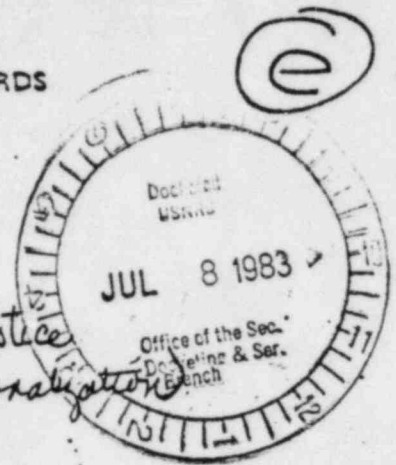




UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, D. C. 20555

April 19, 1983



Honorable Nunzio J. Palladino  
Chairman  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

PR-Misc Notice  
(Policy Statement on Regionalization)  
(48 FR 12619)

Dear Dr. Palladino

Subject: ACRS COMMENTS ON REGIONALIZATION OF NRC STAFF ACTIVITIES

During its 274th, 275th, and 276th meetings, February 10-12, March 10-12, and April 14-16, 1983, respectively, the ACRS reviewed the proposed plan for regionalization of certain NRC operations. In this review, we had the benefit of a Subcommittee meeting on February 8, 1983 with members of the NRC Staff and the information contained in the Draft Policy Statement on Regionalization, SECY-83-14, dated January 12, 1983, and the subsequent memorandum from the Secretary of the Commission to the Executive Director for Operations on the same subject, dated March 7, 1983.

During this long period of interaction and introspection, we have been able to reach a conclusion, but have been unable to agree on a recommendation:

Conclusion: If there is one among us who fully supports the present program and pace for regionalization, he has not made himself known. Our concerns are several, but all have to do with the potential negative impact on reactor safety.

Recommendation: We have been (so far) unable to arrive at a collegial recommendation between two alternatives, to which individual members of the Committee are attached:

- Stop or defer regionalization until its impact on safety has been more thoroughly understood.
- Proceed with extreme caution and attention to specific safety-related concerns.

We hope to discuss this question at greater length, both with you and with each other and hope that, at a minimum, nothing irrevocable is done in the interim, to leave us with a fait accompli.

DS 09 add: 1/0  
Edward Blackwood, 6113 MW66  
Tom Wambach, 314 Phil

Sincerely,

*Jesse C. Ebersole*

Jesse C. Ebersole  
Acting Chairman



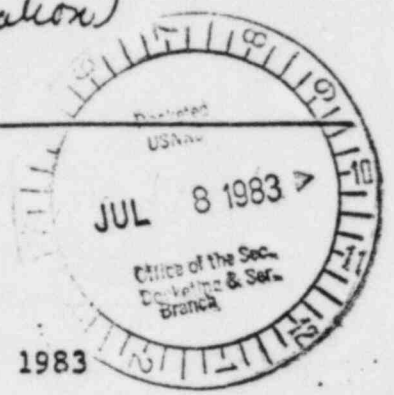
DOCKET NUMBER  
PROPOSED RULE *PR-Misc Notice*  
(*Policy Statement on Regionalization*)  
(48 FR 12619)

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# Nuclear Information and Resource Service

1346 Connecticut Avenue NW, 4th Floor, Washington, D.C. 20036 (202) 296-7552



May 12, 1983

Mr. James Asselstine  
Commissioner  
Nuclear Regulatory Commission  
1717 H Street, NW  
Washington, DC 20555

Dear Mr. Asselstine:

We are writing to share with you some concerns stemming from recent information we have received about the NRC's Regionalization program. As you know, the Nuclear Information and Resource Service is a national organization serving citizens concerned about nuclear energy. The particular matter which has come to our attention reflects a disturbing inattention on the part of some NRC staff to proper process and procedure. We direct this information to your attention both because you are directly affected and because of your customary concern for maintaining proper process and procedure at the agency.

