



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

**October 10, 2025
Radiation Section**

Licensing and Registration Activities

License Type	Companies	Sites
X-Ray Registrations	18,896	23,537
Laser	4,342	5,139
Mammography	644	644

Registration Completed Actions: June 2025 – August 2025				
	New	Renewal	Amendment	Termination
X-Ray	843	182	967	463
Laser	370	34	114	107
Mammography	14	39	142	9
Total	3,284	1,227	1,223	579

RAM Licensing actions: June 2025 – August 2025				
	New	Renewal	Amendment	Termination
General License Acknowledgment	1	0	23	4
RAM	12	22	221	12
Waste Shipper/Transporter	2	4	0	0
RAM Reciprocity	2	10	5	0
Sealed Source and Device	0	0	0	0
TOTAL	17	36	249	16

Industrial Radiographer Certification	
Application for Exam	320
Trainee Application	289
Renewal Application	91
Non-Texas Radiographer	136
TOTAL	836

Rulemaking

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:

- The Adopted Rule was published in the September 5, 2025, issue of the Texas Register and became effective on September 11, 2025.

Inspection Data

Number of Inspections				
	FY25 Q1 (9/1/24 – 11/31/24)		FY25 Q2 (12/1/24 – 2/28/25)	
	# Ins	# Insp with Violations	# Ins	# Insp with Violations
RAM	166	27 (16%)	175	48 (27%)
X-Ray	887	358 (40%)	640	263 (41%)
X-Ray Remote	215	82 (32%)	381	163 (43%)
Mammography	187	29 (16%)	172	41 (24%)
Laser	12	9 (75%)	7	6 (86%)
	FY25 Q3 (3/1/25 – 5/30/25)		FY25 Q4 (6/1/25 – 8/31/25)	
	# Ins	# Insp with Violations	# Ins	# Insp with Violations
RAM	171	24 (14%)	114	19 (17%)
X-Ray	852	297 (35%)	746	267 (36%)
X-Ray Remote	154	53 (34%)	236	88 (37%)
Mammography	153	24 (16%)	146	22 (15%)
Laser	12	9 (75%)	12	11 (92%)

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	November 2025	Posted
X-ray Inspector	Austin	TBD	Department hold
X-ray Inspector	Beaumont/Houston	November 2025	Beaumont – position filled,

			part-time/Full-time position posted
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
Remote X-ray Inspector	Austin	November 2025	Posted
Remote X-ray Inspector	Austin	November 2025	Posted
RAM Inspector	Arlington	November	To be reposted (2)
RAM Inspector	Corpus Christi	November 2025	To be posted
RAM Inspector	Houston	November 2025	To be reposted
Health Physicist II (RAM Licensing)	Austin	TBD	To be posted
Medical X-ray Reviewer	Austin	TBD	To be posted
Medical X-ray Reviewer	Austin	TBD	To be posted
Industrial/Medical X-ray & Laser Reviewer	Austin	TBD	Selection in progress

Staff Training and Activities

- All radiation staff attended an All-Staff meeting from August 26-29, 2025, in Austin, Texas, at the main DSHS campus.
- Three RAM inspectors attended the NRC Inspection Procedures course
- One investigator attended the NRC Root Cause/Incident Investigation Workshop.
- Two RAM inspectors, two RAM license reviewers, and one investigator attended the NRC Materials Control & Security Systems & Principles course.
- Trae Windham attended the Public Health Decision Making in a Radiation Emergency Train-the-Trainer Course on behalf of CRCPD.

Compliance Activities

July 2025 to August 2025:

- Orders: 34
- Administrative Penalties: \$ 75,545.00
- Revocations:
 - 2 X-ray registrations

Mammography Branch

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

Registration Branch

- Three 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 dress rehearsal for the CPNPP Hostile-Action Based (HAB) exercise was held on July 9, 2025, with 55 Radiological Emergency Response Team (RERT) members participating.
- The FEMA-graded HAB exercise was held on August 13, 2025, with 58 RERT team members participating. FEMA's draft after-action report states that state and local organizations demonstrated knowledge of their emergency response plans and procedures and adequately implemented them. No plan issues or findings were identified. A final report is scheduled for issuance in November.

