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MEMORANDUM FOR: Ben C. Rusche, Director
Office of Nuclear Reactor Regulation

FROM: Michael B. Aycock
Paul S. Check
Gordon L. Chipman, Jr.
Lawrence P. Crocker
John C. Guibert

SUBJECT: TASK FORCE RECOMMENDATIONS RELATED TO THE
DEVELOPMENT OF A PROGRAM PLAN FOR THE MANAGEMENT
OF NRR TECHNICAL ACTIVITIES

In accordance with your directive of February 22, 1977, we have prepared the enclosed report providing our recommendations for a program plan for the management of NRR technical activities. We believe the program plan described in our report sets out a basic framework of policy, organizational structure and procedures that will provide the necessary tools to effectively manage the technical activities within NRR. By copy of this memorandum, we have transmitted our report to the division directors for their consideration.

The principal input to the report was our collective experience with the difficulties involved with this management activity in the past. We readily admit that the program plan we have developed will not completely resolve all of these difficulties. However, we believe that whatever difficulties remain can be overcome by a firm management commitment to the goal of timely completion of technical projects. Such a commitment at the lower and intermediate management levels must be supported by a similar commitment at the upper management levels by providing adequate resources and by providing unambiguous guidance as to NRR priorities and task responsibilities.

We will be most happy to discuss our recommendations with you, and the division directors should you find it appropriate. We suggest that such discussions would be helpful in your deliberations.

OFFICE →					
SURNAME →					
DATE →					

Unless otherwise directed, we consider our task to be complete.

Original signed by

Michael B. Aycock
Task Force Chairman
Technical Assistant
Program Support Branch

Original signed by

Paul S. Check
Task Force Member
Chief, Core Performance Branch
Division Systems Safety

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Gordon L. Chipman, Jr.
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Lawrence P. Crocker
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Technical Assistant
Division of Project Management

Original signed by

John C. Guibert
Task Force Member
Project Manager
Division of Operating Reactors

Enclosure:
Task Force Report

cc: E. G. Case
R. Boyd
H. Denton
R. Heineman
V. Stello

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RECOMMENDATIONS RELATED TO
THE
DEVELOPMENT OF A PROGRAM
PLAN FOR THE MANAGEMENT
OF
NRR TECHNICAL ACTIVITIES

Task Force Report

Mike Aycock, Chairman
Paul Check
Gordon Chipman
Larry Crocker
John Guibert

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1.0 INTRODUCTION AND SUMMARY OF RECOMMENDATIONS

1.1 Task Force Objective

In a memorandum from Chairman Rowden to Lee V. Gossick dated October 8, 1976, the Commission asked that a number of follow-up tasks be undertaken as a result of the FY 1978 budget development effort. One task identified by the Commission was the development of "a program plan for resolution of generic issues and completion of technical projects." The Commission further stated that "this plan should include: task schedules; task priority based on impact-value assessments; and manpower requirements (with proportions of staff contract efforts explicitly identified)."

In response to this directive and in recognition of the need for improved upper level management direction and continuing attention to those technical tasks that fall outside of the normal case review process, the Director, NRR by memorandum dated February 22, 1977, (copy attached) established this task force with the objective of developing and recommending a program plan for the management of technical activities for the consideration of NRR management.

Based on these directives of the Commission and the Director, NRR, we have developed a basic framework of policy, organizational structure and procedures that we believe will provide the tools necessary to effectively manage the technical activities within NRR.

1.2 Background

The various technical and projects organizations within NRR have been involved in generic technical activities both as a part of and outside of the normal case review process for many years. The efficiency inherent in achieving technical solutions to important issues related to a number of reactor facilities through a single staff and industry effort is obvious and in many cases essential. Other technical activities directed at improving the licensing process can also be of great importance in providing added assurance of the public health and safety, improving staff efficiency, and reducing licensing uncertainties; all of which enhance public and industry confidence in the process and make us better regulators.