A portion of an NRC document has come into our possession which identifies a number of programs within the Division of Fuel Cycle and Material Safety, NMSS of the NRC which have been decentralized to the regions as of April 1, 1983. Specifically, these include: 16 types of materials licenses and three types of amendments to existing fuel cycle licenses (see attached document). To the knowledge of the public (and the Commission), a number of these types of licensing responsibilities were not scheduled to be regionalized until FY 84. This discrepancy, while relatively minor in itself, is important in that it indicates that the Commission and public are not being accurately informed of NRC staff activities, and that part of the proposed regionalization plan has already been implemented prior to written public comment and Commission and Advisory Committee on Reactor Safeguards approval. As this division of licensing covers the preponderance of total NRC licensing, the scope of the problem takes on added significance.

In light of the extreme controversy of the regionalization program (see ACRS letter, enclosed), this hasty implementation seems especially inappropriate. Further, we have reason to believe that the action of this particular division reflects a growing agency-wide tendency to take actions independent of Commission guidance. Your investigation into these matters will be greatly appreciated.

*DS 09 add: 1/0*  
*Edward Blackwood, 6113 MNBB*  
*Tom Wambach, 314 Phil*

Sincerely,

*Kit Gage*

Kit Gage

Reactor Safety Project

*John F. Seiberling*

ACCELERATED DECENTRALIZATION SCHEDULE  
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY

4, J1/83

<u>ITEM</u>	<u>PPSAS CODE</u>	<u>PROGRAM CODE</u>
Academic	1311-10, 20, 30 <sup>1</sup>	M01100, 200
Medical Institutions	1311-11, 21, 31	M02110, 120
Medical Private Practice	1311-12, 22, 32	M02200
Other Medical Licenses	1311-14, 24, 34	M02400
Measuring Systems - Gauges, etc.	1311-17, 27, 37	M03120
Services - Leak Test, Installation	1311-1G, 2G, 3G	M03220
Broad - No Distribution	1311-10, 20, 30	M03610
Other - No Distribution	1311-1P, 2P, 3P	M03620
Civil Defense	1311-1Q, 2Q, 3Q	M03710
Plutonium Neutron Sources and Unencapsulated	1311-1W, 2W, 3W	M22110-150
Plutonium Power Sources	1311-1X, 2X, 3X	M22110-150
Labor Expended on SNM	1311-1Y, 2Y, 3Y	M22110-150
Depleted Uranium for Shielding	1311-1R, 2R, 3R	M11200, 300 <sup>2</sup>
Subcritical Assemblies	1311-1S, 2S, 3S	M11300 <sup>2</sup>
Manufacturing of Products	1311-1U, 2U, 3U	M11200, 300 <sup>2</sup>
Other Source Material	1311-1V, 2V, 3V	M11200, 300 <sup>2</sup>
Licenses for More Than Critical Amounts of SNM, but Less Than Critical Amounts To Be Located in Any Room or Area	1111-4 <sup>3</sup>	
Uranium Fuel Fabrication Licenses for Decontamination/Termination and Close-Out Surveys	1111-D <sup>4</sup>	M21220, 230
Advanced Fuel R&D and Pilot Plant Licenses for Decontamination & Close-Out Surveys	1111-92 <sup>4</sup>	

1. 0 = Zero; O = Alphabet Letter
2. Some of these licenses are being handled presently by Regions I and III, although they have not been specifically delegated. The license actions were forwarded to the two Regions on a case-by-case basis. On 4/01/83, all of these licenses will be delegated officially to all Regions.
3. This is only a portion of the work done under this PPSAS Code (entitled Complete Licensing Cases for Critical Mass Materials Licensees). The remainder will be delegated to the Regions on 4/02/84.
4. Only the above portions of the PPSAS Codes will be delegated to all five Regions in April 1983. The remaining functions will be delegated at a later time.

NOTE: The first 12 items were delegated to Regions I and III on 5/13/82. Licenses for District of Columbia agencies are included in these and subsequent delegations. Until further notice, federal facility licenses will be handled by Headquarters.