Waste Isolation Pilot Plant (WIPP)

- Local Briefings were conducted with representatives from Martin and Howard counties
- There have been thirteen WIPP shipments through Texas since the last report was issued.
- The WIPP program is currently working on exchanges and calibrations of the survey instruments along the WIPP route (I-20).
- The WIPP Staff participated in a tabletop exercise, conducted at the end of August, which involved 41 participants and focused on the Low-Level Radioactive Waste exercise to be performed in Stanton, TX.
- The WIPP Staff attended the West Central Texas Emergency Preparedness Conference (WCTEPC) on September 4, 2025.
- Since the last report, the WIPP Staff has conducted six training courses of the Compressed Modular Emergency Response Radiological Transportation Training (CMERRTT) course in Martin County and Howard County, with a total of 75 participants attending these trainings.
- Since the last report, the WIPP Staff has scheduled a Full-Scale Low-Level Radioactive Waste (LLRW) exercise in Stanton, TX, and a Technician Modular Emergency Response Radiological Transportation Training (TMERRTT) in Big Spring, TX.

Pantex/Agreement in Principle (AIP)

- Shay Christian, Tim Gibson, and Joann Harthcock participated in a Pantex tabletop exercise on August 6, 2025.
- The quarterly Agreement in Principle meeting was held on July 30, 2025.
- A local RAPTER exercise was attended/participated in by Tim Gibson and Shay Christian. This was organized by RAP Region IV.
- Shay Christian provided training at the annual staff meeting in Austin on August 28, 2025. The training included instrument detection using the Ludlum 3003 meter and radresponder training using live simulations.
- Tim Gibson and Shay Christian attended RSI detector training on September 16-19, 2025, in Austin.
- Instrument calibrations were performed on August 20, 2025; 8 Canberra URAD, 2 Ludlum 3001, 6 Ludlum 26-2. Three Thermo iPCM12 and 1 Ludlum Model 54 were calibrated on August 19, 2025, under the oversight of Art Tucker.
- Plans and preparations are being made for the Pantex Exercise on November 5, 2025, which will include an off-site release of radiologic contamination. Field team

members will be participating in this exercise. 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.
- Plans are moving forward with a TMERRTT course that has been scheduled for October 28th & 29th. A hospital contamination/decontamination course will also be offered on October 30th.

