



**Department of State Health Services (DSHS)
Program Report to the Texas Radiation Advisory Board (TRAB)
Consumer Protection Division**

**July 11, 2025
Radiation Section**

Licensing and Registration Activities

License Type	Companies	Sites
X-Ray Registrations	18,796	23,376
Laser	4,238	5,074

Registration Completed Actions: March 2025 – May 2025				
	New	Renewal	Amendment	Termination
X-Ray	851	169	983	591
Laser	278	28	120	107
Total	3,127	1,129	1,103	698

RAM Licensing actions: April 2025 – May 2025				
	New	Renewal	Amendment	Termination
General License Acknowledgment	3	0	5	6
RAM	10	32	213	8
Waste Shipper/Transporter	0	5	0	0
RAM Reciprocity	4	7	0	0
Sealed Source and Device	0	0	2	0
TOTAL	17	44	220	14

Industrial Radiographer Certification	
Application for Exam	210
Trainee Application	203
Renewal Application	92
Non-Texas Radiographer	86
TOTAL	591

Rulemaking

24R087 Radiation Safety Requirements for Mammography Machines

A revision of §289.230 Certification of Mammography Systems and Mammography Machines Used for Interventional Breast Radiography and repeal of §289.234 Mammography Accreditation. The revision of §289.230 is to be compatible with the amended FDA regulations at 21 CFR 900 Mammography Quality Standards Act (MQSA).

Progress:

- The Adopted Rule was published in the June 6, 2025, issue of the Texas Register and became effective on June 8, 2025.

25R021 Radiation Safety Requirements for Well Logging Service Operations and Tracer Studies

A revision of §289.253(cc)(2) and (4) to correct the reference to the records retention table at §289.253(ee). The NRC rule 10 CFR 39 requires certain records to be maintained at a field station (39.73) and a temporary job site (39.75). To make §289.253(cc) compatible with NRC, the list of required documents in the Texas rule was corrected.

Progress:

- A Kick-off meeting was held on 2/25/25 to schedule the rule project. The program decided to skip the public comment period for the draft version and proceed directly to the proposed rule public comment period.
- The proposed rule was published in the 6/13/25 issue of the Texas Register. The public comment period will end 7/14/25.
- The rule was presented to the HHSC Executive Council on 6/12/25.
- The effective date for this rule project is expected to be in September.

Inspection Data

Number of Inspections				
	FY24 Q4 (6/1/24 – 8/31/24)		FY25 Q1 (9/1/24 – 11/31/24)	
	# Ins	# Insp with Violations	# Ins	# Insp with Violations
RAM	129	20 (16%)	166	27 (16%)
X-Ray	918	382 (42%)	887	358 (40%)
X-Ray Remote	235	77 (33%)	215	82 (32%)
Mammography	147	26 (17%)	187	29 (16%)
Laser	42	36 (86%)	12	9 (75%)
	FY25 Q2 (12/1/24 – 2/28/25)		FY25 Q3 (3/1/25 – 5/30/25)	
	# Ins	# Insp with Violations	# Ins	# Insp with Violations
RAM	175	48 (27%)	171	24 (14%)
X-Ray	640	263 (41%)	852	297 (35%)
X-Ray Remote	381	163 (43%)	154	53 (34%)
Mammography	172	41 (24%)	153	24 (16%)
Laser	7	6 (86%)	12	9 (75%)

Technical Staff Vacancies

Position	Location	Anticipated Fill Date	Notes
Mammography Inspector	Float	TBD	To be posted
Mammography Inspector/Certification Reviewer	Tyler	TBD	To be posted
X-ray/Mammography Inspector	Amarillo	September 2025	Approved to be reposted
X-ray Inspector	Austin	TBD	Department hold
X-ray Inspector	Beaumont/Houston	September 2025	Approved to be reposted
X-Ray Inspector	Houston	TBD	Department hold
X-Ray Inspector	Houston	TBD	Department hold
X-Ray Inspector	Houston	TBD	Department hold
X-Ray Inspector	Arlington	TBD	Posted
X-ray Inspector	Arlington	TBD	Posted
RAM Inspector	Arlington	March 2025	To be reposted (2)
RAM Inspector	Corpus Christi	March 2025	To be posted
RAM Inspector	Houston	March 2025	To be reposted
Health Physicist II (RAM Licensing)	Austin	TBD	To be posted
Medical X-ray Reviewer	Austin	TBD	To be posted
Industrial/Medical X-ray & Laser Reviewer	Austin	TBD	To be posted

Staff Training and Activities

- One RAM Inspector-in-training recently completed the NRC Industrial Radiography Course and was approved for independent inspections for this use type.
- Two RAM inspectors-in-training recently completed qualifications for being approved for independent inspections for selected use types.
- Six X-ray Inspectors – currently working through the initial first-year X-ray inspector training for all modalities.

