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## POLICY ISSUE

December 18, 1997

(NEGATIVE CONSENT)

SECY-97-293

FOR: The Commissioners

FROM: L. Joseph Callan  
Executive Director for Operations

SUBJECT: WALNUT CREEK FIELD OFFICE (WCFO) CLOSURE PLAN

### PURPOSE:

The purpose of this Commission paper is to provide the Commission the Walnut Creek Field Office Closure Plan.

### BACKGROUND:

In a memorandum to Chief Financial Officer dated August 20, 1997, the Chairman provided guidance on behalf of the Commission regarding the FY 1999-2001 budget proposal. The approval of the budget reflected a decision on the part of the Commission to close the Walnut Creek Field Office effective no later than October 1, 1998. The staff was directed to develop a closure plan and submit it to the Commission no later than December 1, 1997.

### DISCUSSION:

The Executive Director for Operations assigned the Region IV Regional Administrator the responsibility for overall transition planning and implementation of the Commission's decision. A WCFO Closure Working Group was established to prepare the Field Office Closure Plan. The Closure Working Group consisted of NRC management representatives and representatives of the National Treasury Employees Union (NTEU). Two Closure Working Group meetings were held in Walnut Creek to develop the Closure Plan. The Closure Plan provides strategies for accomplishing the following: (1) transition of regulatory programs from

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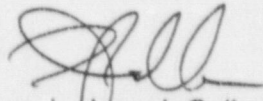
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WCFO to the Region IV Arlington office; (2) personnel actions for WCFO closure and Region IV Arlington staffing; and (3) closure of WCFO facilities and expansion of Region IV Arlington facilities. These strategies are provided in the Closure Plan, along with preliminary estimates of incremental costs associated with the major activities. The resource estimates will need to be refined and finalized after detailed transition plans have been completed. Significant changes will be provided to the Commission via the Executive Council. These resource estimates are not included in the FY 1998 and FY 1999 budget, and such costs will have to be funded by reprogramming existing resources and through the use of unobligated carryover. Implementation of these strategies will be done in accordance with applicable travel and personnel regulations. Detailed milestones and schedules to accomplish these strategies will be developed by teams within the Region IV organization. The Closure Working Group will maintain oversight of the implementation efforts throughout the transition period by conducting periodic reviews of the transition plan accomplishments and conducting meetings with affected staff. In addition, the DEDM will continue to brief the Executive Council on closure activities.

The Office of the General Counsel has no legal objection to this paper or the Closure Plan.

The Office of the Chief Financial Officer has reviewed this Commission paper for resource implications and has no objections.



L. Joseph Callan  
Executive Director  
for Operations

Enclosure:  
Walnut Creek Field Office Closure Plan

SECY NOTE: In the absence of instructions to the contrary, SECY will notify the staff on Monday, January 12, 1998 that the Commission, by negative consent, assents to the action proposed in this paper.

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## WALNUT CREEK FIELD OFFICE CLOSURE PLAN

### BACKGROUND

In September 1993, the Nuclear Regulatory Commission (NRC) made a decision to consolidate Regions IV and V into one Region headquartered in Arlington, TX, with a field office remaining in Walnut Creek, CA. A partnership committee of NRC management and National Treasury Employees Union (NTEU) members was formed to resolve any and all implementation issues associated with that decision. The Partnership Agreement Regarding Regional Realignment (Attachment 1) documents the agreements reached by the partnership committee.

The consolidation was scheduled to take place no later than October 1, 1994. Detailed transition plans were developed to outline specific milestones within the various program areas. As circumstances evolved, formal dissolution of Region V as an organizational entity occurred on April 4, 1994.

As provided for under the terms of the original Partnership Agreement, after 2 years, the staff (including management and NTEU representatives), prepared an assessment of the effectiveness of the realigned organization. The assessment was submitted to the Commission under SECY 96-165 (Attachment 2). In short, the assessment concluded that the realigned Region IV with a Walnut Creek Field Office (WCFO) was functioning effectively. However, the assessment did note that there were certain management costs associated with this structure.

In conjunction with the FY 1999 Internal Program Review and Budget Process, the Executive Council recommended to the Commission that they consider closure of WCFO. Chairman Jackson's August 20, 1997, memorandum to the Chief Financial Officer (Attachment 3) provided feedback on the budget proposed by the Executive Council. The Chairman's memorandum specifically stated that "The approval of this budget reflects a decision on the part of the Commission to close the Walnut Creek Field Office effective no later than October 1, 1998. The staff is directed to develop a closure plan and submit it to the Commission no later than December 1, 1997. The staff should undertake appropriate discussion with NTEU relative to the implementation of this decision. The plan should assume that all affected employees will be offered a position within the agency."

On September 18, 1997, the Executive Director for Operations issued a memorandum to the Regional Administrator, Region IV, assigning responsibilities for certain transition activities (Attachment 4). This tasking memorandum called for the establishment of a Closure Working Group composed of management and NTEU members to prepare the WCFO Closure Plan. The Closure Working Group was established as an independent entity which would only coordinate with the Agency Labor Management Partnership Committee if agreement could not be reached on any specific issues. Activities of the Working Group were summarized and forwarded to the Executive Council through the Deputy Executive Director for Management Services on a weekly basis throughout the development of the WCFO Closure Plan.

The general approach of the Closure Working Group was to develop a plan that drew upon the prior successful experience with the Region IV/V consolidation. The group was comprised of the management and NTEU members listed in Attachment 5. Two Closure Working Group meetings were conducted at WCFO to develop the Closure Plan. Following each meeting, the

WCFO staff was briefed and feedback was obtained on the proposed strategies. This Closure Plan provides the agreed upon strategies for accomplishing the following: (1) transition of regulatory programs from WCFO to the RIV Arlington office, (2) personnel actions for WCFO closure and Region IV Arlington staffing, and (3) closure of WCFO facilities and expansion of Region IV Arlington facilities. These strategies are provided in the following sections of this Closure Plan along with preliminary estimates of incremental costs associated with the major activities. The resource estimates will need to be refined and finalized after detailed transition plans have been completed. Significant changes will be provided to the Commission via the Executive Council. These resource estimates are not included in the FY-1998 or FY-1999 budget and such costs will have to be funded by reprogramming existing resources and through the use of unobligated carryover. Implementation of these strategies will be done in accordance with applicable travel and personnel regulations. Detailed Transition Plans with milestones and schedules to accomplish these strategies will be developed by teams within the RIV organization. The Closure Working Group will maintain oversight of the implementation efforts throughout the transition period by conducting periodic reviews of the transition plan accomplishments and conducting meetings with affected staff.

## **PROGRAM TRANSITION STRATEGIES**

Transition plans will be prepared to ensure program continuity and stability. These plans will be developed by teams comprised of staff members from the various organizations responsible for program implementation and approved by the Regional Administrator, Region IV, by March 31, 1998. Each plan will include detailed assignments with schedules and will address any needed coordination of matters such as staffing, recruitment, training of personnel, and transfer of files and equipment. The plans will be tailored to expected circumstances and will be maintained as working documents to accommodate the anticipated changes.

The Closure Working Group reviewed the functions accomplished at WCFO and developed strategies to prepare transition plans for each organizational unit in Region IV Arlington to assume those functions upon WCFO closure. These strategies were subsequently reviewed and approved by the responsible managers. The following strategies will be employed by the various organizations for their transition responsibilities:

### Regional Administrator (RA) Staff

Transition plans for functions supporting the RA from WCFO will be limited to accommodating a turnover of activities in the Regional State Liaison Officer (RSLO) and Public Affairs Officer (PAO) functions including the transfer or replacement of staff. Currently, both functions are supported by staff in WCFO and Arlington offices with the incumbents serving as backup for each other. Transition plans will be developed to ensure timely and appropriate notification of the states, licensees, and public of the change in contacts from WCFO to the Arlington office of Region IV and any changes in personnel. Close coordination with the Office of State Programs and Office of Public Affairs will be conducted for transition planning.



#### Division of Reactor Safety (DRS)

Transition plans for DRS functions will be limited to supporting the transfer of staff from WCFO to the Arlington office. No official files are maintained at WCFO. Further, the lead for DRS regulatory activities is not conducted from WCFO. Only three DRS employees are expected to be at WCFO at the time of closure. These employees are currently supervised from Arlington. No problems are anticipated with adjusting inspection schedules in support of personnel moves or replacement.

#### Division of Reactor Projects (DRP)

Transition plans for DRP functions will address personnel moves and the turnover of oversight of four reactor licensees, currently being accomplished by WCFO, to the Arlington office. The resident inspector personnel at the four reactor sites will not be affected by the WCFO closure, except for their supervisory transfer. The final number of DRP branches will be reduced during WCFO closure to less than the current total of Arlington and WCFO branches (6) as part of agency streamlining actions. Transition planning will identify the branches to be assigned the WCFO sites and provide scheduling milestones for an effective turnover commensurate with the movement of WCFO personnel.

#### Division of Resource Management and Administration (DRMA)

Transition plans for DRMA functions will be limited to the transfer of responsibilities from the WCFO support staff to existing staff in the Arlington office. No WCFO support staff positions are being transferred to Arlington. Transition planning will ensure timely transfer of the travel, property and payroll functions and files to the Arlington office. A significant amount of DRMA activities will be conducted after WCFO closure to accommodate facility closure as described in the Facility Strategies section of this Closure Plan.

#### Division of Nuclear Material Safety (DNMS)

Transition plans for DNMS functions will be the most complex. Approximately one third of the Region IV materials licensing and inspection activities are currently being conducted by the eight WCFO staff assigned to DNMS. Official agency files are maintained at WCFO for these activities. Additionally, WCFO has responsibility for the regional fuel cycle inspection program and oversight of the Syncor multi-site license involving 38 nationwide radiopharmacies. Specific program expertise needs to be developed in Arlington through aggressive training, transfer of people, and innovative measures to cover program needs. Transition planning will account for the potential loss of expertise and knowledge for the materials inspection and licensing areas. Aggressive staffing and training activities will be initiated as soon as WCFO personnel plans are known and shortages identified. Despite these aggressive activities, Region IV management estimates that a minimum of four licensing and inspection staff from the WCFO DNMS organization will be required to maintain program continuity. These staff could be required for a period of up to 2 years to maintain program continuity while Region IV undertakes necessary hiring and training of new personnel to effectively carry out the workload. This challenge dictates the use of innovative personnel staffing approaches discussed in the Personnel Staffing Strategies section of this WCFO Closure Plan.

Additionally, State Agreement Officer (SAO) activities for the western states, including participation in the IMPEP Program, have been predominantly conducted from WCFO. The SAO functions in Arlington have been covered by the RSLO in addition to his normal responsibilities. Transition planning for accommodating the transfer of the SAO functions will include consolidating all SAO functional support into a single position located in Arlington.

#### Office of Investigations (OI)

Transition plans for OI Field Office activities will be limited to accommodating the transfer of one Special Agent position and the working files for ongoing investigations to the Arlington Office. Projected OI workload and the availability of trained resources to fill a vacant position in the Arlington office may necessitate the use of temporary staffing actions to ensure program continuity. Any transition staffing options offered to the OI Special Agent assigned to WCFO will be consistent with those offered to DNMS personnel to the extent justified by programmatic needs.

