

TRTR

National Organization of Test,
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September 7, 1989

The Honorable Kenneth M. Carr, Chairman
US Nuclear Regulatory Commission
Washington, DC 20555

Dear Honorable Chairman Carr:

In your August 2, 1989 letter, you anticipated action regarding reorganization of NRC staff responsible for non-power reactor regulation at approximately this date. As the Commission considers this issue, we wish to reiterate the TRTR organization's concern that there be a single individual designated who has the responsibility, authority, and accountability for all regulatory activity related to non-power reactors. We believe this can only be effectively accomplished by consolidating all activities involving non-power reactors in a single group. Significant improvement in dialogue and responsiveness has developed in recent years, but the process continues to suffer from the lack of a focal point within the NRC Staff. We again assure you that our intent is to meet our charter of conducting the nation's research and educational programs in the most effective and efficient manner with the utmost attention to the safe operation of our facilities and to the protection of the health and safety of the general public.

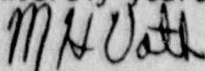
The second reason for this letter is a request to correct a specific problem characteristic of the above concern. In 1987, Part 55 was amended to require reactor operator requalification exams to be administered by NRC personnel during each six-year cycle. Despite assurances by Staff personnel that the amendment was intended for power reactors, the final rule was issued so as to include non-power reactors. There are numerous sound reasons why this is unnecessary and undesirable for non-power reactors. To date, no one has taken responsibility for what is generally agreed to be an oversight. More importantly, the situation has not been corrected. In reviewing the matter, Mr. Victor Stello assured us in his April 11, 1988 letter that implementation would be deferred to the end of the six-year cycle such that there would be no impact before early 1991. In subsequent discussions he committed to take action to exempt non-power reactors from the rule. Since his departure, it appears that this commitment will not be honored without high-level intervention. TRTR does not have access to a study initiated by the Staff which supports our position. We understand that a generic evaluation of facilities 2 megawatts and smaller and a specific evaluation of each non-power reactor above 2 megawatts shows that the consequences of the most severe scenarios do not support the need for the rule in question. Since we do not have access to this study, and do not care to dwell on the manner the issue has been handled in the past, we believe it best be executed within the Commission. We therefore request that you initiate the necessary action for

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prompt reconsideration of the regulation in question as it applies to all non-power reactors.

As always, we stand ready to meet with you and your staff and provide additional information which you may request. We are most appreciative of your assistance in designating a single focal point for non-power reactor regulatory matters and in revisiting commitments to correct the requalification requirements.

Sincerely yours,



Marcus H. Voth
Chairman, TRTR

MHV/jlw