



OFFICE OF THE
SECRETARY

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

January 18, 1979

MEMORANDUM FOR: Lee V. Gossick
Executive Director for Operations

FROM: Samuel J. Chilk, Secretary *[Signature]*

SUBJECT: COST-BENEFIT, VALUE-IMPACT AND OTHER SIMILAR
ANALYTICAL METHODS IN REGULATION

See
note
below

The Commission requests the staff to conduct a detailed review of Professor Baram's study, "Cost-Benefit Analysis in Energy Decision-Making of the Nuclear Regulatory Commission." As part of an earlier NRC review of the recommendations in Professor Baram's study, the Commission decided to request staff to review, with an eye toward making available for public comment, the "Value-Impact Guidelines" adopted by the Commission in January 1978. The purpose of such a statement is to provide for public review NRC's perspective in its cost-benefit approach (e.g., method for evaluating regulatory impacts, discounting future costs, etc.) as well as the manner and extent of public participation in the process. Accordingly, the Commission also requests the staff to prepare a draft Federal Register notice for Commission approval which would solicit public comment on the "Value-Impact Guidelines" and to review any office level guidelines which were prepared to implement the Commission's guidelines to determine if they should also be made available for public comment as part of this process. (SECY SUSPENSE: March 15, 1979)

cc: Chairman Hendrie
Commissioner Gilinsky
Commissioner Kennedy
Commissioner Bradford
Commissioner Ahearne
Director, Policy Evaluation
Acting General Counsel

8007140/30

NOTE

MPA and ELD comments on Baram Report were sent to Commission in March 1979. NRR comments were sent to each Commissioner in May 1979.

Enclosure A (Item 3)

ENCLOSURE B
DRAFT FRN

Draft Federal Register Notice

U. S. NUCLEAR REGULATORY COMMISSION

REVIEW OF COMMISSION'S VALUE-IMPACT GUIDELINES

Significant proposed Commission regulatory actions (such as development of new, or modifications to existing, regulations) are subjected to value-impact analysis. Such analysis attempts to illuminate both the merits and the undersirable ramifications of these proposed actions. The term value-impact appeared in a memo dated 4/15/76 from Chairman Anders to Mr. Gossick suggesting the need to improve upon NRC's evaluation of proposed regulations. For the sake of convenience the reader may equate value-impact with benefit-cost or cost-effectiveness analysis. However, the reader is warned that this view is not universally held by NRC staff. A summary of the agency-wide Value-Impact Guidelines, which were adopted by the Commission in January, 1978 is provided below. The Commission believes that it would now be useful to review comprehensively the guidelines. In keeping with the NRC's efforts to increase public participation in the regulatory process, and in order to provide for public review of NRC's perspective on the benefit-cost portion of its regulatory analysis, the Commission is requesting public comments on the guidelines.

In addition to comments on the guidelines' clarity, perceived usefulness, and discussion of analytical techniques, the Commission would appreciate receiving comments on whether the role of cost impacts could or should be broadened beyond that stated or implied by the Guidelines. It is anticipated that the guidelines will be modified after their review has been completed.

Several NRC offices have developed their own office-specific implementing guidelines. The public is welcome to comment on office-specific guidelines as well.

The agency-wide guidelines are available for review at any of the Commission's Public Document Rooms (PDRs) listed below. Office-specific guidelines, previous Commission comments, and recent staff comments have also been placed in the PDRs.

Copies of each of these documents or further information may be obtained by contacting John A. Sullivan, Office of Management and Program Analysis, U. S. Nuclear Regulatory Commission, Washington, D.C. 20555 (phone 301-492-7721).

Written comments should be submitted to the Secretary of the Commission, U. S. Nuclear Regulatory Commission, Washington, D.C. 20555, ATTENTION: Docketing and Services Branch. Comments must be received by the 120th day after publication. Copies of comments received from the public may be examined at the Commission's Public Document Room at 1717 H Street, N.W., Washington, D.C.

Summary of the Nuclear Regulatory
Commission's Agency-wide Value-Impact Guidelines

(The following is extracted from the guidelines that
have been in effect at the NRC)

Regulatory Perspective

The policy of the Nuclear Regulatory Commission is that value-impact* analyses be conducted for any proposed regulatory actions that might impose a significant burden on the public (where the term public is defined in its broadest sense). Such policy is not to be construed to mean that cost considerations take precedence over considerations of health, safety, environment,

*In order to provide uniformity and to avoid misunderstanding these analyses should be referred to as "value-impact" rather than "impact-value" or "value/impact."

or national security. These factors remain paramount. However, where there are alternative means of realizing equivalent benefits in regulatory matters, cost should be a prime consideration.

