



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

FDR

APR 16 1981

MEMORANDUM FOR: Myrna L. Steele, Deputy Director
Division of Technical Information
and Document Control, ADM

FROM: E. Kevin Cornell
Deputy Executive Director for Operations

SUBJECT: DIFFERING PROFESSIONAL OPINION ON DECISIONS
TO REDIRECT THE DOCUMENT CONTROL SYSTEM

As responsible program manager, I have received your differing professional opinion and reviewed your report, "Analysis and Comment on Redirection of the NRC Document Control System." I do not believe your report justifies changing the Executive Director for Operations' recent decisions about the Document Control System (DCS).

The "DCS Actions" contained in the EDO's November 18, 1980 memorandum, as you point out, do not correspond on a one-to-one basis with the findings and evidence presented in the Program Evaluation of the Document Control System prepared by the Office of Management and Program Analysis (MPA). However, the DCS actions were based not only on the MPA program evaluation but on several other factors as well. In particular, budgetary considerations, the comments of the NRC Office Directors, and our judgments on the benefits provided by the DCS were considered.

Additionally, the DCS Policy Advisory Group, composed of Deputy Office Directors, reviews all DCS actions and thus serves as a check to make sure that decisions about the DCS do not have an adverse effect on NRC's responsibilities to assure public health and safety. The initial decisions about the DCS were also reinforced by the results of the Office of Inspector and Auditor's DCS report.

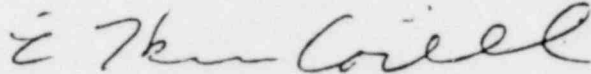
We expect to keep the Commission fully informed of the status of the DCS decision. I understand that each Commissioner's office has received your differing professional opinion so your report is available for Commission consideration. I also understand you have had an opportunity to meet with at least two Commissioners and discuss your concern about the Document Control System.

In summary, as the responsible official for assessing your differing professional opinion (per NRC Manual Chapter 4125), I believe that your differing professional opinion fails to justify any change in recent

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decisions about the Document Control System. A copy of your differing professional opinion and this memorandum will be placed in the Public Document Room.

In response to the additional questions asked in your April 8, 1981 memorandum, your opinion has not been incorporated into the EDO tracking system. Also, I have not received other differing professional opinions that are relevant to yours.



E. Kevin Cornell
Deputy Executive Director
for Operations