



Science &
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06 March 1992

U.S. Nuclear Regulatory Commission
Policy Branch
Division of Contracts and Property Management
Mail Stop P-118
Washington, DC 20555

Attention: William H. Foster, Chief
Subject: Nuclear Regulatory Commission "Conflict of Interest " Policy
Reference: NRC letter dated February 21, 9192

Dear Mr. Foster:

Science and Engineering Associates, Inc. (SEA) supports the NRC's current Conflict of Interest Policy without reservation.

Ten years ago we made a decision to compete for business at the NRC. That decision process included a review of our potential for conflict of interest. Because we recognized the sensitive role a regulatory agency has, we decided to not solicit any business with the operators of nuclear power plants. We took the position then, and endorse again now, that it is imperative for contractors to avoid performing work which might give rise to a bias, or the appearance of a possibility of bias, in the services we and others perform for the NRC. Our experience since then and our reputation for meeting or exceeding expectations on our NRC contracts strongly supports our original position.

We believe that the existing policy is reasonable and is the best interest of the NRC, the nuclear power industry, and the engineering and services firms that provide support to both industries. In addition to SEA, we know there are many other well qualified firms who support the NRC without a real or apparent conflict of interest, and willingly accept the need to remain free of bias. We endorse the current policy and oppose changes that would weaken it.

We appreciate the opportunity to comment on the Policy. If you desire further information, please call me at (505) 884-2300.

Very truly yours,

SCIENCE AND ENGINEERING ASSOCIATES, INC.

Greg Woods
President

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