ACCELERATED DECENTRALIZATION SCHEDULE  
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY

4/02/84

<u>ITEM</u>	<u>PPSAS CODE</u>	<u>PROGRAM CODE</u>
Teletherapy	1311-13, 23, 33	M02300
Medical Distribution - Radiopharmaceuticals	1311-15, 25, 35	M02500
Well Logging	1311-16, 26, 36	M03110
Broad - Authorizes Distribution	1311-18, 28, 38	M03211
Other - Authorizes Distribution	1311-19, 29, 39	M03212
Distribution to General Licensees Other Than In Vitro	1311-1A, 2A, 3A	M03213
Distribution to General Licensees of In Vitro Kits	1311-1B, 2B, 3B	M03213
Nuclear Laundries	1311-1F, 2F, 3F	M03218
Commercial Low-Level Waste Receipt and/or Packaging	1311-11, 21, 31	M03232
Radiography - Fixed Facility	1311-1J, 2J, 3J	M03310
Radiography - Temporary Job Sites	1311-1K, 2K, 3K	M03320
Power Source	1311-1L, 2L, 3L	M03400
Irradiators - Internal Beam	1311-1M, 2M, 3M	M03510
Irradiators - Other	1311-1N, 2N, 3N	M03520
Plutonium Powered Cardiac Pacemakers	1311-1Z, 2Z, 3Z,	M22160, 161
Complete Licensing Cases for Critical Mass Materials Licensees	1111-4 <sup>1</sup>	
Complete Licensing Cases for Interim Spent Fuel Storage Facilities	1111-5 <sup>2</sup>	
Perform Interim Spent Fuel Storage Minor Reviews	1111-52	
Complete Licensing Cases for Storage of Reactor Low-Level Waste	1111-6	
Perform Storage of Reactor Low-Level Waste Major Reviews	1111-61	
Perform Storage of Reactor Low-Level Waste Minor Reviews	1111-62	

1. Licenses for more than critical amounts of SNM, but less than critical amounts to be located in any room or area - delegated to Regions on 4/01/83.
2. PPSAS Code 1111-51 (Major Reviews) will not be delegated to the Regions.

( 02/84 (Continued)

<u>ITEM</u>	<u>PPSAS CODE</u>	<u>PROGRAM CODE</u>
Complete Licensing Cases for Uranium Fuel R&D and Pilot Plants	1111-8	
Perform Uranium Fuel R&D and Pilot Plants Major Reviews	1111-81	
Perform Uranium Fuel R&D and Pilot Plants Minor Reviews	1111-82	
Complete Licensing Cases for Advanced Fuel R&D and Pilot Plants	1111-9	
Perform Advanced Fuel R&D and Pilot Plants Major Reviews	1111-91	
Perform Advanced Fuel R&D and Pilot Plants Minor Reviews	1111-92 <sup>3</sup>	
Conduct Pre- and Post-Licensing Activities	1111-C <sup>4</sup>	
Complete Licensing Cases for Radiological Contingency Planning	1111-E	

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3. A portion of this PPSAS Code (licenses for decontamination and close-out surveys) was delegated to the Regions on 4/01/83.
  4. A portion of this PPSAS Code will be retained at Headquarters to cover licensing activities, including technical assistance to the Regions, not being decentralized as of 4/02/84.

ACCELERATED DECENTRALIZATION SCHEDULE  
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY

10/01/84

<u>ITEM</u>	<u>PPSAS CODE</u>	<u>PROGRAM CODE</u>
Complete Licensing Cases for Uranium Fuel Fabrication Facilities	1111-1	
Perform Uranium Fuel Fabrication Facility Major Reviews	1111-11	
Perform Uranium Fuel Fabrication Facility Minor Reviews	1111-12	
Complete Licensing Cases for Fresh Fuel Storage Only at Reactor Sites	1111-3	
Perform Fresh Fuel Storage Only Major Reviews	1111-31	
Perform Fresh Fuel Storage Only Minor Reviews	1111-32	
Processing for Extraction of Other Elements (Zirconium, Hafnium or Rare Earths)	1311-1T, 2T, 3T	