



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

JUL 24 1979

MEMORANDUM FOR: Commissioner Ahearne

FROM: Thomas F. Engelhardt
Chairman
Budget Review Group

THRU: Lee V. Gossick
(Signed) Lee V. Gossick
Executive Director for Operations

SUBJECT: UNIT RESIDENT INSPECTORS (SECY-79-436)

This responds to your request of July 16, 1979, for the views of the Budget Review Group (BRG) on SECY-79-436 which describes the I & E proposed unit resident inspector program.

During its review of the proposed budgets for the Office of Inspection and Enforcement for FY 1980 supplemental and FY 1981-1983, the BRG discussed the proposed unit resident inspector program at length with representatives of I&E and among itself. These discussions recognized that Congressional authorization for a unit resident inspector program involving 146 people and \$5M for FY 1980 was almost certain. Nevertheless the BRG recommended the setting aside of all proposed funds in the I&E and Office of Administration proposed budgets for Commission consideration because of concerns regarding the concept and implementation of the program.

Subsequent to the transmittal of the BRG recommendations on the requested office budget on July 11, 1979, which contained the above set aside recommendations, I&E transmitted to the Commission SECY-79-436 which further described the concept and proposed implementation of the unit resident inspector program. While that paper does provide the Commission with substantially more information on the details of the proposed program than had previously been available to either the Commission or the BRG, it still appears to the BRG to fall short in dealing with the concerns of the BRG as reflected in its recommendations to the EDO.

The primary concern of the BRG with the proposed unit resident inspector program is that it has not been given the detailed consideration that is customary with respect to the development and implementation of such a major program. For such a manpower intensive program we believe that the Commission should have available to it for consideration (a) additional information covering the projected benefits of the program as well as its potential risks; and (b) an assessment of alternatives which would vary both program content and planned resource requirements.

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Clearer definition as to objectives and scope of the program is essential to insure a common understanding of just how safety will be affected and to minimize the potential for misunderstanding the capability of the program. The BRG is concerned that the unit resident inspector program will be viewed by the public as an improved inspection program which will assure that accidents will not occur or that NRC will be able to instantly respond to an accident. The present concept of the program, as described in SECY-79-436, would not be capable of achieving either of these expectations.

Further, the BRG expressed concern that the implementation of the program may be moving forward at a pace which will not permit taking into account the results of "lessons learned" from TMI and the recommendation of the various TMI inquiries. The implementation of a major new program of this nature should be paced so as to take these matters into account. The results of these efforts may be recommendations to improve the NRC inspection program in a way not presently contemplated. To implement the program without these results may involve the necessity of reprogramming.

Another concern of the BRG is the ability of NRC to recruit and absorb such a large increase in personnel as would occur with the implementation of the unit resident inspection program in FY 1980-1983. The percent rate of recruitment for technical personnel is low. The proposed grade level for unit inspectors as proposed by I&E is GS-11/12. Recruiting at this grade level in the present market will be difficult and assignment of present NRC employees, if available at such grades, would create considerable problems for other I&E programs as well as those of other NRC offices. Absorbing such large numbers into the work force over such a relatively short period could create substantial strains on the management capability of I&E, possibly degrading other important programs.

The BRG also questioned the feasibility of the proposal in SECY-79-436 that the site inspectors and unit inspector programs be separate and that the resident and unit inspectors report to different supervisors in the Regional Offices--in our view an unnecessarily confusing chain of command. The BRG believes that the proposed chain of command as proposed by I&E be reviewed.

In its review of SECY-79-436, the BRG noted the lack of discussion of alternatives to the I&E proposed implementation of the unit resident inspector program. I&E presented to the Commission a single proposal which would implement the unit inspector program by continuing the present site resident program and adding a unit resident inspector for each unit in pre-operational startup or operation.

There are other alternatives which might be considered. An example would be the merging of the developing site resident program and the proposed unit resident program into a single program which would establish a resident unit inspector at each unit. This would change the present concept of both the site and unit resident inspection program and enhance the experience and skill level of the unit inspector. This would reduce resource requirements while achieving the apparent Congressional objectives.

In summary, it is the view of the BRG that the proposed unit resident inspection program is in need of more attention--both in terms of what is supposed to accomplish and how it stacks up against alternatives--than has been presented in SECY-79-436.

Thomas F. Engelhardt
Chairman
Budget Review Group

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