

August 15, 2001

Mr. David C. Childs  
Office of Federal Procurement Policy  
Office of Management and Budget  
New Executive Office Building  
Room 9013  
725 17<sup>th</sup> Street, N.W.  
Washington, D.C. 20503

Dear Mr. Childs:

On July 2, 2001, OMB published proposed changes to OMB circular A-76, revised supplemental handbook, in the Federal Register. Our comments on these proposed changes are provided below.

We received a copy of the comments submitted to you by John Seal on behalf of the Small Agency Council (SAC) and agree with the concerns expressed on behalf of SAC members. With respect to the U.S. Nuclear Regulatory Commission, we believe that the proposed deletion of the "grandfathering clauses" found in the A-76 Supplemental Handbook, Part 1, Chapter 2, paragraphs 5 and 5.a, and the expansion of public-private competition for all Inter-Service Support Agreements (ISSAs) would place a significant and unnecessary strain on our existing resources. It is likely that the resources of other agencies with whom we currently have ISSAs would also be strained, preventing those agencies from being in a position to develop and submit meaningful proposals for a recompetition. Consequently, user agencies may be left without a provider to perform a support activity or with a more costly source after all pertinent factors are taken into consideration.

Should this proposed rule become effective, we recommend that a dollar and/or FTE threshold be included below which such recompetition need not be performed. This would eliminate the need for recompetition in situations where the cost of conducting the recompetition is as much or more than the value of the ISSA.

Should you wish to discuss our comments, please contact Mr. Timothy Hagan, Director, Division of Contracts and Property Management, Office of Administration, on 301-415-7305 or by e-mail to [TFH@nrc.gov](mailto:TFH@nrc.gov).

Sincerely,

**/RA/**

Michael L. Springer, Director  
Office of Administration

cc: John Seal, Chairman  
Small Agency Council  
Pension Benefit Guaranty Corporation

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 Michael L. Springer, Director  
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