### **PERSONNEL STAFFING STRATEGIES**

The Closure Working Group agreed upon an approach to reassign the WCFO staff and fill the positions in Arlington. Consistent with the Region IV/V consolidation, NRC agreed to exercise any authority that is granted to the agency to offer incentives for retirement and early outs so that affected WCFO employees may take advantage of these incentives unless this would result in a significant disadvantage to the agency. Similarly, NTEU agreed not to grieve or arbitrate the selections made according to the process described in the WCFO Closure Plan. This agreement does not preclude an individual from filing an Equal Employment Opportunity complaint with the Agency. Any hardship cases will be considered by the Regional Administrator, Region IV, consistent with the practices used during the Region IV/V consolidation. The Closure Working Group identified the following sequential steps to accomplish the personnel actions:

- 1) Determine the Fiscal Year (FY) 1999 Staffing Plan for the Region IV organization consolidated in the Arlington, TX, office. The Region IV FY 1999 Staffing Plan was developed through normal regional partnership activities consistent with existing agency guidance.
- 2) Offer permanent reassignment letters to WCFO staff based on the openings on the Region IV FY 1999 Staffing Plan and other positions within the agency. After responses are received, actions for the competitive selection and recruitment of remaining vacant positions will be initiated by normal agency procedures.
- 3) After the permanent transfers to the Region IV Arlington office are identified, initiate a competitive selection process to fill transition staffing positions to meet the remaining needs identified in the Program Transition Strategies for DNMS. Any transition staffing options deemed appropriate by the Director, OI, that are justified by programmatic needs will be offered to the incumbent Special Agent.



## Region IV Consolidated Organization

The Region IV Labor Management Partnership Committee met and agreed upon a staffing plan to be implemented once WCFO closure has been completed and all Region IV resources are consolidated in Arlington, TX. Attachment 6 is the agreed upon organizational structure reflecting the elimination of overhead positions and transfer of direct staff positions to Arlington. This staffing plan identifies progress toward agency streamlining objectives such as the supervisory ratio and the percentage of GG-14's and above, but does not achieve the desired ratios. Region IV management made a conscious decision not to propose further organizational changes during this transition period to avoid further distractions from the agency mission and safety focus. The intent is to establish the identified organization by October 1, 1998. However, some interim functional or organization shifts may be required prior to that time to accommodate early departure of personnel.

## Permanent Staffing Process

The following actions will be taken to identify permanent reassignments of WCFO personnel.

- 1) All WCFO staff will be issued a reassignment letter. For most staff, there are equivalent positions in Arlington with comparable duties. Reassignment letters are expected to be issued by January 30, 1998.
- 2) Individuals for whom there is not a one-for-one comparable position match will be issued a reassignment letter to an equivalent position in Arlington or elsewhere wherever the best match can be made. If an individual chooses to take an alternative position at a lower grade, they will be afforded saved-grade for 2 years and saved-pay thereafter.
- 3) The WCFO staff will be briefed on relocation benefits by representatives of the Office of the Chief Financial Officer. Similarly, all interested individuals will have an opportunity to have an individual consultation with the Regional Personnel Officer and will be given severance pay calculations and retirement estimates. A career counselor will be available for assistance with resume preparations, etc. These activities, briefings, and services will be timed to generally coincide with the issuance of the reassignment letters.
- 4) Reassignment letters will require acceptance or declination within 30 days in order to allow management to proceed with the transition process. Failure to respond will be treated as a declination. Staff will be encouraged to identify any preference for a location other than Arlington, TX, when they respond to the reassignment letters.
- 5) Personnel desiring to transfer to other Regions or Headquarters may be reassigned to the location of their choice and placed in a position for which they are qualified and for which viable work exists. Individuals assigned to lower graded positions will be afforded saved-grade and saved-pay in accordance with Agency regulations. Where management determines that no viable work exists, they will work with the impacted employee on a case-by-case basis.

- 6) All employees transferring to Arlington will be expected to report for duty no later than October 1, 1998. No employees transferring to Arlington will be required to transfer any earlier than October 1, 1998.
- 7) As soon as possible after offer letters are accepted, employees will be provided appropriate authorizations to incur relocation expenses consistent with applicable regulations.
- 8) Individuals finding positions elsewhere in the Agency will need to report for duty consistent with existing agency policy or within approximately 120 days of acceptance of any such position.
- 9) Individuals not able to accept a position outside the W/CFO commuting area who will separate from government service, will not be required to separate earlier than October 1, 1998. Earlier separations are at the discretion of the individual. These separations will be considered involuntary.
- 10) WCFO employees may withdraw their declination of reassignment at any time prior to October 1, 1998. Upon withdrawal, the staff member will be considered for available positions within the agency for lateral reassignment. However, if no positions are available, the individual may have to take a lower grade position under Agency saved-grade/saved-pay provisions.

#### Transition Staffing Process

If sufficient personnel do not accept permanent reassignment to Arlington, TX, it will be necessary to retain experienced WCFO staff to ensure DNMS and OI program continuity during the transition period until the Arlington office can be fully staffed with trained and qualified personnel. The transition positions would be for a period which would allow management time to recruit and train new staff. For DNMS, this period could be approximately 2 years consistent with NRC Inspection Manual Chapter 1246. For OI, the training period is not as well defined and the period could be approximately 3 years, depending on the quality and background of the replacement individual hired. At the end of the 2- or 3-year period (DNMS or OI respectively) the positions would be abolished and incumbents separated from the agency, allowing incumbents to be eligible for discontinued service benefits such as retirement or severance consistent with OPM and Agency regulations. The following two options were developed for filling these transition positions:

- WCFO staff could be transferred to Arlington, TX, as transitional reassignments until trained replacements were in place. Transitional reassignments would be lateral reassignments. Staff transferring to Arlington, TX, under this option would be authorized reimbursement for relocation costs consistent with applicable travel regulations. This option is the preferred selection for accomplishing the program transition strategy.
- Work-at-home arrangements could be established until trained replacements were in place. The work-at-home positions would be at the GG-13 level since such individuals would not be able to perform the full range of duties of a GG-14 staff member including



training more junior individuals. Thus, if a current GG-14 individual applied and was accepted for a work-at-home position, they would accept a voluntary down grade with saved pay. Periodic trips to Arlington to review work may be required at management discretion. Each work-at-home arrangement will be reviewed by management on a case-by-case basis every 6 months. If any arrangement is found to be not in the best interest of the agency, the position would be abolished and the incumbent will be given the opportunity to relocate under a transitional reassignment or terminate employment at their option.

For OI, the options available for the Special Agent will be discussed with the incumbent and a decision made by the Director, OI, on the approach to be taken for transition and permanent staffing of the Special Agent position.

For DNMS, up to four such transition positions (depending upon the number of staff who permanently transfer to Arlington) would be posted for competitive selection. The following process will be used to fill the DNMS transition positions:

- 1) Position descriptions, elements and standards, and rating factors will be developed for the transitional, lateral reassignment and work-at-home positions based on the anticipated needs of the DNMS organization. These staffing documents will be developed by management and coordinated with the Region IV partnership.
- 2) The postings will be advertised simultaneously and applicants can apply for both the transitional, lateral reassignment and work-at-home positions. Applications will be accepted from WCFO staff for transition positions associated with the Closure Plan.
- 3) The rating panel for these positions will be comprised of two management representatives, two NTEU representatives, and a personnel representative from Region IV.
- 4) The best qualified list (BQL) for each position will be rank ordered according to qualification.
- 5) Selections from the posting for transitional reassignment will be considered first. After acceptances are received for the transitional reassignments, the remaining vacant transition positions will be filled from the work-at-home posting. Personnel selected for both positions will be offered their choice. If an employee previously selected for transitional reassignment chooses the work-at-home alternative, an additional work-at-home selection will be made to complete filling the transition positions. Once selections have been made for the work-at-home positions, these positions will not be canceled if other WCFO DNMS employees change their decision and choose to relocate to Arlington, TX.

- 6) The selecting official will consider personnel on the BQL in rank order. If a person is selected in other than the rank order, such selection must be reviewed by the Region IV Administrator in consultation with the appropriate NTEU representative and the selecting official.

## **FACILITY STRATEGIES**

The Facility Transition Plan will address the disposition of all equipment and property at WCFO as well as the return of the space to the General Services Administration (GSA). While some of this activity may begin while staff are still working out of the WCFO offices, a significant portion will have to occur immediately after October 1, 1998. The formal inventory and preparation of property for sale or excess is expected to take approximately 3 months. This may require that an individual from the WCFO support staff remain for a short period of time to conduct these activities. Service and maintenance contracts for equipment at WCFO will have to be terminated as appropriate.

Conversely, facility expansion plans will be initiated in Arlington. GSA and the Harris Health Building management have been approached about acquiring additional space to accommodate the staff transferring or being recruited to fill vacant positions.

## **INCREMENTAL COSTS**

As part of the FY 1999 Internal Program Review and Budget Process, resource savings were considered for steady-state conditions with and without WCFO. Budgeted resources were subsequently reduced to reflect projected savings in staff overhead (5 FTE) and net facility reductions for Region IV with closure of WCFO (\$250K). Based on the options described in this Closure Plan, the Closure Working Group estimated the preliminary incremental costs that could be incurred during the transition period associated with WCFO closure. These estimates were included, not to revisit the closure decision, but rather to provide information on requisite cash flows by expense categories during the implementing years. Preliminary incremental costs considered were associated with facilities closure and employee expenses including permanent and transition relocations, severance packages, and work-at-home expenses. The vast majority of relocation costs are expected to occur during fourth quarter FY-1998. The majority of other costs will be generated during fourth quarter FY-1998 and first quarter FY-1999. Severance payments and replacement employee training and travel will be spread out over FY-1999 with the latter extending into FY-2000. The Closure Working Group recognizes that in addition to these preliminary incremental costs there will be a number of factors such as unemployment compensations and locality pay savings which were not included in the estimates.

Each category of costs is described in the following paragraphs of this section. A preliminary summary of these costs with a low estimate and high estimate for the total costs is provided. We have intentionally presented the low and high figures within the bounds of what we think is realistic to establish budget input for specific expense categories. These summary costs were based on the Closure Working Group's assessment of the probable decisions made by each employee. A summary review of the demographics of the WCFO employees is also provided. These demographics were considered in the development of the summary of preliminary



estimates. It should be noted that employee decisions will not be made until sometime in 1998 and can be subject to change up until WCFO closure on October 1, 1998.

#### WCFO Employee Demographics

The WCFO staff currently consists of 30 personnel, including one inspector who plans to retire in early 1998 and one inspector who has accepted a position as a resident inspector at a site. Of the 28 WCFO employees expected to be assigned at the time of closure, six are or will be eligible for regular retirement and an additional eight are or will be eligible for discontinued service retirement. The remaining 14, having an average of 18 years of service and 46 years of age, will be eligible for severance pay. These 14 employees not yet eligible to retire represent the greatest uncertainty with respect to the incremental cost estimates. Three DNMS employees eligible for severance pay are within 2 years of retirement eligibility under discontinued service conditions; one DNMS inspector in FY 1999, two DNMS inspectors/reviewers in FY 2000. The OI Special Agent assigned to WCFO is eligible for retirement under discontinued service conditions in FY 2001. These individuals and some of the retirement eligible employees have shown the greatest interest in pursuing the transition staffing positions.