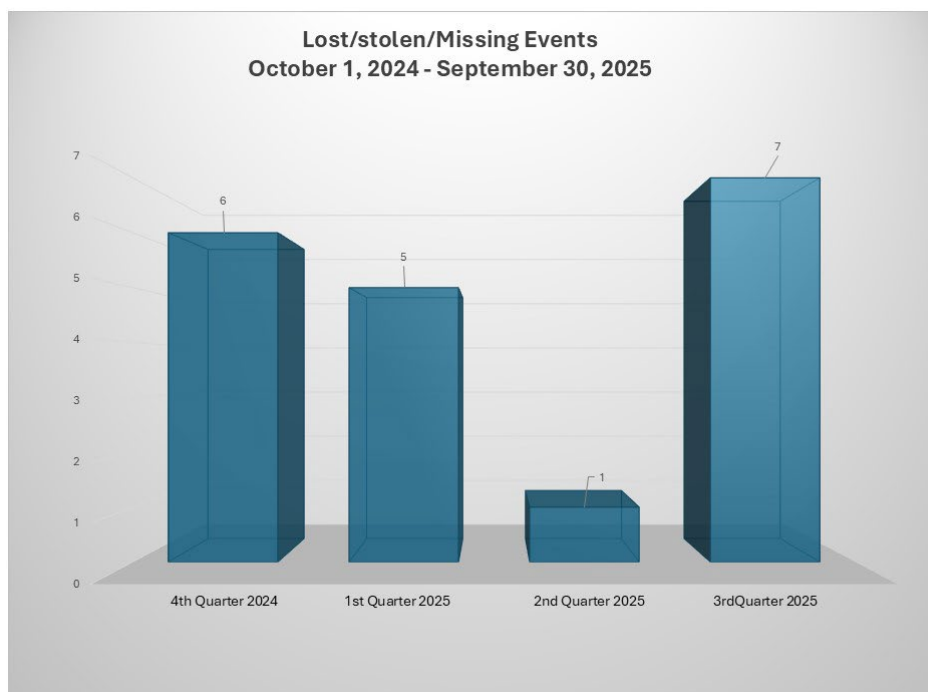
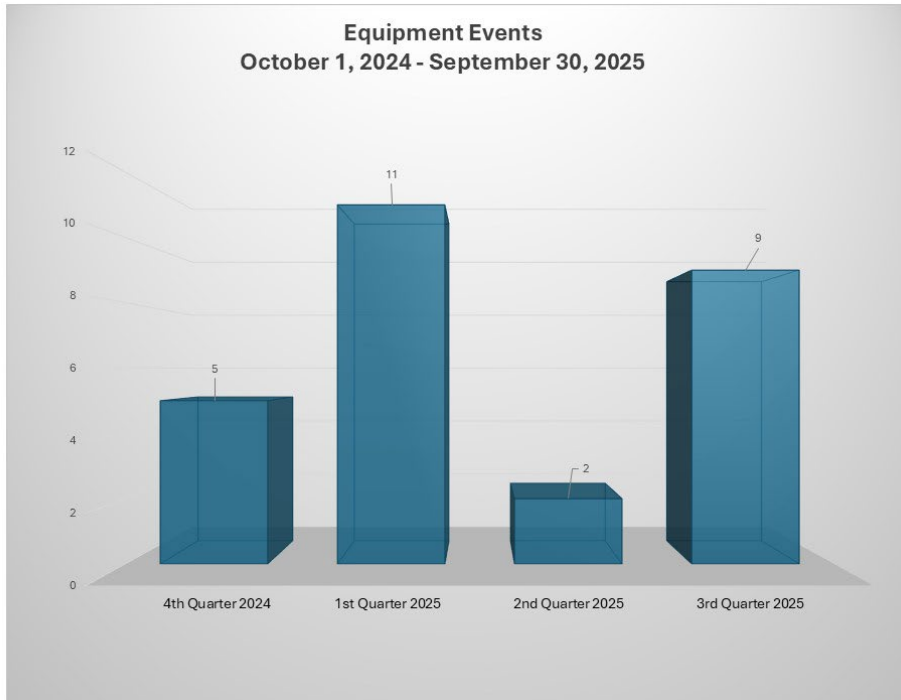
Counterterrorism / Radiological WMD

