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Washington, D.C. 20555

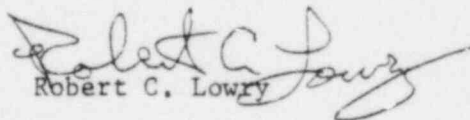
Subject: Comments on NUREG-0731, "Guidelines for Utility Management Structure and Technical Resources", Draft Report for Interim Use and Comment, September, 1980

Paragraph II.A.1. of the subject report specifies characteristics that must form the basis for the plant staff organization. Two such characteristics that are enumerated are that "the reporting of the functional areas of radiation protection, quality assurance, and training should assure independence from operating pressures", and that "distinct functional areas are separately supervised and/or managed".

Figure 1 of the subject report recommends that Quality Assurance Personnel report offsite to the Director of Operational Quality Assurance. To be consistent with the previously quoted characteristics of plant staff organization, it should either be recommended that the Radiation Protection and Training groups also report to an offsite Director or that the Quality Assurance group report only to the Plant Manager and/or Assistant Plant Manager as shown in Figure 1 for the Radiation Protection and Training groups.

While the staff's effort to allow maximum flexibility to licensees is commendable, it must be realized that the wide variation in existing organizational structure of the plant staff at the various utilities clearly demonstrates that there is wide disagreement on what constitutes a "distinct functional area". A good example is the philosophy that, because the purpose of chemistry control is to preserve the integrity of the first two containment boundaries, Chemistry and Radiochemistry fall into the "distinct functional area" of Radiation Protection. The subject report implies that radiation protection is a distinct functional area in itself, but does not make this clear. Because organizational philosophies vary so widely from one utility to another, I believe that, if the desired goal is to be realized, the "distinct functional areas" that are of major concern to the staff must be much more clearly defined.

Sincerely,


Robert C. Lowry

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