It is recognized that only rarely will all considerations in a regulatory matter be amenable to quantification. Regulatory decisions will in the final analysis remain a matter of judgment. However, value-impact analyses, by focusing on the narrower issue of public benefit and burden, can help to make more informed judgment possible. Elimination of unnecessary costs associated with a regulatory action provides resources to achieve desired levels of other societal goals. It is not intended that the value-impact analyses replace the normal pro/con discussions usually contained in staff papers. Such analyses should be complementary to the more inclusive pro/con discussion which may address more subjective items such as procedural and organizational alternatives, or public perception of the issues.

Value-impact analysis is appropriate for unique or generic licensing actions and other non-routine, non-recurring regulatory actions requiring Commission decision.* Value-impact analysis is also appropriate for proposals which are reviewed by the Regulatory Requirements Committee and during the preparation of Branch Technical Positions and new or revised regulatory guides. Value-impact analyses will not routinely be required for specific licensing actions, such as the issuance of facility, material and export-import licenses, license amendments, and enforcement actions.

* See Appendix I for more extensive discussion including examples of previous staff work for which value-impact analysis would have been appropriate.

Some NRC evaluations such as generic environmental impacts statements already contain elements in common with value-impact analyses.* In instances where value-impact analyses have been integrated with such non-routine appraisals, a separate section (called a value-impact statement) which briefly summarizes the elements of the value-impact analyses should be included when the document is forwarded to the Commission.

All Commission papers classified as either "Commission Actions Items", "Policy Session Items", or "Consent Calendar Items" should be accompanied by a value-impact statement or an explanation of the reasons for not including a statement. Such reasons might be that the action is non-regulatory (e.g., paper recommends that the Chairman sign a letter to a Congressman) or that the regulatory actions recommended is "routine" or recurring in nature (e.g., approval of an export license for low-enriched uranium).

In instances where it has been concluded that the public would not be significantly affected, a declaration of negative findings is appropriate, i.e., "Analysis indicates inconsequential impact associated with recommendation." A brief statement of the elements evaluated should accompany a negative declaration. In some instances the following statement may be appropriate, "Alternatives to the staff recommendation have may been precluded (or limited) by statute (or previous Commission action)."

* These guidelines would not require additional documentation to that staff now provide where the latter contain the essential elements of value-impact evaluations listed on pp. 5 & 6. Thus no new format would be necessary for the analyses (unless required by office-specific guidelines. However, when feasible, value-impact statements should follow the format used in the illustrative value-impact statement presented at the end of this summary section.

As a general rule, the depth or extensiveness of a value-impact analysis should depend on the magnitude of the expected costs and benefits associated with the proposed action, except where anticipated public interest alone would dictate a more complete statement. In any event, though there may be extensive background or supporting analysis, the value-impact statement itself should be kept as brief as possible.

Elements of Value-Impact Analysis

Value and impact analysis as commonly interpreted at the Nuclear Regulatory Commission is essentially a technique equivalent to benefit and cost analysis, or cost and effectiveness.* The term value-impact was introduced at NRC to dispel certain connotations associated with other terms. Benefit-cost analysis, in particular, is sometimes misperceived as a process of reducing all factors to a common dollar form.**

In these guidelines impacts are negative consequences (e.g., environmental damage or increased economic costs) and values are positive or beneficial (e.g., reductions in radiation doses to the public.) Ideally, elements of value and impact evaluations would include:

- . A statement of the objectives of the recommended action.
- . A description of the setting and background of the problem including analytical assumptions, and specification of the relationships between alternatives and the objective.***

* See Appendix II which discusses benefit-cost and cost-effectiveness analyses.

** When, in fact, factors expressed in physical units can be quite acceptable in some benefit-cost analyses.

*** This element is sometimes called the scenerio or the model.

- . Description, identification, and definition of alternatives (which should include the status quo or current system).
- . Estimates of the incremental (or marginal, or differential) benefits (or levels of effectiveness), and associated costs, (including side effects) of the various alternatives when compared with the base case or status quo.
- . Identification of criteria for assessing or ranking of alternatives.

The heart of value-impact analysis is the evaluation of alternatives and these should be described and defined in the statement. Ideally, alternatives would be defined as different actions with the identical or similar consequences, benefits or costs. A possible exception is the base or reference case (e.g., the status quo, the option of taking no action, or continuing with current practices). The implications of taking no action should be evaluated even in those instances where the option would not completely satisfy the same objectives as would the alternative recommended by NRC staff.

Both basic elements and special topics are addressed at length in the body of the guidelines.* Although pro-forma, sketchy treatment of alternatives should be avoided, it is unlikely that many value-impact analyses conducted at NRC will necessitate such lengthy discussion of each of the elements. Nevertheless, the material may prove to be useful on a selective basis to NRC analysts, Appendix III contains examples of the possible scope and content of value-impact analyses and evaluations.

