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

CHAIRMAN

March 28, 1980

The Honorable Morris K. Udall, Chairman
Subcommittee on Energy and the Environment
Committee on Interior and Insular Affairs
United States House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

Enclosed are the Commission's responses to your March 11, 1980 questions for the record of the March 7, 1980 Subcommittee on Energy and the Environment hearing on our fiscal year 1981 budget request.

Sincerely,

John F. Ahearne

Enclosure:
As stated

cc: Rep. Steven Symms

8004180240

QUESTION 1. What is the Commission's position with regard to the recommendation of the Special Inquiry Group that the NRC should satisfy itself that every applicant for an Operating License has evaluated:

--- The management and technical qualifications of its site crew and site management, and their familiarity with the new plant.

ANSWER.

All of the the recommendations of the Special Inquiry Group (SIG), were considered by the Commission in the evaluation of the TMI Action Plan from draft 2 to draft 3. A number of the SIG recommendations were considered to be accommodated implicitly in action items already in the plan. Other SIG recommendations were accommodated either by modification of action items for draft 3 or by the addition of new action items in draft 3. Since the TMI Action Plan is still in draft form, the scope and content of some action items may change. However, some items have already been approved by the Commission for implementation. These items are marked in the discussions below with an asterisk (*). This specific recommendation category is covered adequately in draft 3 of the TMI Action Plan. The specific Task Action Plans (TAP's) associated with this category are as follows:

*TAP I.A.1.1. Operating Personnel and Staffing: Shift Technical Advisor.

*TAP I.A.2.1 Training and Qualifications of Operating Personnel: Immediate Upgrading of Operator and Supervisor Training and Qualifications.

TAP I.A.2.2 Training and Qualifications of Operating Personnel: Training and Qualification of Other Operations Personnel.

TAP I.A.2.3 Training and Qualifications of Operating Personnel: NRR Audit Training Programs for Licensed Operators.

TAP I.A.2.6 Training and Qualifications of Operating Personnel: Long-Term Upgrading of Training and Qualifications.

TAP I.A.2.7 Training and Qualifications of Operating Personnel: Accreditation of Training Institutions.

TAP I.B.1.1 Management for Operations: Organization and Management Long-Term Improvements.

TAP I.B.1.2 Management for Operations: Evaluation of Organization and Management Improvements of Near-Term Operating License Applicants.

QUESTION 1 (cont'd). --- Emergency operator procedures, which should be examined thoroughly to identify whether they may be conflicting or could in some other fashion mislead the operators.

ANSWER.

This recommendation category is covered adequately in draft 3 of the TMI Action Plan. The specific Task Action Plans (TAP's) associated with this category are as follows:

*TAP I.A.2.1	Training and Qualifications of Operating Personnel: Immediate Upgrading of Operator and Supervisor Training and Qualifications.
TAP I.A.2.6	Training and Qualifications of Operating Personnel: Long-Term Upgrading of Training and Qualifications.
*TAP I.C.1	Operating Procedures: Short-Term Accident Analysis and Procedures Revision.
*TAP I.C.7	Operating Procedures: NSSS Vendor Review of Procedures.
*TAP I.C.8	Operating Procedures: Pilot Monitoring of Selected Emergency Procedures for Near-Term Operating License Applicants.
TAP I.C.9	Operating Procedures: Long-Term Program Plans for Upgrading of Procedures.

QUESTION 1 (cont'd). --- The control room, which should be examined to identify outstanding human factors deficiencies and any instrumentation problems.

ANSWER.

This recommendation category is covered adequately in draft 3 of the TMI Action Plan. The specific Task Action Plans (TAP's) associated with this category are as follows:

*TAP I.D.1	Control Room Design: Control Room Design Reviews.
TAP I.D.2	Control Room Design: Plant Safety Parameter Display Console.
TAP I.D.4	Control Room Design: Control Room Design Standard.
TAP I.D.5	Control Room Design: Improved Control Room Instrumentation Research.
TAP V.11	Reexamine Organization and Functions of the NRC Offices.

QUESTION 1 (cont'd). --- The training program for the new operators.

ANSWER.

This recommendation category is covered adequately in draft 3 of the TMI Action Plan. The specific Task Action Plans (TAP's) associated with this category are as follows:

*TAP I.A.2.1	Training and Qualifications of Operating Personnel: Immediate Upgrading of Operator and Supervisor Training and Qualifications.
TAP I.A.2.2	Training and Qualifications of Operating Personnel: Training and Qualifications of Other Operations Personnel.
TAP I.A.2.6	Training and Qualifications of Operating Personnel: Long-Term Upgrading of Training and Qualifications.
TAP I.A.2.7	Training and Qualifications of Operating Personnel: Accreditation of Training Institutions.

QUESTION 2: What is the Commission's position with regard to the findings of the Special Inquiry Group that:

> "... the NRC's management would be wise to suspend processing of applications for construction permits and limited work authorization until it considers the various recommendations that we have made for reform of the licensing process and for increased standardization."

ANSWER.

While the small number of Construction Permits (CP) (11) and Limited Work Authorizations (LWA) (0) active applications in the review stage have not yet received significant attention with respect to TMI-related actions, they are sufficiently advanced in the review process that they would be little affected by the proposed one-step licensing and standardization reforms proposed by the Special Inquiry Group. Furthermore, no new applications are forecast to be received over the next couple of years. Although we will account for the Rogovin recommendations as to specific safety improvements before issuing any of the remaining CP's now in process, it would seem to serve no useful purpose to delay the completion of those reviews, given their late stage, to examine the proposed procedural reforms. It should be noted that the Special Inquiry Group indicated in their Errata "that LWA's should not have been included in their recommendation.

QUESTION 3. Chairman Ahearne notes on page 2 of his statement that "a significant part of the requested resources can be identified as derived from the TMI lessons learned." What part of the budget request (for each program office) is for TMI lessons learned?

ANSWER.

