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SERVICE FOR EVALUATING REGULATORY CHANGES

RULES & DIR. BRANCH
US NRC

Mr. David L. Meyer, Chief
Rules and Directives Branch
Office of Administration - MS T-6D59
Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Meyer:

This is in response to the request for comments on relocating the Public Document Room from Washington, DC, to Rockville, Maryland. The relocation itself seems a logical step in assuring all resources are in close proximity to one another. However, I have concerns regarding *what* is being relocated.

The notice indicates that only paper copies "of the more frequently requested, recent documents" will be kept on site. The majority of the "historical paper collection" will be off site. Although the notice also indicates a "quick turn-around" retrieval service will be utilized, perceptions vary as to what "quick" means. Currently it takes two to three days to recall paper copy at L Street. Not having paper copies immediately available is particularly troublesome because of the extremely poor quality of the microfiche when the system was switched to the ARMS fiche. Our service is geared to provide a quick response to utilities to enable them to quickly respond to NRC concerns. This frequently involves faxing documents for same-day receipt or overnight for next day use. These typically are not "the most frequently requested" documents and the lack of same-day access to paper copies to respond to the nuclear industry is indeed a huge impediment. Even a one- or two-day delay could have serious impacts on utilities' ability to have the necessary information they feel they need to interface with the NRC.

The poor quality of the ARMS fiche is due to the lack of any QA being consistently applied since its inception; this was based on the belief (by the NRC Staff) that the microfiche would be used as a backup only but would never be relied on since the paper would always be available. Over the years, the PDR staff can attest to constant complaints about the quality of the microfiche. In addition, there is almost no or very inconsistent microfiche of 1978-1979 documents; paper is the only reliable source of information for that timeframe.

On miscellaneous matters, one suggestion that would provide added value to the usefulness of the PDR would be the ability to have complete updated technical specifications available for public use. Currently, the original technical specifications and all amendments are simply filed in the plant folder.

Also, the question of amenities for contractors needs to be addressed. Many companies contract with individuals to retrieve information from the PDR because of the lack of easy accessibility; currently phones, computers and storage ability are available for these individuals. Such services should continue to be available in the Rockville location.

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TEMPLATE: ADM-013

E-RIDS = ADM 03
Add Thomas E. Smith (TES)



With the proximity of the PDR to Central Files, it is hoped that greater interface can be achieved, such that documents that were "lost" on their way to the PDR and have to be retrieved from Central Files would be available on a more timely basis, e.g., same-day availability.

Very truly yours,

A handwritten signature in cursive script, appearing to read "N. G. Chapman".

Nancy G. Chapman
SERCH Manager