* These guidelines are intended to provide general instructions. Each NRC office should develop its own specific guidelines (e.g., emphasizing format) which are adapted to the particular issues analyzed by the office.

Ar. Illustrative Value-Impact Statement (Inerting of Containment)

A. Objective

It is predicted that inerting of containments of selected reactors will reduce the probability of a hydrogen explosion immediately following a Loss-of-Coolant-Accident (LOCA)

B. Background and Setting

In some small containments (for a few boiling water reactors) the combustible gas control system would not be able to accommodate the large concentration of hydrogen associated with the metal-water reaction immediately following a LOCA. Five reactors would be required to inert if staff recommendations are approved.

Major assumptions are:

1. Agency policy is continue with the current technical approach, a passive containment concept.
2. Reduced containment inspection will not result in failure to diagnose a reduction in containment integrity.

C. Alternatives

1. Retain Status Quo
2. Inerting
3. Purging
4. Recombiners

D. Value-Impact Evaluation

Value and impact estimates are provided in the accompanying table. For example, the incremental value of alternatives 2 and 3 is that each would

prevent a radioactive dose release of 595 rem in the event of a post-LOCA hydrogen explosion.

Note that the costs shown are per plant. Total plant costs estimated to be: Alternative 2, \$62,500 to \$3,260,000; Alternative 3, \$7,000,000 equipment cost plus \$620,000 annual operating cost. Incremental costs associated with increased demand for and transportation cost of nitrogen, used in inerting, are estimated to be minimal.

E. Criteria

Select lowest cost alternative which reduces probability of a hydrogen explosion. See discussion in Text of guidelines - pp. 14 and 15 - regarding additional analysis which might be accomplished on the inerting issue.

CONTROL OF HYDROGEN FROM M-W REACTION IMMEDIATELY (2 min.) AFTER LOCA

(FOR THE ESTIMATED 5 PLANTS THAT WILL STILL BE REQUIRED TO INERT

<u>Alternative</u>	<u>Potential Radiation Dose</u>	<u>Cost of Implementing</u>	<u>Developmental Work</u>	<u>Comments</u>
Inerting	0	\$12,500 to \$507,000	None	Appeal Board Decision Against Inerting Vermont Yankee
Purging	0	\$1,400,000 capital cost \$120,000 annual operating cost (Does not account for loss in production time associated with maintenance of these systems)	Very Little	Will have to purge immediately after LOCA with maximum radiation in containment. Must therefore have filtering system capability of 150,000 cfm. Represents a radical departure from the passive containment concept that is presently required by NRC.
Recombiners	595 rem*	\$200,000 per 100 cfm unit	None for present units. However, a major effort would be required to develop a system to handle 150,000 cfm.	Recombiner must operate immediately after accident and must handle 150,000 cfm. This would require about 1,500 currently available units or undertaking a major developmental program that may or may not succeed in producing 150,000 cfm units in a reasonable time period. The calculated dose assumes loss of containment integrity because of inability of currently available units to handle large amounts of hydrogen rapidly. This is the same release as if the plant had not been inerted.

* Assumes no fuel failure, however, transient occurred before LOCA and resulting iodine spike is at Technical Specification limit of 4 uCi/gm I-131 equivalent.

This concludes the summary of the Guidelines. The Guidelines themselves, as well as related materials, can be reviewed at the locations listed below:

ROSTER OF ALL LOCAL PUBLIC DOCUMENT ROOMS BY STATE

ALABAMA

1. Mrs. Maude S. Miller
Athens Public Library
South and Forrest
Athens, Alabama 35611

(205) 232-1233
2. Mr. Wayne Love
G. S. Houston Memorial Library
212 W. Verdeshaw Street
Dothan, Alabama 36301

(205) 792-3164
3. Mrs. Joanne Wyatt
Clanton Public Library
100 First Street
Clanton, Alabama 35045

(205) 755-1768
4. Mrs. Peggy McCutchen
Scottsboro Public Library
1002 South Broad Street
Scottsboro, Alabama 35768

(205) 574-4335

ARIZONA

1. Mrs. Mary Carlson
Phoenix Public Library
Science and Industry Section
12 East McDowell Road
Phoenix, Arizona 85004

(602) 262-6534

ARKANSAS

1. Mr. Vaughn
Arkansas Tech College
Russellville, Arkansas 72801

(501) 968-0304

CALIFORNIA

1. Mr. C. Combs
Kern County Library
1315 Truxtun Avenue
Bakersfield, California 93301

(805) 861-2130
2. Mrs. Alice Rosenberger
Palo Verde Valley District Library
125 West Chanslorway
Blythe, California 92255

(714) 922-5371
3. Mrs. Eileen Danforth
Mission Viejo Branch Library
24851 Chrisanta Drive
Mission Viejo, California 92676

(714) 830-7100
4. Mrs. Patricia Clark
San Luis Obispo County Free
Library
888 Morro Street
San Luis Obispo, California 93406

(805) 543-6076
5. Mrs. Judy Klapprott
Humboldt County Library
636 F Street
Eureka, California 95501

(707) 445-7513
6. Mrs. Dorothy Harvey
Business & Municipal Department
Sacramento City-County Library
828 I Street
Sacramento, California 95814

(916) 449-5204

CALIFORNIA, Cont'd.

