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Science Applications International Corporation
An Employee-Owned Company

March 13, 1992

92-TJR.159

U. S. Nuclear Regulatory Commission
Division of Contracts and Property Management
Mail Stop P-1118
Washington, DC 20555

Attn: Ms. Laurette Moorin

Reference: NRC letter dated February 21, 1992

Subject: Public Meeting Planned Attendees

Dear Ms. Moorin:

In response to the referenced letter, the following representatives of Science Applications International Corporation (SAIC) plan to be in attendance at the public meeting scheduled for March 26, 1992 to discuss the U. S. Nuclear Regulatory Commission's revised Organizational Conflict of Interest (OCI) policy:

David Aldrich
Paul Amico
Bahman Atefi
Sally Bryan-Prell
R. Tenny Johnson

Peter McGrath
Steve Mirsky
Thomas Rodehau
Edward Straker
Thomas Trevino

SAIC looks forward to attending this public meeting and we are optimistic that the meeting will result in a satisfactory resolution of our expressed concerns with the changes that have been made to the NRC's OCI policy.

In advance of this public meeting, we would appreciate receiving the names of the panelists who shall represent the NRC and general information pertaining to the planned format of this meeting.

Kindly direct your response to this request to the attention of the undersigned at your earliest convenience.

If there are any questions with regard to the foregoing please refer them to my attention at (703) 448-6503.

Very truly yours, 9307150091 930608
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SCIENCE APPLICATIONS INTERNATIONAL CORPORATION

Thomas J. Rodehau
Thomas J. Rodehau
Senior Contract Representative
Energy Systems Group

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Under the revised policy, NRC's right to disapprove work for others is limited to those instances in which NRC already has the contractor performing under a specific task order, or plans to do so. In that case, the contractor shall neither solicit nor perform work at the site or work in the same technical area for that licensee or applicant organization for a period from the start of the award to one year after completion.

Questions:

What does "or plans to do so mean," and how would a multi-divisional contractor know what plans NRC has for one of its divisions?

How would the contractor be able to gain information regarding NRC's plans regarding one of its divisions without violating integrity in procurement regulations?

What is the definition of a licensee or applicant organization?

Could DOE be considered a licensee or applicant organization in its Management and Operating (M&O) role at sites all over the country?

If the answer to the above is yes, would one division of a corporation be precluded from soliciting furthering research for, say for example DOE Savannah River, while one of its other divisions is performing the current state of the art for a different DOE site, both in the same technical area?

Could one division of a multi-divisional corporation ever be considered a separate entity with respect to questions regarding COI?