Several attempts have been made in the past to improve management oversight and control of technical activities. The "Technical Safety Activities Report," previously maintained by the Division of Technical Review and last issued in December, 1975, was one such attempt. This report, although it presented the status of over two hundred technical safety activities on a monthly basis, proved to have limited value as a management tool for achieving the timely completion of these activities. The lack of a well defined program for the management of all such activities made it difficult for reviewers and managers alike to understand and assign priorities and accordingly to make substantial progress on a significant number of identified issues. The result is that the number of identified issues has not been significantly reduced. The development of programs such as the Topical Report Review Program and the Technical Assignments Control System (TACS) have aided lower level managers in defining their workloads and scheduling activities within their organizational elements. However, these programs have done little to define the overall NRR priorities for completion of the assigned activities or to provide needed intradivisional and interdivisional coordination.

The reorganization of NRR in early 1976 into four separate divisions, each with technical responsibilities, has complicated efforts to move forward with the completion of specific technical activities.

The reorganization has, as we perceive its primary objective, provided needed focus on the licensing activities associated with operating reactors. However, the existence of more than one technical organization with slightly different objectives and time constraints participating in the evaluation of similar technical issues has in some instances resulted in interfacing difficulties between divisions. Without proper control, these interfacing difficulties can be a major obstacle to the efficient management of those NRR technical activities that cut across divisional lines.

Another difficulty of the past has been that technical activity coordinators and reviewers have been hampered in their attempts to move forward on their assigned technical activities because their other workloads (e.g. case workloads) do not allow them adequate time for their technical activities. The uncertainties in priorities referred to above coupled with this competition for the time of the assigned individuals have made it difficult in the past to make substantial progress in many cases.

Although we have pointed out several instances above and elsewhere in this report of past problems, we would like to make it clear that we do not feel that these problems have resulted in the neglect of activities of immediate importance to the health and safety of the public. Technical activities of this type and activities of critical importance to licensing schedules and continued reactor operation have

received appropriate management attention. Further, we believe that there is no question as to the "fire fighting" capabilities of the technical staff when circumstances demand expeditious and competent action.

1.3 Summary of Recommendations

Our recommendations for a program plan for the management of technical activities are:

1. Adopt uniform criteria for grouping technical activities into categories indicative of NRR priorities.
2. Establish a Technical Activities Review Committee to provide high level management involvement and oversight of technical activities.
3. Form groups of task managers with sufficient authority and who are dedicated full-time to technical activities.
4. Employ a "rainbow book" to improve visibility of technical activities through formalized scheduling.
5. Document the final resolution and disposition of each technical activity. This documentation should be published in a formal manner such as a NUREG document for the highest priority activities.
6. Proceed with implementation of the program in a deliberate fashion with a goal of full implementation by the end of the calendar year.

Section 2.0 describes our recommended definitions and criteria for use in placing identified activities into categories indicative of NRR priorities. Section 3.1 provides our recommendations for the composition and functions of the Technical Activities Review Committee. Section 3.2 describes our recommendations regarding the establishment of task manager groups including a discussion of the various options that we considered. Our recommendations related to scheduling and documentation are provided in Sections 3.3 and 3.4 respectively. Section 5.0 describes our suggested approach for program implementation.

We believe that implementation of the program described in this report combined with a management commitment to its success will significantly improve NRR's performance in the timely completion of technical activities.

2.0 NRR TECHNICAL ACTIVITIES

The first and possibly the most difficult matter that we considered was the definition of a technical activity and, having arrived at this, the definition of categories or subsets of these activities based on NRR priorities. The boundaries of the categories we have described below are not always precise. Placing activities into specific categories is to a large extent a matter of judgment. We believe, however, that the program described in Sections 3.0 and 4.0 will assure that the judgment made is a sound one. One of the most important benefits of categorizing technical activities is that those carrying out the activities have clear guidance as to the priority of their assigned tasks.

2.1 Definition of Technical Activity

We took, as a first premise, that NRR technical work can generally be divided into two groups, (1) that work related only to a specific license application or operating facility (i.e., docketed casework) and (2) that work performed in support of licensing activities, e.g., the resolution of generic issues, the development of improvements in the licensing process and studies that provide better staff understanding of particular technical issues. It is this second group of activities that we have termed "Technical Activities" and to which we have directed our efforts. Specifically we have chosen the following definition for technical activities:

Those technical matters of identified concern or interest to the NRR staff which relate to the safety, safeguards or environmental aspects of nuclear power plant design,

construction or operation, and which are applicable to all or a subset of plant types.

