

From: [McGill, Richard](#)
To: [Brown, Don](#)
Cc: [Leoni, Carlie M.](#)
Subject: FW: First Notice Documents from JCAR
Date: Tuesday, June 21, 2022 4:10:33 PM
Attachments: [image001.png](#)

Good afternoon, Mr. Clerk:

Please docket this email exchange with JCAR as a public comment in R18-28.

Thank you.

Richard R. McGill, Jr.
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From: Eastvold, Jonathan C. <JonathanE@ilga.gov>
Sent: Tuesday, June 21, 2022 3:58 PM
To: McGill, Richard <Richard.McGill@illinois.gov>
Subject: [External] RE: First Notice Documents from JCAR

That's funny; I wrote a list and forgot to send it.

Here's what I've got on file. Thanks for asking.

Rulemaking: Procedures for Reporting Releases of Radionuclides at Nuclear Power Plants
(35 Ill. Adm. Code 1010; 46 Ill. Reg. 6896)

Changes:

1. In line 25, delete "/13.6 and 27".
2. In line 36, strike "/13.6".
3. Strike line 59.
4. Strike line 62 and add "10 CFR Chapter I.".
5. In line 64, strike "Licensee controlled" and add "Licensee-controlled".

6. In line 75, strike "Station generated" and add "Station-generated".
7. In line 76, strike "and". After "contain" strike the comma.
8. In line 77, strike the comma.
9. In line 88, strike the comma.
10. In lines 97-98, strike "adjudged" and add "determined to be".
11. In line 97, change "the" to "that".
12. In line 97, strike "of this Part as a whole or".
13. In lines 110 and 111, strike "station generated" and add "station-generated".
14. In lines 114-115, change "station generated" to "station-generated".
15. In line 115, delete the comma.
16. In line 117, strike subsection label "a)", pull text up to the end of line 115, and add "either".
17. In line 118, strike "of".
18. In line 118, strike "licensee controlled" and add "licensee-controlled".
19. In line 119, strike the period.
20. In line 121, strike subsection label "b)", pull text up to the end of line 119, and add "or".
21. In line 128, delete "Reporting" and reinstate "Reports". Strike "under" and add "by".
22. In line 128, change "done" to "made".
23. In lines 132 and 136, change "done" to "made".

Lines 141-142: Add actual addresses.

Line 152: How can a telephone report be signed?

24. In line 152, strike ", signature,".
25. In lines 152-153, strike "Principal Executive Officer" and add "principal executive officer".
26. In line 153, strike "Principal Executive Officer's" and add "principal executive officer's".
27. In line 161, strike "station generated" and add "station-generated".
28. In lines 204-205, strike "if samples have been taken, the measured and modeled extents of the release if known" and add "and any follow-up samples".

29. In line 220, strike "Principal Executive Officer" and add "principal executive officer".

30. In line 221, strike "Principal Executive Officer's" and add "principal executive officer's".

Lines 226-227: Why are hard copies still necessary?

jce

5/9/2022

From: McGill, Richard <Richard.McGill@illinois.gov>

Sent: Tuesday, June 21, 2022 15:31

To: Eastvold, Jonathan C. <JonathanE@ilga.gov>

Subject: RE: First Notice Documents from JCAR

Good afternoon, Jonathan:

I'm checking to see whether you have any suggested changes concerning 35 IAC 1010—Procedures for Reporting Releases of Radionuclides at Nuclear Power Plants (46 Ill. Reg. 6896 (May 6, 2022)). If you already emailed suggested changes to Part 1010 and I've overlooked them, please forgive me and re-send.

Thank you.

Best regards,

Richard

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From: Eastvold, Jonathan C. <JonathanE@ilga.gov>

Sent: Friday, May 6, 2022 4:16 PM

To: McGill, Richard <Richard.McGill@illinois.gov>

Subject: [External] FW: First Notice Documents from JCAR

Richard –

Below are a number of suggested changes for this rulemaking. The line numbers correspond to the numbers in the attached document.

Thanks for your consideration.

Jonathan

PROPOSED FIRST NOTICE CHANGES

Agency: Pollution Control Board

Rulemaking: Radiation Hazards (35 Ill. Adm. Code 1000; 46 Ill. Reg. 6867)

Changes:

1. In line 69, delete "must comply" and strike "with" and "this Part".
2. In line 70, delete "and".
3. In line 72, change "the lowest radiation" to "making every reasonable effort to maintain exposures to radiation as far below the dose limits in this part as is practical consistent with the purpose for which the licensed activity is undertaken, taking into account the state of technology, the economics of improvements in relation to state of technology, the economics of improvements in relation to benefits to the public health and safety, and other societal and socioeconomic considerations, and in relation to utilization of nuclear energy and licensed materials in the public interest (10 CFR 20.1003 (2022))".
4. In line 73, strike existing text and delete added text.
5. Strike lines 74-76.
6. In line 91, after "1000.202" add a comma.
7. In line 105, delete "1".
8. In line 106, strike "*et seq.*".
9. In lines 110-111, strike existing text and delete added text.
10. Before line 121, add "\"IEMA\" means the Illinois Emergency Management Agency's Bureau of Nuclear Facility Safety.".
11. In line 142, strike "highspeed" and add "high-speed".

