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E. Baker

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From: "Greg & Claudia Yuhas" <uhaskep@castles.com>
To: TWFN_DO.twf2_po(NRCREP)
Date: Mon, Feb 14, 2000 11:57 PM
Subject: REACTOR ALLEGATION OPTIONS

The ability to bring safety concerns to the attention of an independent regulatory body is a cornerstone of safety philosophy. The actions taken by the regulatory body in response to the expression of concern will either reinforce the perception of commitment to safety or undermine the credibility of the regulatory authority.

Allegations, while frequently not safety significant, are almost always an indicator that something is either not going as expected or that communication within the licensee's organization is less than optimal.

Option 4, presented in SECY 99-273 facilitates communication by involving the alieger in discussion of the safety significance. This gives the regulatory authority the opportunity to demonstrate its commitment to safety and to understand why the allegation is being presented. For this option to be most effective, the staff must demonstrate its ability to explain to the alieger the safety significance of the concern. While I don't doubt the technical acumen of the staff, I do question their ability to be empathetic and to listen effectively in search of the underlying communication concerns. Further, I wonder if the staff can be sufficiently effective in its discussion of safety significance to assuage the emotional commitment of the alieger to his or her concern.

I support Option 4 and encourage NRC management to improve the communication skills of the staff that will be meeting with aliegers.

Thank you for the opportunity to comment on this important matter.

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The ability to bring safety concerns to the attention of an independent regulatory body is a cornerstone of safety philosophy. The actions taken by the regulatory body in response to the expression of concern will either reinforce the perception of commitment to safety or undermine the credibility of the regulatory authority. Allegations, while frequently not safety significant, are almost always an indicator that something is either not going as expected or that communication within the licensee's organization is less than optimal. Option 4, presented in SECY 99-273 facilitates communication by involving the allegor in discussion of the safety significance. This gives the regulatory authority the opportunity to demonstrate its commitment to safety and to understand why the allegation is being presented. For this option to be most effective, the staff must demonstrate its ability to explain to the allegor the safety significance of the concern. While I don't doubt the technical acumen of the staff, I do question their ability to be empathetic and to listen effectively in search of the underlying communication concerns. Further, I wonder if the staff can be sufficiently effective in its discussion of safety significance to assuage the emotional commitment of the allegor to his or her concern. I support Option 4 and encourage NRC management to improve the communication skills of the staff that will be meeting with allegors. Thank you for the opportunity to comment on this important matter. Gregory P. Yuhas 790 West J Street Benicia, CA 94510 707.745.6227 uhaskep@castles.com