 04/23/2007 ML071140038 No Comments 07/18/2006 ML061990575	Part 34 Part 39 Part 36 adopted by reference

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2001-1	Requirements for Certain Generally Licensed Industrial Devices Containing Byproduct Material Parts 30, 31 and 32 65 FR 79162	02/16/2004	R ² ML14139A065 License Condition for 32.52 (a) & (b) ML040500440 Final ML15012A519	No Comments 08/06/2014 ML14139A060 No Comments 03/10/2004 ML040700191 No Comments 02/09/2015 ML15012A465	
2002-1	Revision of the Skin Dose Limit Part 20 67 FR 16298	04/05/2005	Final ML062210438	No Comments 08/31/2006 ML062490010	
2002-2	Medical Use of Byproduct Material Parts 20, 32 and 35 67 FR 20249	10/24/2005	R ² ML14139A065 Final ML15012A516	No Comments 08/06/2014 ML14139A060 No Comments 02/09/2015 ML15012A465	
2003-1	Financial Assurance for Materials Licensees Parts 30, 40 and 70 68 FR 57327	12/03/2006	Final ML090210714	No Comments 02/06/2009 ML090260305	
2004-1	Compatibility With IAEA Transportation Safety Standards and Other Transportation Safety Amendments Part 71 69 FR 3697	10/01/2007	Final ML091240053	No Comments 06/11/2009 ML091470300	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2005-1	Security Requirements for Portable Gauges Containing Byproduct Material Part 30 70 FR 2001	07/11/2008	License Condition ML062920179	No Comments 11/09/2006 ML063130004	
2005-2	Medical Use of Byproduct Material - Recognition of Specialty Boards Part 35 70 FR 16336; 71 FR 1926	04/29/2008	R ² ML14139A065 Final ML15012A519	No Comments 08/06/2014 ML14139A060 No Comments 02/09/2015 ML15012A465	
2005-3	Increased Controls for Risk-Significant Radioactive Sources (NRC Order EA-05-090) 70 FR 72128	12/01/2005	License Condition ML081280851	No Comments 05/13/2008 ML081340260	California chose to revise its IC License Condition at the time of the Fingerprinting Order EA-07-305 License Condition Implementation. The original license condition can be seen at ML053060120. The response letter sent 11/04/2005 can be seen at ML053080246.
2006-1	Minor Amendments Parts 20, 30, 32, 35, 40 and 70 71 FR 15005	03/27/2009	R ² ML14139A065 Final ML15012A519	No Comments 08/06/2014 ML14139A060 No Comments 02/09/2015 ML15012A465	Note: changes to Part 40 and 70 are not required for compatibility.
2006-2	National Source Tracking System - Serialization Requirements Part 32 with reference to Part 20 Appendix E 71 FR 65685	02/06/2007	License Condition ML070360575	No Comments 02/16/2007 ML070470007	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2006-3	National Source Tracking System Part 20 71 FR 65685, 72 FR 59162	01/31/2009	Final ML103550423	No Comments 02/14/2011 ML110120070	
2007-1	Medical Use of Byproduct Material - Minor Corrections and Clarifications Parts 32 and 35 72 FR 45147, 54207	10/29/2010	R ² ML14139A065 Final ML15012A519	No Comments 08/06/2014 ML14139A060 No Comments 02/09/2015 ML15012A465	
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	R ² ML14139A065 Final ML15012A519	No Comments 08/06/2014 ML14139A060 No Comments 02/09/2015 ML15012A465	
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	R ² ML14139A065 Final ML15012A519	No Comments 08/06/2014 ML14139A060 No Comments 02/09/2015 ML15012A465	
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 ML081280851	No Comments 05/13/2008 ML081340260	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2008-1	Occupational Dose Records, Labeling Containers, and Total Effective Dose Equivalent Parts 19 and 20 72 FR 68043	02/15/2011	Final ML103550423	No Comments 02/14/2011 ML110120070	
2009-1	Medical Use of Byproduct Material – Authorized User Clarification Part 35 74 FR 33901	09/28/2012	Proposed ML14139A0652 Final ML15012A519	No Comments 08/06/2014 ML14139A060 No Comments 02/09/2015 ML15012A465	
2011-1	Decommissioning Planning Parts 20, 30, 40 and 70 76 FR 35512	12/17/2015	Proposed ML18067A028 Final ML19066A324	No Comments 04/13/2018 ML18067A027 No Comments 03/28/2019 ML19066A318	
2011-2	Licenses, Certifications, and Approvals for Materials Licensees Parts 30, 36, 39, 40, 70 and 150 76 FR 56951	11/14/2014	Final ML13144A735 License Condition ML13196A091	No Comments 07/03/2013 ML13162A553 No Comments 08/21/2013 ML13196A080	Part 36 adopted by reference
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	R ² ML14139A0652 Final ML15012A519	No Comments 08/06/2014 ML14139A060 No Comments 02/09/2015 ML15012A465	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
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 ML18065B098 Final ML19085A266	No Comments 04/19/2018 ML18065B082 No Comments 05/20/2019 ML19085A252	
2012-3	Technical Corrections Parts 30, 34, 40 and 71 77 FR 39899	08/06/2015	Proposed ML18065B098 Final ML19085A266	No Comments 04/19/2018 ML18065B082 No Comments 05/20/2019 ML19085A252	
2012-4	Requirements for Distribution of Byproduct Material Parts 30, 31, 32, 40 and 70 77 FR 43666	10/23/2015	Proposed ML14139A0652 Final ML15012A519	No Comments 08/06/2014 ML14139A060 No Comments 02/09/2015 ML15012A465	
2013-1	Physical Protection of Byproduct Material, 10 CFR Parts 20, 30, 32, 33, 34, 35, 36, 37, 39 and 71 78 FR 16922	03/19/2016	Proposed License Condition ML15216A474 Revised License Condition ML15281A285 Proposed ML18065B098 Final ML19085A266	Comments 08/31/2015 ML15216A443 No Comments 11/03/2015 ML15281A277 Comments 04/19/2018 ML18065B082 No Comments 05/20/2019 ML19085A252	Part 37 only. Part 37 only.

