

D911017

Mr. Eric S. Beckjord, Director
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Beckjord:

SUBJECT: PROPOSED PAPER ON METRICATION POLICY

We appreciate the opportunity to review the proposed policy statement on metrication, which is to be sent to the Commission with a staff recommendation that it be issued for public comment. We recognize the staff's problem in reconciling the requirements of the Omnibus Trade and Competitiveness Act of 1988, which mandates a certain level of movement toward the metric system, and the requirements of safety, which would normally preclude unnecessary changes.

Of course we reserve the right to comment on the final version of the proposed Policy Statement when you finally send it to the Commission, but we have a few comments on the draft.

Generally, we support the staff approach, which is to avoid monumental upheaval, while encouraging the use of the metric system by licensees and applicants, and preparing the NRC staff through education and through cooperative interaction with the industry.

We also support the one specific step proposed, to issue all new actions and supporting documents in dual units. We think one could in fact go the next step without a safety penalty (and possibly with a safety advantage) by always using the metric system for the primary units, with the translation into English units in parentheses. That will facilitate the ultimate transition to a fully metric system.

We call your attention to the footnote on page 12, which purports to explain how one is to carry significant figures from one system of units to another. It is wrong.

Sincerely,

David A. Ward
Chairman

Reference:

Draft SECY paper for the Commissioners from James M. Taylor, Executive Director for Operations, NRC, Subject: Metrication Policy, transmitted by memorandum dated October 3, 1991, from Eric S. Beckjord, Office of Nuclear Regulatory Research to Raymond F. Fraley, ACRS (Predecisional)

cc:
James M. Taylor, EDO