7. Mr. Andrew LaMance
Stanislaus County Free Library
1500 I Street
Modesto, California 95345

(209) 526-6821 or 6823
8. Mr. William B. Rohan
San Diego County Law Library
1105 Front Street
San Diego, California 92101

(714) 236-2231
9. Nuclear Regulatory Commission,
Region V
Office of Inspection and
Enforcement
Suite 202, 1990 N. California Blvd.
Walnut Creek, California 94596

(415) 486-3141

COLORADO

1. Miss Ester Fromm
Greeley Public Library
City Complex Building
Greeley, Colorado 80631

(303) 353-6123 X-271
2. Mrs. Elizabeth Morrisett
Acquisitions Department
Auraria Library, University of
Colorado at Denver
Lawrence and 11th
Denver, Colorado 80204

(303) 629-2623

CONNECTICUT

1. Mrs. Liskov
Waterford Public Library
Rope Ferry Road
Rout 156
Waterford, Connecticut 06385

(203) 442-8551

CONNECTICUT, Cont'd.

2. Mr. Stewart Porter, Director
Russell Library
119 Broad Street
Middletown, Connecticut 06457

(203) 347-2528

DELAWARE

1. Mrs. Yvonne Puffer
Newark Free Library
750 East Delaware Avenue
Newark, Delaware 19711

(302) 731-7550

FLORIDA

1. Ms. Sally Litton
Jacksonville Public Library
122 North Ocean Street
Jacksonville, Florida 32204

(904) 633-3926
2. Mrs. R. Scott
Indian River Community
College Library
3209 Virginia Avenue
Ft. Pierce, Florida 33450

(305) 464-2000
3. Mrs. Rene' Daily
Environmental and Urban Affairs
Library
Florida International University
Miami, Florida 33199

(305) 552-2414
4. Mrs. Bona'll
Crystal River Public Library
668 N. W. First
Crystal River, Florida 32639

(904) 795-3716

GEORGIA

1. Mrs. J. W. Borom
Burke County Library
4th Street
Waynesboro, Georgia 30830

(404) 554-3277
2. Ms. Annette Osborne
Appling County Public Library
103 City Hall Drive
Baxley, Georgia 31513

(912) 367-3145

ILLINOIS

1. Mr. Ed Anderson
Illinois Valley Community College
Rural Route #1
Oglesby, Illinois 16348

(815) 224-6011
2. Mrs. Pam Wilson
Morris Public Library
604 Liberty Street
Morris, Illinois 60451

(815) 942-6880
3. Mrs. Marie Hoschied
Moline Public Library
504 - 17th Street
Moline, Illinois 61265

(309) 762-6883
4. Jo Ann Ellingson
Zion-Benton Public Library
2600 Emmaus Avenue
Zion, Illinois 60099

(312) 872-4680
5. Mrs. M. Evans
Vespasian Warner Public Library
120 West Johnson Street
Clinton, Illinois 61727

(217) 935-5174

ILLINOIS, Cont'd.

6. Mrs. Penny O'Roarke
Byron Public Library
Third and Washington Streets
Byron, Illinois 61010

(815) 234-5107
7. Mr. Thomas Carter
Wilmington Township Public
Library
201 S. Kankakee Street
Wilmington, Illinois 60481

(815) 476-6719
8. Savanna Township Public Library
326 Third Street
Savanna, Illinois 61074

(815) 273-3714

INDIANA

1. Mr. David Palmer
West Chester Township
Public Library
125 South Second Street
Chesterton, Indiana 46304

(219) 926-7696
2. Mr. Don C. Johnson
Madison-Jefferson County
Public Library
420 West Main Street
Madison, Indiana 47250

(813) 265-2745

IOWA

1. Miss Kay Burke
Reference Service
Cedar Rapids Public Library
428 Third Avenue, S.E.
Cedar Rapids, Iowa 52401

(319) 398-5123

KANSAS

1. Mr. Jack Scott
Coffey County Courthouse
Burlington, Kansas 66839

(316) 364-2191

LOUISIANA

1. Business and Science Division
New Orleans Public Library
219 Loyola Avenue
New Orleans, Louisiana 70140

(504) 586-4917
2. Mr. Ken Owen
University of New Orleans Library
Louisiana Collection, Lakefront
New Orleans, Louisiana 70122