12. In line 145, strike "means" and add "mean".
13. In line 149, strike "an".
14. In line 151, strike "upon" and add "on".
15. In line 152, strike "upon".
16. In line 167, after "in" add "the".
17. In lines 172 and 178, strike "access to which" and add "to which access".
18. In line 226, strike "as to create" and add "in a way that creates". After "in" add "the".
19. In line 228, change "an" to "a dose to the whole body greater than 0.5 rem in any single year".
20. In line 229, after "account" strike the comma.
21. In line 230, delete "receiving" and strike all existing text except the semicolon.
22. In line 233, after "area" add "receiving a dose greater than 2 millirems in any single hour".
23. In line 234, strike the comma.
24. In lines 234-235, strike "receiving a dose in excess of 2 millirems in any one hour".
25. In line 238, after "area" add "receiving a dose greater than 100 millirems in any 7 consecutive days".
26. In line 238, after "by" add "the".
27. In line 239, strike the comma.
28. In lines 239-240, strike "receiving a dose in excess of 100 millirems in any seven consecutive days".
29. In line 247, strike "so as to" and add "that".
30. In line 247, after "to" add "the".
31. In line 248, after "concentration" add "limits".
32. In line 249, strike "of".
33. In line 269, strike "which" and add "that".
34. In line 277, strike "that" and add "the".
35. In line 277, strike "producing" and add "that produces".

36. In line 286, strike "which" and add "that".
37. In line 289, strike "refers" and add "is the unit used to refer".
38. In line 294, strike "that" and add "who".
39. In line 295, after "whether" add "or not".
40. In line 295, strike "may or may not" and add "is". Strike "be".
41. In line 302, after "any" add "uranium".
42. In lines 302-303, strike "through utilization of" and add "using".
43. In line 309, strike "is conducted".
44. In line 310, after "Part" add "is conducted".
45. In line 317, strike ", but" and add ". "Uranium fuel cycle".
46. In line 319, strike "nonuranium" and add "non-uranium".
47. In line 319, strike "by-product" and add "byproduct".
48. In line 326, change "assure" to "ensure".
49. In line 333, after "operations" add a comma.
50. In line 339, strike "halfives" and add "half-lives".
51. In line 347, strike "the Department" and add "IEMA".
52. In lines 352, 355-356, 360, and 363, delete ", incorporated by reference in Section 1000.202".
53. In line 354, after "amendments" add "to that permit".
54. In line 367, after "reports" add "conducted by or for that person and".
55. In line 368, after "in" add "the".
56. In line 369, after "into" add "the".
57. In line 369, delete "conducted by or for such person".
58. In line 375, after "notify" add "IEMA".
59. In line 376, strike all existing text and delete all added text.

60. In line 380, strike "in excess of" and add "exceeding".
61. In the table after 397, in the 3rd from last and 5th from last rows, strike "radio- active" and add "radioactive".
62. In the table after 397, in the bottom row, strike ", which" and add "that".
63. In line 412, after "milligrams" add "of".
64. In line 420, after "as" add "a".
65. In line 422, change "Where" to "When".
66. In line 429, strike "such" and add "the".
67. In line 432, strike "MPC's" and add "MPCs".
68. In line 438, reinstate "for" and strike "of".
69. In line 441, strike "lieu" and add "place".
70. In line 448, strike the comma.
71. In line 451, strike "which" and add "that".
72. In lines 469 and 472, strike "than".

From: Knudson, Cheryl J.

Sent: Thursday, May 5, 2022 14:34

To: Richard.McGill@illinois.gov

Cc: Eastvold, Jonathan C. <JonathanE@ilga.gov>

Subject: RE: First Notice Documents from JCAR

First Notice documents are attached for your review:

- [Notice Page](#)
- **1st Notice** – [Numbered Line Version](#)
- [Agency vs. JCAR r01](#)

If you have any questions or concerns, please contact Jonathan Eastvold @ 217-524-9010.

Thank you,
Cheryl

Cheryl Knudson
Joint Committee on Administrative Rules

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