



G-75 Working Group for General Licensing Program Guidelines

Co-Chairs and Presenters:

Nathaniel Kishbaugh (NYSDOH)

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**Conference of Radiation
Control Program Directors, Inc. (CRCPD)**

OAS Annual Meeting 2024

G-75 Working Group Members

Jennifer McAllister (OK) [Member]

Kenneth Farmer (VA) [Member]

Grace Schoeniger (PA) [Member – Prior Chair]

Jasmin Hernandez (WA) [Advisor]

Bryan Miller (NE) [Advisor]

Lawrence Jacobi (Affil) [Advisor]



<https://orau.org/health-physics-museum/collection/radioactive-sources/nrd-ion-gun-static-eliminator.html>



<https://healthybuildingscience.com/2019/04/08/lead-dust-testing/>

G-75 General Licensing Program Tasks and Charges

Review and evaluate recommendations and conclusions of the OAS/NRC General Licensing working group

Evaluate and identify how the National Materials Program can be more consistent with respect to the general licensing programs

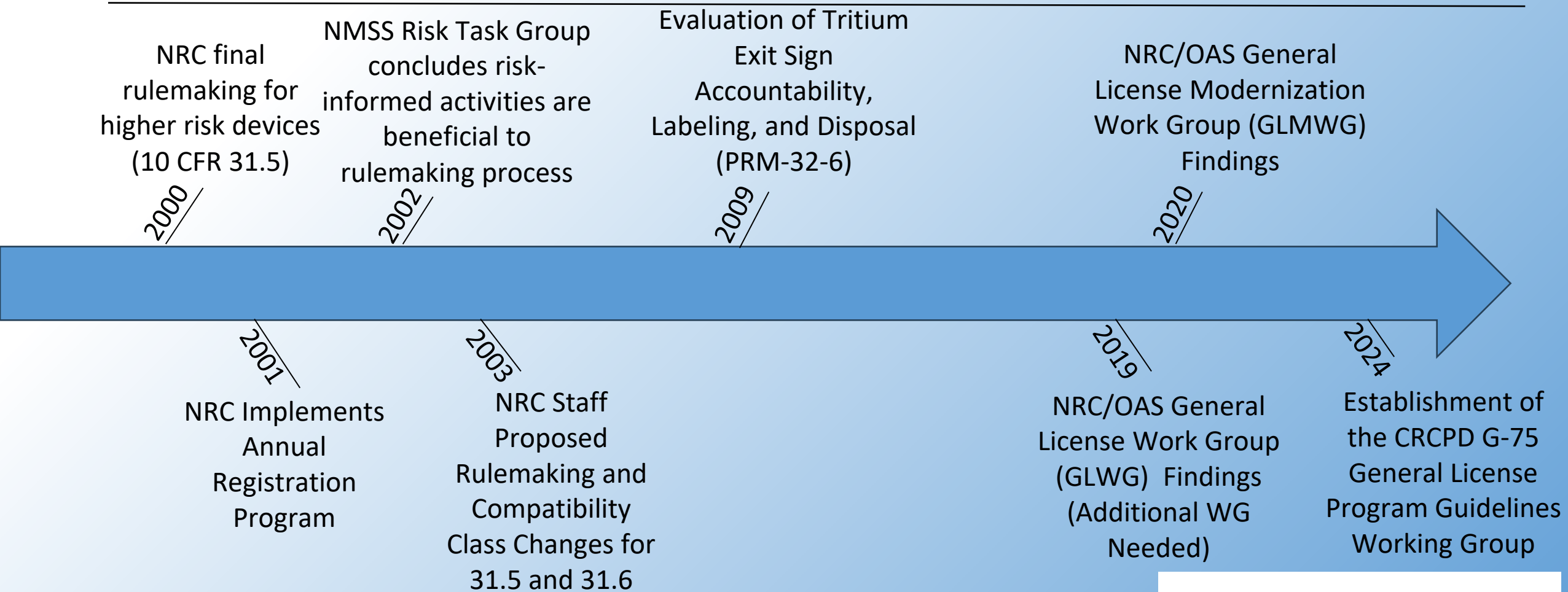
Develop a survey for CRCPD and Agreement State programs to help identify “best practices”, unique regulations and/or desired regulations

Develop a “Best Practices Program Guidelines” for general licensing that provides structure and guidance for agreement states to follow to implement an adequate GL program

Determine if Suggested State Regulations or NRC Petition for Rulemaking are appropriate to support the GL best practices program guidelines.

Evaluate licensing practices for general and specific devices to provide clear and consistent licensing practices for state programs to follow.

