



DSI - 11
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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 11
OPERATING REACTOR OVERSITE**

It appears the many times when the NRC tries to improve regulation of the nuclear power industry by changing its regulations, the industry experiences significant increase in the cost of operation. In general, these increased costs were not taken into account when the economic decisions to construct and finance these facilities were made. Burdensome regulations have driven several units into early decommissioning by the utilities. The greatest benefit to the public health and safety generally happens when an industry has a stable economic base.

Also, reduced expenses also occur when a State, such as Texas, can maintain oversight of the off-site releases of radioactive materials and utility related economic parameters (cost of electricity, etc.).