· Southern States (Energy Board

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July 25, 1980

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Dr. John Ahearne

Chairman

U.S. Nuclear Regulatory Commission

Washington, D.C. 20555

Dear Dr. Ahearne:

On behalf of the Southern States Energy Board and our seventeen member jurisdictions, I am writing to express deep concerns about current NRC plans for the Office of State Programs. We are very much opposed to a transfer of the Agreement States Program to any licensing division. The states view the Agreement States Program as a federal/state partnership rather than a licensing function. By making a change here, you and the Commission will undo a trust and a working relationship which has taken a long time to build.

The states have found NRC's Office of State Programs to be one of the most responsive and responsible organizations in the federal establishment. Under Bob Ryan's direction, this group has sought out state problems and worked with the states to correct them. When new NRC programs or regulations were being promulgated, the states knew that there would be opportunity for input and comment because the Office of State Programs insured it.

NRC already has state liaison offices in each of the five regions. To further regionalize the Office of State Programs is sheer nonsense. NRC needs a central policy focus and an office which is dedicated to a partnership with the states. Bifurcating these functions will return NRC to the state of unresponsiveness evident prior to 1976.

I urge your immediate attention to these serious matters so that proper resolution gar be made.

> Kenneth J. Nemeth Executive Director

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