#### Employee Severance Payments

As noted above, 14 WCFO staff will be eligible for severance pay if they do not accept reassignments within the Agency. The average age of these 14 staff is 46 and the average number of years of service is 10. The calculations indicate that severance payments, which will be incurred during FY-99, will range from approximately \$4K to \$90K per individual. The median payment is estimated as \$50K per individual. The best estimate of the Closure Working Group is that approximately five to eight employees will leave federal service and be entitled to severance pay.

#### Permanent Relocation Expenses

As previously indicated, all 28 WCFO employees will be offered reassignments in the Agency. Permanent relocation expenses are comprised of two major components. The first component is made up of various claims associated with the change of station. The second component is the relocation service fee if such services are used. The change of station claims include house hunting, transportation of the employee and family, transportation and storage of household goods, temporary quarters, the reimbursable real estate closing costs, miscellaneous expenses, and the relocation income tax allowance. Experience over recent years indicate that such costs range from \$1K to \$55K. A figure of \$50K per employee is used, since experience from the Region IV/V consolidation indicated that employees from that area tend to have expenses on the high end of the range. The relocation service fee, if an employee sells their home to the relocation company, is 24% of the sale price. The Office of the Chief Financial Officer performed an analysis using the zip codes of the WCFO staff and determined that the average price of homes is approximately \$240K. Therefore, the relocation service fee for an employee using the full service program would be approximately \$60K. We have used \$60K as the estimate for the relocation service component. However, experience indicates that less than 50% of those relocating use the service. With the \$50K estimate for change of station claims and the \$60K estimate for the relocation service, our total permanent change-of-station

figure per employee is estimated at \$110K. Based on the prior experience with use of the relocation service, this estimate is somewhat conservative. While theoretically all 28 WCFO employees could relocate, the Closure Working Group estimates that 6-12 will permanently move to positions in Region IV or elsewhere in the Agency if the options for transition positions are offered to four DNMS employees and the OI Special Agent.

#### Transition Relocation Expenses

As noted under the Staffing Strategies section, up to five transitional positions will be established. Management's preference is that these positions be in Arlington, TX. If an employee were to relocate for one of these transitional positions, they would be entitled to all claims associated with a temporary change-of-station. The specific cost estimate for such claims including house hunting, transportation, temporary quarters, storage of household goods, property management, miscellaneous expenses, and relocation income tax allowances is \$135K per employee. This estimate is highly conservative since it assumes that a family of four would temporarily relocate, lease their home and need full temporary quarters on both ends. While up to five staff could transfer for such transitional positions, the Closure Working Group considers it likely that only one or two staff members will consider this alternative.

#### Work-at-Home Costs

As with the temporary relocation discussed above, one of the options identified in the Staffing Strategies Section for transitioning the OI and DNMS programs is work-at-home. Up to five such positions may be established. Certain costs will be incurred to establish any such work-at-home arrangements. The specific costs will be those associated with establishing a computer with point-to-point video conferencing and fax capability plus ongoing costs for a communications link. The estimate for such expenditures is \$5K for the initial installation and approximately \$100 per month thereafter. While up to five such positions may be established; the Closure Working Group estimates that two to four such positions will, in fact, be established. Individuals chosen for such work-at-home assignments may be required to make periodic visits to interact with management in Arlington. Costs associated with this travel are expected to be a small fraction of the Region IV travel allocation and are expected to occur throughout FY-1999 and FY-2000.

#### Employee Recruiting and Training Costs

As discussed in the section on Program Transition Strategies for DNMS, an aggressive recruiting, training and qualification program will be undertaken to restore the technical expertise expected to be lost after WCFO closure. Incremental recruitment costs are expected to be small in comparison to the overall agency budget. However, current DNMS materials reviewer and inspector qualification requirements outlined in NRC Inspection Manual Chapter 1246 specify a number of courses available only through contractor supported efforts. In order to support these emergent requirements, the Region IV training budget will need to be supplemented by approximately \$20K to \$30K over a period of 2 years to train new personnel



to fill the DNMS program losses. Incremental training costs for other Region IV organizations are expected to be small in comparison to the overall budget allotment. Travel to support the qualifications training is estimated at approximately \$100K over the next 2-year period starting in FY-1998.

#### Facility Costs

On September 30, 1998, WCFO will close and no longer exist as an organizational entity. However, to avoid disruption of WCFO activities before this date, there will necessarily be a number of activities which will have to occur in the months following closure to return the building to GSA. Most of these activities are related to property management. Some progress will be able to be made in terms of furniture and property excessing before closure; however, all furniture, property and files still being used by the staff will have to be available and functional until the employees depart. Therefore, the Closure Working Group assumed that the Agency will need to continue to pay WCFO rent for 3 to 4 months after closure while such property management activities are ongoing. Based on the current GSA lease, the incremental cost estimate for rent during facility closure is \$80K to \$100K. Additionally, a rough estimate of \$10K to \$20K for other miscellaneous facility costs such as shipment of files, computers, and equipment has been factored into the facilities closure cost estimate.

Additionally, one time costs will be incurred to set up the Region IV Arlington facilities to support the increased number of inspectors assigned to this office. Informal discussions with the Harris Health Building (current landlord for Region IV offices) indicate that space is available on a floor adjacent to the current NRC spaces. Incremental costs associated with setting up these spaces and preparing them for NRC occupation are being negotiated with GSA and the Harris Health building management, and are not included in the aforementioned cost estimates.

#### Expected Personnel Costs

The Closure Working Group developed two profiles for the expected 28-employee decision. These profiles represent our best assumptions of what the 28 staff will do.

Profile 1 represents our best assumptions of what the 28 staff will, in fact, decide to do. According to this profile:

- 9 employees will retire,
- 8 employees will resign and take severance pay,
- 6 employees will accept permanent reassignments involving relocation,
- 1 employee will accept a temporary change-of-station for a transition position in Arlington,
- 4 employees will enter work-at-home arrangements.

The preliminary estimated costs (excluding Region IV office reconfiguration costs) to support these personnel decisions is approximately \$1.2 million.

Profile 2 reflects more costly assumptions to account for the reasonable amount of uncertainty about what the 28 staff will decide to do, particularly if fewer staff retire or resign. According to Profile 2:

- 7 employees will retire,
- 5 employees will resign and take severance pay,
- 12 employees will accept permanent reassignments involving relocation,
- 2 employees will accept a temporary change-of-station for a transition position in Arlington,
- 2 employees will enter work-at-home assignments.

The preliminary estimated cost (excluding Region IV office reconfiguration costs) to support these personnel decisions is approximately \$2 million.



December 1993

## PARTNERSHIP AGREEMENT REGARDING REGIONAL REALIGNMENT

On September 22, 1993 the Nuclear Regulatory Commission made a decision to consolidate Regions IV and V into one Region located in Arlington, Texas with a field office remaining in Walnut Creek, California. Subsequently, on October 1, 1993, President Clinton issued Executive Order 12871, Labor-Management Partnership, which made significant portions of the Commission's decision subject to negotiation with the Union representing NRC bargaining unit employees. The Executive Order requests agencies and unions to try to resolve issues in partnership. As a result, the Agency and Union formed a Joint Partnership Committee. Subsequently, the undersigned members of the Joint Partnership Committee met for 7 days over a period of two months and reached the following agreement for the realignment of Regions IV and V.

FIELD OFFICE ORGANIZATION AND STRUCTURE

1. There will be a Field Office of Region IV located in Walnut Creek, California, which shall be organized in accordance with Attachment 1, which is hereby incorporated into this agreement.
2. This Field Office will commence operation no later than October 1, 1994.
3. By October 30, 1996, an assessment of the effectiveness of the Walnut Creek Field Office will be provided to the Commission in accordance with the following:
  - A. The assessment will be carried out by a Joint Partnership Committee comprised of both union and management officials.
  - B. In the event of a disagreement between the management representatives and the union representatives to the Joint Partnership Committee, both sides will present their separate views to the Commission.
  - C. After reviewing the assessment presented by the Committee and any potential differing views, the Commission will make a binding decision regarding the continued operation of the Field Office or any component thereof.
  - D. The Union agrees that it will not appeal the Commission's decision on this matter outside the Agency.
4. During the assessment period, meetings of a Joint Partnership Committee will be held at least semi-annually to discuss the operational effectiveness of the Field Office.
5. The Walnut Creek OI Field Office will be comprised of two personnel for the period October 1994 to January 1996. Only one of the two people will remain after January 1996 for the remainder of the assessment

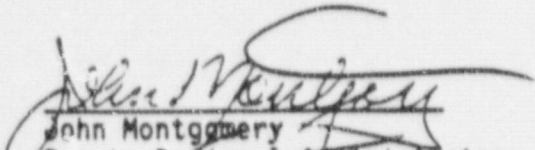
24. Individuals not selected for Field Office positions and who do not desire to move will not be required to separate from government service prior to October 1, 1994. An earlier separation date may be agreed upon if desired by an employee.
25. NRC agrees to exercise any authority that may be granted to federal agencies to offer incentives for retirement and early outs so that affected Region V employees may take advantage of these incentives unless this would result in a significant disadvantage to the agency.
26. Region V employees choosing not to remain employed by the NRC and who have service obligations resulting from any prior commitments to the NRC will be released from these obligations.
27. NRC agrees to use relocation bonuses for those employees relocating from Walnut Creek to Arlington who meet the requirements of existing regulations and guidelines.
28. NRC management agrees to consider exceptional hardship situations based on recommendations of a Joint Partnership Committee on a case-by-case basis in negotiating reassignment dates.
29. Management and the Union recognize that implementation of this agreement may require some added flexibility in working hours and travel requirements that could include off-hours travel and some added overtime to assure the mission is fulfilled.
30. The Transition Team which oversees the implementation of this agreement will be comprised of management and union representatives.
31. Management and the Union recognize that the Commission has the right to withdraw from or modify this agreement at any time if it determines that the public health and safety are negatively effected.

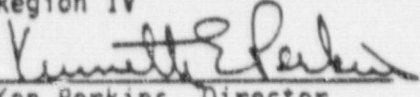
The Partnership Committee recommends that further reductions in FTE, consolidations, or any other actions should not result in the relocation of any of the combined Region IV/V staff prior to the end of the negotiated assessment period, October 1996. It is hoped that any reduction in FTE to reach 1995 goals can be achieved through normal attrition. The Committee is concerned that any further relocations would negatively affect building an effective combined organization and negatively affect morale throughout Region IV.

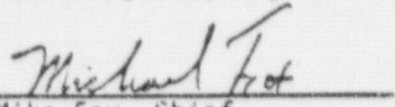
Further, it is the Committee's understanding that consolidation of certain region based functions, such as operator licensing, are being considered by the staff and the Commission. It is strongly recommended that any such decisions which are imminent be disclosed prior to effecting the relocation of current Region V employees in those functional areas in order to avoid double moves.

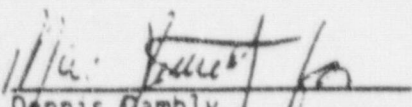


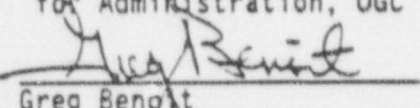
The above agreement represents the best efforts of the Partnership Committee. If the Commission does not approve this agreement or considers it necessary that substantive changes be made, the management and union representatives on the Joint Partnership Committee have agreed that we are at impasse on the realignment of Regions IV and V. The impasse would be resolved by proceeding under the auspices of the Federal Mediation and Conciliation Service and the Federal Service Impasses Panel. Such proceedings would result in a binding third party decision on the Agency and the Union.

