



TEXAS DEPARTMENT OF STATE HEALTH SERVICES

DOCKET NUMBER
PETITION RULE PRM-34-06
(10 FR 76724)

2

EDUARDO J. SANCHEZ, M.D., M.P.H.
COMMISSIONER

DOCKETED
USNRC

100 W. 49th Street • Austin, Texas 78756
1-888-963-7111 • <http://www.dshs.state.tx.us>

March 10, 2006 (9:43am)

March 10, 2006

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

FAX: (301) 415-1101

Subject: PRM-34-06

Re: Petition for Rulemaking to amend NRC rule 10 CFR, Part 34 that was submitted on November 3, 2005, by the Organization of Agreement States

The Texas Radiation Control Program (RCP) supports the proposed amendments to the following subsections and the justification of the changes as presented in the OAS petition:

10 CFR §34.41(a), which would remove the sentence relating to the responsibilities of the additional qualified individual, and would reinforce the two-person crew requirement at temporary job sites;

10 CFR §34.43(a)(1), which would require an individual to complete an accepted radiation safety course of at least 40 hours before becoming a radiographer;

10 CFR §34.43(c), which would require an individual to complete an accepted radiation safety course of at least 40 hours prior to working as a radiographer's assistant; and

10 CFR §34.51, which would require that the radiographer be responsible for ensuring continuous direct visual surveillance of the operation in order to protect the high radiation area from unauthorized entry

In addition, the Texas RCP also supports the proposed conforming change to guidance document NUREG 1556, Vol. 2, as outlined in the petition.

The Texas RCP has been a leader in the activities and issues associated with industrial radiography for more than 20 years, and is committed to ensuring the safety of the industry workers as well as the public. The Texas RCP believes these changes will help to facilitate a better understanding of industrial radiography operational requirements and promote a safer work environment. If you have questions regarding Texas' concurrence with this petition, please contact me at 512/834-6689.

Sincerely,

Ruth E. McBurney, CHP, Manager
Radiation Safety Licensing Branch
Texas Radiation Control Program
Department of State Health Services

An Equal Employment Opportunity Employer

Template = SECY-067

SECY-02