

PUBLIC SERVICE COMPANY OF OKLAHOMA

A CENTRAL AND SOUTH WEST COMPANY

P.O. BOX 201 / TULSA, OKLAHOMA 74102 / (918) 583-3611



DOCKET NUMBER
PROPOSED RULE PR-19 (7)
(45 FR 19564)

May 5, 1980



Secretary to the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Gentlemen:

The following comments are submitted for your consideration with regard to the USNRC proposed rule, "Informal Conference During Inspection, 10CFR19."

In our opinion, the proposed rule is ambiguous in some areas and we propose clarifying and narrowing language which we believe more closely reflects the intent of the NRC, which is to expedite the resolution of inspection findings.

The proposed rule states that the NRC inspector and licensee could invite, as either determine appropriate, individuals with legitimate interests in matters pertaining to the inspection. The rule should explain that employees of the licensee, contractors and NRC consultants are the types of people contemplated by the NRC as having specific and legitimate interests in an NRC inspection.

More appropriate wording to protect the licensee from outside persons would perhaps be "The NRC inspector shall have the options of inviting appropriate, bonafide representatives of employees at the licensee's facility (these shall be employed at the facility and may be employees of the utility or the contractors) or appropriate consultants under contract to the NRC with legitimate interests in matters pertaining to the inspection. The licensee may invite any representatives of organizations or individuals with legitimate interests in matters pertaining to inspection."

We feel the NRC should clarify whether the invitees of the inspection are to go on the walk-through inspection or only participate in the meetings regarding inspection. Confusion arises from existing rule, Section 19.14 (f) which allows a licensee's consultant or a worker's representative to accompany NRC inspectors on their tour of the plant. We recommend the final rule be specific in identifying the appropriate scope of participation by the invitees of the inspection.

The present rule Section 19.4(a) states that "Each licensee shall afford the Commission... opportunity to inspect materials, activities, facilities, premises and records pursuant to the regulations in this chapter"...

Acknowledged by card 5/9/80 mdu

CENTRAL AND SOUTH WEST SYSTEM

Central Power and Light
Corpus Christi, Texas

Public Service Company of Oklahoma
Tulsa, Oklahoma

Southwestern Electric Power
Shreveport, Louisiana

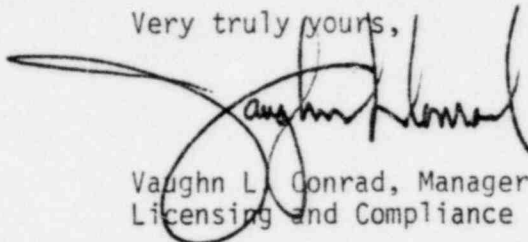
West Texas Utilities
Arlene, Texas

8005220760

We request that the proposed rule clarify the scope of the NRC's invitees access to the premise, licensee's records, etc. Under proposed rule Section 19.4(h) the use of the word "informal" should be deleted so as to accomplish the intent of the rule.

We appreciate this opportunity to comment on the proposed rule.

Very truly yours,

A handwritten signature in black ink, appearing to read "Vaughn L. Conrad". The signature is written in a cursive style with a long horizontal stroke extending to the left.

Vaughn L. Conrad, Manager
Licensing and Compliance

VLC/MSG/dah