

**SUPPLEMENT TO THE STATEMENT OF REASONS
DPH-11-024, 15-Day Public Availability**

The California Department of Public Health (Department) has instituted additional changes to these proposed regulations as discussed below.

Section 30180.1: It was noted that the provision found in existing section 30180(c)(1) was unintentionally deleted during the restructuring of section 30180. The Department intended only to restructure and recodify that provision. Proposed section 30180.1(f) is added to correct the deletion.

Section 30181: Nonsubstantial punctuation changes are made at the end of subsection (d) and the second paragraph of subsection (e). Paragraph designations in subsection (e) are changed from capital letters to numbers for consistency with California regulatory structure. These changes are without regulatory effect.

Section 30330(b)(18): The phrase “from the Department or” is deleted as recommended by the U.S. NRC to ensure compatibility with NRC’s regulations.

Section 30334(d): Though this section was not included in the initial 45-day comment period, the word “direct” is inserted to address comments from NRC. This amendment is within the scope of the initial public notice (PN) because the PN clearly identified the types of licensees that may be impacted and that the proposal was to ensure State regulations are compatible with NRC regulations regarding industrial radiography. The insertion is necessary to ensure State regulations are compatible with NRC’s regulations. However, the proposed amendment results in no substantial effect because affected licensees already comply with the proposed revision.

Section 30348.1(b)(2): Subsection (b)(2) references section 30365.2 indicating that the section requires operating and emergency (O&E) procedures. However, section 30365.2 does not exist. The reference is changed to section 30348.2 because that is the section requiring O&E procedures, also referenced in subsection (a)(2). This is a change without regulatory effect.