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## Omaha Public Power District

1623 HARNEY ■ OMAHA, NEBRASKA 68102 ■ TELEPHONE 536-4001

June 12, 1980

Mr. K. V. Seyfrit, Director  
U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region IV  
611 Ryan Plaza Drive  
Suite 1000  
Arlington, Texas 76011

Reference: Docket No. 50-285

Dear Mr. Seyfrit:

On April 7, 1980, the District received from you IE Information Notice 80-14. The notice enclosed a copy of Temporary Instruction No. 1210/1. It suggested that both be posted for employees to read.

The District believes that TI 1210/1 is inconsistent with 10 CFR § 19.15 and with the intent of 10 CFR § 19.16. As written, it would encourage employees to report matters not related to occupational radiation protection or the protection of public health and safety and matters not within the Commission's jurisdiction. The inspector would then be required to devote his time and attention to such matters instead of fulfilling the Commission's statutory responsibilities.

To conform with 10 CFR Part 19, TI 1210/1 should be revised. Specifically, the first sentence should state:

"During inspections, inspectors may receive from licensee employees suggestions concerning occupational radiation exposures or plant conditions or operations that could adversely affect the public health and safety."

The paragraph numbered 2 should be deleted. The last sentence should state:

"It is important that an employee proffering a suggestion related to occupational radiation exposures or the public health and safety be made aware that the NRC is interested in such suggestions and that they will be pursued."

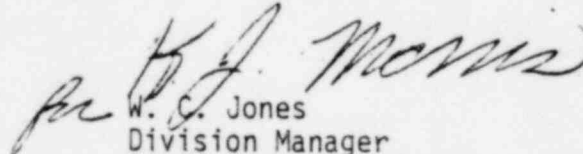
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The District respectfully requests that TI 1210/1 be revised and reissued.

Sincerely,

  
W. C. Jones  
Division Manager  
Production Operations

WCJ/KJM/BJH/TLP:jmm

cc: Mr. Victor Stello, Jr.  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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