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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

## COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION

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October 15, 2003

TO - U.S. Nuclear Regulatory Commission  
Document Control  
Washington DC 20555-0001  
Attn.: Rulemakings and Adjudications Staff

SUBJECT – Proposed Rule on Security Requirements for Portable Gauges  
(RIN 3150 – AHO6)

The Virginia Department of Transportation has one of the largest Portable Gauge inventories in the United States. In our program, we have our own calibration, maintenance and operator training facilities throughout the Commonwealth. VDOT has not suffered any loss of stolen gauges in the past 8 years. VDOT prides itself on this and therefore feels that our current security measures based on your specifications are quite adequate means of security. If we have to make many changes to meet your new specifications it will result in a large expenditure to the taxpayers of the Commonwealth to maintain this program.

We strongly support the goal to reduce lost or stolen gauges but find some of your proposed rules to be impractical. We have reviewed the comments submitted from Troxler Electronic Laboratories, Inc. and VDOT concurs with their comments.

Thank you for the opportunity to comment on the proposed rules for increased security of our portable nuclear gauges.

Sincerely,

Paul M. Baldwin Jr.  
VDOT Radiation Safety Officer  
State Density Engineer

VirginiaDOT.org  
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