

Official Record

AUG 28 1990

MEMORANDUM FOR: James Lieberman, Director
Office of Enforcement

FROM: Stewart D. Ebnetter
Regional Administrator

SUBJECT: STUDY OF EFFICIENCY OF NUCLEAR MATERIALS SAFETY INSPECTION
AND ENFORCEMENT PROCESS, JAMES LIEBERMAN MEMORANDUM,
DATED 8/1/90

We have reviewed your memorandum of August 1, 1990, concerning the above subject and provide the following comments.

We encourage and support your efforts to promote efficiency of the Nuclear Materials Safety inspection and enforcement process. We believe the enforcement process could be expedited by minimizing the review time at all levels (e.g., Region, NMSS, OE, OGC). The use of the standard citations recently provided by OE is a first step in this process. As more experience is gained in the enforcement area, this set of standard citations should be expanded.

We understand that the Regions may be authorized to issue escalated enforcement actions to materials licensees without prior review by Headquarters. This would improve timeliness and also reduce Regional resource requirements to some extent. We recognize it will also impart greater responsibility to the Regional Offices for enforcement consistency; in that regard, participation by OE representatives in enforcement conferences and panels will be even more important than in the past.

In your memo to me you also requested that we complete a matrix showing resource expenditures on regional materials inspection and enforcement resources. Provided as an enclosure are our estimates of these resource expenditures. Please be aware that these estimates are our best approximation since we do not keep exact records of the time spent on the various stages of the enforcement process.

We appreciate the opportunity to comment on this matter. If you have any questions, please let me know.

/SDE/

Stewart D. Ebnetter
Regional Administrator

Enclosure:
Resource Expenditures Estimate

bcc w/encl:
Document Control Desk

RII:DRSS
Chasey
8/22/90

RII:DRSS
EMcAlpine
24 for
8/22/90

RII:DRSS
ACline
8/22/90

RII:DRSS
JStohr
8/22/90

RII:DRSS
GJenkins
8/22/90

RII:ORA
JMilhoan
8/27/90

9010230156 900828
REQ SUBJ

FDC

1007 119

REGIONAL MATERIAL INSPECTION AND ENFORCEMENT RESOURCES ESTIMATES

REGION II	I	S	D	B	D	D			R
	N	E	I	R	I	E			E
	S	C	R	A	V	P			G
	P	T	E	N	I	U			I
	E	I	I	C	O	S		D	O
	C	O	C	H	N	D		E	N
	T	N	S	C	C	I		P	L
	O	C	&	C	H	D		U	C
	R	H	S	H	I	V		T	O
		I	T	I	I	R		R	N
		E	A	E	E	A		A	
		F	F	F	F	R		A	
Estimate the percent of time the category of position spends on the activity per week, on average (e.g., the typical inspector spends 10% of time on holding Enf Conference)									
ACTIVITY									
Preparing, reviewing, revising nonescalated Insp Rpt & Enf Action	23	10	1	10	5	N/A	<1	<1	N/A
Preparing & reviewing Insp Rpt (with escalated action)	10	7	<1	5	5	N/A	<1	<1	N/A
Arriving at decision to hold, and scheduling of, Enforcement Conference	3	3	<1	3	3	N/A	<1	<1	N/A
Preparation for Enf Conference (briefing, etc)	2	3	1	3	3	N/A	<1	1	N/A
Holding Enf Conference	1	2	1	2	3	N/A	<1	1	N/A
Post Enf Conf briefing, etc	1	4	<1	2	3	N/A	<1	<1	N/A
Drafting & Reviewing Escalated Enf Action (Pre OE submittal)	3	3	30	2	2	N/A	<1	<1	N/A
Post OE submittal coordination with OE and reviewing OE revision	1	2	10	2	1	N/A	<1	<1	N/A
Issuance of escalated Enforcement Action including contacting licensee	0	0	2	0	0	N/A	<1	<1	N/A
TOTAL HOURS (PER WEEK)	18	14	18	12	10	0	4	4	0