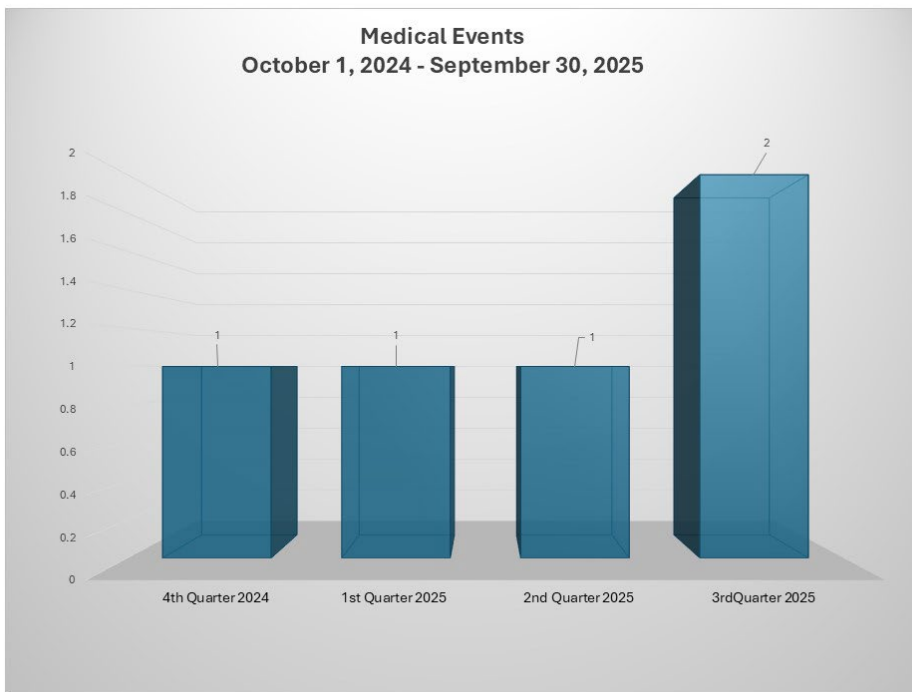
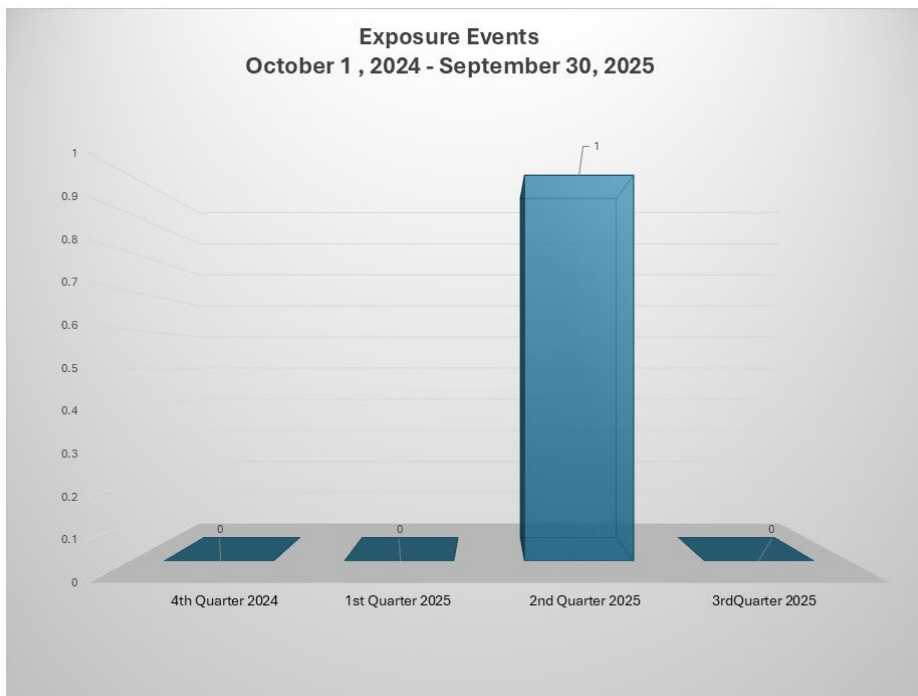
- The 2026 World Cup Soccer Event will include Dallas-Ft Worth and Houston since they are designated as the Host Cities for the scheduled matches in June-July 2026. Meetings to address Emergency Preparedness and Response for this major international event have been ongoing. Clint Taylor has been monitoring this as the representative for the DSHS Radiation Section (Radiological WMD). 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 response actions during 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.
- Members of the DSHS Radiological Emergency Response Team (RERT) participated in the all-day Third Coast Thunder Radiological Weapons of Mass Destruction (WMD) Table-Top Exercise (TTX) on Wednesday, July 16, 2025, in Galveston, Texas. Third Coast Thunder focused on a terrorist created WMD/radiological incident affecting the University of Texas Medical Branch and the greater Galveston community. Third Coast Thunder is part of the DOE/NNSA Office of Counterterrorism Policy and Cooperation Silent Thunder Exercise Series, designed to foster collaboration among representatives from local, state, and federal agencies with a shared stake in ensuring a positive outcome. Radiation Section participants included Joann Harthcock, Rae Walker, Tina Suominen, and Clint Taylor, who was the planning representative for this exercise.
- The DSHS Radiation Section continues to monitor Houston's Securing the Cities Program. The Securing the Cities (STC) Program seeks to reduce the risk of a successful deployment of a radiological/nuclear (R/N) terrorist weapon against a major metropolitan area in the United States by establishing sustainable capability to detect, analyze, and report nuclear and other radioactive materials out of regulatory control within their jurisdictions. The STC grant is used to train and equip personnel to be proficient in the use of R/N detection equipment and guided by detection and response protocols. This program is now state-wide, working with the Texas Department of Public Safety and local law enforcement and first responders to train and equip personnel on Preventative Radiological/Nuclear Detection (PRND) issued equipment. Clint Taylor monitors this program and participates in monthly meetings, scheduled training, and exercises.
- DSHS Radiation Section continues to foster Inter-Agency Partnerships and coordination on radiological hazards and radiological WMD issues. One partner in particular is the Texas Army National Guard 6th Civil Support Team (CST) based at Camp Mabry in Austin. The 6th CST maintains a significant radiological detection and decontamination capability. The DSHS Radiation Section has maintained a solid relationship, and with the upcoming change of 6th Civil Support Team command leadership in October, the Radiation Section will be scheduling a meeting once the new leadership is in place to reinforce that relationship and look to discuss future training and exercise participation.
- On-going work on the new 5-year Texas Homeland Security Strategic Plan (HSSP) for 2026-2030. The Radiation Section is involved in revising and updating the

