



CONFERENCE OF RADIATION CONTROL PROGRAM DIRECTORS, INC.
State Health Division, P.O. Box 231, Portland, Oregon 97207

May 22, 1980

The Honorable John F. Ahearne
Chairman
Nuclear Regulatory Commission
Washington, DC 20555

Dear Chairman Ahearne:

On Wednesday, May 21, the entire membership of the Conference of Radiation Control Program Directors passed an unanimous Resolution imploring the Commission to proceed with great caution in its deliberation and actions as it considers the reorganization of the NRC. Until 1976, the Commission, for all practical purposes, was unresponsive and incapable of providing any assistance to the Agreement States or any other state. The NRC reorganization in 1976 formed the Office of State Programs which provided the Agreement States with access to information absolutely vital to their programs and initiated a period of marked improvement in NRC and state relations.

This timely, accurate, and highly beneficial information has done much to improve the ability of the Radiation Control Programs in the Agreement States to cope with the rapidly expanding usage of radioactive material. I and some of the members of the Executive Board would like to meet with you and the other members of the Commission at the earliest possible moment. The purpose of this meeting is to express our deep concern over the possibility of severe curtailment of and direct access to highly valuable technical information and staff to deal with the problems that we encounter on a daily basis.

Your early reply would be most appreciated.

Sincerely,

Marshall W. Parrott, Sc.D.
Chairman, Conference of
Radiation Control Program
Directors, Inc.

Enclosure

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RESOLUTION

With regard to the organization of the U.S. Nuclear Regulatory Commission (NRC) and its Office of State Programs, the following resolution was passed by the Conference of Radiation Control Program Directors, Inc., at its annual meeting in Louisville, Kentucky, on May 21, 1980.

- WHEREAS: The States effectively regulate better than 90% of all of the sources of ionizing radiation in the nation, including NRC agreement materials, naturally occurring and artificially produced radioactive materials, and machine produced radiation;
- WHEREAS: State radiation programs combine certain functions of the NRC offices of the Nuclear Materials Safety and Safeguards (NMSS), Inspection and Enforcement (I&E), Standards Development (SD), etc.;
- WHEREAS: State radiation programs must interact with other Federal and State agencies in areas of mutual interest and responsibility in emergency response, transportation, disposal, remedial programs, etc.;
- WHEREAS: The concept of compatibility and equivalency appear to the Conference to frequently be a one-way street from the Federal to the State and we believe the concept should be one of partnership serving our mutual interest;
- WHEREAS: It is our understanding the NRC plans to reorganize the Office of State Programs, the liaison group between the States and the NRC, either into another form, or place it under the jurisdiction of another office;
- WHEREAS: Recent testimony by members of the Commission and the NMSS staff before Congressional committees indicate an intention of the NRC to impose its will on the States at its discretion;
- WHEREAS: The intent of Congress, as stipulated in Section 274 of the Atomic Energy Act of 1954, as amended, is to encourage State regulatory programs in this area;
- WHEREAS: The Office of State Programs since 1976 has provided a viable focal point for multi-NRC program concerns;

NOW THEREFORE BE IT RESOLVED:

That the Conference of Radiation Control Program Directors, Inc. expresses its concern for the NRC anticipated reorganization of the Office of State Programs and that further we voice support for the continued operation and status of the Office of State Programs as the focal point for the Commission's principal State relations function in a coordinating role to the betterment of both NRC's and the States' programs and mutual interest; and

that further, a copy of this resolution be directed to John F. Ahearne, Chairman of the Nuclear Regulatory Commission and to the four Commissioners of the Nuclear Regulatory Commission.