Compliance Activities

April 2025 to June 2025:

- Orders: 120
- Administrative Penalties: \$ 291,095.00
- Revocations:
 - 8 X-ray registrations
 - 4 Laser registrations

Mammography Branch

- One vacancy for a full-time floating MQSA inspector.
- One vacancy for an MQSA inspector/certification reviewer

Registration Branch

- Two vacancies for X-ray/Laser Registration Reviewers.

Emergency Response Activities

South Texas Project Nuclear Power Plant (STP)

- No exercises or drills involving state participation were held during the period of review.

Comanche Peak Nuclear Power Plant (CPNPP)

- The CPNPP dress rehearsal is scheduled for July 9, 2025, and the FEMA-graded exercise is scheduled for August 13, 2025. There will be a full radiation control team participating in both exercises.
- There are 60 DSHS staff preparing for the exercise and participating in training for radiological emergency response roles.

Waste Isolation Pilot Plant (WIPP)

- Local Briefings were conducted with representatives from Ector, Martin, and Howard counties.
- There have been ten WIPP shipments through Texas since the last report.
- The program is currently working on exchanges and calibrations of the survey instruments along the WIPP route (I-20).
- The WIPP Staff participated in Operation Liberation, a Full-Scale Radiation Dispersal Device Exercise, from April 2-4, 2025, in Midland, TX.
- The WIPP Staff participated in the Low-Level Radioactive Waste Forum, Inc. from April 7-11, 2025, in Odessa, TX.
- Since the last report, the WIPP Staff has scheduled seven training courses of the Compressed Modular Emergency Response Radiological Transportation Training (CMERRTT) course in Martin County and Howard County.

Pantex/Agreement in Principle (AIP)

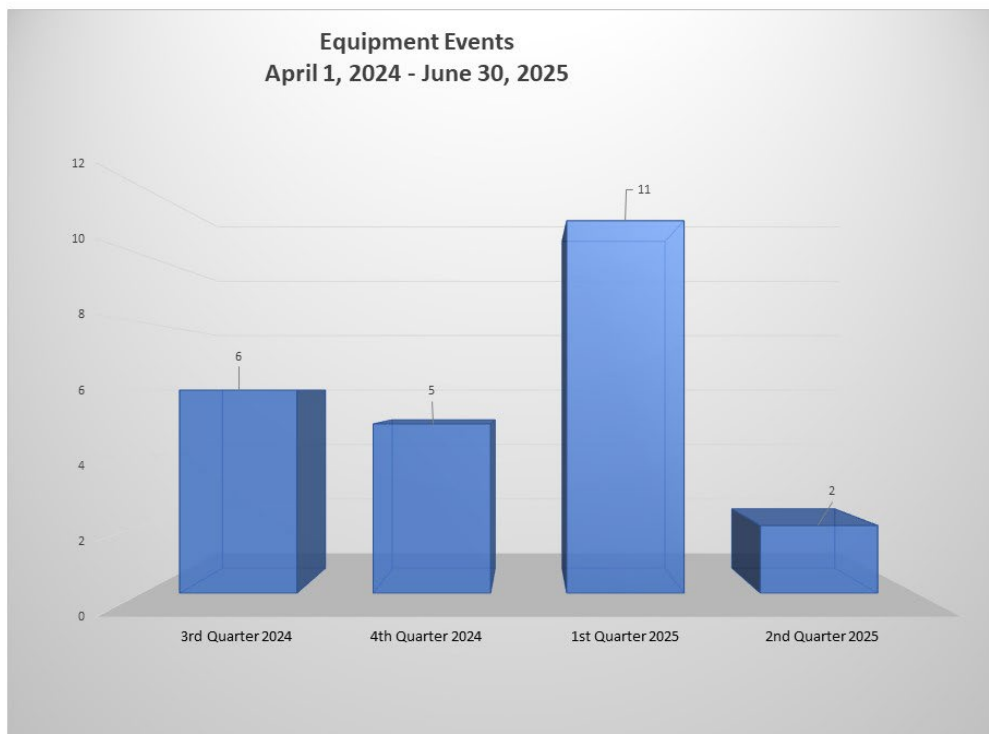
- The Pantex Full Participation Exercise was completed on April 16, 2025. DSHS participation included 37 RERT members covering various aspects of response.
- On April 15, 2025, the DSHS Pantex exercise RERT members attended an equipment demonstration and training on radiological monitoring of livestock. A DSHS group also attended a Tabletop Exercise regarding response to livestock radiation contamination with Tyson Foods, the beef processing plant located in the Pantex Plant area.
- On April 23, 2025, Shay Christian and Tim Gibson participated in the Amarillo Area Community Reception Center training. They assisted in training responders in radiation surveys.
- Shay Christian and Jordan Coulson from TDEM are completing plans and making preparations for a Tabletop Exercise for Pantex EOC leadership and AIP members scheduled for August 6, 2025.
- Plans and preparations are being made for the Pantex Exercise on November 5, 2025, which will include an off-site release of radiologic contamination. Items identified during the August 6 Tabletop Exercise will be tested during this exercise.
- Plans are in process for a Tabletop Exercise on October 8, 2025, for Pantex Radiologic Waste Transportation.