The resources and programs shown below reflect the planned FY 1981 effort associated with the resolution and/or implementation of TMI lessons learned and other additional effort initiated or amplified as a result of TMI based on the information available in the latter part of 1979 during the development of the FY 1981 budget as submitted to Congress. However, NRC is currently developing and reviewing a comprehensive TMI action plan based on its own recently completed investigations, including the Rogovin report, and the President's recommendations enumerated in his response to the Kemeny Commission investigation. Decisions on the Action Plan may result in adjustments to the currently planned resources and programs. For example, in the FY 1981 budget, we estimated that the impact of TMI on the Office of Nuclear Reactor Regulation based on the Lessons learned Task Forces. These resources equal 60 people. This does not take into account any of the non-lessons learned items included in the Action Plan.

Dollars in Millions

Resources	FY 1981
Nuclear Reactor Regulation	
(People)	(60)
Contractual Support a/	$ 7.9
Standards Development	
(People)	(6)
Contractual Support a/	0.6
Inspection and Enforcement	
(People)	(134)
Contractual Support a/	5.6
Nuclear Material Safety and Safeguards	
(People)	(4)
Contractual Support a/	0.3
Nuclear Regulatory Research	
(People)	(44)
Contractual Support a/	77.2
Program Technical Support	
(People)	(39)
Contractual Support a/	1.9
Program Direction and Administration	
(People)	(9)
Contractual Support a/	6.4
NRC Grand Total	
(People)	(296)
Contractual Support a/	$ 99.9

a/ Includes program support, equipment, and administrative support where appropriate.

Description of Planned Effort

Nuclear Reactor Regulation

Effort will continue to be directed toward the numerous recommendations of the various TMI investigations in the areas of: (a) additional operating reactor licensing actions (including emergency planning, instrumentation needs, environmental qualification, hydrogen monitoring and control, and radiation monitoring); (b) significant increases in the scope and depth of operator and senior operator licensing exams and related activities; (c) expanded scope of reviews for construction permits, operating licenses, and standard plant designs (including emergency planning, accident analysis, plant safety systems, accident and post-accident monitoring); (d) additional generic issues expected to be identified; (e) a number of special analyses and studies, generic in nature but are not generic issues as identified by NRR (including control room design, hydrogen behavior monitoring and control, structural response to core-degraded accidents, steam explosions, and systems function under accident and post-accident conditions); and (f) the management and coordination of the activities associated with TMI-related efforts.

Standards Development

Effort will continue on the review and revision of nuclear power plant engineering regulations and guides to assure consistent treatment of fission product release resulting from fuel clad failure and the continuation worker radiation protection efforts in the areas of respiratory protection and performance testing of personnel dosimetry/radiation survey instruments.

Inspection and Enforcement

The training and assignment of resident inspectors consistent with the expanded resident inspector program which was initiated in FY 1980 will continue. Also, the NRC Incident Response Center will be renovated and upgraded to enhance the 24 hour/seven day per week coverage. Effort will be directed at increasing radiological and environmental monitoring capability at reactors. In addition, a program has been initiated to develop and define a "nuclear data link" system which would transmit and display pertinent facility data in the NRC Operations Center.

Nuclear Material Safety and Safeguards

NMSS will continue the development of radiological contingency plans for major fuel cycle licensees, for the transportation of radioactive materials, and for radioisotopes materials licensees and will initiate development of an improved interim capability for incident response for radioisotopes materials licensees.

Nuclear Regulatory Research

The following identifies the planned RES effort:

a. Effort in Light Water Reactor safety research includes upgrading semiscale to study PWR transients; upgrading the Two Loop Test Apparatus (TLTA) to study BWR transients and small LOCA, and participating in industry valve testing program. Also, the test program in Semiscale, 3D, and Model Development will be reoriented for transient testing. The LOFT facility will be modeled to do small LOCA tests and add control room diagnostics. We will modifiy and check existing engineering codes to improve the capability to handle transients, natural circulation and small LOCA

Nuclear Regulatory Research (continued)

accidents in PWRs and BWRs, and the results will be applied to better define and understand behavior of reactors under these conditions. Also, several studies will be initiated in the areas of fission product chemistry; coolability of severely damaged cores; release and transport of fission products, hydrogen behavior in coolant and containment; and the effects of hydrogen embrittlement on primary system components.

b. Seismic, Engineering and Site Safety studies associated with benchmark testing of structual codes and conduct damage assessments of structures and pump valve operability under accident conditions.

c. Reactor Environmental Effect studies associated with in-plant measurements, physical transport, and occupational exposures of fission products, and socioeconomic studies programs.

d. Risk assessment research to develop event trees of accidents leading to severe core damage; analysis of human error rates and impact of human errors on risk.

e. Improved safety systems for coping with accidents, human interaction, and improved containment concepts.

Program Technical Support

In the Office of the Executive Legal Director, address the increased volume of petitions for regulatory actions involving licensees, revisions to regulations, Price Anderson Act matters, and emergency planning activities stemming from TMI.

In the Office for Analysis and Evaluation of Operational Data, collect, collate, and analyze operating data for use in assessing nuclear power plant operations and related safety implications. Based on these analyses, identify areas of deficiencies for which corrective actions are needed.

In the Office of State Programs, conduct reviews and tests of state emergency response plans and provide NRC concurrence (with FEMA) in these plans.

Program Direction and Administration

In the Office of Administration, maintain and enhance the reactor emergency telecommunications system, increase timesharing services for NRR, backfit licensing documents into the Document Retrieval System; and provide headquarters administrative support for the I&E Unit Inspector Program and TMI investigation groups.

In the Office of the General Counsel, review a variety of unresolved legal matters, Congressional testimony preparation, review and analysis, and the development and review of proposed nuclear legislation.

In the Office of Public Affairs, accommodate significant workload growth stemming from increased interaction with the public and the media as a result of TMI and provide better public information at the regional level.

QUESTION 4. What does the Commission regard as the three or four most significant examples of:

-- "redefined priorities"?
-- "altered existing programs"?
-- "new programs"?
-- "revised organizational structure"?

ANSWER.

The TMI accident has had a major impact on NRC, in particular on research activities and reactor operations. NRC's first order of business is to apply the TMI "lessons learned" to all operating reactors.

