

Parameter, Inc.

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Mechanical Design and Analysis

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March 6, 1992

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

Attn: Mr. William H. Foster, Chief Policy Branch

Copy: T. F. Hagan

Reference: Letter dated 2/21/92 from Mr. T. F. Hagen of the
NRC to Mr. R. A. Lofy of PARAMETER, Inc.

Subject: Proposed Revision of the NRC's Organizational
Conflict of Interest (COI) Policy

Gentlemen:

Unfortunately, due to prior commitments, we will be unable to attend the public meeting on the proposed revision of the NRC's Organizational Conflict of Interest (COI) policy. We, as an NRC contractor for 28 years, would like to make the following comments on conflict of interest.

1. We strongly believe that no NRC contractor should take advantage of their position while working at, or after leaving, a NRC licensee site to solicit licensee business from that licensee during the life of the NRC contract.
2. No NRC contractor should be receiving financial remuneration from a licensee in any technical area or location of the licensee, its parent company, or a licensee supported group or association during the life of the NRC contract.

We believe that these should be part of the NRC conflict of interest policy.

An NRC contractor should be capable of certifying that they have at present no electric utility clients; nor are they seeking business from utilities. The contractor should receive no income or revenues from NRC regulated nuclear utilities, state power authorities, members of such owners' groups, or any other utility related or sponsored organizations.

This, we believe, is necessary to provide an unbiased evaluation of each licensee regarding NRC actions and regulations affecting that licensee.

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PDR

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CONSULTING ENGINEERS
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Mr. William H. Foster, Chief Policy Branch
U.S. Nuclear Regulatory Commission

If you have any question or need additional information please
feel free to contact us.

Very truly yours,

PARAMETER, Inc.



Lou Albers
Project Administration

CC: RAL
FAX'ed on 3/6/92 to
W. H. Foster