

NOTATION VOTE

RELEASED TO THE PDR

12/14/90  
date

*g*  
initials

RESPONSE SHEET

TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION

FROM: COMMISSIONER CURTISS

SUBJECT: SECY-90-347 - REGULATORY IMPACT SURVEY  
REPORT

APPROVED <sup>x</sup>        w/comments DISAPPROVED        ABSTAIN       

NOT PARTICIPATING        REQUEST DISCUSSION       

COMMENTS:

See attached comments.

*John R. Utin*  
\_\_\_\_\_  
SIGNATURE

10/24/90

\_\_\_\_\_  
DATE

RELEASE VOTE   / x /  

WITHHOLD VOTE   /    /  

ENTERED ON "AS" YES   x   NO       

*For 2/11*

Commissioner Curtiss' comments on SECY-90-347:

In general, I concur in the staff's recommendation to publish a Federal Register notice soliciting public comments on the recommendations contained in the subject SECY paper. I have four additional comments:

- 1) In addition to publishing a Federal Register notice, the staff should also send a copy of the request for comments directly to all power reactor licensees.
- 2) The one area where I think further attention is required is the matter of ensuring consistency and uniformity between the regions and among our inspectors in the interpretation and application of regulatory requirements to individual licensees. Accordingly, I would recommend that this area be highlighted in the Federal Register Notice for the purpose of inviting comments. Additionally, I would ask the staff to devote further attention to this issue as it prepares its final paper for Commission consideration, focusing on what specific steps or initiatives can be undertaken to bring a greater degree of consistency and uniformity to how we apply our regulatory programs to individual licensees. Staff's recommendations should be set forth at the time that the final paper is submitted to the Commission.
- 3) The underlying SECY documents, SECY-90-080, SECY-90-205, and SECY-90-250, should be placed in the Public Document Room.
- 4) While I believe the staff has done a very thorough and professional job in evaluating and addressing the various concerns that have been identified, I would reserve judgment on the scope and details of the specific recommendations pending receipt of public comments on the staff's proposals.