

7/30/2010  
75 FR 44992

9

# PUBLIC SUBMISSION

**As of:** October 12, 2010  
**Received:** October 11, 2010  
**Status:** Pending\_Post  
**Tracking No.** 80b6c8fd  
**Comments Due:** October 13, 2010  
**Submission Type:** Web

**Docket:** NRC-2010-0242  
Notice of Comment and Opportunity to Provide Written Comments on Management Directive 8.11

**Comment On:** NRC-2010-0242-0001  
Review of Management Directive 8.11

**Document:** NRC-2010-0242-DRAFT-0009  
Comment on FR Doc # 2010-18739

## Submitter Information

**Name:** Kevan Crawford  
**Address:**  
3781 S 3145 E  
Salt Lake City, UT, 84109

## General Comment

See attached file(s)

## Attachments

**NRC-2010-0242-DRAFT-0009.1:** Comment on FR Doc # 2010-18739

RECEIVED

2010 OCT 12 AM 7:59

RULES AND DIRECTIVES  
BRANCH  
USNRC

*SONSI Review Complete  
Template = ADM-013*

*E-RIDS = ADM-03  
Add = T. Munsch (TMC)*

## Rule Making Comments under Docket NRC-2010-0242: Management Directive 8.11

I am a reactor operations manager turned whistleblower multiple times because the RRO inspectors could not understand and execute properly over 17 years of reporting problems due to lack of operations management and administration experience and ignorance begat of arrogance. As the last option remaining to correct critical safety and safeguards issues that have reached the stage of whistle blowing or 10CFR2.206 petitioning and must be resolved immediately, a whistleblower or petitioner with current or former facility credentials should always be offered the option to attend the enforcement action site visit with an additional option of escort by federal armed guard.

Furthermore, 18USC1001 fraud warnings should be routinely issued to both the Licensee and the RRO inspection team primarily because the entire action is an adversarial situation with motive to conceal criminal acts. The whistleblower or petitioner should be routinely informed of the right to take any issue to the NRC-OIG in the event criminal activity has been detected. The NRC-OIG should be routinely informed whenever an enforcement action is prompted by a 10CFR2.206 petition or whistleblower report.

The Criteria for Petition Evaluation are still somewhat vague and subjective. While general petition requirements are mentioned, a structured petition outline should be defined to reduce petition rejections. Issues addressed in a previous enforcement action are not necessarily resolved and should not be rejected unconditionally, particularly since the petitioner can take the previously "addressed" issue to oversight authorities and crucify both the NRC and the Licensee.

A violation identified by the RRO should not be delayed for any reason. A petitioned issue the RRO does not take action on must remain open and be reviewed after the petitioner has commented on the RRO findings. If oversight authorities find different facts, then either or both the Licensee and the RRO have dug themselves a very deep hole.

A notice of the 10CFR2.206 petitioning process and the Management Directive 8.11 should be posted in every NRC licensee workplace alongside other federal posting requirements such as EEO. Text in the notice should include "workplace safety," "materials safeguards," and "national security," as well as the appropriate warnings about whistleblower protection. The nature of this business is such that there is no issue that should be downplayed.

Kevan Crawford, PhD