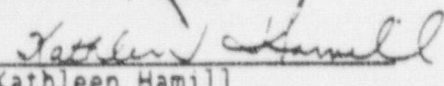
  
John Montgomery  
Deputy Regional Administrator  
Region IV

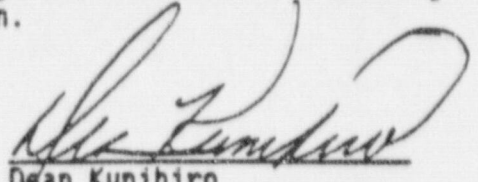
  
Ken Perkins, Director  
Division of Reactor Safety  
and Projects, Region V

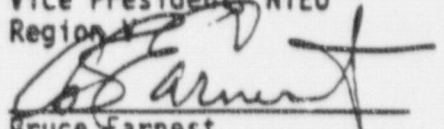
  
Mike Fox, Chief  
Policy and Labor Relations, CP

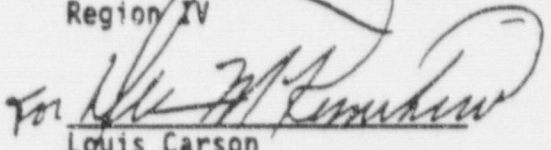
  
Dennis Dambly  
Assistant General Counsel  
for Administration, OGC

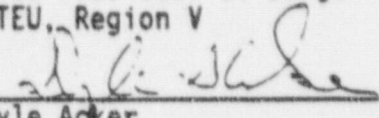
  
Greg Benoit  
Director, DRMA, RIV

  
Kathleen Hamill  
Director, DRMA, RV

  
Dean Kunihiro  
Vice President, NTEU  
Region IV

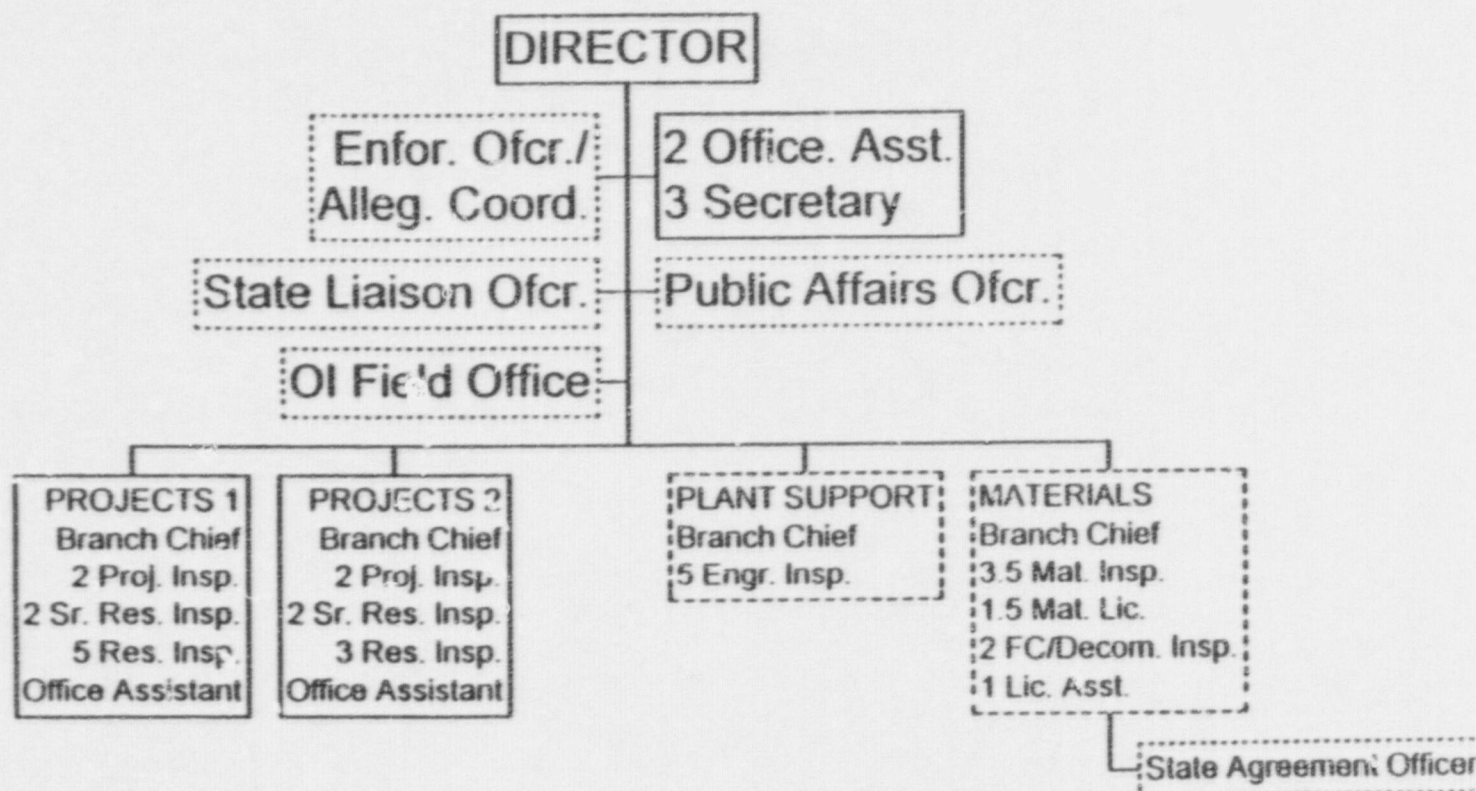
  
Bruce Earnest  
Vice President, NTEU  
Region IV

  
Louis Carson  
Vice President at Large  
NTEU, Region V

  
Dyle Acker  
Union Steward, NTEU  
Region V

Enclosure:  
Attachment 1

# WALNUT CREEK FIELD OFFICE



NOTE: The Public Affairs Officer reflected on this chart is funded by HQ OPA.  
Other organizational components outlined with dotted boxes would have direct line authority to Arlington.

132 Res  
10 WFO  
412 Total



July 24, 1996



SECY-96-165

## POLICY ISSUE

FOR: The Commissioners (Information)

FROM: James M. Taylor  
Executive Director for Operations

SUBJECT: ASSESSMENT OF REGIONAL REALIGNMENT

### Purpose:

To provide the Commission the assessment of the realigned Region IV. A commitment to perform the assessment was contained in COMSECY-93-064, "Partnership Agreement Regarding Regional Realignment," December 14, 1993.

### Background:

On September 22, 1993, the Commission made a decision to consolidate Regions IV and V into one Region located in Arlington, Texas with a Field Office remaining in Walnut Creek, California. Implementation of this decision was partnered with the National Treasury Employees Union. In December of 1993 the staff forwarded to the Commission the Partnership Agreement Regarding Regional Realignment which retained a Field Office for a period of two years from October 1994 and then required an assessment of its effectiveness and a binding decision by the Commission regarding continued operation of all or any part of the Walnut Creek Field Office. On December 23, 1993, the Secretary of the Commission advised me that the Commission had approved the Agreement including the provision for an effectiveness assessment to be completed and provided to the Commission by October 30, 1996.

### Discussion:

The Joint Partnership Committee responsible for preparation of the regional realignment assessment, comprised of both union and management officials, has met periodically throughout the assessment period. On April 15, 1996, I

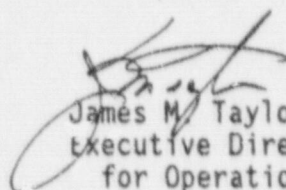
Contact: Samuel J. Collins, RIV  
817/860-8226

SECY NOTE: TO BE MADE PUBLICLY AVAILABLE IN 5 WORKING DAYS FROM THE  
DATE OF THIS PAPER.

informed the Commission that the staff was proceeding with the final assessment earlier than had originally been scheduled in order to facilitate consideration during the ongoing Strategic Assessment/Rebaselining efforts. This assessment was conducted using the guidelines provided by the December 1993 Partnership Agreement Regarding Regional Realignment.

The report reflects Region IV experience in implementing assigned programs operating with the Walnut Creek Field Office to date. As indicated, the general conclusion is that program implementation under the realigned structure has been effective. There have been communication and coordination challenges, and consistent program implementation has been achieved at costs in overhead resources and discretionary management time.

Closing of the Walnut Field Creek Office (WCFO) is part of the FY 1998 Budget proposal. The FY 1998 budget reflects a savings of \$244,000 and 6 FTE associated with the anticipated closing of WCFO.

  
James M. Taylor  
Executive Director  
for Operations

Attachment:  
Assessment of the Realigned Region IV Structure

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## ASSESSMENT OF REALIGNED REGION IV

### BACKGROUND

On September 22, 1993, the Nuclear Regulatory Commission decided to consolidate Regions IV and V into one Region located in Arlington, Texas, with a field office (referred to as the Walnut Creek Field Office or WCFO) located in Walnut Creek, California. Subsequently, as a result of Executive Order 12871, the Agency and the National Treasury Employees Union formed a Partnership Committee to address implementation issues. The partnership committee reached agreements regarding the field office organization and structure; field office staffing; and the placement of former Region V employees outside of Walnut Creek. It was also agreed that by October 1996 an assessment of the effectiveness of the Walnut Creek Field Office would be provided to the Commission. On December 23, 1993, the Secretary for the Commission advised the Executive Director for Operations that the assessment should not only address the effectiveness of the field office but also how well the Region IV office is carrying out the responsibilities of Region V which were transferred to it so that the Commission would be in a position to evaluate the results of the regional realignment.

The Partnership Committee responsible for preparation of the realignment assessment has met periodically throughout the assessment period. In the spring of this year the committee agreed to accelerate the schedule of the assessment so that it might be considered by the Commission in the context of any other organizational issues arising under the Strategic Assessment/Rebaselining efforts. The Partnership Committee concluded that it was unlikely that the content of the assessment would be substantially affected by an acceleration of the schedule from October to July and furthermore, given that the realignment was initiated in April of 1994, the revised assessment period covers two years of operational experience.

The original realignment study attempted to evaluate the costs and savings as well as program effectiveness associated with the various options which were considered. Following partnership discussions, the organizational structure which was implemented was substantially different from that discussed and costed in the original study. In addition to the changes which resulted from the partnership process, about halfway through the assessment period, additional intraregional realignments occurred resulting in the transfer of responsibility for Grand Gulf and Callaway from Regions II and III respectively. In short, this has not been a controlled experiment. In light of these changes, a detailed comparison of the actual costs and savings to those initially projected, would be of limited value. Consequently, the following evaluation primarily focuses on program effectiveness under the realigned structure noting benefits, challenges and/or relative costs resulting from this unique organization. Financial considerations have been included in a summary fashion for completeness, although these factors are not considered deterministic.

## PROGRAM EFFECTIVENESS

### REACTOR PROGRAM

In considering the effectiveness of Region IV's implementation of the reactor program we have focused on the following four program areas:

- o resident inspection program
- o region-based inspection program
- o operator licensing program
- o assessment and integration activities

Because the impact of the existence of the WCFO varies significantly from one program area to the next, each area will be addressed separately. Within each area the assessment will briefly describe the Region IV approach to program implementation, discuss program effectiveness, and note any challenges which the organization has had to face as a result of the realignment, as well as any benefits or costs associated with the unique Region IV structure which includes the WCFO.