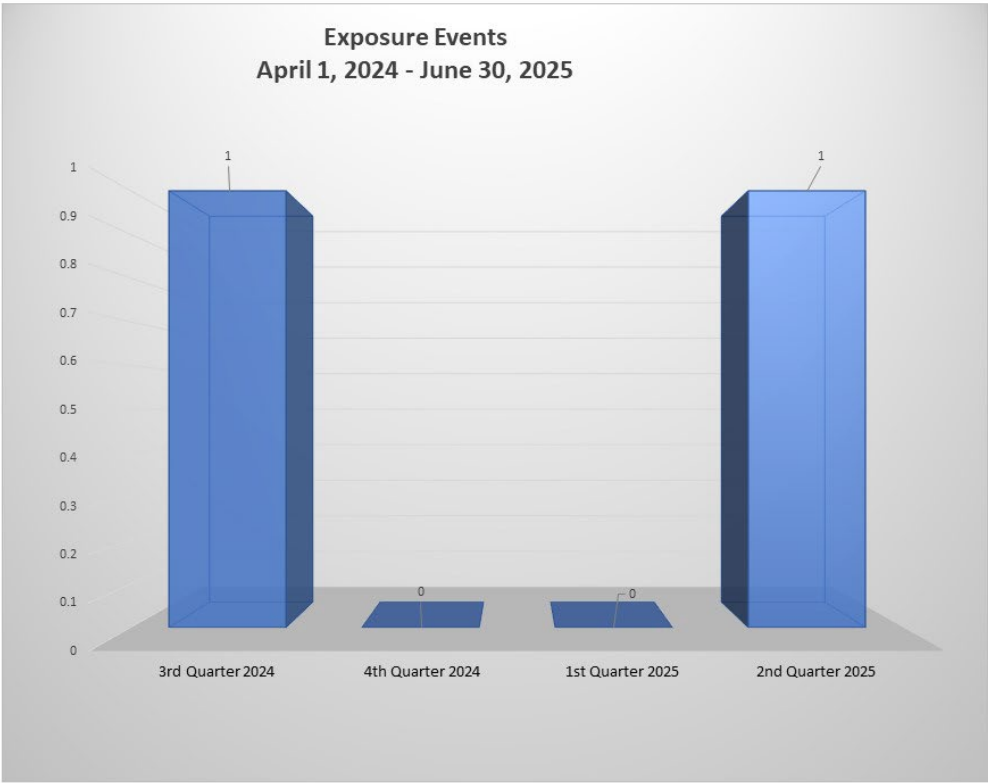
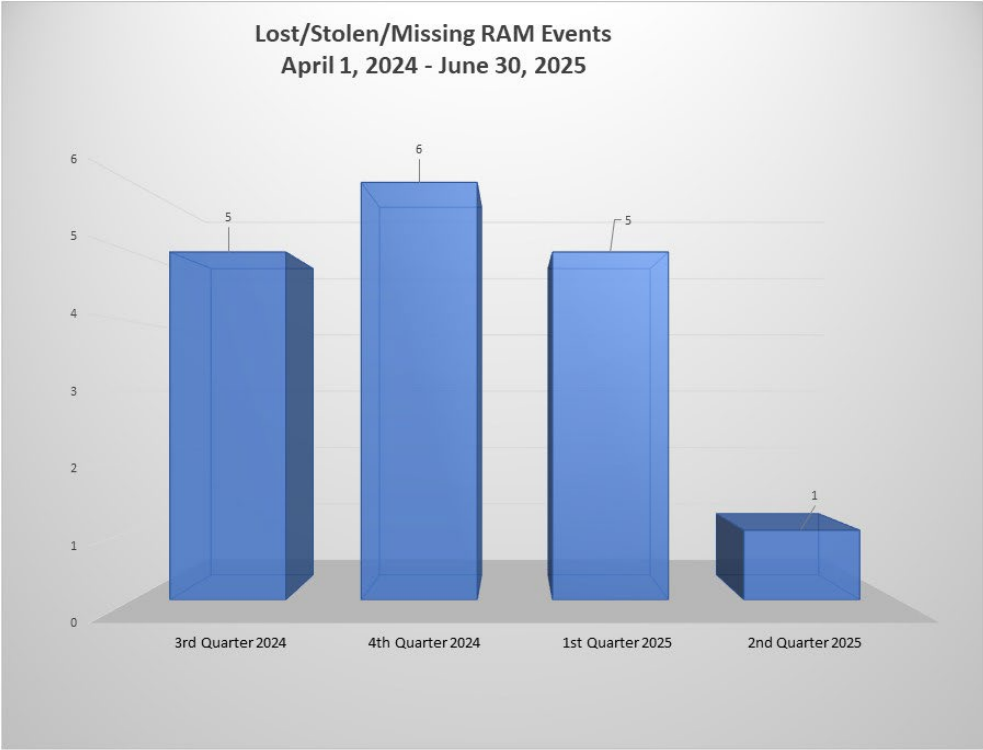
Counterterrorism / Radiological WMD