Some of NRC's priorities that have been redefined include:

. New emphasis on human factors and accelerated resolution of generic and specific safety issues.
. Increased presence at nuclear power plants and other selected facilities.
. New emphasis on risk assessment as a systems evaluation tool to be applied to the review of all reactors.

Existing programs have been altered in terms of direction, size and application. Some of these changes are:

. Acceleration of resolution of generic safety issues and performance of studies related to criteria for training and licensing of personnel for operation.

. Increases to the Resident Inspector Program to provide more frequent inspection of operating reactors, improvements to environmental and radiological measurement capability.

- Increases to emergency preparedness to better protect the public near all operating facilities; improvements to NRC Incident Response Center to aid communication between licensees and NRC.
- Increased emphasis on risk assessment, small break loss-of-collant accidents (LOCA) and anomalous transient events, enhanced operator capability, plant response under accident conditions, postmortem examination and plant recovery.

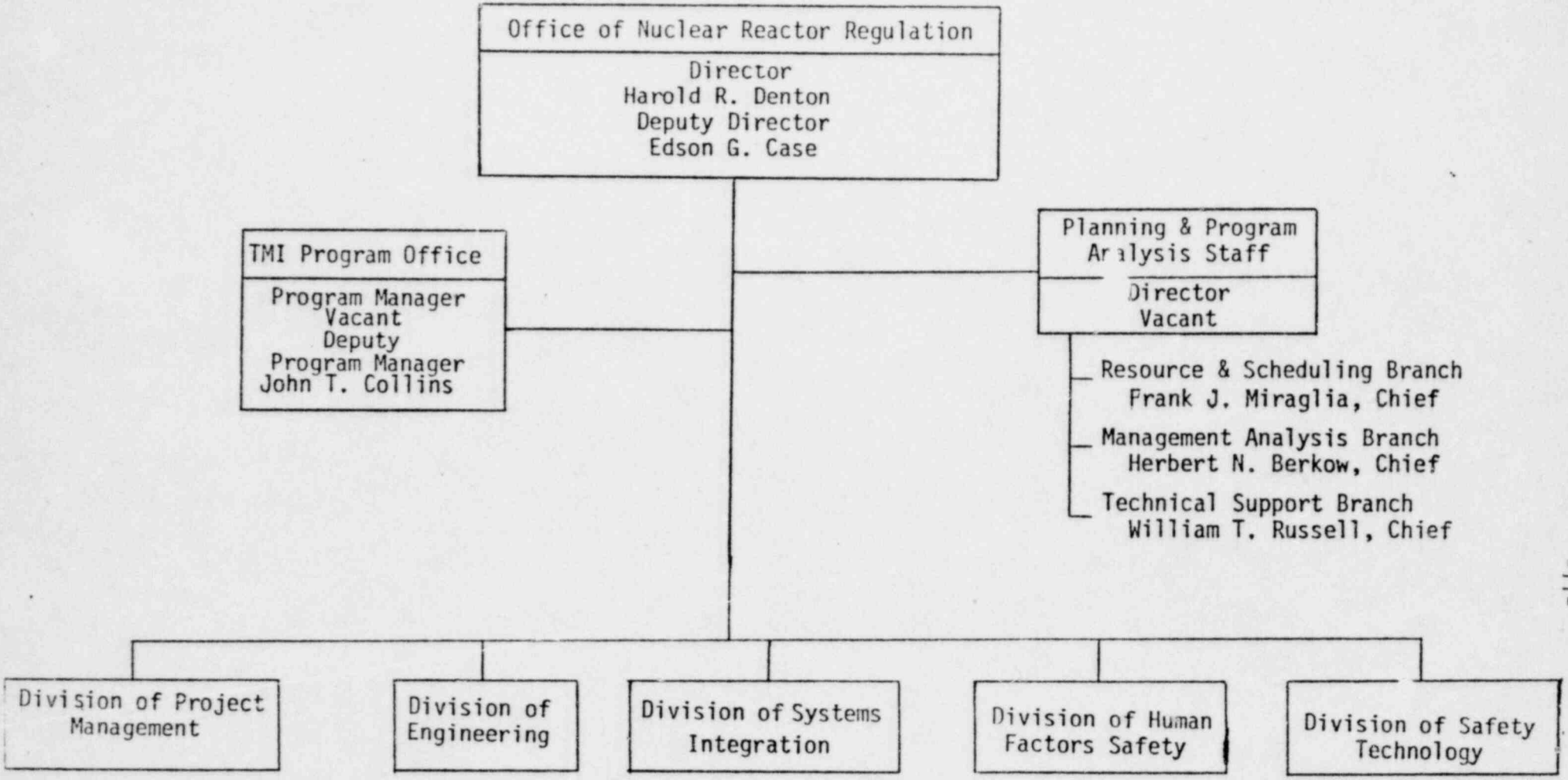
New programs resulting from the TMI accident include:

- Analysis and Evaluation of Operating Data, for which a separate office has been created.
- Collection and Analysis of Human Error Rate Data and Methodology Development Program for predicting human reliability.
- Integrated Reliability Evaluation Program
- Research on degraded cores

In addition, the Commission is developing major policy, planning, and program guidance for NRC that is based in part on lessons learned from the TMI accident. The guidance discusses major problems facing the Commission and sets forth policies, major priorities, and desired goals, objectives, and planning assumptions for major programs.

We are currently considering revisions to NRC's organization structure. NRR is in the process of reorganizing to recognize human factors aspects of safety, deal with licensing, operating problems, and generic issues by an inter-disciplinary system approach, and to assure uniformity and continuity between pre- and post-licensing phases. A chart of the NRR reorganization is enclosed with this question.

