

April 13, 2001

Mr. Dennis Case, District Manager  
Fort Worth Field Office  
General Services Administration  
819 Taylor Street, Room 14B06  
Fort Worth, TX 76102

Dear Mr. Case:

The purpose of this letter is to provide additional information requested by Donna King, of your staff, in conjunction with the processing of our request for space dated October 4, 2001. Specifically, we were asked to provide information to support the selection of our delineated area, particularly as it relates to Executive Order 12072 (concerning Agency locations in central business districts). Our delineated area was identified through the development of a business case based on the mission requirements of the Agency.

There are two primary factors to be considered in determining an appropriate location for the Nuclear Regulatory Commission's (NRC) Regional Office in Arlington, Texas. Both factors hinge on the Regional Office's mission requirements during emergency conditions. The region's Incident Response Center (IRC) and the NRC staff's requirement to respond both to the IRC from home and from the IRC to DFW International Airport comprise these factors. The area where the two factors overlap delineates the appropriate area for the Regional Office.

Furthermore, in addition to these considerations, the Regional Office has been designated the Agency's principal backup role in response to Presidential Decision Directive 67 (Continuity of Government/Continuity of Operations) in case the Seat of Government or Agency Headquarters is rendered inoperable. Execution of this responsibility is furthered by being located in a civilian (as opposed to Federal) building, outside a central business district, and above the ground floor. This enhances workforce and mission protection in case of an emergency resulting in a disruption in government operations.

#### Response to the IRC

The IRC is activated when there is a significant event involving one of the nuclear power plants or one of the hundreds of other users of NRC licensed materials in the 21 state regional area of responsibility. In addition, Presidential Decision Directive 67 requires contingency planning in case the Seat of Government or Agency Headquarters is rendered inoperable. The Commission assigned the Regional Office the principal backup role to Agency Headquarters in the event of such an emergency, with regional staff assigned short term responsibility to respond to nuclear emergencies nationwide in addition to those in the regional area of responsibility. This requires that we be able to quickly call into the office some 5-30 professional and administrative staff to coordinate and direct the initial Agency response to a nuclear emergency. Because NRC's mission is to protect public health and safety, the environment, and the common defense, the Agency has committed to Congress that our IRC will be staffed within one hour of the time the decision is made to activate NRC's Emergency Response Plan. Clearly, the more quickly the IRC can be activated, the better nuclear safety and the public are served.

Many of our staff have selected homes with a view to being within an appropriate response time to our current location. Therefore, locating the office within our delineated area will maximize the pool of timely emergency responders.

#### Response from the IRC

One of the primary missions of our regional emergency response team is to form the core of a "site team", from 6 to 25 personnel, that can travel to the site of a nuclear emergency within a nominal 6- to 8-hour window from time of dispatch from the IRC to arrival on site. Since some response staff may not be at home when the emergency occurs and, therefore, need time to return home, pack personal belongings, and report to the IRC for briefings and equipment prior to traveling to the airport, a location central to both the airport and most employees' residences is critical. Although we exercise chartering private aircraft from local airports, the distances involved to many of our regulated facilities results in the most timely travel being via scheduled commercial airlines. In addition, upon the office's activation as the Headquarters backup, senior Agency officials will be dispatched to the regional office by the quickest method. As a result, our office needs to be in close proximity to DFW International Airport. The delineated area satisfies this requirement.

#### Conclusion

The large majority of the regional staff live in an area to allow rapid response to office locations within our delineated area, which is Fielder Road to the west, TX 360 to the East, Randol Mill Road to the south, and Airport Freeway to the north. Our operational requirements and workforce protection issues as detailed above preclude our location in the central business districts of either Dallas or Fort Worth, as they both fall well outside the limit for timely travel to DFW airport and would require the staff significant additional drive time to the office to respond to an emergency, especially during high traffic hours. Further, location away from Federal buildings and the central business districts will enhance the Agency's Continuity of Government/Continuity of Operations function by reducing the risk to that backup function in the Regional Office.

Therefore, based on the business case presented above, it is requested that you proceed with the leasing action using the delineated area identified in our SF-81, Request for Space. Please have your staff contact Louis Fisher, Chief, Facilities Branch, on (301) 415-7310 or e-mail: [lx@nrc.gov](mailto:lx@nrc.gov) if you need additional information.

Sincerely,

**/RA/**

Michael L. Springer, Director  
Office of Administration

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Sincerely,  
**/RA/**  
Michael L. Springer, Director  
Office of Administration

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\*concurrence by fax; \*\*see previous concurrence.

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