Handled generally rather than an extended licensing case -

2.2 Categories

Within the definition above we have subdivided technical activities into four categories indicative of NRR priorities. Our definitions for the four categories are provided below. In addition, as an aid to placing technical activities in these categories, we have developed a set of criteria to be used to test each identified activity for assignment to the proper category. An activity, meeting one or more of the test criteria of a given category, would be assigned to that category.

Category A:

Those technical activities judged by the staff to warrant priority attention in terms of manpower and/or funds to attain early resolution. These matters include those the resolution of which could (1) provide a significant increase in assurance of the health and safety of the public, or (2) have a significant impact upon the reactor licensing process.

Category A Tests:

1. Resolution could remedy significant deficiencies in facility design or operation.
2. Early resolution of issue could significantly improve the existing regulatory process.
3. Other activities that are judged to require high level management attention and oversight.

Category B:

Those technical activities judged by the staff to be important in assuring the continued health and safety of the public but for which early resolution is not required or for which the staff perceives a lesser safety, safeguards or environmental significance than Category A matters.

Category B Tests:

1. Issue is important to safety, safeguards or environmental protection, but of smaller scope that does not require NRR wide coordination to obtain timely resolution.
2. Resolution needed to confirm adequacy of previous staff judgements.
3. Issue has potential of becoming a Category A issue.

Category C:

Those technical activities judged by the staff to have little direct or immediate safety, safeguards or environmental significance, but which could lead to improved staff understanding of particular technical issues or refinements in the licensing process.

Category C Tests:

1. Issue is of relatively minor safety safeguards or environmental significance.
2. Activity will lead to improved staff understanding of technical matters pertinent to the staff's review activities.
3. Activity could lead to refinements in the licensing process.

Category D:

Those proposed activities judged by the staff not to warrant the expenditure of manpower or funds because little or no importance to the safety, environmental or safeguards aspects of nuclear reactors or to improving the licensing process can be attributed to the activity.

Category D Tests:

1. No safety, environmental or safeguards significance can reasonably be attributed to the activity.
2. Activity will have little or no impact on the licensing process.

3.0 ELEMENTS OF THE PROGRAM

The program described in this section contains the following essential elements of an integrated NRR approach to technical activities.

1. A Technical Activities Review Committee to focus high level management attention on Category A technical activities.
2. A Task Management Force to coordinate the resolution of Category A technical activities.
3. Mechanisms for scheduling and documenting the disposition of technical activities.

Section 4.0 provides a description of how we envision the various elements of the program would be integrated to accomplish the objective of improving NRR's performance in the timely completion of these activities.

The program we recommend focuses primary attention on Category A technical activities that (1) are of primary safety, safeguards and environmental significance, (2) require the particular attention of higher level management and (3) clearly defined procedures for resolution of the activity are most vital. We further believe the number of Category A activities will be small enough to be effectively managed in this manner. We, by no means, intend to imply by omission of an activity from the Category A subset that that activity is not important or that it does not merit management attention and expenditure of NRR

resources. Rather, we believe that Category B activities, so designated on the basis of their scope or their safety significance, do not yet require high level management involvement. Furthermore, although Category C activities may be of lesser safety significance in the light of information currently available, we believe that these activities improve the staff's understanding of technical matters in a fashion that strengthens the staff's regulatory capability and should be actively pursued as time and manpower considerations will permit. Category D activities should not be pursued by the staff.

3.1 Technical Activities Review Committee

In order to provide a vehicle through which high level management attention may be focused on the progress of NRR technical activities, we recommend that a Technical Activities Review Committee be established with the following composition:

Chairman	Deputy Director, Office of Nuclear Reactor Regulation
Participating Members	Director, Division of Project Management Director, Division of Operating Reactors Director, Division of Systems Safety Director, Division of Site Safety & Environmental Analysis
Secretary	Assigned member of Program Support Branch or Division of Project Management

We recommend that the functions of the Committee include, as a minimum, the following:

1. Assignment of priorities for technical activities by placing each activity in an appropriate category (i.e., Category A, B, C or D) based on its review of proposals from the divisions.

