



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

FEB 04 1981

EGM-81-07

MEMORANDUM FOR: Gary Snyder, Region I  
Charles Upright, Region II  
Charles Norelius, Region III  
Walter Vetter, Region IV  
Allen Johnson, Region V

FROM: Dudley Thompson, Director  
Enforcement and Investigations, IE

SUBJECT: INSPECTION REPORTS AND FORMATS OF ESCALATED ENFORCEMENT CASES

A. Inspection Reports

Quite often, during the course of reviewing elevated enforcement actions, we find that Inspection Reports (IR's) do not accurately reflect the violation(s), or are misleading or sometimes even contradictory. We request that when an IR issue is settled following conversations on a case with the appropriate HQ reviewer that the affected page or pages of the report be redone (in draft) and sent to the reviewer who will, in turn, send copies to any other reviewers in HQ. This should be done expeditiously in order to continue the reviews. We recognize that the initial IR's are drafts but, frequently, the final reports are not made available to us until well after the fact; i.e., following enforcement actions.

B. Formats

A few elevated enforcement actions have been issued from HQ using the new Enforcement Policy, and many other cases are still under review. Upon issuance, each regional coordinator receives a copy. These should be examined for new "boiler plate" format language. Specifically, note the language in transmittal letters consisting of sentences relating to the use of the new Enforcement Policy, the base dollar value of the penalty for each primary event and the assignment of Severity Level(s), including a description of the primary underlying cause(s). Note also that some cases include the Notice of Proposed Imposition in the NOV while others include separate Appendices A and B. At this point in time, it makes no difference which approach is used as long as all of the necessary language is used. Note for the combined format, the boiler plate lead-in paragraph references, among other things, P.L. 96-295. When using an Appendix B, P.L. 96-295 should also be used.

FOIA-88-353

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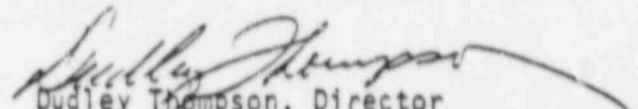
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Multiple Addressees

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I want to avoid rigidity in wording on elevated enforcement actions - we should use whatever language skills we possess to make the case clear. On the other hand, there are some legal requirements for including some key phrases, and the efficiency of word processing can be improved by standard wording.

  
Dudley Thompson, Director  
Enforcement and Investigations  
Office of Inspection and Enforcement

cc: J. Lieberman, ELD  
T. Brockett  
J. Riesland  
J. Metzger  
G. Barber

Contact: J. R. Metzger  
(28188)