

Reciprocal Recognition of Licenses

The Division of Waste Management and Radiation Control (DWMRC) can approve the use of radioactive materials at temporary job sites, throughout the State of Utah, except in areas under Exclusive Federal Jurisdiction. An area of Exclusive Federal Jurisdiction is an area over which the federal government exercises legal control without interference from the jurisdiction and administration of state law. The determination of whether a temporary job site at a federal facility is an area of Exclusive Federal Jurisdiction must be made on a case-by-case basis since the status of such land is subject to change. We strongly recommend that you find out the jurisdictional status for any use of radioactive material at a federal facility in the State of Utah. If you need a list of federal agency contacts, you may obtain one from the Division.

The intent of the Utah Radiation Control Rules for reciprocity is to allow licensees to work in Utah for short periods of time without having to obtain a specific Utah license, not to circumvent Utah's licensing program. Therefore, a legal entity that performs the same licensed activity under more than one Agreement State or NRC license may file for reciprocity only once with the DWMRC for this activity in a calendar year-limiting the entity's total activities in Utah to 180 days. For example, a company authorized to conduct radiography under both an Arizona and a Colorado license may file only once to conduct radiography in Utah-limiting their radiography activities in Utah to 180 days in a calendar year. However, a legal entity holding two or more licenses for different activities may file once for each type of activity in a calendar year. For example, a company authorized to conduct radiography under a New Mexico license and moisture-density gauge work under an Arizona license may file separate requests for each activity, allowing 180 days for radiography and 180 days for gauge work in Utah in a calendar year. A "calendar day of use" is one on which you store or use licensed material in Utah. Licensed activities conducted concurrently (i.e., on the same day) at different locations within Utah count as one calendar day of use.

At least three (3) days written notification is required before engaging in any licensed activity within Utah. The Division may grant permission to proceed sooner in the case of undue hardship. The following summarizes the information required when you request reciprocity:

1. Provide the date span identifying the start and end dates for all work activities in Utah during the calendar year. It is acceptable on the initial filing to indicate tentative dates or 180 days from January 1 through December 31, provided you submit clarification for adding or deleting dates as they become known. Please track the days of use, as the need to clarify work dates becomes important when you approach the 180-day limit.
2. Provide exact work location(s) in Utah for each work activity. If the work location is changing daily, then you must furnish a map, drawing, or a schedule designating where the work site will be on any given day. You should describe the work location in sufficient detail for DWMRC personnel to readily find the job site. This detail should be at least equivalent to the detail that you would supply to your own employees, if they were unfamiliar with the location.

3. Proposed use of licensed radioactive material.
4. Radioactive material and/or devices to be used. Radionuclide Activity Device.
5. Names of individuals who will perform the work. You shall make no change in personnel unless you notify the Division.
6. Name, address, and telephone number of the client(s).
7. Name and telephone number of the client's representative to contact at the work site.
8. Provide a complete and current copy of your applicable radioactive material license. If you have received reciprocal recognition to work in the State of Utah in the past and you have made no revisions to your license within the past year, you need only state that the DWMRC has a current and complete copy on file.
9. Provide a complete and current copy of your applicable operating and emergency procedures. If you have received reciprocal recognition to work in the State of Utah in the past and you have made no revisions to these procedures within the past year, you need only state that the DRC has a current and complete copy on file.
10. Submit the appropriate fee to the DWMRC. The most common fees are listed below:

Portable Gauges	\$ 520.00
Industrial Radiography	\$2,560.00
Well Logging (other than field flooding tracer studies)	\$2,100.00
Services for Other Licensees (except leak testing or waste disposal)	\$ 420.00

We may request additional information on a case-by-case basis, and if your current license is in a category different from one of those above, please contact the Division for the appropriate fee.

Because of changes in work circumstances or conditions, revisions or clarifications to an initial filing for reciprocity may be necessary. It is your obligation to keep the information you have submitted current. A revision may include additional work locations or clients, changes to the radioactive material, or work activities different from that described in the information submitted with the initial filing for reciprocity. Clarification provides information that modifies administrative items of the initial filing, clarifies or deletes specific locations of work sites, changes work site technicians, or adds or deletes dates of work different from the initial filing.

Please note that well logging restrictions are placed on the use of a sealed source in a well without a surface casing for protecting freshwater aquifers and on the injection of radioactive material into potable aquifers. You may want to review the Utah Radiation Control Rules that address these restrictions. The Utah Radiation Control Rules may be obtained from our website at www.wasteandradiation.utah.gov.

The applicant for reciprocity must become familiar with, and abide by, the applicable sections of the Utah Radiation Control Rules. You should provide this information to any of your employees who will transport or use materials within the State of Utah.