2. Assignment of lead responsibility to an NRR division for the resolution of each Category A and B technical activity based on review of proposals from the divisions. We suggest that such factors as the scope of impact of the activity, the technical expertise available, and the manpower available be considered in assigning responsibilities.
3. Approval of the task action plan for resolution of each Category A technical activity, as proposed by the assigned task manager.
4. Review of the progress of each Category A technical activity.

We recommend that the Committee convene on a regular basis (we suggest monthly) to (1) assign the priority of and the lead responsibility for newly-identified technical activities, (2) approve proposed action plans for previously assigned Category A technical activities, and (3) review the status, as presented by the assigned task managers, of selected Category A technical activities.

We recommend that the Committee Secretary be responsible for preparing the agenda and meeting minutes for each meeting. As such, proposals for new activities and recommendations for status review by the Committee should be made through the Secretary.

Our recommendation that the Technical Activities Review Committee be composed of such high level management representatives was based on

the significance of the functions which we have envisioned for the Committee and on our assessment of the difficulties experienced in the past. We believe that the establishment of such a committee is necessary to assure that all technical activities move forward at a pace consistent with their importance to the licensing process. We believe the actions of the Committee could provide significant improvements by (1) providing continuity and a sense of direction to our overall approach to NRR technical activities, (2) providing management attention at an early point in the development of the action plans for the highest priority activities, (3) providing balanced high level management input into the resolution effort as it progresses, and (4) establishing unambiguous assignments of lead technical responsibility, thereby minimizing interdivisional friction and duplication of manpower expenditures.

3.2 Task Management

The question of how to provide first-level management and coordination of Category A items was discussed at length by the task force. We were unanimous from the start in our convictions that (1) the principal function of the assigned task manager should be to provide aggressive, effective coordination of the elements necessary to resolve a technical activity, (2) strong task managers with sufficient authority were needed, and (3) the cumulative workload of an assigned task manager would have to be adjusted in order to assure that he would not be handicapped by the press of lower priority assignments.

We also felt that the most serious and obvious deficiency in the previous handling of generic issues or technical activities is that they have not been adequately managed; either no one was assigned a management responsibility or, a technical reviewer was assigned who was not experienced in the coordination of numerous technical inputs or, in those cases where a project manager was assigned, he was handicapped because he was not recognized by either higher-level management or by his fellow workers as the individual who was fully responsible and directly accountable for the progress and resolution of the task. In addition to this task management deficiency, in many cases the resolution of a technical activity has been impacted adversely by organizational problems which are attributable to the lack of clear-cut assignments of lead technical responsibility for either portions of or for the entirety of the task.

Opinion varied regarding prescribing the source or organization location within NRR of the task management force. Several options occurred to us; the three most likely are (1) a group in the Office of the Director of NRR, (2) the existing pools of project managers in DPM or DOR, and (3) a group of task managers in each division.

While Option 1 is highly attractive from the standpoint of endowing task managers with sufficient authority, we rejected it because we felt it (1) undercut the existing NRR organization, (2) represented bureaucratic growth which should be avoided if possible, and (3)

was probably unpalatable to division management. Nevertheless, we believe that if a workable alternative cannot be found, this option should be given serious consideration.

Option 2 is attractive because it is virtually in place and because there is no doubt that PMs would be well attuned to the licensing ramifications of each technical activity. However, we believe that full exploitation of this approach to managing high priority technical activities is dependent on development of an improved management attitude toward and support of assigned task managers. Such improvements would be necessary to remedy the identified deficiencies in the present handling of generic issues. Adoption of this option would not, in itself, resolve the difficulties associated with interfacing between the technical divisions. For instance, a task manager in DOR will surely have less clout with technical reviewers in DSS than with those within his own organization. We do, however, believe that having access to and the attention of high-level management through the Technical Activities Review Committee could alleviate this problem to a great extent.