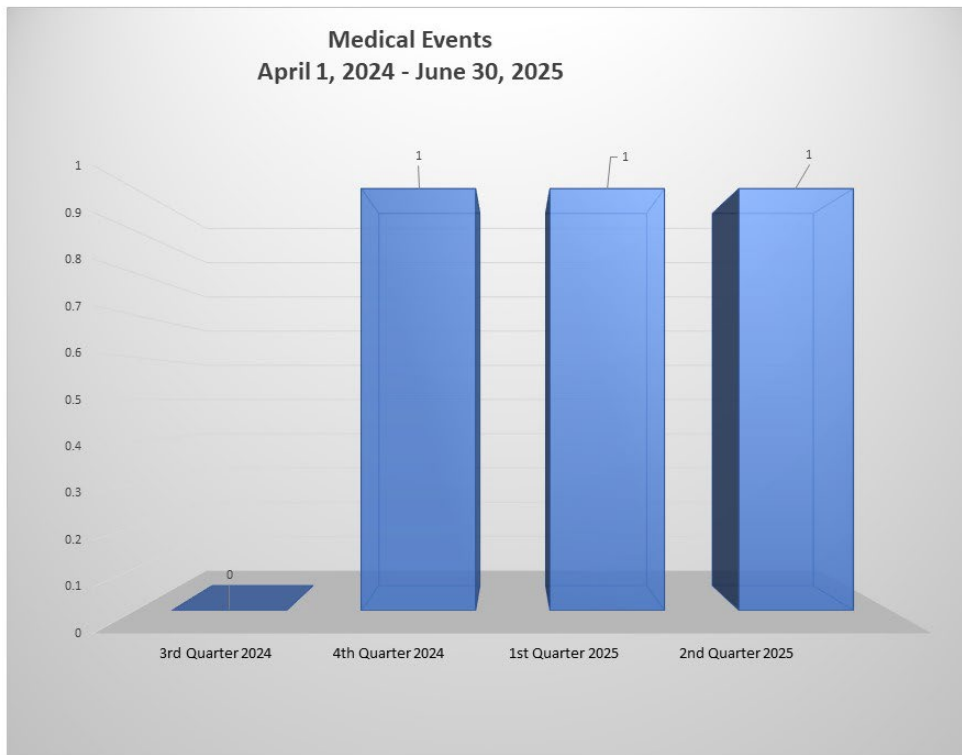
- Ongoing Federal, State, and Local Agencies preparedness planning is in progress for the World Cup 2026 Soccer Event. Dallas and Houston are the Host Cities for the scheduled matches in June-July 2026. Planning meetings to address Emergency Preparedness and Response for this major international event will be taking place beginning in July 2025. Clint Taylor will be attending these meetings as the representative for the DSHS Radiation Section. The Dallas-Fort Worth area is planning a multi-tiered exercise involving local, state, and federal response partners on October 27-29, 2025. The intent of this exercise is to prepare for the World Cup 2026 Soccer Event. The Houston area is planning an area-wide exercise as well. A final exercise date has not been announced yet.
- On May 13th, 2025, the Radiation Section participated in the Isotope Crossroads Tabletop Exercise (TTX). This was a large-scale tabletop exercise involving a response to a potential radiological Weapons of Mass Destruction (WMD) event. The lead agency coordinating this exercise was the FBI Dallas Office, and it involved the Dallas-Fort Worth area. This exercise focused on the security of radiological material during commercial transport. This all-day TTX promoted information sharing, joint situational awareness, team building, and problem resolution in a crisis response situation. Participants included representatives from federal, state, and local law enforcement and emergency response agencies, public health organizations, transportation companies, and radiological material-producing companies. Participants from DSHS Radiation Section included Lisa Bruedigan, Rae Walker, Ruben Cortez, and Clint Taylor.

