

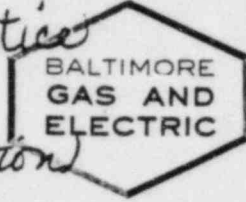
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*C Policy Statement on Regionalization*

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CHRIS H. POINDEXTER  
VICE PRESIDENT  
ENGINEERING AND CONSTRUCTION

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February 14, 1983

STATEMENT BEFORE THE  
NUCLEAR REGULATORY COMMISSION  
BY  
BALTIMORE GAS AND ELECTRIC COMPANY  
ON THE  
NRC DRAFT POLICY STATEMENT ON REGIONALIZATION

Baltimore Gas and Electric Company has the following advance comments concerning the NRC Draft Policy Statement on Regionalization. These comments are necessarily general due to the lack of a detailed NRC Action Plan for "regionalizing" its functions, and we intend to submit more specific comments as soon as the Commission publishes such a plan for comment.

1. The overall long-term plan for regionalization of specific NRC functions has yet to be consolidated and published for public and licensee comment. Nonetheless, the NRC has moved steadily toward implementation of the regionalization "plan" on a piecemeal basis. We are concerned that the NRC intends to accomplish regionalization to such an extent using this piecemeal approach that the publishing of a formal plan, if and when it occurs, will be pro forma in nature.
2. A significant segment of the nuclear industry will be affected by regionalization. This includes licensees, consultants, A-E's, NSSF vendors, law firms and equipment suppliers. Yet, the NRC has apparently ignored the potential impact on the nuclear industry, especially the licensees, of its regionalization activities. We feel strongly that the NRC should suspend all of its actions related to the implementation (or the partial or equivalent implementation) of regionalization pending a broad and comprehensive identification and resolution of all concerns and issues which may be raised by the industry as well as other interested parties.
3. The Draft Policy Statement indicates that the NRC "plans" to retain certain licensing functions such as reload reviews, generic issues resolution and license application reviews in the Washington-Bethesda area. At present, the NRC Project Manager assigned to each operating reactor plant conducts numerous activities which are associated with the above functions and which are of great importance to the licensees. Most licensees have come to depend procedurally on the liaison function of the Project Managers with the NRC Technical Staff. If the NRC intends to proceed with its proposed plan to displace the project managers to the Regional Offices, the burden of daily interface with the NRC Technical Staff in Bethesda-Washington will necessarily fall upon the licensees.

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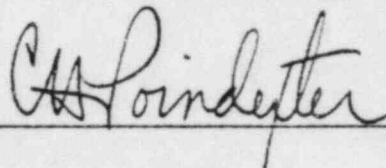
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4. The Draft Policy Statement proposes a 30-day public comment period. We feel that at least 60 days should be allowed. Following the 60-day comment period, the NRC should compile and address any comments received and then schedule public meetings to discuss the comments and their proposed resolution. The public meetings should not be scheduled to occur concurrently with the release of the Policy Statement.
5. With specific respect to Region I, there is no rationale for transferring key licensing functions to King of Prussia, Pa. If regionalization does occur in Region I, the Region I Headquarters should be located in Bethesda or Washington, not King of Prussia. There exists in and around Bethesda and Washington a significant concentration of nuclear industry support organizations. The proximity of these organizations with respect to the NRC licensing staff has contributed greatly to the ability of Region I licensees to respond to NRC concerns quickly and with strong technical backing. To summarily uproot this strong technical forum is not in the best interest of the public, the licensees or the NRC and is clearly not cost effective on any basis. We feel very strongly about this point, and we plan to take whatever action is necessary to ensure that the current stability of our licensing interface with the NRC is preserved.

These comments are intended to call Commission attention to a situation that we feel has not been handled with due consideration of all affected parties. We intend to submit more detailed comments, individually and as a member of appropriate industry groups, as soon as the NRC releases more information on the regionalization plan.

BALTIMORE GAS & ELECTRIC COMPANY

BY 

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