Option 3, which we recommend, is an extension of the concept discussed under Option 2. While we are confident that Option 2 could provide the kind of task management needed to achieve our objective of active, close pursuit of the resolution of broad-scope NRR technical activities, we believe that Option 3 would provide an additional

improvement in the quality of our management of those technical activities for which licensing considerations are not paramount until the technical work is completed. In addition, adoption of Option 3 offers an added dimension in that a task management force in being within DSS and DSE, as well as within DOR and DPM, could also handle Category B and lesser technical activities as desired by management within the overall task management framework established to handle Category A matters. Coordination of the review activities of several technical groups on other than case work (topical reports, for instance) has been acknowledged as being troublesome for some time; the establishment of a task management force within DSS and DSE to coordinate the technical inputs required for the resolution of purely technical activities should improve this situation.

Regardless of which option is adopted, we believe that the required management support could best be achieved by the formation of a single, identifiable technical activity task management force. We strongly urge that each of these groups report to an official with a strong commitment to their purpose. We leave it to each division to determine precisely what form its task manager group will take. One suitable scheme would be to have these divisional task managers report to the division director through his deputy. This would work particularly well in DSS for example. On the other hand, DOR might find it best to assign all or a portion of an existing project management branch to the management of NRR technical activities. Other possibilities exist; however, any option which is adopted should have the prime objective of providing an unambiguous organizational reference for fully-credentialed task managers.

3.3 Scheduling

We recommend that the formalism of a rainbow book be adopted to provide the necessary information for controlling the progress of technical activities. We feel that the good experience this agency has had with the Blue Book and others warrants application of the methodology to another major regulatory activity.

The book should be compatible with the TACS system and should have two main parts:

(1) A listing of all technical activities, Categories A, B, C and D, with a brief description/status/schedule comment for each. Completed activities and Category D activities should show a reference document where the staff's conclusions can be found.

(2) Logic networks for Category A tasks.

We suggest that to best serve the interests of the Technical Activities Review Committee, the task managers, and the technical reviewers, the book should be issued (up-dated) monthly.

3.4 Documentation

By meeting the tests of Section 2.0, Category A activities will be of particular interest to a broad spectrum of groups and individuals within and outside of the NRC. Accordingly, we recommend that final resolution and disposition of each issue be thoroughly documented and published, preferably as a NUREG document.

Publication would be the primary reporting mechanism and, as such should be a scheduled activity.

For Category A activities, we recommend that the final report contain the following elements:

1. A statement of the technical issue or problem under study including its significance to the design, construction or operation of nuclear power plants.
2. A summary of the staff conclusions.
3. A detailed discussion of the staff evaluation.

For some Category B, and C activities it may also be appropriate to publish a NUREG report similar to that for Category A items. This decision, however, should be left to the organization responsible for resolving the issue and it should not be a scheduled activity.

For Category D activities the documentation should be sufficient to establish the staff's rationale for not pursuing the activity after it has been suggested.

Publication would be the primary reporting mechanism and, as such should be a scheduled activity.

For Category A activities, we recommend that the final report contain the following elements:

1. A statement of the technical issue or problem under study including its significance to the design, construction or operation of nuclear power plants.
2. A summary of the staff conclusions.
3. A detailed discussion of the staff evaluation.

For some Category B, and C activities it may also be appropriate to publish a NUREG report similar to that for Category A items. This decision, however, should be left to the organization responsible for resolving the issue and it should not be a scheduled activity.

For Category D activities the documentation should be sufficient to establish the staff's rationale for not pursuing the activity after it has been suggested.

4.0 THE INTEGRATED PROGRAM PLAN

In Section 3.0 we described and discussed the various elements of our recommended program. In this section we have described the way in which these elements should be integrated to form a working program. This description is of the program as we envision it after the initial hurdles of implementing it are behind us. We have chosen to describe it by tracking a "generic issue" from its birth to resolution.

4.1 Example

Many technical activities arise as a result of a need perceived by the staff to obtain an answer to a particular technical matter, to improve the licensing process or to obtain a better understanding of phenomena associated with the safety and/or performance of nuclear power plants. Activities may also originate from other sources such as operating experience, questions from the Advisory Committee on Reactor Safeguards, hearing boards, the Commissioners, congressional committees, applicants and licensees, reactor vendors, consultants, and members of the public.

We have chosen, for the purposes of an example, a hypothetical technical issue with generic implications to all of a type of reactors, PWRs for instance. We have assumed that the issue has been identified within one of the four divisions and an initial judgement has been made that although there is no immediate threat

to the health and safety of the public nor does any pending licensing action depend on its immediate resolution, the issue could have a significant impact on the reactor licensing process.

