

We are the Texas Department of Transportation state agency.

This new rule would impact our operations. We currently have on inventory close to 400 Nuclear Density Gauges (NDG). These NDG's are stored in over 119 permanent sites STATE-WIDE. We currently track our NDG's four ways. 1. MES - Inventory number assigned to the NDG. 2&3. SN, make and model are tracked in Calibration Manager. Calibration assigns an ID# to the NDG's. 4. We conduct 6 month inventory reporting not to exceed 6 month's. In addition when transferring or relocating an NDG we complete a form to show the traceability of the NDG at all times. With all of these tools in place there is no need to add another method of tracking. We currently do not have the man-power to comply with this rule.