(504) 283-0353
3. Miss Janie Videtto
Audubon Library
West Feliciana Branch
Ferdinand Street
St. Francisville, Louisiana 70775

(504) 635-3364
4. Mr. Jimmie Hoover
Government Documents Department
Louisiana State University
Baton Rouge, Louisiana 70803

(504) 388-2570

MAINE

1. Mrs. Barbara Shelton
Wiscasset Public Library
High Street
Wiscasset, Maine 04578

(207) 882-7161

MARYLAND

1. Mrs. Elizabeth Hart
Charles County Library
Garrett and Charles Streets
LaPlata, Maryland 20646

(301) 934-9001
2. Mrs. Marie Barrett
Calvert County Library
Prince Frederick, Maryland 20678

(301) 535-0291
3. Ms. Pamela R. Schott
Harford Community College
401 Thomas Run Road
Bel Air, Maryland 21014

(301) 838-1000 x-268

MASSACHUSETTS

1. Mrs. Margaret Howland
Greenfield Community College
1 College Drive
Greenfield, Massachusetts 01301

(413) 774-3131
2. Mr. Mark Titus
Plymouth Public Library
North Street
Plymouth, Massachusetts 02360

(617) 746-1927
3. The Carnegie Library
Avenue A
Turner Falls, Massachusetts 01377

(413) 863-4484

MICHIGAN

1. Mrs. Diana Shamp
Kalamazoo Public Library
315 South Rose Street
Reference Department
Kalamazoo, Michigan 49006

(616) 342-9837
2. Mrs. Katherine Thomson
St. Clair County Library
210 McMorran Blvd.
Port Huron, Michigan 48060

(313) 987-7323
3. Mrs. M. B. Wallick
Charlevoix Public Library
107 Clinton Street
Charlevoix, Michigan 49720

(616) 547-2651
4. Mrs. Joan Somerville
Grace Dow Memorial Library
1710 W. St. Andrews Road
Midland, Michigan 48640

(517) 835-7151
5. Ms. Ann Stobbe
Maude Preston Planeske
Memorial Library
500 Market Street
St. Joseph, Michigan 49085

(616) 983-7167
6. Mrs. Marcia Learned
Monroe County Library System
Reference Department
3700 South Custer Road
Monroe, Michigan 48101

(313) 241-5277

MINNESOTA

1. Mrs. Copeland
Environmental Conservation Librarian
Minneapolis Public Library
300 Nicollet Mall
Minneapolis, Minnesota 55401

(612) 382-6609

MISSISSIPPI

1. Mrs. Stella Jennings
Clairborne County Chancery Clerk
Clairborne County Courthouse
Port Gibson, Mississippi 39150

(601) 437-4992
2. Mr. William McMullin
Corinth Public Library
1023 Fillmore Street
Corinth, Mississippi 38834

(601) 287-2441

NEBRASKA

1. Mrs. Leona Hansen
Blair Public Library
1665 Lincoln Street
Blair, Nebraska 68008

(402) 426-3617
2. Mrs. Loy Mowery
Auburn Public Library
118 - 15th Street
Auburn, Nebraska 68305

(402) 274-4023
3. Mr. Frank Gibson
W. Dale Clark Library
215 South 15th Street
Omaha, Nebraska 68102

(402) 444-4800 or 4834

NEW JERSEY

1. Arthur Flandre
Stockton State College Library
Pomona, New Jersey 08240

(609) 657-3333
2. Miss Elizabeth Fogg
Salem Free Public Library
112 West Broadway
Salem, New Jersey 08079

(609) 935-0526
3. Mrs. Gail Colure
Ocean County Library
Brick Township Branch
Brick Town, New Jersey 08723

(201) 477-4513

NEW YORK

1. Mr. Ralph W. Schmidt
Oswego County Office Building
46 E. Bridge Street
Oswego, New York 13126

(315) 349-3236
2. Mrs. June Rogoff
Rochester Public Library
Business and Social
Science Division
115 South Avenue
Rochester, New York 14604

(716) 428-7300
3. Mr. Oliver Swift
White Plains Public Library
100 Martine Avenue
White Plains, New York 10601

(914) 682-4400

NEW YORK, Cont'd.

