



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

NOV 1 1979

MEMORANDUM FOR: Daniel J. Donoghue, Director
Office of Administration

FROM: Paul E. Bird, Director
Division of Organization and Personnel
Office of Administration

SUBJECT: DRAFT PAPER ON NRC ORGANIZATIONAL OPTIONS FOR EMERGENCY
PREPAREDNESS (HALLER MEMO 10/31/79)

As you requested, we have reviewed the subject draft and have the following comments.

In general, the draft seems to be a well-reasoned paper. The faults we think we see with it are related more to some basic flaws in the Agency organization than to any lack of sound logic on the part of the writer. There are four points, however, which we think should be thoroughly considered before the paper is made final.

First, it seems inconsistent to dismiss an SP-IE joint effort because this would introduce an additional licensing office into the mix, when the long-term recommendation (IE responsibility) entails the same problem.

Next, option 2 appears to have some desirable qualities, its drawback of adding another licensing office notwithstanding. Among others, the fact that the Emergency Preparedness function would be consolidated and thus easy to transfer if the recommendation of Kemeny, et al., are accepted may have some merit.

Next, option 3, the NRR-IE combination, puts NRR in the materials safety and safeguards business and may thus be inconsistent with the Energy Reorganization Act of 1974 -- although in the long run, this may be a desirable development.

Last, under options 3 and 4, the recommendations of the draft, it is not clear to us what, if anything, happens to SP.

Given resolution of these issues, and recognizing the constraint that the paper encompassed only those conditions which can be resolved internally, we probably would have come out at the same place as the author of the draft, except that we might have leaned a little stronger toward option 2 for the reason listed above.

Hand signed by
Paul E. Bird

Paul E. Bird, Director
Division of Organization and Personnel

cc: W. W. Haller, NRC

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