Timeline for Prior General License Evaluations



A Partnership Dedicated to Radiation Protection



OAS/NRC General License Workgroups

- Both Working Groups identified that there is no information available suggesting that public health and safety is not being maintained but identified some areas of improvement to increase accountability while also reducing regulatory burden and supporting the risk-informed approach for rulemaking.
- GLWG Recommendations:
 - One-Time Reconciliation of NRC's GL Program to Improve Accuracy of NRC's General License Tracking System
 - Establishment of a National Database
 - Risk-informing existing GL Programs to focus efforts on higher level activities and viability of exempting lower-level activities.
 - Develop a consistent oversight program nationwide
 - Begin routine communications with GL users

OAS/NRC General License Workgroups

- GLMWG Recommendations:
 - Expand the registration program while providing relief for reporting requirements for certain GLs and distributors (rulemaking changes)
 - Removal of the lower-activity limit in 10 CFR 31.5(c)(13)(i) [improvement of accountability]
 - Removal of certain reporting requirements for users and distributors; such as lost, damaged or disposal of non-registered devices and relief from distribution reports to Agreement States and NRC if transfers have not been made in a quarter.
 - Re-evaluate certain GL devices as “exempt”; such as tritium exit signs

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Devices Applicable for Annual Registration

DEVICES APPLICABLE FOR ANNUAL REGISTRATION:

RADIOISOTOPE	ACTIVITY GREATER THAN OR EQUAL TO:
CESIUM-137 (CS-137)	10 MILLICURIES (370 MEGABECQUERELS)
AMERICIUM-241 (AM-241) COBALT-60 (CO-60)	1 MILLICURIE (37 MEGABECQUEREL)
ANY OTHER TRANSURANIC ELEMENT (ATOMIC NUMBER > 92) SUCH AS: CALIFORNIUM-252 (CF-252) CURIUM-244 (CM-244)	
STRONTIUM-90 (SR-90) RADIUM-226 (RA-226)	0.1 MILLICURIE (3.7 MEGABECQUEREL)

Per 10 CFR 31.5

Application Form Pt. 1

- Facility Information
 - Company/Facility name
 - Mailing address and Location address

- Contact Information
 - Responsible Individual
 - Alternate contact

FACILITY INFORMATION

COMPANY OR FACILITY NAME:	
MAILING ADDRESS:	
LOCATION ADDRESS WHERE THE DEVICE WILL BE USED AND/OR STORED:	

CONTACT INFORMATION

RESPONSIBLE INDIVIDUAL	
NAME:	
TITLE:	
PHONE NUMBER:	
EMAIL:	
TRAINING RECEIVED TITLE/HOURS:	

ALTERNATE CONTACT	
NAME:	
TITLE:	
PHONE NUMBER:	
EMAIL:	

Application Form Pt. 2

- Device Information
 - Manufacturer
 - Model
 - Serial Number
 - Isotope and Activity
- Regulatory Requirements
 - Radioactive Material label affixed?
 - Date of most recent leak test
 - Date of most recent shutter check (if applicable)
- Additional Information/Condition of device

REGULATORY REQUIREMENTS	
RADIOACTIVE MATERIAL LABEL AFFIXED (YES/NO):	
DATE OF MOST RECENT LEAK TEST:	
DATE OF MOST RECENT SHUTTER CHECK:	
ANY FAILURES OF THE LEAK TESTS OR SHUTTER CHECKS (YES/NO): IF YES, PROVIDE MORE INFORMATION BELOW	
DEVICE CONDITION (EXCELLENT, GOOD, FAIR, POOR, OR BAD):	

Application Form Pt. 3

- Certification

- Responsible Individual's printed name and signature
- Facility Manager's printed name and signature

I HEREBY CERTIFY THAT:

- A. ALL INFORMATION CONTAINED IN THIS REGISTRATION IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.
- B. A PHYSICAL INVENTORY OF THE DEVICES SUBJECT TO REGISTRATION HAS BEEN COMPLETED, AND THE DEVICE INFORMATION ON THIS FORM HAS BEEN CHECKED AGAINST THE DEVICE LABELING.
- C. I AM AWARE OF THE REQUIREMENTS OF THE GENERAL LICENSE, PROVIDED IN 10 CFR 31.5

Quarterly Reports

	A	B	C	D	E	F	G
1	Receiving Company Name	Address shipped to	City/State	Zip	Nuclide	mCi	Order Ship Date
2	John's Supplies	123 NJ Ave	Trenton, NJ	12345	CS137	10	5/6/2024
3	Jill's Supplies	234 NJ Ave	Trenton, NJ	12345	CS137	10	5/6/2024