#### Resident Inspection Program

Initially the projects and resident inspection functions under the realigned Region IV structure were anticipated to function in a relatively self-contained manner; however, as the assessment period has unfolded, there has been considerably more integration than originally anticipated. The Walnut Creek Field Office Director, who is a member of the SES, has performed as a Division level representative reporting to the Director, Division of Reactor Projects involved in Division wide activities.

The inspection interval for resident activities is six weeks. All reactor inspection reports in Region IV are signed out at the Division level. The assignment of a third Division level manager (i.e., in addition to the Director and Deputy Director of the Division of Reactor Projects) has made the report review effort more manageable. In order to ensure greater integration, the three managers have rotated the reviews of various licensee reports. This third Division level management representative has resulted in increased oversight provided to the Region IV residents who are dispersed over a wider geographic area than other regions.

Throughout the inspection period, daily plant status reviews are conducted to keep regional management apprised of emerging plant issues. Prior to the realignment, both Regions IV and V had status reviews at a daily 8 a.m. meeting with Projects Branch Chiefs and other senior managers. This information is now exchanged at two meetings: a brief one held at 8 a.m. Central Time (CT) and the other at 10 a.m. CT (8 a.m. Pacific Time). Initially there was considerable redundancy in the information exchanged at the 8 a.m. and 10 a.m. meetings about the eight sites assigned to the Arlington branches (which has grown to ten sites with the addition of Callaway and Grand Gulf). Over time the redundant information has been minimized and only highly time sensitive status is reviewed at the 8 a.m. CT meeting. The WCFO branch chiefs as well as Headquarters representatives from NRR and the EDO's office participate in the 10 a.m. daily meeting via conference call.



While there was some initial concern about the need to schedule two separate meetings, Regional management has become convinced that due to the time zone differences, an 8 a.m. and 10 a.m. meeting would be required regardless of whether the field office existed. It would not be reasonable to expect residents to routinely get to the West Coast sites early enough in order to be able to review plant status with their branch chiefs, regardless of where the branch chiefs were located, in support of an 8 a.m. CT meeting. Nor is it reasonable to expect Regional management to wait until 10 a.m. to be briefed on time sensitive plant issues involving plants within the same or earlier time zones. Thus, to the extent that this represents any inefficiency, it is more a function of Region IV's tremendous geographic size with reactors in three different time zones than it is a function of the existence of the WCFO.

The obvious indicators of inspection program effectiveness are the consistency of inspection findings and the quality and timeliness of inspection reports. Feedback indicates that Region IV's performance with respect to these factors has been good. Timeliness of reports has been reasonable and, while the Region continues to focus attention on improving in this area, timeliness of reports for the resident program staff is more or less neutral in terms of the field office. Inasmuch as Region IV policy is to assure consistent, high quality inspection reports by having a Division of Reactor Projects SES member sign the reports out, there is greater need for telephone and electronic communication and coordination between the branch chiefs and the division managers. However, this has not presented a significant challenge.

The establishment of a single Region, larger than either of the two prior organizations, has increased the opportunities for issues to receive wider attention and consideration. Essentially, Regional management has a larger experience base and thus has a better perspective and is better equipped to appropriately address and resolve issues. The larger population of Regional sites also increases the flexibility for rotations of resident staff. The larger geographic area and distribution of sites has added some travel related burden for Region IV SES managers providing oversight in the field. The additional SES manager (WCFO Director) has facilitated maintaining the desired level of management coverage and oversight across the Region.

Overall, the realigned Region IV has effectively implemented the resident inspection program through close coordination and communication between Arlington and Walnut Creek.

#### Region-based Inspection Program

The region-based reactor inspection effort covers a wide spectrum of disciplines. With the exception of the Project Engineer inspection function, all of the region-based efforts now come from the Division of Reactor Safety (DRS). Inspections disciplines include engineering, maintenance, and various plant support activities such as radiation protection, physical security and emergency preparedness. Within the various specialty areas, the region-based efforts may take the form of routine, planned inspections defined in Inspection Manual 2515 (which are scheduled using the Master Inspection Plan), team inspections, or reactive inspections. The feedback that the

Region has received from Headquarters and management appraisals is that, from an outside perspective, Region IV has been implementing an effective reactor inspection program.

Initially the DRS inspectors located in Walnut Creek were assigned to a distinct organizational unit called the Plant Support Branch. This branch performed inspections of safety assessment and quality verification, fire protection, and quality assurance programs. In October of 1995, Region IV implemented a reorganization that consolidated all Region reactor inspection functions in the Division of Reactor Safety (DRS). This involved the transfer of the power reactor (Part 50) emergency preparedness, security and radiation protection functions from the former Division of Radiation Safety and Safeguards (DRSS) to DRS. These disciplines are more closely linked to the Plant Support category used in the Systematic Assessment of Licensee Performance (SALP) process and a new Plant Support Branch located in Arlington was formed at that time. Another goal of the reorganization was to achieve progress in the supervisor-to-employee ratios emanating from the National Performance Review (NPR). The WCFO Plant Support Branch consisted of four permanent employees reporting to an on-site Branch Chief. Given the above, the DRS WCFO Plant Support Branch was absorbed into the existing Arlington Engineering Branch. The former WCFO Plant Support Branch Chief became a group leader and acts as a proxy for the Engineering Branch Chief.

Inspections in the region-based areas, except engineering, have generally been executed by staff stationed in the Arlington office. Therefore, execution of the inspection program at reactor sites for all disciplines other than engineering (i.e., maintenance, emergency preparedness, security and radiation protection) has not been affected in any meaningful way by the existence of the Walnut Creek Field Office.

Within the reactor program, it is this Engineering Branch which faces the greatest challenges with the unique organizational alignment involving the Walnut Creek Field Office. Since the October reorganization, Engineering Branch management has been in Arlington with approximately 40 percent of the staff resources, located in Walnut Creek. Thus, the planning, scheduling and ongoing coordination of the Engineering Branch has required a greater level of management attention. Access and communication has been easier where an employee or supervisor can walk next door into an individual's office to exchange information. Although the branch chief conducts weekly staff meetings in order to integrate schedules and communicate general information and the WCFO staff and personnel on inspections participate in these meetings via teleconference, the management burden is increased since time zone differences within the Region reduce the window of availability for scheduling such meetings.

Inspection documentation and the issuance of inspection reports for the Engineering staff assigned to the WCFO is a specific activity which is not implemented as efficiently as a result of the unique organizational alignment. Draft reports are e-mailed into the Arlington office for review. The marked up copy is typically returned to the inspector via e-mail or overnight mail. This process may involve several iterations with potential delays that would not necessarily occur if the manually edited copy could be handed to the



inspector down the hall. Inspection preparation is another area in which some additional effort is required for those inspectors planning an inspection at one of the 10 sites not previously assigned to the former Region V. The access to plant reference material for the WCFO inspectors is limited and may require that material be faxed or copied and mailed from Arlington to WCFO for preparation purposes.

In addition, the Region-based reactor inspection effort is often in the form of team inspections. In fact, the single inspector, single-week inspection is becoming the exception as opposed to the rule. Therefore, the requirement for coordination of preparation and documentation activities associated with team inspections has led to a greater number of WCFO inspector trips to Arlington than had originally been anticipated.

Perhaps the greatest challenge for the Engineering Branch Chief and staff located in the WCFO has to do with employee development and evaluation. There is a growing concern that it is more difficult for these individuals to receive the kind of direct feedback and mentoring that management would find necessary and desirable.

#### Operator Licensing Program

The operator licensing function is managed and implemented totally from the Arlington office. While one inspector in the Walnut Creek Field Office has elected to maintain his operator license examiner qualifications, this individual's participation in the execution of the program has been minimal. NRR conducted a recent evaluation of the Region IV operator licensing program and found it to be acceptable in all areas. While the NRR report noted a number of strengths and weaknesses, all program findings were unaffected by the existence of the WCFO.

#### Assessment and Integration Activities

Assessment and integration activities include the periodic Plant Performance Reviews (PPRs), the Systematic Assessment of Licensee Performance (SALP), and the efforts associated with preparation for the Senior Management Meetings including the preparation of the Plant Issues Matrices (PIMs). These efforts are directed at distilling from the specific inspection findings those issues and concerns which are most important.

The Semi-Annual Plant Performance Reviews (SPPRs) are conducted in March and September. These reviews are led by the Division of Reactor Projects and consist of a discussion of each of the 14 Region IV sites across all four SALP functional areas. By discussing one plant at a time and covering all four functional areas, the management team is able to identify common problems, concerns, or trends that are characteristic of the facility. The end result of these discussions is a product which Regional management reviews with NRR in April and October for purposes of deciding which plants will be discussed at the Senior Management Meetings held each year in January and June.

The periodic Plant Performance Reviews (PPRs) are conducted on the off quarters between the SPPRs with the Division of Reactor Safety responsible for

the lead. This review proceeds with a discussion of all 14 sites within each SALP functional area. This provides perspective about each licensee's performance in a given functional area.

Outside of four additional trips per year for the WCFO Branch Chiefs and Field Office Director, the DRP contribution for the assessment and integration efforts is relatively unaffected by the organizational structure. Likewise, the DKS efforts to conduct the PPRs are quite straightforward except in the engineering SALP functional area. The challenge in the engineering area stems from the fact that each individual in the Branch has been designated as a site coordinator for one of the 14 sites. Some additional coordination and communication effort is required to obtain information from the four or five site coordinators located in WCFO. Additionally, these individuals are not physically present to participate in the PPR meetings as are their counterparts in Arlington.

In general, there is a fairly strong feeling that the assessment and integration results of the realigned Region IV are significantly better than the products of either the former Region IV or Region V. As a result of the realignment, not only does management have the perspective which comes from a broader base with more licensees, but it also has benefitted from the blended perspectives of the staffs.



## NUCLEAR MATERIAL SAFETY AND SAFEGUARDS PROGRAMS

In considering the effectiveness of Region IV's implementation of the Nuclear Material Safety and Safeguards programs, we focused our attention on the following four program areas:

- o materials licensing
- o materials inspection
- o fuel facility inspection
- o decommissioning inspection

Once again, because the impact of the existence of the Walnut Creek Field Office varies somewhat from program to program, each is addressed separately. Within each area the report describes the approach to program implementation, assesses program effectiveness including relevant results from the Integrated Materials Performance Evaluation Program (IMPEP), and discusses challenges which the organization faces as a result of the realignment, as well as any benefits or costs associated with the unique Region IV structure which includes the WCFO.

### Materials Licensing

Initially it was intended that the materials licensing workload would be geographically split between Arlington and Walnut Creek in much the same manner as the geographic split associated with the former Regions IV and V. The licensing backlog that existed in the Arlington office led to some changes in this initial concept. The Walnut Creek staff were subsequently assigned the additional responsibility for licensees in the states of Idaho, Montana, and Utah. As the situation has evolved, there has been even more integration of licensing activities in that workload continues to shift to match resource availability. In the preparation of the FY-95 Operating Plan, Region IV proposed, and the Office of Nuclear Material Safety and Safeguards (NMSS) approved, the redirection of some resources from the inspection program to the licensing area in order to reduce the backlog. This meant that two of the WCFO staff previously assigned inspection responsibilities became more heavily involved in licensing. Presently, specific actions are reviewed, completed and signed out independently by the office (Arlington or WCFO) to which they are assigned. The Arlington licensing organization has the lead for policy matters. The licensing area is one in which the policy guides and directives are quite detailed. There is far greater control over these responsibilities than many others which the Region is charged with executing. Consequently, there is a high degree of consistency in the program products. The Arlington based Materials Licensing Branch Chief holds routine meetings to review workload and discuss generic issues. The WCFO staff involved in licensing activities participate in these meetings via conference call.

