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United States Senate
COMMITTEE ON ENVIRONMENT AND PUBLIC WORKS
WASHINGTON, D.C. 20510

November 20, 1979

Honorable Joseph Hendrie
Chairman
Nuclear Regulatory Commission
Washington, D.C.

Dear Chairman Hendrie:

The Comptroller General's report, Placing Resident Inspectors at Nuclear Powerplant Sites: Is It Working?, prepared at our request, raises a number of significant questions about both the resident and regional inspection programs. To facilitate consideration of provisions relating to the inspection program by the upcoming Senate-House conference on the Nuclear Regulatory Commission authorization bill for fiscal 1980, we request your response to the questions contained herein by Monday, December 3.

The code of conduct adopted by the Commission to assure objectivity of resident inspectors may be so strict, according to the report, as to cause employee discontent and to discourage would-be applicants for the position. For example, resident inspectors and their families are required to avoid all social contact with plant employees while "such persons may be the only people in town that possess similar backgrounds and interests."

(1) Does this requirement seriously hamper NRC recruitment efforts?
(2) Is this requirement enforceable?
(3) Can alternative measures be taken to assure objectivity? For example, could the regional inspection force be augmented to provide resident inspectors on a rotating basis, who would be assigned to particular sites and units for short periods (perhaps one month), instead of the three-year period of residence now required?

While the General Accounting Office report recommends against 24-hour coverage by resident inspectors, it does so subject to reexamination of this issue in light of current evaluations of NRC licensing and inspection programs.

(4) From what is known of the results and conclusions of these evaluations, does the Commission see a need for 24-hour coverage by resident inspectors at nuclear power plants?

On the issue of unannounced regional inspections, the GAO concludes they have become less important because of the Resident Inspector program. In support of this conclusion the report also cites the unavailability of utility records or personnel when inspections are unannounced, the predictability of unannounced inspections, and the time it takes for inspectors to gain access to a plant.

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(5) Can the Commission enhance the element of surprise in regional inspections to offset the factors cited by GAO in support of its conclusion that unannounced inspections have become less important? For example, can such inspections be made less predictable? Can prompt entry to the plant be assured? Can the prompt availability of key plant records and personnel be required?

(6) Since regional inspection teams are characterized by an interdisciplinary approach, in contrast to the more limited expertise of resident inspectors, how can the presence of resident inspectors make unannounced regional inspections less important?

The GAO indentified a number of deficiencies in NRC's definition of resident inspector.

(7) What are the Commission's views of these findings by GAO and what efforts, if any, does NRC have underway to better define the role of the resident inspector?

(8) Should the inspector advise plant personnel to remedy to violation in advance of citing it?

(9) Does this depend on the potential seriousness of the violation?

When the Committee on Environment and Public Work was about to report the NRC authorization bill in May of this year, it was advised by the Commission that resident inspectors, because of the special training and expertise required could not all be in place earlier than the end of fiscal 1981. According to the GAO, the Commission now appears to be "changing the qualifications and training the resident inspectors so that it can meet a predefined time frame for assigning inspectors to reactor sites."

The report indicates the original intention was a training period of up to 24 months for candidates who had "at least 18 months NRC experience and demonstrated above-average performance." NRC officials told GAO that "unit" resident inspectors now may have to be drawn from the ranks of "college graduates or persons with little actual experience."

(10) If the Commission's original plans on training and qualifications of "site" inspectors were retained and extended to "unit" inspectors, how long would full implementation take? Is such a requirement necessary or desirable?

(11) Given the disparity between current plans on training and qualifications of unit resident inspectors and the training and qualifications of licensed reactor operators, is accelerated implementation of the program still worthwhile?

The report recommends that resident inspectors be assigned in the future to reactor sites that the Commission considers to be most in need of regulatory attention.

(12) What plans does the Commission have to prioritize sites for future assignments?

(13) Has the Commission assigned resident inspectors to construction sites where significant irregularities have bee alleged, such as Marble Hill, Indiana, and Bay City, Texas?

Finally, the GAO observed that greater coordination between the regional and resident inspection programs is necessary to prevent possible overlap between the two.

(14) What steps has the Commission taken to define the respective program roles and to avoid duplication of effort?

(15) What steps has the Commission taken to maximize direct observation, as opposed to review of records by resident inspectors and by regional inspection teams?

We appreciate your prompt attention to this request.