content of the plan as it pertains to radiological WMD and response. The 5-year plan, when completed, provides the state’s framework for establishing homeland security priorities and plans for developing and sustaining homeland security capabilities.

Incident Investigations

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





Medical Event Summaries:

- On September 4, 2025, the Department received a call from the RSO at Texas Oncology PA in San Antonio reporting that they had discovered on Saturday that they received a box that was supposed to contain two patient doses, but the box was empty. They contacted the pharmacy to attempt to get the doses. The records reflected that the patients were done. In a routine review of records from the previous week, the RSO discovered that three patients were done Saturday afternoon, but only one dose was used. They determined the NMT had subdivided

the unit dose into three doses to do the patients. Their normal range is 8-14mCi. Patient 1 received 7.3 mCi; Patient 2 received 7.8 mCi, and Patient 3 received 5.8 mCi. The dose administered to Patient 3 was 26% lower than the minimum range and greater than the 20% variance allowed, resulting in a Medical Administration event that is reportable under 35.3045 (c)(1)(ii). The tech failed to notify any authorized user or the RSO about the splitting of a unit dose or to determine if the dosages were acceptable.

- On September 10, 2025, the Agency received a call notifying us of a misadministration. The Radiation Safety Officer explained that the wrong patient was treated with a 6 MeV treatment. The therapist failed to properly identify the individual who responded to being called for treatment. A fifteen-day report was received on September 10, 2025. As a result of this incident, a procedural change was made to ensure that two therapists confirm patient identity and treatment location before treatment starts. No violations noted. File closed.

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
CRCPD	Conference of Radiation Control Program Directors
CST	Civil Support Team
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
HSSP	Homeland Security Strategic Plan
LLRW	Low-Level Radioactive Waste
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
RAP	Radiological Assistance Program
RAPTER	Radiological Assistance Program Training for Emergency Response
RDD	Radiological Dispersal Device
RERT	Radiological Emergency Response Team
RSI	Radiological Solutions Inc.
RSO	Radiation Safety Officer
RUL	Right Upper Lobe
STC	Securing the Cities
STP	South Texas Project Nuclear Power Plant
TAC	Texas Administrative Code

TDEM	Texas Division of Emergency Management
TMERTT	Technician Modular Emergency Response Radiological Transportation Training
TRAB	Texas Radiation Advisory Board
TTX	Tabletop Exercise
URAD	Ultra Radiac
WCTEPC	West Central Texas Emergency Preparedness Conference
WIPP	Waste Isolation Pilot Plant
WMD	Weapon of Mass Destruction