Other reorganizations being considered will be to improve inter-office communications, avoid compartmentalized attitudes, shift reactor regulatory emphasis from facility design to facility operations, and promote greater presence in the field. In addition, President Carter announced December 7, 1979 that a reorganization plan for NRC will be sent to Congress early in the next session.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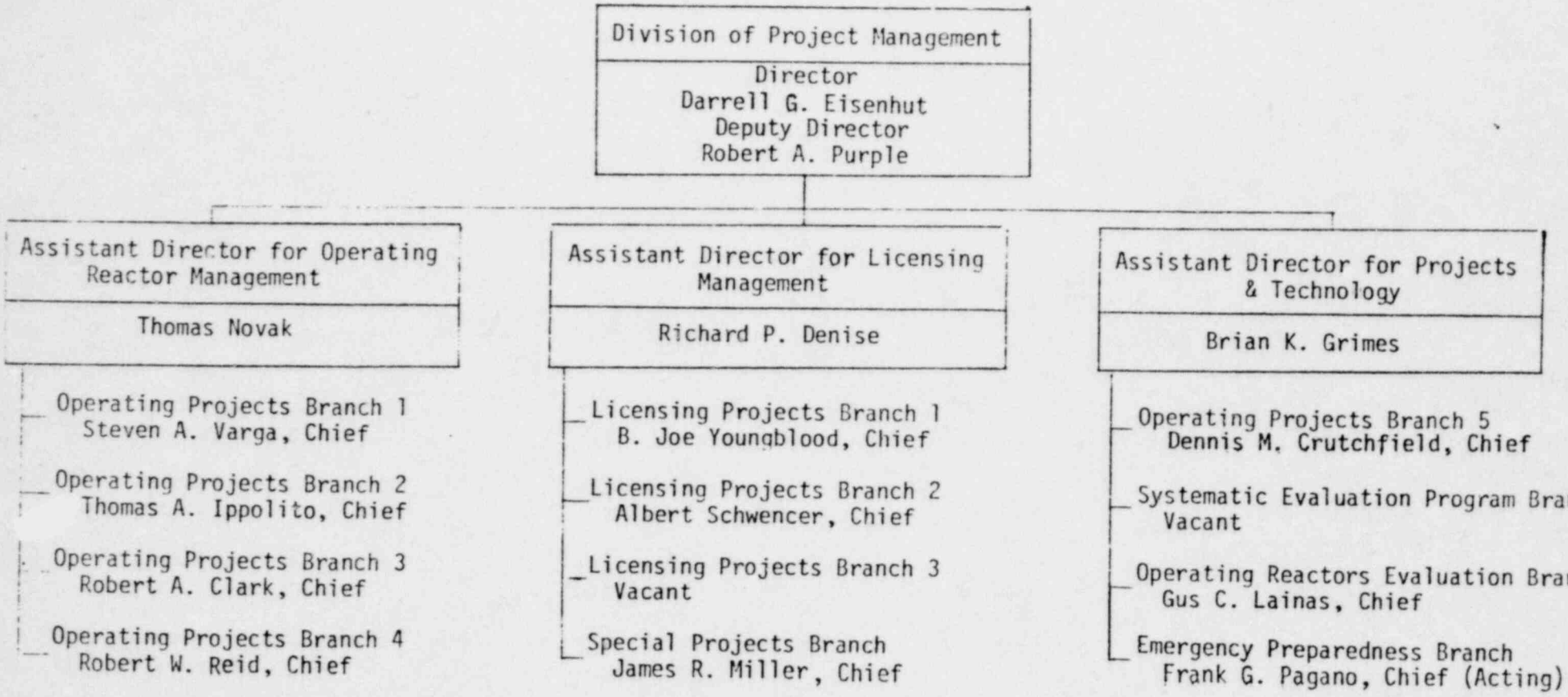
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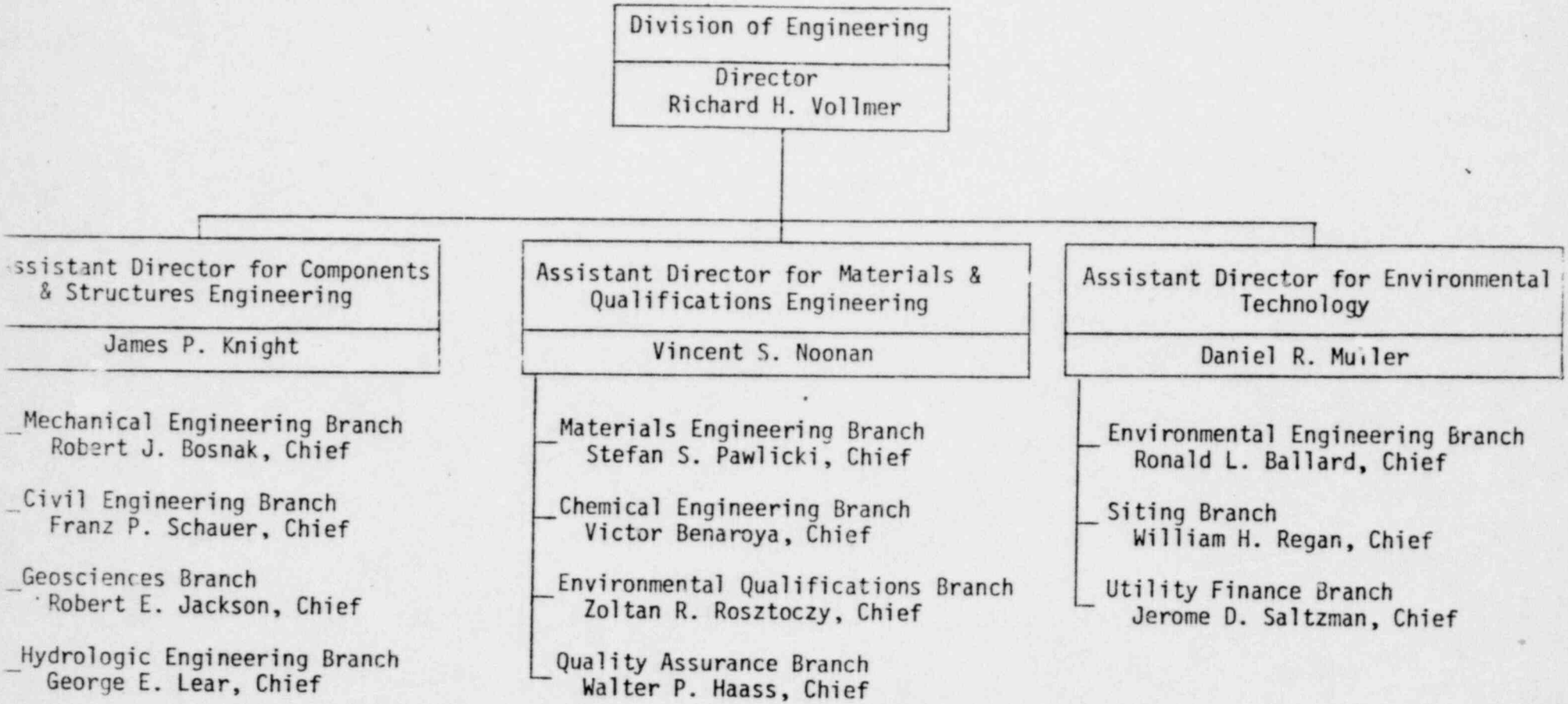
