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May 5, 1980

OFFICE NUMBER  
PROMULGATED RULE PR-19 (6)  
(45 FR 19564)



Mr. Samuel J. Chilk, Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Docketing and Service Branch

Dear Mr. Chilk:

The subject of this letter is Proposed Rule 10 CFR 19.14 regarding the presence of representatives of licensees and workers during inspections.

Detroit Edison does not feel that improvements in safety will result from the implementation of 10 CFR 19.14 but has no strong objections to the intent of the regulation. However, it seems that adequate channels for worker input to NRC already exist. If 10 CFR 19.14 is implemented, it should be done with the following four conditions:

1. It should be done on a trial basis and evaluated after a period of one year to determine if any worthwhile safety enhancement was achieved. If not, it should be rescinded.
2. The invitees should be present only for that portion of the meeting (or tour) in which they have a legitimate specific interest.
3. Exit interviews are frequently set up for late in the working day. This should not be changed to accommodate invitees, nor should there be any obligation to pay them overtime to attend.
4. The number of people invited to attend on each item must be limited--typical exit interviews already have 15 to 20 people because every involved staff member plus several NRC people are usually present. Extra people could be counterproductive to a good review of inspection results. This comment applies to touring the plant (limiting scope and number of people)

Acknowledged by *5/7/80 mdv*

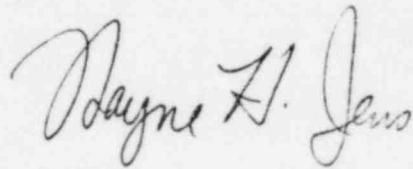
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as well as to the exit interview. The scope of the tour for the invitees should be limited to their being present to point out something specific to an NRC inspector and should not be considered a part of the process of discovery or of a separate inspection or investigation.

I hope these comments are helpful in trying to make 10 CFR Part 19 rulemaking an enhancement to safety which is cost effective in its implementation. However, I do not believe any worthwhile safety objective will be accomplished with the proposed rule.

Sincerely,

A handwritten signature in cursive script, reading "Wayne A. Jens". The signature is written in dark ink and is positioned to the right of the typed name.

ELA-WHJ/ap

VPNO-80-109