

# **Implementation of 10 CFR Part 35 In Agreement States**

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on Behalf of  
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# **Rulemaking Process**

- **Involvement of Agreement State staff in Working Group and Steering Committee**
- **Fair process that allowed for input from all stakeholders**

# **Implementation Issues**

- **Three years to implement**
- **Some rules needed now**
  - **LDR, HDR**
  - **New technologies**
- **Scheduling of rule changes will vary**

# **T and E Requirements for MD Authorized Users**

- **Recommend NRC cooperation with states to get immediate uniformity in requirements**
- **Approve Boards to facilitate uniformity**

# **Workforce Issues**

- **Maturing workforce similar to NRC**
- **Lack of trained personnel for licensing and inspection**
- **Attraction of new staff is difficult**