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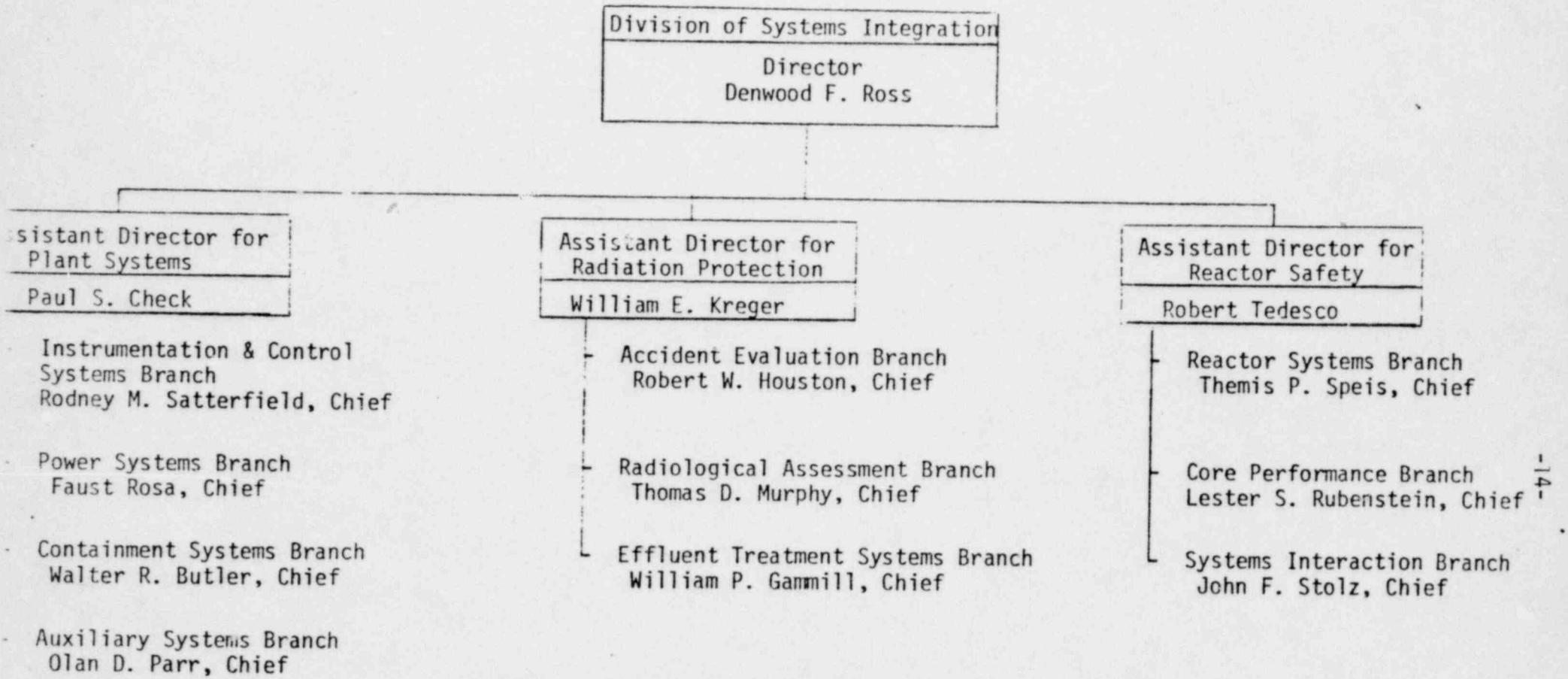
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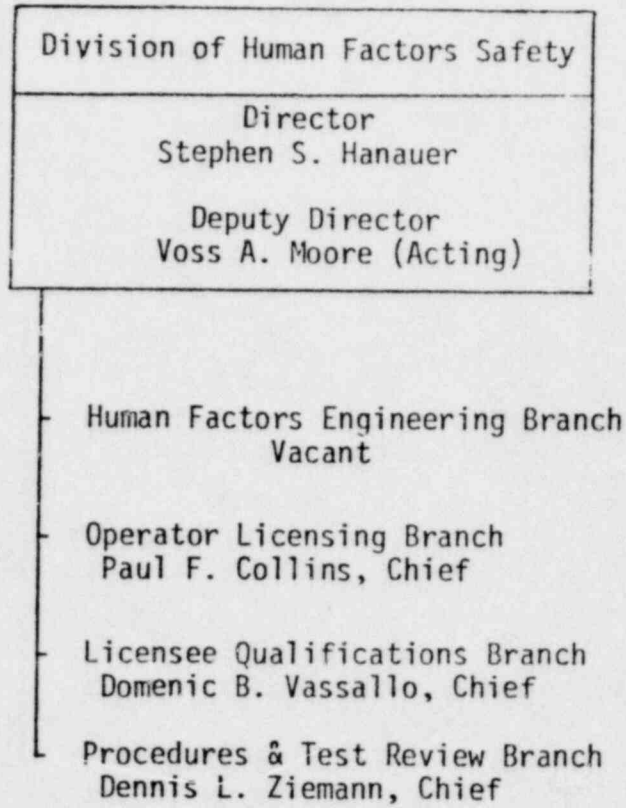
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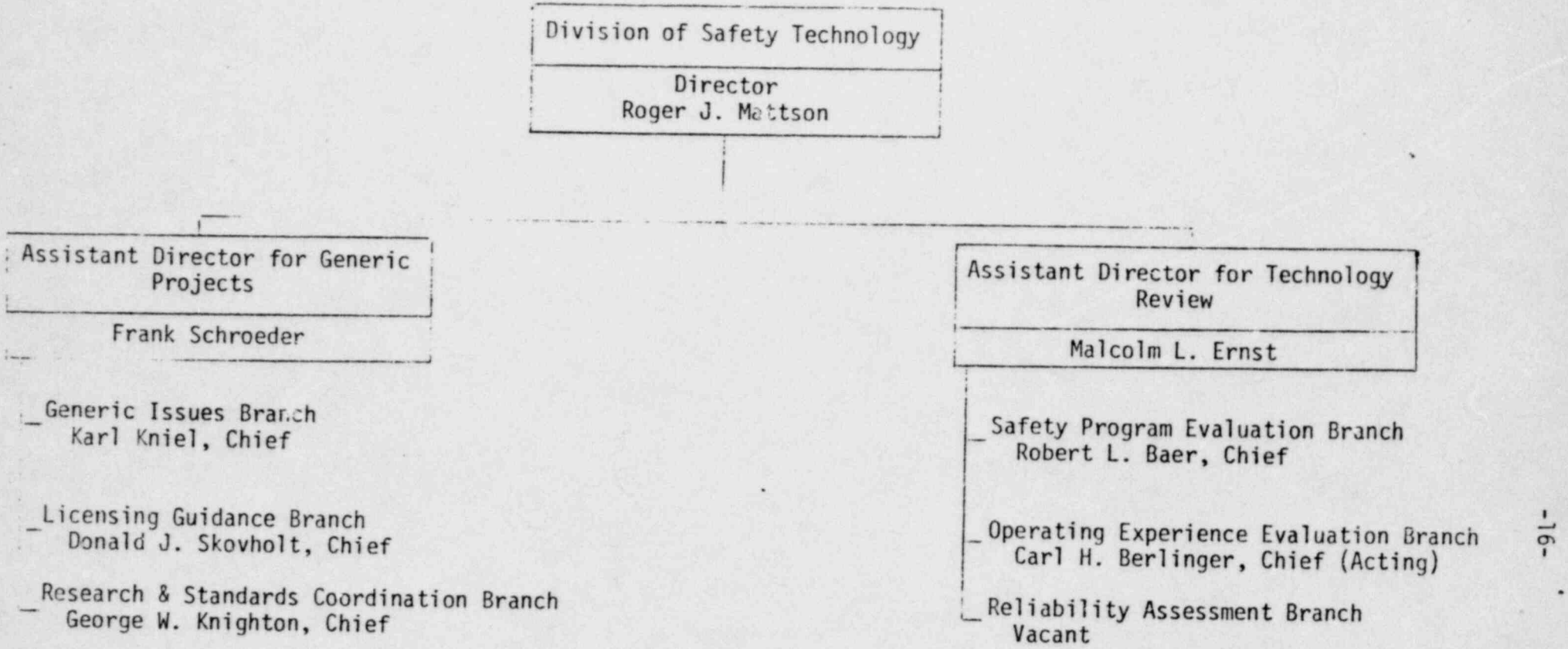
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QUESTION 5. Chairman Ahearne refers on page 7 of the Lewis Group Report; to what extent does the Commission agree with the conclusion of the Special Inquiry Group that:

> "The NRC Commissioners, seeming not to understand these conclusions (of the Lewis Group), then adopted a policy statement and press release that was read as if the Commissioners intended to discredit the entire Rasmussen effort." (Rogovin Report, page 150.)

ANSWER.

The Commission thinks that the "seeming not to understa[illegible]" clause conveys an impression that is wrong. The Commission's January 18, 1979 policy statement specifically endorsed the Lewis Panel's finding that "the fault-tree/event-tree approach coupled with an adequate data base is the best available tool to quantify these [accident] probabilities." In addition, the Commission follow-up directive to the staff (S.J. Chilk to Lee V. Gossick, January 18, 1979) -- which was not cited in the SIG report -- states,

> "Quantitative risk assessment techniques may be used to estimate the relative importance of potential nuclear power plant accident sequences or other features where sufficient similarity exists so that the comparison are not invalidated by lack of an adequate data base. Such techniques should not be used to estimate absolute values of probabilities of failure of subsystems unless an adequate data base exists, and it is possible either to quantify the uncertainties or to support a conservative analysis."

The Special Inquiry Group's impression that the policy statement tended "to discredit the entire Rasmussen effort" is unfortunate. The Commission's primary concern was that the Reactor Safety Study's numerical estimate of the overall risk of a reactor accident -- which the Commission did not regard as reliable -- would be used in the regulatory process and had been used in ways that conveyed a sense of excessive certainty to the public. It was, as the Chilk-to-Gossick memo confirms, our intention to follow the Lewis Committee's advice on affirmative uses carefully in 1979. This process was interrupted by the Three Mile Island accident.

QUESTION 6: On page 11 of Chairman Ahearne's statement he says new emergency planning guidance should consider "a spectrum of design basis and core-melt accidents." Does this include "Class 9" accidents? For purposes of emergency planning guidance, how does the Commission define "Class 9" accidents?

ANSWER:

The spectrum of design basis and core-melt accidents includes "Class 9" accidents. However, the NRC has not developed a special definition for "Class 9" accidents for the purpose of emergency planning. Rather, the agency's emergency planning policy is based on a broad variety of possible accidents, with a relatively continuous spectrum of severity and risk levels. Sharp distinction among accident severity classes is not required for emergency planning purposes.

In line with the foregoing considerations, the NRC staff has proposed abandoning the nine-year-old accident nomenclature (Classes 1 to 9), to emphasize sharp distinctions among severity and risk levels. The NRC staff has also recommended considering accident responses that would previously have been Class 9.