4. Shoreham-Wading River
Public Library
Route 25A
Shoreham, New York 11786

(516) 929-4488
5. Mrs. E. Overton
Roverhead Free Library
330 Court Street
Riverhead, New York 11901

(516) 727-3228
6. Mrs. Dorothy Augustine
Catskill Public Library
1 Franklin Street
Catskill, New York 12414

(518) 943-4230
7. Mr. Stanley Zukowski
Buffalo and Erie County
Public Library
Lafayette Square
Buffalo, New York 14203

(716) 856-7525
8. Ms. Marsha Russell
Town of Concord Public Library
23 North Buffalo Street
Springville, New York 14141

(716) 592-7742
9. Mr. Sol Becker
Public Health Library
New York City Department
of Health
125 Worth Street
New York, New York 10013

(212) 566-5169

SOUTH CAROLINA

1. Mrs. Ruth Osborne
Public Library of Charlotte
and Mecklenburg County
310 North Tryon Street
Charlotte, North Carolina 28201

(704) 374-2725
2. Mr. Roy Dicks
Wake County Public Library
104 Fayetteville Street
Raleigh, North Carolina 27601

(919) 755-6077
3. Mr. David G. Ferguson
Davie County Public Library
416 N. Main Street
P.O. Box 158
Mocksville, North Carolina 27028

(704) 634-2023
4. Mr. Philip Barton
Southport-Brunswick County Library
109 W. Moore Street
Southport, North Carolina 28461

(919) 457-6237
5. Mrs. Charlotte Ellis
Franklin County Library
1026 Justice Street
Louisburg, North Carolina 27549

(919) 496-4942

OHIO

1. Mrs. Betty Waltman
Perry Public Library
3753 Main Street
Perry, Ohio 44081

(216) 259-3300

OHIO, Cont'd.

2. Ms. Edith Holman
Clermont County Library
Third and Broadway Streets
Batavia, Ohio 45103

(513) 732-2128
3. Mr. Donald Fought
IDA Rupp Public Library
310 Madison Street
Port Clinton, Ohio 43452

(419) 732-3212
4. Mrs. Esther Schedley
Berlin Township Public Library
4 East Main Street
Berlin Heights, Ohio 44814

(419) 585-2250

OREGON

1. Mr. H. B. Allen
City Hall, Records Office
Arlington, Oregon 97812

(503) 454-2743
2. Mr. Zimmer
Columbia County Courthouse
Law Library Circuit Courtroom
St. Helens, Oregon 97501

(503) 397-4322

PENNSYLVANIA

1. Osterhout Free Library
Reference Department
71 South Franklin Street
Wilkes-Barre, Pennsylvania 18701

(717) 823-0156

PENNSYLVANIA, Cont'd.

2. Mr. John Geschwindt
Government Publications
Section
State Library of Pennsylvania
Education Building
Commonwealth and Walnut Street
Harrisburg, Pennsylvania 17126

(717) 787-3752

3. Mrs. Gordon Bauerle
Pottstown Public Library
500 High Street
Pottstown, Pennsylvania 19464

(215) 326-6975

4. Mr. F. E. Virostek
B. F. Jones Memorial Library
663 Franklin Avenue
Aliquippa, Pennsylvania 15001

(412) 375-7174

PUERTO RICO

1. Mrs. Rosario Cabrera
Public Library, City Hall
Jose' de Diego Avenue
P.O. Box 1086
Arecibo, Puerto Rico 00612
2. Mrs. Amalia Ruiz De Porrás
Etien Totti Public Library
College of Engineers, Architects,
and Surveyors
Urb Roosevelt Development
Hato Rey, Puerto Rico 00918

(809) 767-7522

RHODE ISLAND

1. Mrs. Ann Crawford
Cross Mill Public Library
Old Post Road
Charlestown, Rhode Island 02813

(401) 364-6211

RHODE ISLAND, Cont'd.

2. Thomas Reynolds
University of Rhode Island
University Library
Government Publications Office
Kingston, Rhode Island 02881

(401) 792-2606

SOUTH CAROLINA

1. Joe E. Garcia
York County Library
325 South Oakland Avenue
Rock Hill, South Carolina 29730

(803) 327-3630

2. Reference Department
Richland County Public Library
1400 Sumter Street
Columbia, South Carolina 29201

(803) 799-9084

3. Miss Louise Marcum
Oconee County Library
201 S. Spring Street
Walhalla, South Carolina 29691

(803) 638-5837

4. Mrs. Allene Reep
Hartsville Memorial Library
Home and Fifth Avenue
Hartsville, South Carolina 29550

(803) 332-5115

5. Mr. David Eden
Cherokee County Library
300 E. Rutledge Avenue
Gaffney, South Carolina 29340

(803) 489-4381

6. Mr. T. E. Richardson
County Office Building
Room 105
P.O. Box 443
Barnwell, South Carolina 29812
ATTN: Fred Bodiford

(803) 259-3464

SOUTH CAROLINA, Cont'd.