Incident Investigations

The graphs below reflect the numbers and categories of incidents received during this reporting period.







Medical Event Summaries:

On May 8, 2025, the department received a notification regarding the treatment of the wrong site on a patient undergoing radiation therapy. The incident occurred on May 5, 2025, during the first of four treatment fractions and was discovered by the physician during the patient's second fraction. The Radiation Safety Officer (RSO) was notified on May 7, 2025, and reported that the intended treatment site was a malignant lesion located below the Right Upper Lobe (RUL) of the lung. However, radiation was mistakenly delivered to a benign lesion at the apex of the RUL. The RSO stated that physicians misinterpreted the diagnostic CT images of the two sites within the RUL, resulting in treatment planning and delivery to the wrong site. No harm is anticipated as a result of this exposure. The licensee stated that the planned site was underdosed by over 99% of the beam. The treating physician notified the patient on May 6, 2025.

List of Acronyms

ACU	Abilene Christian University
AIP	Agreement in Principle
CMERRTT	Compressed Modular Emergency Response Radiological Transportation Training
CPNPP	Comanche Peak Nuclear Power Plant
CT	Computed Tomography
DSHS	Department of State Health Services
EOC	Emergency Management Center
EPZ	Emergency Planning Zone
FEMA	Federal Emergency Management Agency
HHSC	Health and Human Services Commission
MQSA	Mammography Quality Standards Act
MSRR	Molten Salt Research Reactor
NEXT	Nuclear Energy eXperimental Testing Lab
NRC	Nuclear Regulatory Commission
OSL	Optically Stimulated Luminescence
PET/CT	Positron Emission Tomography-Computed Tomography
RAM	Radioactive Material
RDD	Radiological Dispersal Device
RERT	Radiological Emergency Response Team
RSO	Radiation Safety Officer
RUL	Right Upper Lobe
STP	South Texas Project Nuclear Power Plant
TAC	Texas Administrative Code
TDEM	Texas Division of Emergency Management
TRAB	Texas Radiation Advisory Board
TTX	Tabletop Exercise
URAD	Ultra Radiac
WIPP	Waste Isolation Pilot Plant
WMD	Weapon of Mass Destruction