Headquarters conducted an Integrated Materials Performance Evaluation Program (IMPEP) in the spring of 1995. Their report found that Region IV was meeting all program goals. They also noted that rather significant improvement had occurred with respect to the licensing backlog issue. More recently, NMSS undertook a License Extension Review effort. During this review they noted that the Region IV licensing files, Arlington and Walnut

Creek, were in excellent shape. There is typically more day-to-day interaction between the NRC staff and licensee representatives in the licensing function than in inspection. By having staff located on the West Coast, the Region has extended the availability of personnel for an additional two hours per day. For those licensees in Alaska, Hawaii, and the Pacific Trust Territories, where they already have to contend with limited windows of opportunity for interaction, the extended availability has assured continued, effective responsiveness.

One of the challenges which the staff has had to face as the work assignments have been shifting is the physical location of the files. Further, as will be discussed later in the materials inspection area, there is not a direct relationship between the assignment of licensing casework and inspection responsibility. Therefore, files which may have been sent to WCFO for licensing action may not be available for an Arlington-based inspector to review prior to an inspection. In reality this has not been a significant problem since both organizations maintained a convenience file for the use of inspectors. These convenience files can be mailed, if necessary, and are generally adequate for inspection preparation purposes.

Both Arlington and Walnut Creek personnel agree that the physical separation of staff has required diligent attention to ensure effective communication. Extensive and effective use of teleconferencing and electronic mail has minimized this problem.

#### Materials Inspection

The assignments in the materials inspection area have more closely tracked with the original notion of a geographic split following the lines of the former Regions IV and V boundaries. Only recently has cross fertilization of inspection efforts begun. The physical location of the files will have to be considered carefully as this continues. Overall the IMPEP noted that the materials inspection program was being completed on time and that reports and escalated actions were also meeting timeliness goals. Basically the process is rather straightforward if the inspection is clear or the findings are minor. A form 591 may be issued in the field or from the office immediately after the inspection is completed. The IMPEP report did note that there was some inconsistency between the field notes from inspectors in Arlington versus Walnut Creek in terms of the level of detail. Their recommendation was that a middle ground might be appropriate. Corrective actions have been implemented and DNMS is continuing to monitor this area. Nonetheless, for routine inspection activity the program was found to be running in a highly effective manner.

For those instances when the inspection reveals significant findings or violations, the process becomes somewhat more complex. While the Materials Branch Chief in the WCFO is involved, the lead on escalated Materials enforcement cases resides with the Arlington Inspection Branch Chief. Therefore, as inspection findings are discussed with management, when it becomes apparent that escalated action may be considered, the inspector conducts a joint debrief of the Walnut Creek and Arlington Branch Chiefs. The



Arlington Branch Chief then becomes responsible for directing the action through a pre-enforcement panel, Office of Enforcement conference call and/or pre-decisional enforcement conference. The coordination of escalated cases has been an evolving process as the regional managers have sought an optimum solution. This process has become an additional burden for the Arlington Branch Chief, but management expects to become more efficient in dealing with this challenge.

#### Fuel Facility Inspection

Regional activities in the regulation of fuel facilities involves the conduct of inspections and program support to Headquarters. Headquarters NMSS is responsible for the licensing of fuel facilities and shares some of the inspection program responsibility as well, primarily in the specialty areas of criticality, material control and accountability, and chemical safety. There is extensive coordination with Headquarters with respect to fuel facility inspection, perhaps more so than in any other inspection area. Essentially there has been little change in the implementation of the fuel facility inspection program as a result of the realignment since all of the licensees are located on the West Coast (GE, Westinghouse, General Atomics, and Siemens). Further, the current trained and qualified inspection personnel are located in the Walnut Creek Field Office. Therefore, the inspection reports continue to be signed by the WCFO Materials Branch Chief with the only significant change that the Division Director signing the cover letter is located in Arlington.

Once again, the IMPEP report noted that the fuel facility inspection program was meeting all goals. Regional management has found it awkward to have inspection debriefs via conference call; however, it appears to be workable. Further coordination challenges occur when the inspection results in escalated enforcement. Pre-enforcement panels and Office of Enforcement briefs are conducted via conference calls. Some limited travel increases have been experienced for pre-enforcement conferences and management interface.

#### Decommissioning Inspection

The Region IV decommissioning efforts include power reactor decommissioning and various materials and fuel facility decommissioning responsibilities. In the power reactor arena all activity and program responsibility comes from the Arlington office. Therefore, regardless of whether the activity or site involves Independent Spent Fuel Storage Installations (ISFSI), a possession only license or SAFESTOR with fuel still in the fuel pool, the program responsibility and liaison with various Headquarters program offices is centrally managed in Arlington. Thus, power reactor decommissioning is unaffected by the existence of the Walnut Creek Field Office.

Other decommissioning efforts include those under the Site Decommissioning Management Plan (SDMP), previously terminated sites where the documentation is not adequate to support release for unrestricted use and routine casework. These efforts are executed by staff in both Arlington and WCFO, more or less split on the geographic boundaries of the former Regions IV and V.

Most of the fuel facility decommissioning activity is occurring at the General Atomics site in La Jolla, California, which is located in the geographic area of the WCFO. The licensee has been taking a "piece meal" approach to decommissioning their facilities. A decommissioning plan has been developed for specific areas. The plan has been approved by NMSS. Inspections against the plan and the established decommissioning criteria are performed by personnel assigned to WCFO. The WCFO Materials Branch Chief signs out the report and the Division Director in Arlington signs the cover letter. While the same coordination challenges discussed under the materials inspection program exist here, so do the same benefits of proximity, responsiveness and availability.

Other materials licensing decommissioning reviews are an ongoing responsibility with work assignments tracking closely to the other licensing assignments. These involve reviews of licensees relocating their places of business or otherwise vacating a facility and can involve extensive decommissioning review and inspection effort. As discussed under the materials licensing area, coordination between the WCFO and Arlington has been smooth.



## STATE PROGRAMS

State programs responsibility in the Regions generally falls into two major categories: Agreement State activities and State Liaison activities. Region IV has by far the largest State Program responsibilities of all the regions. In fact, the number of states in Region IV is almost as large as all of the other regions put together. Twenty-one states are within the geographic bounds of the Region. Seven of these states are non-Agreement States. Fourteen are Agreement States.

### Agreement State Program

In the past, the Agreement State program consisted of two fundamentally distinct functions. The first area was the review and compatibility determination; the second area was the ongoing liaison with the Agreement State materials program organizations. The NRC Headquarters Office of State Programs has initiated steps within the past two years to centralize the reviews of the Agreement State programs for adequacy and compatibility determinations. They have developed a formal program referred to as the Integrated Materials Performance Evaluation Program (IMPEP). The IMPEP reviews are conducted in a team format and typically involve staff from State Programs, NMSS, Agreement States and a Region. While the IMPEP responsibility is being centralized, the day-to-day liaison and interaction with the Agreement State materials program offices continues to be a regional function. This function is closely linked with the Region's materials program. In fact, regional management considers it essential that there be frequent interaction between the Region and Agreement State Radiation Control Program Directors. In addition, there is a strong commitment that State Program resources be available for assignment in the Incident Response Center and for site response teams.

When the realigned Region IV was initially established through partnership, the intent was to have two State Agreement Officers (SAO), one in Arlington and one in Walnut Creek, with responsibilities (both review and liaison) split more or less along the lines of the geographic boundaries of the former Regions IV and V. As it has evolved, the Region's Agreement State activities have not been functioning as envisioned. Not only have the IMPEP efforts been centralized, but the Arlington SAO has retired and the WCFO SAO has been assigned essentially full time to assisting Headquarters performing IMPEP reviews and an additional teaching assignment at the Technical Training Center. As a result, it is difficult to evaluate program effectiveness. To effectively perform the Agreement State liaison function Region IV has used resources from other programs to cover essential services. For the most part the licensing staff and State Liaison Officer in WCFO have handled West Coast communications to the extent possible and the Arlington State Liaison Officer and Division of Nuclear Material Safety (DNMS) Technical Assistant have covered the remainder of the States. These Arlington-based personnel have participated in the morning DNMS meetings; thus, they have had some opportunity for integrated communication. The West Coast Agreement States have received considerably less attention during this period because of the resource impacts.

While there have been no direct criticisms of the Region's shortcomings in terms of the Agreement State liaison function, management is not comfortable that they have an adequate awareness of ongoing state activities. Two important lessons which the Region has learned from this experience have been the need for integration of the NRC materials program and the Agreement State materials programs and the advantages of centralizing the SAO and the State Liaison functions in Arlington to more efficiently use the combined resources to cover the twenty-one states in the Region.

#### State Liaison

While the Agreement State program focuses entirely on materials issues, the State Liaison function is somewhat broader in that it encompasses interactions with all States on a wide range of agency regulatory issues, including power reactor operations, radioactive waste, formerly licensed decommissioned sites, and emergency response. Execution of this function requires a general awareness of the Agency's programs for nuclear-related issues and events. Both State Liaison Officers serve as Regional Assistance Committee members to the Federal Emergency Management Agency (FEMA). There are five FEMA regional offices in Region IV.

The initial concept of the realigned Region IV was to maintain a State Liaison Officer in both Arlington and Walnut Creek and have them share the program responsibility. Essentially, this has been the case throughout the assessment period. As noted above, the Arlington State Liaison Officer has had the added burden of covering many of the State Agreement Officer liaison assignments in the absence of an available SAO. The assignment of a State Liaison Officer in WCFO during the transition period was probably a net advantage in ensuring continuity and leading to the establishment of good relationships with State personnel. At this time, however, the presence of one of the two regional State Liaison Officers in WCFO has presented management with a significant challenge to balance the uneven workload between them.

As a result of the commitment of two positions in support of this function, the Agency has been able to be more responsive to State requests for support in attendance at meetings and related activities. Further, given the large number of licensees in the State of California, the assignment of a State Liaison Officer there leads to greater sensitivity to their concerns. In addition, having the State Liaison Officer in WCFO in the same time zone as most of the West Coast States has facilitated communication with the States. The significant downside of this arrangement is that the management in Arlington has an additional challenge to ensure continued communication occurs and adequate feedback is provided. Just as previously noted in the case of the SAO position in Walnut Creek, management is not as comfortable that they have an adequate awareness of ongoing non-Agreement State activities as would be the case if the State Liaison function were centralized in Arlington.



EMERGENCY RESPONSE PROGRAM

The true essence of the Emergency Response Program for the Region is the establishment of an emergency response team organization and the training and qualification of the personnel assigned to response team positions. On April 4, 1994, Region V ceased to exist and all emergency responsibilities for the realigned organization were assumed by the Arlington office. In the event of a licensee activity which caused the Agency to enter either a monitoring or standby mode, the Arlington office assumed the clear lead. Since April 4, 1994, Region IV has activated the Incident Response Center to monitor licensee activities related to:

- o the Diablo Canyon fire on August 16, 1994
- o the Waterford-3 fire on June 10, 1995
- o the Waterford-3 ammonia incident of July 20, 1995
- o Hurricane Erin on August 2, 1995
- o Hurricane Opal on October 2-4, 1995
- o the Wolf Creek frazil ice and stuck control rods in January 1996
- o the Palo Verde stuck fuel assembly and fire in April 1996
- o the Arkansas Nuclear One, Unit 1, main steam safety valve stuck open in May 1996

While the field office staff did not directly participate in monitoring activities in the Arlington IRC, they did consult via conference calls during the Palo Verde incident. In addition, WCFO personnel were utilized as initial site responders for the Diablo Canyon, Palo Verde and Waterford incidents.