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
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	Proposed ML19015A163 Revised Proposed ML19100A330 Final ML19238A291	Comments 01/28/2019 ML19015A145 No Comments 04/15/2019 ML19100A318 No Comments 09/26/2019 ML19238A290	
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 ML18065B098 Final ML19085A266	No Comments 04/19/2018 ML18065B082 No Comments 05/20/2019 ML19085A252	
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 ML15216A474 Revised License Condition ML15281A285 Proposed ML18065B098 Revised Proposed ML18324A655 Final ML19085A266	No Comments 08/31/2015 ML15216A443 No Comments 11/03/2015 ML15281A277 No Comments 04/19/2018 ML18065B082 No Comments 01/03/2019 ML18324A651 No Comments 05/20/2019 ML19085A252	Proposed ML15216A474 Revised License Condition ML15281A285

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2015-3	Revisions to Transportation Safety Requirements and Harmonization with International Atomic Energy Agency Transportation Requirements Part 71 80 FR 33987	07/13/2018 extended to 08/15/2020 See STC 17-060	Proposed ML18065B098 Revised Proposed ML18324A655 Final ML19085A266 License Condition ML19193A047 Final License Condition ML19238A292	Comments 04/19/2018 ML18065B082 No Comments 01/03/2019 ML18324A651 No Comments 05/20/2019 ML19085A252 Comment 07/19/2019 ML19193A045 No Comments 09/26/2019 ML19238A290	The LC contained requirements for 10 CFR 71.101(c) and 71.106(b) only.
2015-4	Miscellaneous Corrections, Parts 37 and 40 80 FR 45841	09/02/2018	Proposed ML18065B098 Revised Proposed ML18324A655 Final ML19085A266	Comments 04/19/2018 ML18065B082 No Comments 01/03/2019 ML18324A651 No Comments 05/20/2019 ML19085A252	

