



DSI-14  
23

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November 27, 1996

Mr. John C. Hoyle  
Secretary of the Commissioner  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001



ATTN: Chief of Docketing and Services Branch

Dear Mr. Hoyle:

The Texas Department of Health's Bureau of Radiation Control has reviewed several of the Direction Setting Issues Papers (DSI's) included in the U.S. Nuclear Regulatory Commission's (NRC) strategic and rebaselining initiative. Enclosed are our comments on the following DSI's:

- |       |        |        |        |
|-------|--------|--------|--------|
| DSI 2 | DSI 9  | DSI 14 | DSI 23 |
| DSI 4 | DSI 12 | DSI 20 | DSI 24 |
| DSI 5 | DSI 11 | DSI 21 |        |
| DSI 7 | DSI 13 | DSI 22 |        |

We appreciate the opportunity to comment on these documents and to be part of the process.

Sincerely,

Richard A. Ratliff, P.E., Chief  
Bureau of Radiation Control

Enclosures

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**TX Department of Health  
Bureau of Radiation Control  
Comments on**

**NRC DIRECTION SETTING ISSUE PAPER 14**

**PUBLIC COMMUNICATION INITIATIVES**

What approach should the NRC take to optimize its communication with the public?

We concur with the Commission's preliminary views regarding the options presented in DSI 14. Public concerns must be identified and addressed as early in the process as possible. Agreement States have routinely asked the NRC for the opportunity to provide early and substantive input into rules and policies being developed by the NRC that have impacts on Agreement States. Option 2, giving priority to early identification of public concerns, appears to address some of the concerns raised by Agreement States. Agreement States, representing regulatory authorities equivalent to the NRC, can use their experience and expertise to contribute toward identification and resolution of issues, and help identify otherwise unforeseen impacts.

The best approach for policy development that impacts and involves multiple interest groups is through collaboration and negotiation. When stakeholders feel that their concerns are being addressed, greater buy-in and understanding can occur.

The NRC's recent expansion of documents available electronically on various NRC home pages has been most welcome. Continued electronic access to correspondence, rule proposals and sealed source and device evaluations has eliminated some routine calls to the NRC to obtain information. More timely posting of material electronically would eliminate additional inquiries for copies of documents.

We agree with the suggestion to consider other interactive technology such as videoconferences and electronic meetings, however, the NRC must keep in mind that not all groups will have access to this technology. The NRC must consider alternative methods for participation by interested individuals or organizations.