## Emergency Response Team Organization

Consistent with the April 4, 1994 shift of responsibility, was the need to integrate specific WCFO staff into the response teams. For each position identified as a core position on either a Base Team or an Initial Site Team, the Region has identified a list of primary and alternate personnel. These lists are referred to as depth charts. WCFO personnel have been incorporated into the Region IV depth charts. These charts are maintained in the IRC along with the Division and WCFO weekly availability lists. The charts and availability lists are reviewed periodically to ensure that adequate coverage exists in the event that a base or site team needs to be assembled.

It is recognized that because of the geographic separation, WCFO personnel likely will not be present in Arlington to respond to the IRC. In this same regard, the WCFO Branch Chiefs and Technical Assistant are not available to serve as Duty Officers. This was originally considered; however, the difficulty of handing off the duty officer records, beeper, phone, log, etc. or the need to have multiple Region IV set ups (one in Arlington and one in WCFO) and the potential challenge this would cause the Headquarters Operations Officer, discouraged us from pursuing having WCFO personnel in the Duty Officer rotation.

## Training and Qualification of Response Personnel

An essential ingredient of a successful emergency response program is well trained personnel prepared to respond to an event at a licensee facility. Personnel must understand their role when the Agency enters a monitoring, standby or activation mode. They must clearly understand appropriate lines of communication and be quite familiar with the resources available in the Incident Response Center. Emergency response training typically consists of lectures and handouts related to the concept of operations and emergency exercises and drills focused on practical applications. The existence of WCFO has made scheduling classroom training somewhat more challenging; however, the Region has initiated a mandatory training week which is expected to ease this coordination burden.

Since April of 1994, Region IV has "played" in nine exercises and/or drills with a base and site team. By prestaging the response staff, Region IV has effectively integrated WCFO personnel into both the base and site teams in these exercises. The Headquarters program office, the Office for Analysis and Evaluation of Operational Data (AEOD), conducted an assessment in the summer of 1995 and found Region IV's emergency response program to be outstanding.



## ENFORCEMENT AND ALLEGATIONS MANAGEMENT PROGRAM

### Enforcement Program

Region IV's enforcement program is handled in much the same fashion regardless of whether the case involves a power reactor or a materials licensee. Typically the branch chiefs will make a determination that violations which are identified are either relatively minor and will be handled without escalated enforcement, or they will call for an enforcement panel to review the severity of the enforcement action which should be considered. Escalated cases are those which result in a severity level III or above. If an enforcement panel is held and an inspector assigned to the field office is responsible for the findings, their participation will be handled via conference call. The WCFO inspectors and branch chiefs actively participate in the panel meetings.

Once regional management reaches consensus on an enforcement strategy, there is a conference call to brief the Office of Enforcement. The inspection report is issued and, if appropriate, a pre-decisional enforcement meeting is scheduled. If the enforcement action is one which involves one of the four West Coast facilities, the Projects Branch Chief and inspector typically travel to Arlington for the pre-decisional enforcement conference.

Initially the realigned organization had an Enforcement Officer in Arlington and one in Walnut Creek as well. The Walnut Creek individual was also assigned allegation coordination activities. Soon after the realignment, it was recognized that consistency within the Region was going to be difficult to achieve and that neither individual was vested with overall responsibility. Compounding this situation was the fact that the enforcement guidance was changing. In order to ensure program consistency and effectiveness, it was mutually agreed that enforcement activity would be centrally managed out of Arlington and the individual previously assigned to this function in Walnut Creek became a Technical Assistant for the Division of Reactor Projects.

Aside from the fact that regional management chose to centralize the function, it was accepted that the workload had substantially increased as a result of the realignment. In light of this, a rotational position was established in Arlington and an Enforcement Specialist working for the Enforcement Officer was selected to fill this position for a two year period.

Overall, with the exceptions of the potential for a minor travel cost increase and the absence of an opportunity for face-to-face contact with the branch chief at the time of a panel meeting, the handling of the enforcement process has been relatively neutral in terms of the existence of Walnut Creek.

### Allegations Management

As noted in the enforcement area, the initial assignments for handling the allegations management program were split between Arlington and the Walnut Creek Field Office. However; to address consistency and coordination challenges, the WCFO Enforcement Officer/Allegations Coordinator was reassigned as a Technical Assistant, and the entire workload for allegations

coordination, including entries into the Allegations Management System, shifted to Arlington. Although not entirely due to the realignment, the increase in workload in the allegations area has been significant. Region IV had the largest number of allegations of all the regions in 1995. Another factor which changed during the assessment period was the agency policy in terms of documentation. The requirements for documentation have expanded significantly and have had a direct impact on workload. As noted in several other program areas, this assessment period has been subject to many evolving issues and circumstances outside the original regional realignment considerations.

While some allegations come in by way of a phone call or letter, a substantial number are received directly by the resident inspectors. Region IV conducts a weekly Allegations Review Panel (ARP) meeting. If an allegation to be discussed at the weekly meeting relates to one of the four WCFO reactor licensees or a materials licensee within the geographic responsibility of the field office, the WCFO personnel will participate in the meeting via conference call. The panel will evaluate the significance of the allegation and will assign it to a specific Division for followup and closeout. Early on there was some concern that if a WCFO inspector was assigned responsibility for close out, that they would be hampered by the fact that they did not have physical access to the central allegations files. As a practical matter however, they would only be assigned closeout responsibility if it were their facility. This being the case, they would have already participated in the ARP meeting and as a result would have sufficient background material to use for preparation of followup activities.

NRR has the lead responsibility for coordinating the allegations management program and for providing regional oversight. Effectiveness indicators include timeliness of responses and closeout as well as adequacy of documentation and file content. Annual reviews have been conducted and NRR has found that Region IV is performing in a superior manner. As in the enforcement area, the increased workload has been addressed by the establishment of an Arlington-based allegations assistant position filled by way of a rotational assignment. As noted in the emergency response area, having staff in Arlington and Walnut Creek has made training slightly more challenging; however, the initiation of a mandatory training week should alleviate some of this burden.



PUBLIC AFFAIRS PROGRAM

Appendix A contains a memorandum from the Director of the Office of Public Affairs (OPA) regarding OPA's views on the WCFO experience. An extract from his memorandum summarizes the OPA perspective. "The Director of the Office of Public Affairs continues to believe it is in the interest of the agency to maintain a presence on the West Coast. It makes sense generally to decentralize operations because of the sheer size of the region, the largest geographical organizational unit within NRC, particularly when there is a two-hour time difference between the main regional office and the field office."

On the other hand, Regional management considers this decentralized approach to staffing the two Public Affairs Officers (PAOs) assigned to the Region to present a significant challenge to fully and effectively utilize the PAO assigned to WCFO. The WCFO PAO is not available to interact regularly with regional management and, therefore, doesn't have the opportunity to absorb management's perspective on current and developing issues. Further, the WCFO PAO cannot as easily advise regional management of developing public affairs issues as would be the case if the function were centralized in Arlington.

INVESTIGATIONS PROGRAM

Appendix B contains a memorandum from the Director of the Office of Investigations (OI) regarding OI's views on the WCFO experience. Extracts from his memorandum summarize the OI perspective: "The need for the presence of an agent in the WCFO cannot be overstated. Having an agent in the WCFO has been an invaluable asset to OI, providing immediate investigative assistance to the regional office. ...Therefore, we would recommend the Commission maintain an OI presence in the WCFO."



ADMINISTRATIVE, FINANCIAL AND PERSONNEL PROGRAMS

## Administrative Program

Administrative services and activities are ongoing throughout Region IV in Arlington, WCFO and at the Resident Inspector offices. The administrative program encompasses a wide variety of areas; however, we will focus this review on the following major items:

- o space
- o automated data processing
- o communications
- o correspondence and records management
- o property management

Once the realigned structure was agreed upon, Region IV evaluated space requirements for the Arlington and Walnut Creek offices. It was concluded that the additional staff to be assigned to Arlington could be absorbed within the existing space. Considerable reductions needed to be made to the space in Walnut Creek. A new space plan was prepared for the WCFO office with the assistance of Headquarters Office of Administration and the General Services Administration (GSA). The process to reconfigure the space began in October 1994 and was completed in June of 1995. Costs for space reconfiguration totalled approximately \$60,000. Areas were returned to GSA, after formal notification, as they became available. The final installment in this process became effective on July 1, 1995. A total of approximately 15,000 square feet was returned to GSA for an annual savings in FY 1996 of approximately \$450,000. GSA continues to remain obligated under the terms of the lease until December 31, 1998.

Interactions with GSA are coordinated through the Arlington office. Rent in Walnut Creek is approximately \$10.00 per square foot per year more expensive than rent for office space in Arlington (~46,000 sq. ft. Arlington, ~12,000 sq. ft. Walnut Creek). If any future realignments should be considered, it ought to be recognized that any additional space requirements in Arlington will require current office reconfiguration or additional space to be acquired at another location. The current building is fully occupied.

Automated Data Processing (ADP) arrangements required to implement the realigned Region IV structure were extensive. Reconfigurations of the formerly independent Local Area Networks (LAN) involved changes to LAN drives, directories, groups, etc. Standardization of hardware and software became a challenge. Coordination of the efforts of the contract LAN Administrators became essential to smooth operation. The LAN room, where cables, servers, concentrators, and communication devices are located, had to be moved as part of the WCFO space modification efforts. In order to ensure that information can be shared between the technical staffs located in Arlington and Walnut Creek, the groups share some common drives on the LAN. These drives reside on the Arlington servers; therefore, there are some time delays experienced by the staff located in Walnut Creek when they are trying to access such information or files. All data entry services are performed in Arlington with inputs from the WCFO being sent in overnight mail. Installations of new hardware and software have been handled more or less independently by the LAN

Administrators, but the ordering and all coordination with the Headquarters Office of Information Resources Management is handled from Arlington. Training on new software is coordinated in Arlington by the Division of Resource Management and Administration (DRMA); however, the actual training has taken place in both locations.

Communication between the organizations continues to be one of the most significant challenges which the Region faces. Voice communications are fairly straightforward. WCFO has a contract for centrex phone lines and voice mail services. Arlington purchased a Fujitsu telephone switch in January of 1995 and an Octel voice mail system later in 1995. These products are adequate to support the Region's needs. Data communication has been effective except for lags in sharing data. As noted above, some delays occur when staff are connecting to remote servers. Finally, at this point in time, no videoconferencing capability exists between the Arlington and WCFO offices. The Region is pursuing selected small scale installations in order to cut back on travel for meetings and to simply enhance the overall communication capability of the organization.

The area of correspondence and records management is one which evolved as the Region gained experience with the realigned organizational structure. All official reactor docket files are maintained in Arlington. Copies of the four West Coast sites are kept in WCFO as well. Official materials docket files are generally maintained wherever the inspection responsibility is assigned. While reactor reports signed by the WCFO Field Office Director may be issued from WCFO, an individual in Arlington is responsible for coordinating the service lists for all sites with Headquarters.

