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Texas Department of Health

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August 9, 1993

Mr. Carlton Kammerer, Director
Office of State Programs
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Kammerer:

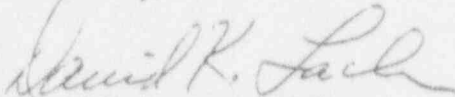
Staff members of the Bureau of Radiation Control (BRC) have reviewed the draft notice of proposed rulemaking to amend 10 CFR 19 and 20 and offer the following comments for consideration.

The BRC supports the deletion of the term "controlled area" since it has caused and will continue to cause confusion with the term "restricted area."

The BRC also supports the change in the definition of "occupational dose" to clarify that visitors to a restricted area are not necessarily subject to the higher occupational dose limit.

We appreciate the opportunity to provide input on the draft notice of rulemaking.

Yours truly,


David K. Lacker, Chief
Bureau of Radiation Control