



Texas Radiation Advisory Board

Dale E. Klein, Ph.D., P.E.
Chair

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July 24, 2001

Robert J. Huston, Chairman
Ralph Marquez, Commissioner
John Baker, Commissioner
Texas Natural Resource Conservation Commission
Mail Code 100
P.O. Box 13087
Austin, TX 78711-3087

Dear Chairman Huston and Commissioners Marquez and Baker:

The Texas Radiation Advisory Board (TRAB) met July 21, 2001, in its quarterly meeting to review radiation policies and programs of the state.

The status of NORM (naturally occurring radioactive materials) rules was discussed with representatives from both the Texas Natural Resource Conservation Commission (TNRCC) and the Railroad Commission of Texas (RRC). In previous meetings, staff of the Texas Department of Health (TDH) has discussed NORM rulemaking with TRAB. Both TDH and RRC have in the past asked for TRAB's recommendations when proposing and adopting NORM rules.

As you know, the responsibilities for NORM regulation are divided between three agencies:

TDH	possession and processing of NORM
TNRCC	NORM disposal (not including oil and gas NORM)
RRC	disposal of oil and gas NORM

For consistency and continuity within the state, we believe it would be appropriate for TNRCC to propose and adopt rules for NORM disposal. For those who possess and process NORM, final disposal becomes a concern when the state radiation programs lack rules.

In unanimous vote, the TRAB recommended that TNRCC begin rulemaking as soon as possible to propose and adopt rules for NORM disposal. This would complete the regulatory framework in Texas for NORM.

Please contact me if you have any questions about TRAB's discussion and recommendation.

Sincerely,

original signed by:

Dale E. Klein, Ph.D., P.E., Chair

cc: Chairman Warren Chisum, House Environmental Regulation Committee
Susan Jablonski