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# Texas Department of Health

David R. Smith, M.D.  
Commissioner

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

Radiation Control  
(512) 834-6688

OF SECRETAR  
Carr Daniels & SERV  
Deputy Commissioner of Programs  
Roy L. Hogan  
Deputy Commissioner for Administration

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March 29, 1994

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

Re: RIN 3150-AE80-1

Attn: Docketing and Service Branch

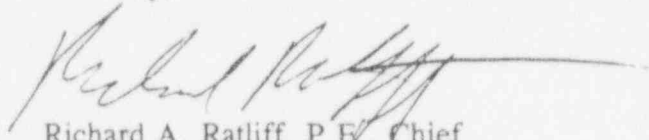
Dear Sir:

Staff members of the Bureau of Radiation Control have reviewed the proposed amendments to the radiation protection requirements concerning definitions and criteria and offer the following comments for consideration.

The Bureau of Radiation Control generally supports the concepts of the proposed amendments as they will help to clarify and therefore, implement the new radiation protection standards. However, in 20.1801, the last three words should be deleted so that the requirement reads, "The licensee shall secure from unauthorized removal or access licensed materials that are stored." There is no reason to believe unauthorized removal or access can or will occur only in unrestricted areas. Radioactive materials should be secured while in storage regardless of the storage location.

If you have any questions, please contact me at (512) 834-6688. Thank you for the opportunity to provide input.

Sincerely,



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

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