



DSI-20
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Texas Department of Health

Patti J. Patterson, M.D.
Commissioner

1100 West 49th Street
Austin, Texas 78756-3189
(512) 458-7111

Carol S. Daniels
Deputy Commissioner for Programs

Randy P. Washington
Deputy Commissioner for Health Care Financing

Radiation Control
(512) 834-6688

Roy L. Hogan
Deputy Commissioner for Administration

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

NUCLEAR REGULATORY COMMISSION
BOOKING & SERVICE SECTION
GENERAL SECRETARY
WASHINGTON, D.C.

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

NRC DIRECTION SETTING ISSUE PAPER 20

INTERNATIONAL ACTIVITIES

We feel that the discussion of international issues has failed to address the involvement Agreement States have in responding to incidents and issues along U.S. borders.

The Agreement States are a resource that the NRC can rely on to respond to radiological incidents resulting from activities in Mexico or Canada as well as incidents resulting from imports from other countries. The issues document discusses reduction in FTEs for NRC activities. The Agreement States have the resources and expertise that the NRC would be giving up under options 1-3. It seem more reasonable to use that expertise as needed rather than to maintain additional FTEs. This applies primarily to incident responses, but other technical issues may arise that would require NRC involvement. The Agreement States may be able to provide the necessary resources and expertise to meet the requirement, especially for the neighboring countries.

Of the options given, we prefer the Option 3 approach because it may free up funds that are currently used for international exchanges. Those funds could be used for other purposes, such as supplying training to Agreement State personnel. The IAEA currently funds international exchanges for training purposes. We have hosted and trained two of the recipients of those grants.