QUESTION 7. What is the basis for suggesting on page 21 of Chairman Ahearne's statement that the Commission may lack sufficient statutory authority to devise a means to attract the best available personnel for the regional inspection staff?

ANSWER.

The Chairman stated that the pool of regional inspectors had been reduced to a low level in order to fill resident inspector vacancies at reactor sites. We have been recruiting vigorously to fill the regional vacancies as well as those at the sites. However, the Resident Inspector Program had the first priority. At this point we still have some vacancies in regional offices. If the President's partial freeze does not impact our recruitment effort too severely, we should be able to fill the remaining vacancies within the next 2-3 months.

The "impediments" to recruitment referred to resident inspectors rather than regional inspectors. In general terms the principal impediment has been the out-of-pocket losses which inspectors have experienced when they have relocated from the regional office to the resident sites. Inspectors also anticipate that they will experience similar losses when relocating to another site or to another NRC office. In addition to the losses which have arisen because government-wide regulations do not provide full reimbursement of relocation costs, there has been the rapid rise in mortgage interest rates resulting in difficulties in selling existing homes and much higher mortgage payments for the new homes. This factor has had an immediate adverse affect on our ability to attract and retain highly qualified individuals for the Resident Inspector Program.

We are acting within existing authority to make the Resident Inspector Program more attractive. We are collecting data which will be used to develop a request to the Congress that would authorize the agency to provide relocation benefits more in line with the private sector. If approved by the Congress and signed by the President, the new authority would allow us to minimize out-of-pocket financial losses which have had a negative affect on our ability to attract and retain highly qualified inspectors in the Program.

QUESTION 8. On page 54 of Chairman Ahearne's statement reference is made to "the closing out" of regulatory research on gas-cooled reactors? What is the Commission's rationale for cutting off funding for gas cooled research?

ANSWER.

We were directed to close the program out by OMB based on a judgment that gas-cooled reactors will not be a commercially feasible technology in the near future.

QUESTION 9. Chairman Ahearne on page 64 notes that the budget request includes an increase for the Division of Contracts for the purpose of increasing "the number of competitive procurements and ensure timely close out of contracts." To what extent does the Commission believe that current practice for the letting of research contracts seriously interferes with the ability of universities to perform regulatory research for NRC? Does the Commission believe it has authority to make research grants to qualified universities? What action(s) could be taken (with or without legislation) to remedy the problems discussed by Dr. R. T. Lahey in his letter to Dr. Budnitz on February 1, 1980?

ANSWER.

The focus of the problems as identified by Dr. R. T. Lahey concerns the ability of a university to continue a research contract through completion or to validation of the program objective. The NRC's staff has met with Dr. Lahey and with staff of the House Interior Committee to discuss the issue and determine what legal or legislative constraints are involved in modifying our procedures appropriately to accommodate universities.

We are currently exploring the possibility of establishing grant programs that would allow NRC to place grants at universities where there exists good technical expertise. It is felt that the NRC currently has the authority to make research grants; however, we are still investigating the limits of our authority and the overall agency need in this area. We expect that this investigation will reveal some limitations upon NRC's grant authority. We feel that general grant authority would be beneficial to all programs of the agency.

QUESTION 10. On page 67 of Chairman Ahearne's statement, reference is made to funds ($500,000) requested by the Commission to establish an intervenor funding program for NRC proceedings. Does the Commission intend to have funding available to intervenors in all licensing, rulemaking and other proceedings conducted by NRC? What "contributions" does the Commission anticipate will be made by intervenors who would not be able to participate in NRC proceedings without a funding program?

ANSWER:

Our intent is to have the option of providing funds in different types of proceedings but not in all proceedings conducted by the agency. We anticipate that intervenors who are able to participate in our proceedings will provide the NRC with new ideas and information with a broader range of alternative considerations. Hence the NRC staff would tend to become more sensitive to the concerns of an enlarged number of constituencies in discharging its public responsibilities. Broader participation would also facilitate a more thorough airing of the issues in contention and aid to the development of a more comprehensive record. Finally, we anticipate that enlarged participation, facilitated by intervenor funding, would contribute to public information and education about the issues raised in our proceedings.

QUESTION 11. What is the status of the Agreement States Program?

ANSWER.

The Commission currently is considering three items concerning the State Agreements program. The first item is NRC's response to a final GAO report, "Radiation Control Programs Provide Limited Protection." The second item is revised criteria for assessing the radiological control program of the Agreement States. The third item concerns organizational changes within NRC that could impact the State Agreements program to the extent that the licensing offices would become more involved in the review of Agreement States licensing activities.

A decision on the first item is expected in the near future. Regarding the second item, the Commission, on March 21, 1980, approved for publication the revised criteria as a policy statement. The NRC staff deliberations on the last item will likely take several months before a recommendation is made to the Commission.

QUESTION 12.

The following statement is found in the National Academy of Sciences' Energy in Transition report:

> "High-level nuclear waste management does not present catastrophic risk potential, but its long-term low-level threat demands more sophisticated and comprehensive study and planning than it has so far received, particularly in view of the acute public sensitivity to this issue."

How do the Commission's waste management programs reflect attention to this problem?

ANSWER.

Pursuant to the Energy Reorganization Act of 1974, the Department of Energy (DOE) has the central responsibility for policy planning and management of energy research and development programs including high-level waste. The NRC's role in the high-level area is to develop appropriate criteria by which DOE's repositories will be evaluated and licensed to ensure that successful long-term waste isolation from the biosphere will be achieved. In FY 1979 NRC initiated an on-going review of the DOE's high-level waste management program to ensure that the information needed for the Commission to make licensing decisions with respect to protecting the health and safety of the public were being adequately addressed.

Such a review of DOE's technical program provides an opportunity for the NRC staff to point out those aspects which in its judgement require special attention or present special problems. For example, NRC staff recommended to DOE that the geologic repositories be a multi-barrier type system instead of placing major (if not sole) reliance for containment of radionuclides on the surrounding geology in order to provide additional assurance to the overall system and to offset uncertainties in the geology, if necessary. NRC recommended to DOE that a more aggressive waste form and packaging development and demonstration effort should be pursued by DOE in order to provide such a multi-barrier repository system.