7. Mr. Carl Stone
Anderson County Library
202 East Greenville Street
Anderson, South Carolina 29621

(803) 225-1429

TENNESSEE

1. Miss Kendall J. Cram, Director
Tennessee State Library and
Archives
403 Seventh Avenue, North
Nashville, Tennessee 37219

(615) 741-2764
2. Ms. Dorothy Dismuke
Oak Ridge Public Library
Civic Center
Oak Ridge, Tennessee 37830

(615) 483-6386
3. Mrs. Patricia Rugg
Lawson McGhee Public Library
500 W. Church Street
Knoxville, Tennessee 37902

(615) 523-0781
4. Mr. Wally Keasler
Chattanooga-Hamilton County
Bicentennial Library
1001 Broad Street
Chattanooga, Tennessee 37402

(615) 757-5415
5. Mr. T. Cal Hendrix
Kingsport Public Library
Board and New Streets
Kingsport, Tennessee 37660

(615) 245-3141

TEXAS

1. Mrs. Tim Whitworth
Somervell County Public Library
On The Square
P.O. Box 1417
Glen Rose, Texas 76043

(817) 897-4582
2. Newton Public Library
P.O. Box 657
Newton, Texas 77034

(713) 379-8300
3. Matagorda County Courthouse
Matagorda County Law Library
P.O. Box 487
Bay City, Texas 77414

(713) 245-2801
4. Mrs. Kroesche
Sealy Public Library
201 Atchison Street
Sealy, Texas 77474

(713) 885-6341

VERMONT

1. Mrs. June Bryant
Brooks Memorial Library
224 Main Street
Brattleboro, Vermont 05301

(802) 254-5290

VIRGINIA

1. Ms. Sandra Peterson
Swem Library
College of William and Mary
Williamsburg, Virginia 23185

(804) 253-4404 or 05

VIRGINIA, Cont'd.

2. Mr. Gregory Johnson
Alderman Library
Manuscripts Department
University of Virginia
Charlottesville, Virginia 22901

(804) 924-3025
3. Mr. Edward Kube
Board of Supervisors
Louisa County Courthouse
P.O. Box 27
Louisa, Virginia 23093
ATTN: Ms. Manrique

(703) 967-0401

WASHINGTON

1. Miss D. E. Roberts
Richland Public Library
Swift and Northgate Streets
Richland, Washington 99342

(509) 943-9118
2. Mrs. D. Stendal
Sedro Wooley Library
802 Ball Avenue
Sedro Wooley, Washington 98294

(206) 855-1166
3. Ms. Selma Nielsen
W. H. Abel Memorial Library
125 Main Street, South
Montesano, Washington 98563

(206) 249-4211

WISCONSIN

1. Mrs. Jane Radloff
LaCrosse Public Library
800 Main Street
LaCrosse, Wisconsin 54601

(608) 784-8623
2. Mr. Arthur M. Fish
Document Department, Library
University of Wisconsin -
Stevens Point
Stevens Point, Wisconsin 54481

(715) 346-0123
3. Mrs. Frances Wendtland
Mead Public Library
710 North Eighth Street
Sheboygan, Wisconsin 53081

(414) 459-3420
4. Miss Sue Grosshuech
Kewaunee Public Library
822 Juneau Street
Kewaunee, Wisconsin 54216

(414) 388-3331
5. Mr. John Jax
University of Wisconsin
Stout Library
Menomonie, Wisconsin 54751

(715) 232-2363

WYOMING

1. Mrs. Carol Highfill
Converse County Library
Douglas, Wyoming 82633

(307) 358-3644

2. Mrs. Margaret Baker
Carbon County Public Library
Courthouse
Rawlins, Wyoming 82301

(307) 324-4756

Dated at _____, this _____ day of _____, 1979.

FOR THE NUCLEAR REGULATORY COMMISSION.

Samuel J. Chilk
Secretary of the Commission

ENCLOSURE C
DRAFT LTR TO CONGRESS

Dear Mr. Chairman:

Enclosed for the information of the Subcommittee on Energy and the Environment is a notice requesting public comments on the Commission's Value-Impact Guidelines. (Significant proposed Commission regulatory actions - such as development of new regulations - are subjected to value-impact analysis.)

Also enclosed is an associated public announcement which will be issued shortly.

Carlton Kammerer, Director
Office of Congressional Affairs

Enclosures:

1. Notice for Federal Register
2. Public Announcement

Enclosure C

ENCLOSURE D
DRAFT PUBLIC ANNOUNCEMENT

PUBLIC ANNOUNCEMENT [Draft]

NRC REVIEW'S VALUE-IMPACT GUIDELINES FOR EVALUATING REGULATORY ACTIONS

The Nuclear Regulatory Commission is seeking public comment on agency guidelines for value-impact analyses conducted by the NRC staff for significant proposed regulatory actions.

In January 1978, the Commission adopted the value-impact guidelines as a technique for assessing the merits and undesirable effects of regulatory actions, such as developing or modifying regulations and regulatory guides.

Under the NRC guidelines, impacts are considered negative consequences, such as environmental damage or increased economic costs, and values are positive or beneficial, such as reductions in radiation doses to the public.

