

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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APR 2 1984

MEMORANDUM FOR: Robert F. Burnett, Director  
Division of Safeguards

FROM: Darrell G. Eisenhut, Director  
Division of Licensing

SUBJECT: REGULATORY EFFECTIVENESS REVIEW REPORTS

As a result of NRR's staff review of the Regulatory Effectiveness Review (RER) reports completed to date, we continue to be concerned about the impact and implementation of the recommended actions identified in these reports. In this regard we suggested earlier, in a November 8, 1983, D. Eisenhut to R. Burnett memorandum, "Report on Turkey Point Regulatory Effectiveness Review," that a revised format be established for presenting the various issues and corresponding actions identified in the report. The same concerns and suggestions apply to the North Anna and Surry RER reports. During the past few months our staffs have had a continuing dialogue on this subject, culminating in a senior-level management meeting on March 22, 1984.

We would like to see the recommended actions resulting from the RER reviews presented in a format and context which is fully compatible with our regulatory framework. More specifically, we suggest that these actions be developed and addressed in discrete categories, each of which is applicable to a prescribed regulatory course of action and an identifiable responsible group.

We recommend that you consider the following five broad categories:

1. Actions related to adequacy of Commission regulations and guidance - These would be in a portion of the report addressed to the staff and would be resolved internally by the responsible staff components through modification or clarification of such regulations and guidance.
2. Actions related to compliance with approved safeguards plans - These would be grouped in a portion of the report addressed to the appropriate Regional Office for action in accordance with regulatory procedures.
3. Actions resulting from identified weaknesses and deficiencies in staff approved safeguards plans - The identified weaknesses and deficiencies would be addressed to the licensee. Resolution would be in full conformance with existing backfitting policies and procedures.

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Robert F. Burnett

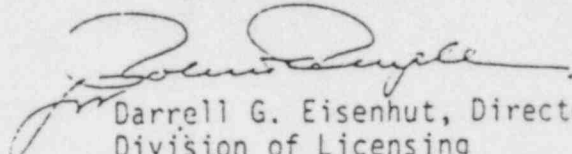
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- 4. Actions resulting from vital area validation - Vital area identifications and categories were approved previously by the staff subject to subsequent validation, and operating licenses were conditioned accordingly. Problems identified by this after-the-fact validation would be addressed to the licensee for action in accordance with the regulations.
- 5. Actions relating to the safety/safeguards interface - Each of these items would be evaluated on a case-by-case basis by NRR/NMSS and the appropriate disposition determined jointly.

We are returning the Surry and North Anna RER reports for your reconsideration in terms of the above recommendations. We also are enclosing specific NRR comments on these reports for your information and consideration. We would be pleased to discuss these matters further with you and to work with you in implementing and/or further refining the recommended approach.

  
 Darrell G. Eisenhut, Director  
 Division of Licensing

Enclosures:  
 As stated

Enclosure(s) contain(s)                       
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