



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

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May 18, 1979

MEMORANDUM FOR: Chairman Hendrie
 Commissioner Gilinsky
 Commissioner Kennedy
 Commissioner Bradford
 Commissioner Ahearne

FROM: *AK* Al Kenneke, Acting Director, OPE

SUBJECT: OPE COMMENTS ON NRC PROGRAMS FOR EMERGENCY RESPONSE
 AND HUMAN FACTORS IN LIGHT OF TMI ACCIDENT

Earlier this week you asked us for our ideas on what else might need to be done in addition to what the staff is now doing in two areas, i.e., emergency planning and reactor operator licensing and training, in which the TMI accident has raised significant questions about NRC policies.

We have reviewed staff reports and memoranda and Commission directives to the staff and discussed the two areas with your offices and with the staff.* The results of our efforts -- a "first cut" in view of the time constraints -- are enclosed in two short reports (Enclosures 1 and 2). You will note that the scope of the reactor operator licensing and training report has been expanded to include human factors in general in nuclear power plants. Although the reactor operator occupies a "front seat" as far as safety is concerned, maintenance and management personnel can be of comparable importance to safe operation.

Common to both of the areas we have examined -- and involved in other areas, e.g., review and evaluation of operating experience -- is the question how NRC staff should be organized to better integrate the related functions of the program offices. You may wish to consider establishing a few standing advisory committees of senior technical people to deal with cross-cutting issues. I believe some such organizational arrangement should be considered to deal with the emergency planning and preparedness program where several offices (NRR, IE, SD, SP) are involved and better integration is necessary. Each member of a standing committee would be selected, not only on the basis of professional competence and experience (as well as association in a program office with work related to

* We have just received from Roger Mattson a summary of the NRR activities on reactor operator licensing and training (Enclosure 3).

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the standing committee's purview), but also on the basis of ability to contribute to an integrated approach.

In each of the reports our perception of Commission policy objectives in the light of the TMI accident is stated and the ongoing staff activities examined; finally, based on our assessment of how well the Commission objectives are being met by the staff activities, we have identified important relevant issues and programs that may not be receiving the attention or priority they deserve. This sequence of analysis should provide a more integrated context for your further consideration of where we may go from here. We are continuing our efforts in examining these areas and if you have comments on what we have done so far or additional aspects you wish us to examine, please let me know.

Enclosures:
As Stated

cc: Leonard Bickwit
~~Sam Chilk~~
✓ Lee V. Gossick
Harold Denton
John Davis
Saul Levine
Bob Minogue
Roger Mattson
Robert Ryan