



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

FEB 4 1980

MEMORANDUM FOR: William J. Dircks
Acting Executive Director for Operations

FROM: Ronald M. Scroggins, Director
Administration & Resource Control Staff
Office of Nuclear Regulatory Research

SUBJECT: COMMENTS BY THE OFFICE OF RESEARCH ON THE NRC's TMI
SPECIAL INQUIRY GROUP REPORT (ROGOVIN REPORT)

The results of the current RES review of the NRC's TMI Special Inquiry Group (SIG) report is being forwarded from me, instead of R. Budnitz, Director, RES, because of the potential conflict of interest (Ref. Memo R. Budnitz to L. Gossick dated January 21, 1980). The comments contained in this memorandum represent a consensus summary of the SIG report by the RES senior management. In general, RES believes that the SIG did a credible review and examination, and we are in general agreement with their diagnosis of the problems in the industry and NRC. Also, there is general agreement on the finding and recommendations of the SIG. In this regard, RES management supports the SIG recommendations for a strong executive function to direct and control the day to day operations of the agency.

We would like to note that a number of the significant recommendations of the Rogovin Report have been acted upon by the agency in both the short- and long-term NRR Lessons Learned Reports, the NRC Response to the President's Commission, the I&E Special Investigations, the Bulletins and Orders Task Force Report, and in the development of the RES FY 1981 program and budget request. Also, most of these recommendations are being covered in the TMI Action Plan, and as in the case of RES, there has been a general reorientation of priorities. While we believe that there exists generally throughout the agency a strong sense of awareness of the problems of the past and an urgent desire to correct them and not to have our efforts degenerate into the "business as usual" attitude of the past, it is clear that continuing effort on the part of the program offices is required to ensure improved interoffice cooperation and coordination.

Our following comments relate to some of the general recommendations of the report, especially as they relate to RES, and will not touch on some of the specific technical aspects raised in the report.

- i. The Rogovin Report recommends that "present NRC staff functions devoted to performing quantitative risk assessment of reactors should probably be relocated in AEOD," (Office of Analysis and Evaluation of Operational Data). The implication of this would be to combine RES's Probabilistic Analysis Staff (PAS) and AEOD. We disagree with this recommendation. Although the collection and analysis of data does correlate well with some aspects of the risk assessment function, we see a number of possible deficiencies arising which could outweigh any gains of such a merger. Primarily, AEOD's effort will be on operating reactor experience, which could dilute PAS efforts on reliability engineering, probabilistic analysis and the application of risk assessment techniques to other areas, such as siting/consequence modeling, fuel cycle risk, and transportation risk. Also, methodology development could suffer, along with PAS's role to educate other Offices on the use and applications of the technology. There exists the possibility of some overlap in functions between the AEOD and PAS in the early stages of operation of the AEOD; however, we feel this early overlap will be worked out as we assure together that all the important areas of data evaluation and interpretation are covered.

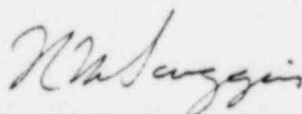
Another recommendation in this area was the "AEOD Office should be staffed in part on a rotational basis from all the other offices and branches of the NRC staff, at a level of no less than 35 to 40 professionals." We feel that the AEOD Office should have a permanent, dedicated staff in order to operate most effectively. The idea of a rotating staff sets up the possibility of "mixed loyalty" for individuals who know they're only on loan for a short time period.

- ii. It was recommended that quantitative risk assessment techniques be used more and that more emphasis on human factors be included in the design review process and in other areas of the licensing process. Also, the SIG recommends that the spectrum of the design basis accidents used for safety assessment be expanded by using operational experience, research results, lessons learned from accidents, and advice from the ACRS, all studied through the use of risk assessment. Additionally, risk assessment could help the agency to establish a safety objective for nuclear power plants. We agree with these recommendations and strongly support the use of quantitative risk assessment methodology throughout the decision making process, such as in establishing priorities for the research programs.

- iii. It was recommended that the NRC retain the Executive Management Team (EMT), but that it should have a single director who would exercise the authority of the entire agency during an emergency. The SIG also proposed that FEMA and other Federal agencies involved should have senior representatives present at the NRC Incident Response Center during an emergency. We believe that this is an area of immediate concern for the Commission and that the NRC should develop a position that defines its authority and responsibility during an emergency. What will be the structure of the EMT, what authority can and cannot be delegated to whom, etc? This position statement should include a definition of NRC's authority at the site under projected emergency situations.
- iv. The Rogovin Report suggests that a Nuclear Safety Board be established "to be responsible for observing, evaluating, and making recommendations to improve the quality of the overall performance of the regulatory staff." It further suggests that this Nuclear Safety Board consist of five full-time members of the Advisory Committee on Reactor Safeguards (ACRS). We agree with the intent and objectives of such a board; however, we disagree with the proposed board membership. We feel this suggestion would inevitably fragment the ACRS. The ACRS would lose its collegiality as power would flow to the five members of the Board, who would have greater control over the supporting staff and more extensive contacts with the licensing staff. We believe, the ACRS could, as presently constituted, satisfy the needs outlined for the proposed Nuclear Safety Board if closer attention were paid to their recommendations by the Commission.
- v. We concur in the objective of the recommendation to rotate the senior staff throughout the various Offices of the NRC to gain greater breadth of experience and foster an agency-wide attitude. We believe it would have been beneficial to both the agency and the staff if various senior managers had been rotated to other Offices of the agency. We are not recommending any prescribed formula for this rotation of senior staff, but the plan should be consistent with the Charter of the Senior Executive Service. The number of staff involved and the period of time could vary as necessary. This is a recommendation which should be pursued further by the agency, as it would afford the senior managers a better perspective of the overall agency operation and could help to foster a closer cooperation among Offices.

- vi. We strongly support the recommendation for a single location for the agency. The present physical separation of RES from NRR, IE, ACRS and the Commission greatly inhibits communication between organizations and people that should be in daily touch with each other. Certainly we feel it would enhance our ability to transfer research results and to be closer in line with the licensing and regulatory needs of the agency. Better communication through closer contact should help in the overall efficiency of the agency in meeting its goals. The Commission and staff should do as much as possible to have a single location found for the agency as soon as possible.
- vii. Last, but not least in importance, is the recommendation for a good staff training program in reactor power plant design, construction and operation and in problems of radiation protection. We agree with this recommendation and feel it could be very beneficial to RES and other Offices of the agency. The training would help to broaden the technical expertise of the staff, many of whom have backgrounds in highly specialized technical areas, and give them a better perspective of some of the licensing and regulatory issues. The training should provide a systems approach to reactors, such that individuals concerned with certain components could develop a feel for how the failure of certain components effect various systems and the overall operation of the plant. This idea of a systems approach to safety is important and should be emphasized.

Staff comments were solicited and carefully considered as part of RES review of the SIG report. As noted earlier, this memo represents a consensus of senior office management. Copies of the individual staff comments are available. Please contact me, if there are any questions on the above comments.



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cc: N. Haller, MPA
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