



DEFENSE NUCLEAR AGENCY

ARMED FORCES RADIOBIOLOGY RESEARCH INSTITUTE
BETHESDA, MARYLAND 20814

91.1.21.

APR 20 1983

DIR

(22)

PROPOSED RULE PR-Misc Nattee
48 FR 12619

'83 APR 21 AM 1:56

Secretary of the Commission
U.S. Nuclear Regulatory Commission
ATTN: Docketing and Service Branch
Washington, D.C. 20555

Dear Sir:

This letter contains comments in response to the U.S. Nuclear Regulatory Commission "Policy Statement on Regionalization" which appeared in the Federal Register (FR 12619-12625) dated 25 March 1983.

The Armed Forces Radiobiology Research Institute (AFRRI) operates a 1.0 megawatt (t) TRIGA Mark-F research reactor under USNRC license R-84 and is, therefore, particularly concerned about the impact of regionalization on non-power reactor licensing activities. AFRRI's Reactor and Radiation Facility Safety Committee concurs with the views and comments expressed herein.

AFRRI wholeheartedly supports the views of the National Organization of Test, Research, and Training Reactors (TRTR), as expressed in a comment letter addressed to the Secretary of the Commission (USNRC) dated 1 April 1983, and as expressed in two TRTR letters on this subject to USNRC Chairman Palladino dated 13 December 1982 and 18 February 1983. To reiterate in summary, AFRRI believes that a single centralized office manned with qualified staff, specifically cognizant of, experienced with, and responsible for non-power reactors, is far more efficient, stable, structured, and manageable organizationally, and more keenly aware of the unique characteristics, requirements, and uses of non-power reactors operationally as well as from a regulatory standpoint. Currently such a centralized system basically exists in-place; thus, no significant change would be required. Further improvements, we believe, would be gained by incorporating emergency planning and safeguards licensing activities into the existing single headquarters-based office.

As you are aware, there are presently two full-time headquarters-based project managers handling virtually all non-power reactor licensing activities within the Standardization and Special Projects Branch. If regionalization were to occur, these two manyears of effort would be segmented into an average 0.4 manyear per region. Such a move, we feel, would introduce inefficiency, fragment the existing body of expertise and experience, and could result in region-based project managers handling non-power reactor licensing actions as an aside.

DS09
add: Edward Blackwood
6113 MWBB

4/26/83 PD

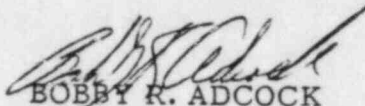
DIR
Secretary of the Commission

Consolidation of non-power reactor licensing activities over the last several years into one headquarters-located office, i.e., The Standardization and Special Projects Branch, employing a limited and identifiable number of highly qualified and experienced project managers, has definitely resulted in a more effective system with better communications, greater availability, more uniform application of regulatory requirements, improved development and availability of guidelines and standards, and a body of knowledgeable staffers having a much clearer understanding of non-power reactors and their safety considerations. Regionalization, we feel, would be counterproductive - tending to splinter, dismantle, and possibly destroy the excellent professional working relationship that has been fostered, and now exists, between USNRC and non-power reactor licensees. Therefore, we believe that public health and safety would be better served by centralization rather than regionalization.

We sincerely appreciate this opportunity to provide comments on this important and far-reaching subject. Should you have any comments or questions concerning this matter, please feel free to contact Major Joseph A. Sholtis, Jr., Chief of our Radiation Sources Division and Physicist-In-Charge of our research reactor facility at (301) 295-1096/1048.

Thank you for your time and consideration.

Sincerely,


BOBBY R. ADCOCK
Colonel, MSC, USA
Director

(21)

JACKET NUMBER
PROPOSED RULE PR-Misc Notice
Policy Statement on Regional

MEMO FROM
JUDI FRIEDMAN
101 Lawton Road
Canton, Connecticut 06019
1-203-693-4377

LET NUMBER PR-Misc Notice
PROPOSED RULE
48 FR 12619

Dear Rustin, APR 21 12:14

I am against the shift
of power to regional offices,
and I agree with the
NIRS position. Please do not
proceed with this program.

Sincerely,

Judi Friedman

DS 09
add: Edward Blackwood
6113 MNRB

4/26/83 PD