In conducting this review, the Commission will consider, among other things, whether the role of cost impacts could or should be broadened beyond that stated or implied by the guidelines.

An executive summary of the value-impact guidelines has been published in the Federal Register of June _____. Copies of the guidelines and other related Commission papers are available for review and inspection at the NRC's Public Document Room, 1717 H Street, N.W., Washington, D.C., and at local public document rooms located near the site of nuclear power plants in operation or under construction.

Further information and copies of the guidelines also may be obtained by contacting John A. Sullivan, Office of Management and Program Analysis, Nuclear Regulatory Commission, Washington, D.C. 20555 (301/492-7721).

Enclosure D

Written comments on the guidelines should be submitted to the
Secretary of the Commission, Nuclear Regulatory Commission, Washington,
D.C. 20555, Attention: Docketing and Service Branch, by _____.

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ENCLOSURE E
VALUE-IMPACT RELATED MATERIALS TO BE PLACED IN PDRs

U.S. Nuclear Regulatory Commission's
Value-Impact Guidelines and Related Materials

<u>Item</u>	<u>Title</u>
1.	Memorandum of April 15, 1976, from W. Anders to L. V. Gossick, "Impact-Value Assessments."
2.	Memorandum of January 23, 1978, from S. J. Chilk, Secretary, to L. V. Gossick, Executive Director for Operations, "SECY-77-388A - Value-Impact Guidelines" (Commissioner Action Item).
3.	NRC Agency-wide Value-Impact Guidelines (see the Guidelines for Table of Contents).
4.	"Responses to Comments on the Secretary's Memorandum (and Enclosure) of 8/5/77 to the Executive Director for Operations"
5.	Memorandum of 5/1/79 from M. G. Malsch, Chief Regulations Counsel, Office of Executive Legal Director, to N. M. Haller, Director, Office of Management and Program Analysis (MPA).
6.	Memorandum of 3/7/79 from J. R. Shea, Director, Office of State Programs, to N. Haller, MPA.
7.	Memorandum of 3/7/79 from Dudley Thompson, Executive Officer for Operations Support, Office of Inspection and Enforcement, to N. Haller, MPA.
8.	Memorandum of 3/8/79, from J. M. Felton, Director, Division of Rules and Records, Office of Administration, to N. Haller, MPA.
9.	Memorandum of 3/6/79, from L. W. Barry, Controller, to N. Haller, M.A. (w/o Enclosures).
10.	Memorandum of 3/20/79 from R. S. Brown, Jr., Assistant to the Director and Chief, Program Support Branch, Office of Nuclear Material Safety and Safeguards (NMSS), to N. Haller, MPA.
11.	Memorandum of 3/12/79 from R. F. Burnett, Director, Division of Safeguards, NMSS, to R. E. Cunningham, Director, Division of Fuel Cycle and Material Safety, NMSS.
12.	Memorandum of 3/1/79 from E. Perchonok, Chief, Technical Planning and Information Branch, to L. J. Evans, Jr., Chief, Regulatory Improvements Branch, NMSS
13.	Comments by individual [*] NMSS

* Note: Where Offices forwarded comments of individuals their names have been removed because individuals were not initially told that comments would be placed in the Commission's Public Document Rooms. Enclosure E

<u>Item</u>	<u>Title</u>
14.	Comments (on NMSS Policy and Procedure Letter 1-9 see item 22, below) by individual from NMSS.
15.	Comments by individual from NMSS.
16.	Memorandum of 3/7/79 from K. Dragonette, Low-Level Waste Branch, to E. Tourigny, Operations and Planning Branch, NMSS (Enclosures are in separate items).
17.	Memorandum of 4/26/79 from D. F. Bunch, Director, Program Support Staff, Office of Nuclear Reactor Regulation, to N. Haller, MPA.
18.	Memorandum of 3/14/79 from R. B. Minogue, Director, Office of Standards Development, to N. Haller, MPA.
19.	Comments by individual from NMSS.
20.	Comments by individual from NMSS.
21.	Comments (on NMSS Policy and Procedure Letter 1-9, see item 22) by individual from NMSS.
22.	NMSS Policy and Procedure Letter 1-9 (October 13, 1978)
23.	Memorandum of April 13, 1977 from R. Minogue, Director, Office of Standards Development (SD) to SD staff (document, "SD Staff Guidance for Preparation of Value/Impact Statements," attached).
24.	Memorandum of January 31, 1978 from E. Case, Acting Director, Office of Nuclear Reactor Regulation (NRR) to NRR Division Directors - R. Boyd, H. Denton, R. Mattson, and V. Stello, Jr. ("Instructions for the Preparation of Value-Impact Analyses, NRR Office Letter No. 16").
25.	Memorandum of February 16, 1979 from N. Haller to All Office Directors (w/o enclosures).