Truly,

Robert T. Stafford
Ranking Minority Member
Committee on Environment and Public Works

Jennings Randolph
Chairman
Committee on Environment and Public Works

Alan K. Simpson
Ranking Minority Member
Subcommittee on Nuclear Regulation

Gary Hart
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COMMITTEE ON ENVIRONMENT AND PUBLIC WORKS U.S. SENATE

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FOR IMMEDIATE RELEASE
November 20, 1979

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WASHINGTON -- There are "several weaknesses" in the Nuclear Regulatory Commission's new program of assigning resident inspectors to nuclear power plants, according to a General Accounting Office (GAO) report released today by the Senate Environment and Public Works Committee.

The GAO recommended a number of improvements for the NRC resident inspector program as an effective complement to the Commission's regional inspection program.

The GAO report was prepared in response to a request by Senators Jennings Randolph, D-W.Va., and Robert Stafford, R-Vt., Committee Chairman and Ranking Minority Member, and by Senators Gary Hart, D-Colo., and Alan Simpson, R-Wyo., Chairman and Ranking Minority Member of the Committee's Subcommittee on Nuclear Regulation.

The four Senators also released a letter they sent today to NRC Chairman Joseph Hendrie urging him to correct problems identified in the GAO report. Answers to the questions contained in this letter will assist the Committee in its oversight of NRC's inspection program and the Senate conferees in the upcoming conference with the House on the NRC Authorization bill for fiscal 1980. The Senate-passed authorization bill provides $4,684,000 for support of 146 additional resident inspectors. According to the NRC, there are currently 48 resident inspectors at 42 nuclear plant sites, including 10 plants under construction. The program began in 1977.

A key issue addressed by GAO at the request of the Senators was whether greater benefits would be obtained from a day-to-day resident inspector at each reactor unit, or from an increased regional inspector program involving periodic, unannounced visits to plant sites.

The GAO responded, "We firmly believe that regional inspection is vital to NRC inspection effort and should not be weakened or depleted as the resident inspection effort is increased." The GAO found that "NRC's regional and resident inspection approaches working together will lead to an overall inspection effort that will be more effective in ensuring nuclear reactor safety. However, we believe that there are several weaknesses that inhibit the potential success of the resident inspection approach."

Among the weaknesses identified by GAO in the resident inspector program were:

- o Loss of objectivity. GAO found that "some loss of objectivity is inevitable the longer that a resident inspector remains at a reactor site," and that the potential for loss of objectivity is greater where there is only a single resident inspector at a site. GAO also found the NRC'S strict code of conduct for resident inspectors -- including a requirement that they and their families not socialize with plant employees -- may cause discontent and also discourage would-be applicants.

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- Excessive routine work. GAO found that "the resident inspectors have been asked to do routine, periodic inspections" -- primarily including a review of records -- rather than independently investigate areas where there are suspected problems....While a review of records is necessary in any inspection effort, we believe the thrust of the resident inspection program should be the direct observation of plant activities."

- Inspector's role undefined. GAO "found no uniform view among NRC officials on the role of the resident inspector nor NRC guidance on the matter."

- Lack of priority to problem reactors. GAO found that "resident inspectors have not been assigned, on a priority basis, to those reactor sites that NRC considers most needing regulatory attention."

- Too much time devoted to administrative matters. GAO found that "resident inspectors perform an excessive amount of administrative work, consequently losing valuable inspection time." A GAO survey of resident inspectors found that they spend an average of 20 to 25 percent of their time, and as much as 60 percent of their time, on clerical matters. For example, some resident inspectors spend about 15 percent of their time picking up official NRC mail.

- Lack of Coordination. GAO found that "inspections conducted by resident and regional inspectors are not effectively coordinated; consequently, each inspection approach may overlap with the other."

- Lowering of Qualifications and Training. GAO found that NRC is reducing qualifications and training for some resident inspectors "so that it can meet a predetermined time frame for assigning inspectors to reactor sites." The present goal is to increase the resident inspector force from the current level of 48 to 174 within two years. Originally there was one resident inspector proposed per site; now the program calls for a "site" resident supervising the activities of "unit" residents at each reactor unit on a site.

NRC's orginal plan, according to GAO, proposed requiring a training period of up to 24 months for site resident inspector candidates, who already had at least 18 months NRC experience and demonstrated above-average performance.

Under the accelerated program, according to GAO, "NRC officials said the Commission might have to lower its standards for 'unit' residents to college graduates or persons with little actual experience. The training the unit resident receives will largely be on-the-job training. This is a marked change from NRC's earlier position on qualification and training of resident inspectors."

The report concluded that it would be beneficial for a resident inspector to receive training comparable to a reactor operator whose training may cover a period of 14 to 17 months, and questioned whether the lowering of qualifications and training of resident inspectors is worth the earlier implementation of the program.

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