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 ML18065B098 Revised Proposed ML18324A655 Final ML19085A266	No Comments 04/19/2018 ML18065B082 No Comments 01/03/2019 ML18324A651 No Comments 05/20/2019 ML19085A252	
2018-1	Medical Use of Byproduct Material – Medical Event Definitions, Training and Experience, and Clarifying Amendments, Parts 30, 32 and 35	01/14/2022	Proposed ML21299A260 Final ML22159A183	No Comments 11/03/2021 ML21299A251 No Comments 07/11/2022 ML22159A181	
2018-2	Miscellaneous Corrections – Organizational Changes Parts 37, 40, 70 and 71	12/21/2021	Final ML19085A266	No Comments 05/20/2019 ML19085A252	
2018-3	Miscellaneous Corrections Parts 1, 2, 34, 37, 50, 71, 73, and 140	07/30/2022	Proposed ML21299A260 Final ML22159A183	No Comments 11/03/2021 ML21299A251 No Comments 07/11/2022 ML22159A181	

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2019-1	Miscellaneous Corrections Parts 2, 21, 37, 50, 52, 73, and 110	12/18/2022	Proposed ML21299A260 Final ML22159A183	No Comments 11/03/2021 ML21299A251 No Comments 07/11/2022 ML22159A181	
2019-2	Organizational Changes and Conforming Amendments Parts 1, 2, 37, 40, 50, 51, 52, 55, 71, 72, 73, 74, 100, 140, and 150	12/30/2022	Proposed ML21299A260 Final ML22159A183	No Comments 11/03/2021 ML21299A251 No Comments 07/11/2022 ML22159A181	
2020-1	Individual Monitoring Devices 10 CFR Parts 34, 36, and 39	06/16/2023	License condition ML20216A341 Proposed ML21299A260 Final ML22159A183	No Comment 9/10/2020 ML20212L540 No Comments 11/03/2021 ML21299A251 No Comments 07/11/2022 ML22159A181	California submitted IBR Part 36 Only

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2020-2	Social Security Number Fraud Prevention 10 CFR Parts 9 and 35	08/17/2023	Proposed ML21299A260 Final ML22159A183	No Comments 11/03/2021 ML21299A251 No Comments 07/11/2022 ML22159A181	
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	Proposed ML21299A260 Final ML22159A183	No Comments 11/03/2021 ML21299A251 Comment 07/11/2022 ML22159A181	
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	Final ML22159A183	No Comments 07/11/2022 ML22159A181	
2021-2	Miscellaneous Corrections 10 CFR Parts 9, 37, 40, 50, 51, 52, 55, 71, 73, and 110	12/30/2024	Final ML22159A183	No Comments 07/11/2022 ML22159A181	
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.

RATS ID	NRC Chronology Identification	Date Due for State Adoption	Incoming Letter	Outgoing Package	Notes
2023-1	Miscellaneous Corrections 10 CFR PARTS 1, 2, 26, 32, 40, 50, 51, 52, 72, and 73	09/25/2026			
N/A	Parts 35.13, 35.14, 35.24, 35.27, 35.57 and 35.2024		License Condition ML111400455	No Comments 07/11/2011 ML111740678	
N/A	Legally Binding Requirement (i.e, license condition for 10 CFR 37.23(b)	N/A	License condition ML20342A203	No Comment 12/23/2020 ML20342A196	
N/A	Legally Binding Requirements (i.e., license conditions for Ge-68/Ga-68 generators, 30.35(a), 32.51a, and 32.71(c) and (d)	N/A	License conditions ML21362A415	No Comment 01/31/2022 ML21361A251	
N/A	Legally Binding Requirements (i.e., license conditions for 10 CFR Parts 34 and 39)	N/A	License conditions ML24139A006	No Commnet 07/02/2024 ML24139A005	

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

ⁱⁱ R stands for revisions to final rule.

2024 CALIFORNIA IMPEP SCHEDULING LETTER AND QUESTIONNAIRE DATE August 28, 2024

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