QUESTION 14.

What disposal capacity exists for transuranic-contaminated materials and equipment from the TMI reactor when it is decommissioned or for other decommissioning and TRU waste?

ANSWER.

At present, there is no commercial disposal capacity for any commercially generated transuranic-contaminated (TRU) waste (i.e., waste contaminated to concentration levels of 10 nanocuries per gram or greater). The last commercial low-level burial site accepting TRU waste (Hanford, Washington) discontinued this practice effective February 28, 1980. NRC has requested in writing on several occasions (December 5, 1979 and December 18, 1979, being the most recent) that the DOE implement its contingency plan for acceptance of commercial TRU waste. Present data indicate the only materials containing TRU waste which will result from TMI-2 cleanup will be the damaged fuel which will be disposed of as high-level waste.

COMMITTEE ON INTERIOR AND INSULAR AFFAIRS
U.S. HOUSE OF REPRESENTATIVES
WASHINGTON, D.C. 20515

March 11, 1980

The Honorable John Ahearne
Chairman, Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Chairman:

Let me take this opportunity to thank you, the other commissioners, and the NRC office directors for participating in the Subcommittee on Energy and the Environment's hearing last Friday on the Commission's budget request for fiscal year 1981.

In order to facilitate the completion of the Interior Committee's consideration of the NRC authorizing legislation for FY 1981 (H.R. 6228), I request that the Commission provide answers to the attached questions by Monday, March 24, 1980. To the extent that a consensus response for a particular question cannot be achieved, the Committee welcomes the submission of differing views.

Sincerely,

MORRIS K. UDALL
Chairman

Attachment

3/12...To OPE For Signature of: Chm...Date Due Comm: March 18...Cpys to: Chm, Cmrs, OGC, SECY, OCA to Acknowledge, Rapifaxed to EDO...80-0478

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QUESTIONS FOR THE COMMISSION

1. What is the Commission's position with regard to the recommendation of the Special Inquiry Group that the NRC should satisfy itself that every applicant for an Operating License has evaulated:

-- The management and technical qualifications of its site crew and site management, and their familiarity with the new plant.

-- Emergency operator procedures, which should be examined thoroughly to identify whether they may be conflicting or could in some other fashion mislead the operators.

-- The control room, which should be examined to identify outstanding human factors deficiencies and any instrumentation problems.

-- The training program for the new operators.

2. What is the Commission's position with regard to the finding of the Special Inquiry Group that:

" ... the NRC's management would be wise to suspend processing of applications for construction permits and limited work authorization until it considers the various recommendations that we have made for reform of the licensing process and for increased standardization."

3. Chairman Ahearne notes on page 2 of his statement that "a significant part of the requested resources can be identified as derived from the TMI lessons learned."* What part of the budget request (for each program office) is for TMI lessons learned?

4. On page 2 of his prepared statement, Chairman Ahearne says, "We have redefined many of our priorities, altered existing programs and added new ones, and are revising our organizational structure to rectify weaknesses revealed by the TMI accident."* What does the Commission regard as the three or four most significant examples of:

-- "redefined priorities"?
-- "altered existing programs"?
-- "new programs"?
-- "revised organizational structure"?

*Page numbers used in these questions refer to the

5. Chairman Ahearne refers on page 7 to the Lewis Group Report; to what extent does the Commission agree with the conclusion of the Special Inquiry Group that:

> "The NRC Commissioners, seeming not to understand these conclusions (of the Lewis Group), then adopted a policy statement and press release that was read as if the Commissioners intended to discredit the entire Rasmussen effort." (Rogovin Report, page 150).

6. On page 11 of Chairman Ahearne's statement he says new emergency planning guidance should consider "a spectrum of design basis and core-melt accidents." Does this include Class 9 accidents? For purposes of emergency planning guidance, how does the Commission define "Class 9" accidents?

7. What is the basis for suggesting on page 21 of Chairman Ahearne's statement that the Commission may lack sufficient statutory authority to devise a means to attract the best available personnel for the regional inspection staff?

8. On page 54 of Chairman Ahearne's statement reference is made to "the closing out" of regulatory research on gas-cooled reactors? What is the Commission's rationale for cutting off funding for gas-cooled research?

9. Chairman Ahearne on page 64 notes that the budget request includes an increase for the Division of Contracts for the purpose of increasing "the number of competititve procurements and ensure timely close out of contracts." To what extent does the Commission believe that current practice for the letting of research contracts seriously interferes with the ability of universities to perform regulatory research for NRC? Does the Commission believe it has authority to make research grants to qualified universities? What action(s) could be taken (with or without legislation) to remedy the problems discussed by Dr. R. T. Lahey in his letter to Dr. Budnitz on February 1, 1980?

10. On page 67 of Chairman Ahearne's statement, reference is made to funds ($500,000) requested by the Commisssion to establish an intervenor funding program for NRC proceedings. Does the Commission intend to have funding available to intervenors in all licensing, rulemaking and other proceedings conducted by NRC? What "contributions" does the Commission anticipate will be made by intervenors who would not be able to participate in NRC proceedings without a funding program?

11. What is the status of the Commission's review of the Agreement States program?

12. The following statement is found in the National Academy of Sciences' Energy in Transition report:

> "High-level nuclear waste management does not present catastrophic risk potential, but its long-term low-level threat demands more sophisticated and comprehensive study and planning than it has so far received, particularly in view of the acute public sensitivity to this issue."

How do the Commission's waste management programs reflect attention to this problem?

13. The proposed procedures for licensing of high-level waste repositories recommend that the Department of Energy submit plans for site study to the Commission prior to site selection. Is this a recommendation, and not a requirement? If so, why?

Is the Department working with the Commission now in characterizing sites? Will the Department be submitting these plans for review?

14. What disposal capacity exists for transuranic-contaminated materials and equipment from the TMI reactor when it is decommissioned or for other decommissioning and Tru waste?