

PDR



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

December 22, 1989

Ms. Susan L. Hiatt  
Ohio Citizens for Responsible Energy, Inc.  
8275 Munson Road  
Mentor, Ohio 44060

Dear Ms. Hiatt:

I am responding to your letter of November 27, 1989, in which you express the concern that detailed information, reports, and studies regarding safety issues at nuclear power plants may not be receiving adequate public disclosure. Your concern apparently arises from an article by our Region III office, and from a number of recent regulatory actions, including rules, generic letters and bulletins, in which detailed reports were not required to be submitted to the U.S. Nuclear Regulatory Commission (NRC).

A fundamental principle that guides much of our regulatory activity is that the safe operation of a nuclear power plant is first the responsibility of the licensee and that the NRC plays an oversight role to ensure that each licensee properly exercises that responsibility. The performance of such an oversight function does not require that the NRC have in its possession every document that supports design, construction, and operation of a nuclear power plant. Such a proposal would not be feasible to implement.

The NRC conducts detailed examinations of a selected fraction of the documents used in support of a nuclear power plant. The material to be examined is selected on the basis of the safety benefits that would accrue from such inspections. An attempt to examine all documents would not constitute an effective or meaningful use of NRC's limited resources.

The reporting and recordkeeping requirements that apply to licensees are clearly indicated in the regulations, codes and standards with which licensees must comply. The NRC routinely audits the records which the licensees are required to maintain including those cited in your letter -- principally responses to bulletins and generic letters. The results of these reviews are documented in inspection reports, which are available to the public. The observation made in the Region III article applies only to reviews that have been voluntarily undertaken by a licensee. The results of such reviews are reportable only to the extent that they identify issues which must be reported under 10 CFR 50.72 and 50.73.

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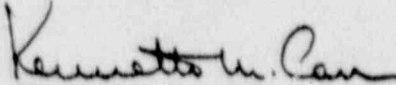
Ms. Susan L. Hiatt

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Reviews by licensees, such as those based on NRC's safety system functional inspection concept, can be much more extensive than those performed by NRC and can be of substantial safety benefit. Thus, the NRC encourages licensees to undertake such initiatives to identify potential problems that may exist with their facility. As the Region III article you identified suggests, the NRC will audit these self-initiated reviews to ensure that NRC reporting requirements are met. As with all other NRC inspections, the results of any NRC inspection examining such licensee reviews are documented in publicly available inspection reports.

I hope this responds to your concerns.

Sincerely,

  
Kenneth M. Carr