After making this initial determination regarding the urgency of action required, the identifying division should initiate a proposal for a task to address the issue. The proposal will flow up through the normal division organizational chain to the Technical Activities Review Committee through the Committee Secretary and should contain recommendations regarding the category and lead responsibility assignments.

The Technical Activities Review Committee will review the proposal at its next scheduled meeting. The review will include discussions with the proposing individuals if necessary. At that time the Committee will assign the activity to a category, assign the division with lead responsibility and give other directions to the assigned division as necessary. We have assumed in this example that the issue was assigned Category A and the lead responsibility was assigned to DSS.

Following the meeting, the Director, DSS or his representative would assign the task to a DSS task manager, who would prepare a task action plan for disposition of the issue including identification on a logic network of all of the technical branches required to

adequately address the issue and the schedule for completion. This task action plan will be proposed to the Technical Activities Review Committee at its next meeting for approval.

During the execution of the task, the task manager may propose or be requested to appear before the Technical Activities Review Committee to review the status of the project.

When the task is completed a NUREG document will be prepared by the task manager and issued as described in Section 3.4. Any necessary licensing actions resulting from the task will be incorporated into the normal licensing framework by the appropriate organizational groups.

5.0 IMPLEMENTING THE PROGRAM

We believe that most of the technical activities that will initially be assigned to Category A or Category B are already underway. In order to prevent unnecessary disruption of the ongoing activities, we recommend that program implementation proceed in a deliberate fashion.

We suggest that an objective of full implementation by the end of the current calendar year be selected. We further recommend that the following paced steps be taken to meet this objective.

1. Establish the Technical Activities Review Committee and assign an individual as Committee Secretary.
2. Establish the appropriate format and procedures for making proposals to the Committee.
3. Initiate division proposals to the Committee for Category A and Category B technical activities through the Committee Secretary. The Committee Secretary will take the necessary actions to eliminate duplication by consolidating proposals when necessary.
4. Begin to establish task management organizations.
5. Committee Secretary working with task managers and MIPC will develop rainbow book format and procedures.
6. Following study of the proposals by the members of the Technical Activities Review Committee, hold the first Committee meeting or series of meetings to approve or modify the proposals. Discussions with representatives of proposing divisions may be necessary and should be called out in the meeting agenda issued by the Committee

Secretary. In assigning lead responsibilities and establishing the task action plan, the current status and particular individuals already participating in existing activities should heavily influence the Committee's decisions.

7. Following this process for Category A and Category B activities, proposals for Category C and D activities should be forwarded by the divisions in the same manner for Committee approval.
8. As new activities are identified, proposals should be made to the Committee as described in Section 4.0.

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

FEB 22 1977



MEMORANDUM FOR: R. Boyd, Director
Division of Project Management

H. Denton, Director
Division of Site Safety and
Environmental Analysis

R. Heineman, Director
Division of Systems Safety

V. Stello, Director
Division of Operating Reactors


FROM: Ben C. Rusche, Director
Office of Nuclear Reactor Regulation

SUBJECT: TASK FORCE TO DEVELOP NRR PROGRAM PLAN FOR
MANAGEMENT OF TECHNICAL SAFETY ACTIVITIES

Per my telephone conversations with you on February 18, 1977, a NRR task force chaired by Mike Aycock will be convened tomorrow February 23, 1977 with the purpose of developing a NRR program plan for the management of technical safety activities. The task force objective will be to prepare a report proposing a program plan for management consideration by March 11, 1977. I am requesting that each of you designate an individual from your division to participate on the task force. Their participation will be full time for the first four or five days and part time after that. Mike will contact the individuals you designate to alert them of the time and place that the task force will convene.

One important input needed for this task force effort is a listing of technical activities with recommended priorities for each of your divisions. It is my understanding that you have such listings under development as was agreed at our meeting on January 13, 1977. Please provide your listings to Mike Aycock by noon Friday, February 25, 1977.

I appreciate your cooperation in this regard.


Ben C. Rusche, Director
Office of Nuclear Reactor
Regulation