

THE STATE OF
STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY
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AUG. 26TH 1818

Rod R. Blagojevich
Governor

Gary N. Wright
Director

February 20, 2003

U.S. Nuclear Regulatory Commission
ATTN: Osiris Siurano, STP
One White Flint North
11555 Rockville Pike, Third Floor
Rockville, MD 20852

Re: Draft Summary Document, "Options for Enhancing Periodic Meetings"
(STP-03-002)

Dear Mr. Siurano:

The Illinois Department of Nuclear Safety hereby submits the following comment on the above-identified draft summary document. The document describes an expansion of periodic meetings held between formal IMPEP reviews. The NRC proposes to augment periodic meetings in response to the recommendation of an NRC-Agreement State working group on IMPEP lessons learned. The working group's April 1, 2002, report alleges that the current periodic meeting process has failed to reveal reliably a deterioration in Agreement State programs.

We disagree with this assertion and strongly oppose the notion of expanding periodic meetings. The proposal in the draft summary document is a knee-jerk reaction to an imagined problem - a reaction that would involve considerable expenditure of Agreement State resources for marginal benefit. The working group's report, which is the basis of this proposal, makes an unsubstantiated leap to judgment by failing to back up its contention with case histories demonstrating that certain Agreement State programs have deteriorated unbeknownst to the NRC. We are unaware of any such cases, and since the report fails to describe any, we conclude that it is invalid on this topic.

We believe that the current periodic meeting process, as established by OSP procedure SA-116, is effective. This procedure defines the scope of meetings as "discussions, information exchange, identification of potential areas of improvement for both NRC and Agreement State programs, and assessment of IMPEP review planning, not

*STP-006 Template
SP07*

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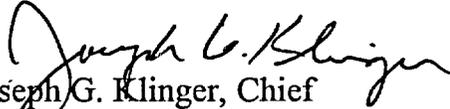
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for a formal evaluation.” We find this to be efficient and useful in the management of our program. Indeed, the working group’s report acknowledges the effectiveness of the current process before taking the tangent that increased complexity is somehow necessary.

In conclusion, we believe that the present scope of periodic meetings should be retained until the NRC provides evidence that change is needed. Until then, the Illinois Department of Nuclear Safety is unlikely to expend resources furnishing information and analyses for meetings that have been expanded to resemble IMPEP reviews.

Thank you for the opportunity to comment on this draft summary document. My telephone number is 217-785-9930 if you have questions or comments.

Sincerely,


Joseph G. Klinger, Chief
Division of Radioactive Materials

JGK:JME

cc: Jim Lynch, NRC Region III