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PROPOSED RULE **PR 30**
(68FR 45172)

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ADJUDICATIONS STAFF

August 25, 2003

Secretary, U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: RIN 3150-AH06

These comments pertain to proposed rules for "Security Requirements for Portable Gauges Containing Byproduct Material" in 10 CFR Part 30. I am writing to you as the Well Service Industry Member of the Texas Radiation Advisory Board and signing with me is Michael Ford, C.H.P., Chair of the board who is also the Waste Industry Member. These comments should be considered as our individual comments. The board has not met to deliberate and vote on the proposed rules.

In each instance in the rules that reference is made to "lock" we recommend that the type of acceptable lock be defined. A "secured key" lock should be mandatory. A locksmith cannot reproduce the key for this type of lock without certain verifications of the responsible party. Requiring that locks be "secured key" locks will create another barrier to theft of keys that may be easily duplicated and shared with others. This added measure of security is essential.

Thank you for considering our comments. If you have any questions or would like additional information, please contact Mr. Ford (806/477-5727) or me (915/563-0891).

Sincerely,

Earl Erdmann

Michael Ford, C.H.P.

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SECY-02

From: Margaret Henderson <Margaret.Henderson@tdh.state.tx.us>
To: "SECY@nrc.gov" <SECY@nrc.gov>
Date: Mon, Sep 8, 2003 11:00 AM
Subject: Comments on proposed rule - RIN 3150-AH06

Attached are comments on the Proposed Rulemaking to increase security requirements for portable gauges that require a specific license was published in the Federal Register on August 1, 2003 (68 FR 45172). I am sending these on behalf of Mr. Erdmann and Mr. Ford.

Thanks.

Have a great day!
Margaret Henderson
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Bureau of Radiation Control
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