



NUCLEAR REACTOR LABORATORY
AN INTERDEPARTMENTAL CENTER OF
MASSACHUSETTS INSTITUTE OF TECHNOLOGY



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L. CLARK, JR.
Director of Reactor Operations

December 13, 1982

The Honorable Nunzio J. Palladino, Chairman
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Palladino:

At their annual meeting in College Station, Texas, On October 18-20, 1982, the managers of Test, Research and Training Reactors (TRTR) were informed that the Nuclear Regulatory Commission is considering the transfer of licensing activities associated with non-power reactors (NPR) to its regional offices. I am writing on behalf of the TRTR community, because it is probable that this action will have a significant impact on the NPR regulatory process and the TRTR reactors.

It is recognized that regionalization has many benefits, and some TRTR members are not opposed to it, particularly for activities such as operator licensing, inspections, byproduct licensing, etc. There is, however, significant concern regarding the areas of reactor licensing and license amendments, including emergency planning, safeguards and similar subjects, especially on the part of those who have been involved in standards development and guidance formulation.

We believe that the consolidation in the last three years of NPR licensing activities in one branch, i.e. Standardization and Special Projects, under a limited number of project managers, has resulted in better communications, more uniform application of regulatory requirements, improved development and availability of guidelines and standards, and more knowledgeable staffers with a much clearer understanding of NPR safety considerations and of the large differences between power reactors and NPR's -- all to the benefit of the general public, TRTR and NRC.

The concern with regard to regionalization of reactor licensing is that it may mean a return to the splintered type of arrangement that existed in earlier years where project managers for NPR's were not in close touch with each other, with the result that regulatory requirements were not consistently applied, the distribution of pertinent information was limited, few NRC staff members had research reactor experience, and NPR licensing actions were generally given a low priority.

Prior to October, the TRTR managers were generally not aware of the intent to regionalize NPR licensing activities and, hence, unable to evaluate the impact and to offer constructive input to the degree appropriate. We now respectfully request that NRC seek input -- from those functioning on both

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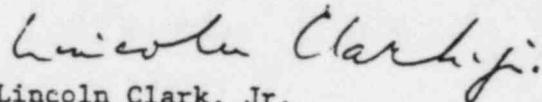
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sides of the regulatory process -- and carefully review its plans for NPR's, including their effect on the benefits we believe have accrued in recent years, as outlined above.

I wish to assure you that the TRTR community shares your objective of finding the most efficient and effective methods of applying regulatory requirements and will cooperate in every way. We shall be very pleased to meet with you and with the NRC staff to further present our views.

Thank you for your consideration of this request.

Sincerely,



Lincoln Clark, Jr.
Chairman, TRTR

LC/sbs

cc: Mr. Victor Stello, Deputy Executive Director
for Operations, USNRC
Mr. Harold R. Denton, Director, Office of
Nuclear Reactor Regulation, USNRC
TRTR members