H	I	J	K	L
Model #	Serial #	Contact Name	Contact Tel #	End Address
1234	5678	John Doe	123-456-7890	SAME
1234	5679	Jill Doe	234-567-8901	Bill's Supplies, 569 Hamilton Ave, Newark, NJ 12456

NOTE: End address can be input as "SAME" if the end address and the "address shipped to is the same"

Note 2: Please fill out end address with company name, state, address and any additional information if the end address and address shipped to are different

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Generally Licensed Device Database

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
			Address					Initial	Date	Current			Model #	Serial # of
1	Facility	Address1	2	City	Zip	zip+4	Nuclide	mCi	Received	mCi	Manufacturer	Mfr. License #	of Device/ Source	Device/ Source
2	ABC Smelting	123 Newark Ave		Newark	08101		Cs137	5	6/25/2024	4.99274	EFG Gauges	12345	27G	2589
3	ABC Smelting	123 Newark Ave		Newark	08101		Cs137	5	6/25/2014	3.97761	EFG Gauges	12345	27G	2358
4	ABC Smelting	123 Newark Ave		Newark	08101		Co60	15	6/25/2024	14.87625	EFG Gauges	12345	52F	3986
	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB
			Last	First	Telephone	ext.	email	Verified	By	Date	Missing	Register	Inspection ID	Enforcement
1	Status	Comments	Name	Name					Whom			able	ID	ID
2			Smith	John	(xxx) xxx-xxxx			X	CG	6/25/2024				
3	Returned	Returned to EFG Gauges per 6/25/24 letter	Smith	John	(xxx) xxx-xxxx			X	CG	6/25/2024				
4			Smith	John	(xxx) xxx-xxxx			X	CG	6/25/2024		X		

Tritium Exit Signs Database

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	Facility	Address1	address 2	City	zip	zip+4	mCi	date rec'd	mCi today	device CO.	license #	model # of device/ source	Serial # of device/ source
2	XYZ Schools	92 West Elm St		Trenton	08696		9270	1/1/2024	8993.45903	LMN Exit Signs	78968	2900	456987
3	XYZ Schools	92 West Elm St		Trenton	08696		9270	1/1/2024	8993.45903	LMN Exit Signs	78968	2900	456988
	N	O	P	Q	R	S	T	U	V	W	X		
1	date return to mfr or disposal co.	comments	last name	first name	telephone	ext.	email	verified	missing	by whom	date		
2	06/25/24	Returned to LMN per 6/25/24 letter	Smith	Sal	(xxx) xxx-xxxx			X		CG	6/25/2024		
3			Smith	Sal	(xxx) xxx-xxxx			X		CG	6/25/2024		

Monthly Counts

- Tritium Exit Signs

	Month Beginning	Month Ending	# Source Verified
Jan-24	1/1/2024	1/31/2024	0
Feb-24	2/1/2024	2/29/2024	0
Mar-24	3/1/2024	3/31/2024	0
Apr-24	4/1/2024	4/30/2024	0
May-24	5/1/2024	5/31/2024	0
Jun-24	6/1/2024	6/30/2024	2
Jul-24	7/1/2024	7/31/2024	0
Aug-24	8/1/2024	8/31/2024	0
Sep-24	9/1/2024	9/30/2024	0
Oct-24	10/1/2024	10/31/2024	0
Nov-24	11/1/2024	11/30/2024	0
Dec-24	12/1/2024	12/31/2024	0
Jan-25	1/1/2025	1/31/2025	0
Feb-25	2/1/2025	2/28/2025	0

- Generally Licensed Device Database

	Month Beginning	Month Ending	# Source Verified
Jan-24	1/1/2024	1/31/2024	0
Feb-24	2/1/2024	2/28/2024	0
Mar-24	3/1/2024	3/31/2024	0
Apr-24	4/1/2024	4/30/2024	0
May-24	5/1/2024	5/31/2024	0
Jun-24	6/1/2024	6/30/2024	3
Jul-24	7/1/2024	7/31/2024	0
Aug-24	8/1/2024	8/31/2024	0
Sep-24	9/1/2024	9/30/2024	0
Oct-24	10/1/2024	10/31/2024	0
Nov-24	11/1/2024	11/30/2024	0
Dec-24	12/1/2024	12/31/2024	0

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CRCPD G-75 Survey

CRCPD G-75 General Licensing Program Guideline Development

Thank you for taking the time to complete our survey. The G-75 Task Force is striving to improve the consistency of general license programs between Agreement states and in areas regulatory oversight of general licensees. While keeping in mind the concern that many Agreement States are currently facing, two working groups have performed surveys of the general license practices in different states. Surveys and have included a wide variety. Our goal is to find a middle ground between the many differences in state programs that could be implemented across the Board. We hope to develop guidelines that reduce regulatory oversight and administrative requirements, allowing us to apply common standards to all licensees as possible.

