

**UNION OF
CONCERNED
SCIENTISTS**

April 18, 2000

Mr. David L. Meyer, Chief - Rules and Directives Branch
Office of Administration
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: RELOCATION OF PUBLIC DOCUMENT ROOM

Dear Mr. Meyer:

The Union of Concerned Scientists submits these comments in response to the *Federal Register* notice dated March 29, 2000 (Vol. 65, No. 61), "Notification of relocation of the NRC Public Document Room."

UCS is a frequent customer of the NRC's Public Document Room, currently located at 2120 L Street NW in Washington, DC. The PDR staff has consistently provided timely, competent service. On more than one occasion, the persistent PDR staff has been able to provide me with the documents I needed despite my having had the wrong document numbers or dates. Hopefully, the talented and experienced PDR staff will continue to serve the public in the relocated PDR.

The referenced notice did not provide many details on the relocation, so many of the following specific comments may already have been covered in the NRC's planning:

1. **Access to hard copies:** The news release indicates that the majority of the historical paper collection will be stored off site with provisions for no-cost, quick turn-around retrieval service. Based upon our experience retrieving hard copy documents from the off site location, it is indeed no-cost but it is not quick. The NRC should establish a standard for turn-around time for records retrieval from long term storage and implement controls to ensure that actual performance meets or exceeds this expectation the majority of the time.
2. **Payment scheme for microfiche copies:** In the current PDR, there is a single copier provided for making hard paper copies and numerous microfiche viewers/copiers. There is a nominal fee charged for making hard paper and microfiche copies. The payment scheme for the hard paper copier permits the user to either pay by coin or via a pre-paid card. The microfiche copiers only accept coins. Despite my efforts to save dimes, including trips to the bank to purchase rolls of dimes, I frequently run out of dimes when using the microfiche copier. The NRC should extend the pre-paid payment scheme currently provided for the hard paper copier to one or more of the microfiche copiers.
3. **Telephone service:** In the current PDR, there is a single pay phone outside the office of the PDR contractor and two telephones inside the PDR itself. Comparable, or expanded, telephone service should be provided for the relocated PDR.

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4. **Number of terminals/printers:** There are four terminals and at least three printers in the current PDR. Until recently, all four terminals could be used to access the NRC's Bibliographic Retrieval System (BRS) to search for information. Two of the terminals have been dedicated for ADAMS use. As a direct result, I have at times been unable to conduct BRS searches in the PDR because both of the non-ADAMS terminals were occupied. I can access ADAMS from my UCS computer, but I cannot access BRS. The NRC should provide at least four terminals in the PDR that can access BRS. Reconfiguring the existing four terminals to access either BRS or ADAMS depending on the user's needs would be a solution.
5. **Integral set of current Technical Specifications:** In the current PDR, the current Updated Final Safety Analysis (UFSAR) can be viewed on microfiche for every operating nuclear power plant in the United States. Unfortunately, it is extremely difficult to view the current Technical Specifications for any US facility. The PDR should maintain an updated, current hard paper copy of the Technical Specifications for each licensed nuclear power plant.
6. **Access to the PDR area:** Security at the NRC's White Flint complex has become quite bizarre recently. I have attended public meetings in the Two White Flint Auditorium where some members of the public had to sign-in on the computer and receive a white Visitor's badge while other members of the public attending the same meeting merely had to sign a paper log and proceed badge-less. With the installation of the security portals, I sometimes had to empty contents of a paper file so the guard could flip through its contents while at other times I've carried entire boxes in without even the briefest review. Prior to one public meeting, I watched as the security guard prevented the court reporter hired by the NRC to record the meeting from going upstairs with his recording equipment.

The NRC probably will, and probably should, require visitors to the relocated PDR to pass through security. The NRC should establish appropriate security measures and then apply them consistently to its visitors. It might benefit the NRC and frequent PDR visitors for the NRC to create a "PDR Badge" that permits its wearer to expedite the computer/hard log signing in process. The availability of a single computer at the desk of both One White Flint and Two White Flint have turned the process of signing in to a quarter-hour or longer delay at times. The "PDR Badge" might allow visitors to the PDR to avoid these needless delays while still maintaining appropriate security controls.

7. **Function of the PDR contractor:** The current PDR uses a contractor to allow users to request copies of PDR materials. We have good experience with this process. The relocated PDR must retain the ability of users to request copies of PDR materials and have these orders filled in a reasonable time period.

Sincerely,



David A. Lochbaum
Nuclear Safety Engineer