The survey is primarily exploring the best practices that can be implemented within the bounds of the current federal regulations. We do realize that some of the suggestions that we receive may require state regulatory changes. This is the goal of the survey. There is a section at the end of the survey that aims to gauge the desire for changes to the NRC general license regulations.

The survey will take approximately 30 minutes to complete. You will not be able to save it as you go along. Please make sure to click the "Submit" button at the end of the survey to submit your answers.

The G-75 Task Force is a partnership of staff from primarily the General License for Unsupervised Medical Group (GLUMG) and General License Modernization Working Group (GLMMG), created by the NRC and OAR. For more information on the work performed by these groups, please visit the following sites:

<https://www.nrc.gov/ohrt/g75/20160603/060316.pdf>
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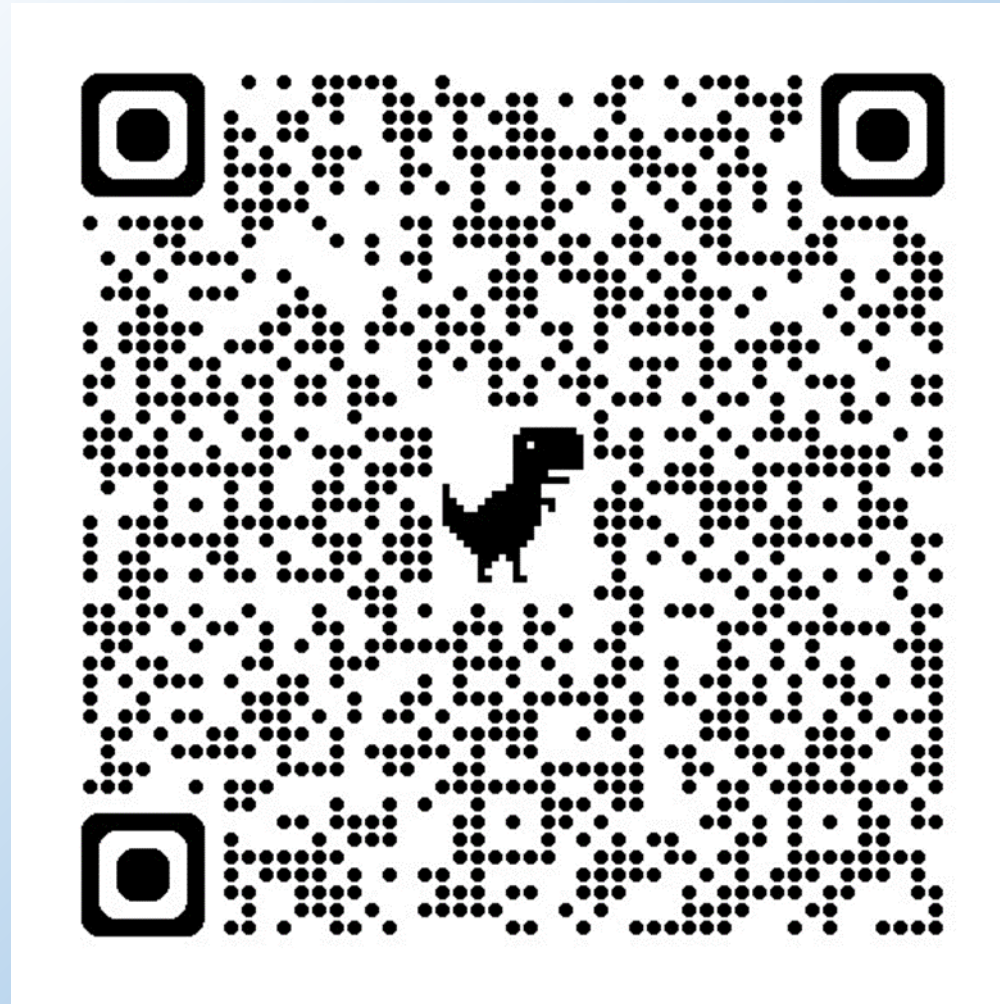
Section 1

Exam

A Partnership Dedicated to Radiation Protection



We Want to Hear from YOU



Contact information

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