The area of property management has been one which has received considerable time and attention and lessons-learned throughout the assessment period. An enormous amount of effort was required during the transition phase to identify excess property in WCFO, prepare all appropriate paperwork, and dispose of the excess furniture and equipment. An individual assigned to the former Region V remained on the Agency roles to accomplish this task until the summer of 1995. Upon completion of the excessing efforts, the accountability for all property was transferred to Region IV. An individual in WCFO is specifically assigned to serve as the property liaison. Although some inconsistencies existed between the office programs, the Region recently completed a 100% inventory of the Region IV property and was unable to account for only 2 out of 380 items in WCFO and 13 of 2460 items in Arlington. Program implementation improvements in the area are ongoing.

#### Financial Management Program

Regional allowances are comprised of Contract Support and Travel. With the exception of travel services and a small imprest fund, all aspects of financial management are handled by the Arlington office. All budgeting, funds control, and procurement are centrally managed by the Resource Management Branch in DRMA. Requisitions for goods and services are generated by WCFO staff and are forwarded to Arlington for approval and certification of the availability of funds. If an item must be ordered, the procurement staff in Arlington handles it. If the item costs less than \$500 (\$1000 with DRMA



approval) and can be obtained locally, once funds have been certified, the procurement liaison in WCFO may be asked to purchase the item with funds from the WCFO imprest fund.

In the original realignment study it was projected that travel would be somewhat more costly under the realigned structure. In fact, however, Region IV projects FY-96 travel expenditures will be fairly close to the combined travel allowances for Regions IV and V in FY-94.

Most of the WCFO staff are frequent travellers and are covered under blanket travel authorizations. This means that separate authorizations are not required for any trip within specified geographic areas. Authorizations for those infrequent travellers not covered by blanket authorizations and for trips outside the specified geographic areas for those under blankets are prepared in WCFO and forwarded to Arlington for approval and fund certification. Vouchers for trips covered by the blanket authorizations are audited in WCFO and Third Party Checks are issued locally. If a separate authorization is required, then the voucher is audited in Arlington.

#### Personnel Programs

Appendix C depicts the current Region IV organization and staffing. The FTE savings estimate in the original study was a calculated number derived by comparing baseline budgets and proposed organization charts. After initial adjustments, the estimate indicated an FTE savings of 26 in the Region and 5 in Headquarters. A number of changes including the evolution of Program Office budgets, the Partnership Committee restructuring efforts, and the realignment involving reassignment of the Callaway and Grand Gulf sites to Region IV make the specific tracking of FTE savings difficult at best. As the Agency has been able to streamline and realize certain efficiencies, Region IV and Headquarters have seen at least this level of resource reduction. Using the methodology from the original realignment study, which calculated savings on the basis of average salaries, the recurring savings from this FTE reduction are estimated at approximately \$2,500,000 per year.

Of the staff formerly assigned to Region V in Walnut Creek, 12 transferred to Region IV, 10 transferred elsewhere in the agency, 15 retired, and 21 resigned. The total payout for severance pay to those individuals who were eligible for such benefits has been slightly less than \$140,000. The total employee relocation costs associated with transfers to RIV and elsewhere in the Agency has been approximately \$1,500,000.

When considering the effectiveness of program implementation in various areas, a number of common themes related to personnel frequently arose. One of these recurring issues was the fact that the realignment that created the WCFO allowed the Region to retain and utilize a number of trained, qualified, and experienced staff who might have left the Agency had they been given no alternative but to relocate. In addition, the Region retained much of the management infrastructure as well as the historical and corporate knowledge about the facilities and licensees being absorbed. Further, having these individuals located on the West Coast, in close proximity to and in either the

same or a closer time zone as licensees, states, and public, affords an increased window of opportunity for communications.

The second general personnel issue is the acknowledgement that a number of additional overhead positions exist as a direct result of the existence of the Walnut Creek Field Office. Because the Region made a commitment to "freeze" the WCFO organization during this assessment period, other staffing considerations, such as the existence of two Project Engineers per WCFO branch, had to be worked around.

The final recurring theme was that the effectiveness of WCFO program implementation appears to be in large part due to the retention of pre-existing, well-experienced, qualified staff. This leads to a question regarding how effective one might expect the programs to be if WCFO staff attrition were to occur.





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

May 8, 1996

MEMORANDUM TO: L. J. Callan  
Administrator, NRC Region IV

FROM: William Beecher, Director  
Office of Public Affairs *William Beecher*

SUBJECT: Public Affairs Staffing in the Walnut Creek  
Field Office

This memorandum is intended to provide the views of the Office of Public Affairs as the process begins for reviewing the NRC's experience with the Walnut Creek Field Office and for considering its future.

BACKGROUND

NRC has had a public affairs officer stationed at Walnut Creek ever since it was the location of the former Region V. A public affairs officer has continued to be there since April 1994, when Walnut Creek became a field office which reported to the Region IV office in Arlington, Texas. (The public affairs officer, like his counterparts elsewhere in the agency, reports to the Director of the Office of Public Affairs and not to the regional administrator or field office director.)

THE PRESENT SITUATION

One of the results of Walnut Creek's becoming a field office is that Region IV, which heretofore had one public affairs officer, now has two who have successfully developed the ability to deal with members of the public and the media throughout the 21-state area which spans three time zones in the western half of the United States (not counting Alaska, Hawaii and the Pacific trust territories).

Both public affairs officers have worked to develop a familiarity with major licensees and with news organizations that cover them in all parts of the region. Breck Henderson, the public affairs officer now in Arlington, who formerly worked in Walnut Creek, brought the knowledge of the West Coast situation with him when he moved to the main Region IV office in the summer of 1995. Since joining NRC last year in Walnut Creek, Mark Hammond has participated in emergency exercises and other NRC activities in states traditionally within the scope of the Arlington office, and thus has a basic familiarity with that territory as well as the area in the far western United States. The two have worked out a regular arrangement for daily information sharing, in

addition to their monitoring of the daily plant status meeting and of the weekly principal staff meeting. Each also regularly backstops the other during absences.

#### THE PERMANENCE OF THE WALNUT CREEK FIELD OFFICE

The Director of the Office of Public Affairs continues to believe it is in the interest of the agency to maintain a presence on the West Coast. It makes sense generally to decentralize operations because of the sheer size of the region, the largest geographical organizational unit within NRC, particularly when there is a two-hour time difference between the main regional office and the field office.

Beyond these general considerations, however, there are these practical ones:

- **Dealing with our constituencies on a "real time" basis.**

For the most part, the public affairs officer in Walnut Creek deals with news organizations which operate in the Pacific time zone (in the spring, summer and early fall, Arizona is in that category, since it does not observe daylight saving time). This is more than just a matter of convenience for the media. It is of crucial importance considering that media activity tends to pick up after noon as TV stations work toward their early evening newscasts and newspapers prepare stories for editions that will be printed that night and delivered the next morning. (Afternoon newspapers, which are printed in the morning for afternoon delivery, are getting to be fewer and fewer.) Working on a schedule which is reasonably close to that of the media makes it much easier to respond effectively (particularly in fast-moving situations) when anti-nuclear critics try to get their spin on events. It is in our interest to have NRC perspectives reflected in the first day's breaking story.

- **Expanded NRC activities in the future**

NRC regulatory oversight of vitrification work at DOE plants is on the near horizon. The Fiscal Year 1997 budget contains \$3 million for initial activities. One of the prime locations for that work will be the DOE Hanford site in the Pacific Northwest, where dealing with decades of waste and contamination is a major national priority. This activity alone will bring about a step-up in media activity and inquiries from the general public, to say nothing of the increased interaction by appropriate members of the technical staff in the Hanford area.



DOE use of commercial reactors for tritium production is still in the discussion stage, as is the use of mixed-oxide fuel for power reactor operation. If either of these options were employed at one of the Washington Public Power Supply System plants, as has been proposed, that too would generate significant new NRC operations in the West.

There also remains the possibility of greater activity at DOE's Yucca Mountain site in Nevada, where site investigation activities continue on a proposed location for a spent fuel underground repository. It is also the proposed location for an interim monitored retrievable facility. Both the repository, if feasible, and the interim facility would require an NRC license. If either or both are licensed, anti-nuclear groups would make a major effort to generate opposition to spent fuel transportation through local communities. They are already voicing their opposition to "mobile Chernobyls." That effort would require OPA reactions.

The foregoing activities — combined with the ongoing NRC oversight of such issues as decommissioning, aging of operating nuclear power plants, and plant operations in a time of downsizing and utility deregulation — all suggest that there is more reason, not less, to keep an active presence at the Walnut Creek Field Office.

#### PUBLIC AFFAIRS OPTIONS IF THE FIELD OFFICE IS CLOSED

- The Walnut Creek public affairs officer could be transferred to Arlington, where he could, at least initially, specialize in dealing with issues involving licensees in the westernmost part of Region IV.
- Because of the two-hour time difference between Arlington and the Pacific Coast, a staggered shift operation might be considered to deal with inquiries from the media and the public which could be expected after 5 p. m. central time (which is 3 p. m. Pacific time). But even if one public affairs officer worked until 7 p. m. central time, he would have to try to get after-hours technical staff support from people at home with their families to deal with matters involving Palo Verde, San Onofre, Diablo Canyon and WNP-2 (unless key technical staff responsible for those plants work that late as a matter of routine).



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555-0001

June 5, 1996

MEMORANDUM TO: L. J. Callan, Regional Administrator  
Region IV

FROM: Guy P. Caputo, Director  
Office of Investigation *[Signature]*

SUBJECT: ASSESSMENT OF REALIGNED REGION IV

The Office of Investigations (OI) provides the following information with regard to OI's presence/staffing of the current Region IV, Walnut Creek Field Office (WCFO).

Since OI's inception, our presence in the regional office has been a benefit to the Commission, in that it has enabled us to be responsive to the staff on issues of potential wrongdoing. At the time of consolidation, OI had five special agents assigned to the former Region V. During the consolidation, three special agents were relocated within the agency, leaving two agents in the WCFO. In January 1996 one of those agents retired, leaving only Senior Special Agent Phil Joukoff in the WCFO.

The need for the presence of an agent in the WCFO cannot be overstated. Having an agent in the WCFO has been an invaluable asset to OI, providing immediate investigative assistance to the regional office. Since the consolidation, OI:RIV has opened approximately 50 cases in the WCFO, many of which have required timely reaction by OI and the technical staff to address and resolve potential health and safety issues.

Through Special Agent (S/A) Joukoff's sixteen years of investigative experience in the WCFO, he has established valuable contacts and rapport with federal, state and local law enforcement agencies, not only in the WCFO area, but throughout the geographic area covered by RIV:WCFO. This interaction with other agencies has proven to be extremely beneficial to OI and the staff. S/A Joukoff has a Bachelor of Science Degrees in both mechanical and metallurgical engineering and a graduate degree in metallurgical engineering. This technical expertise enables him to conduct initial on-site interviews and in many cases conduct preliminary technical reviews without using staff personnel to assist in the initial interviewing process. Consequently, S/A Joukoff is able to pursue investigative issues to closure in a timely manner.

Since the consolidation, OI:RIV has been able to effectively manage the caseload in OI:WCFO without any loss of efficiency, despite inherent problems with span of control. Because of the state of the art communications system



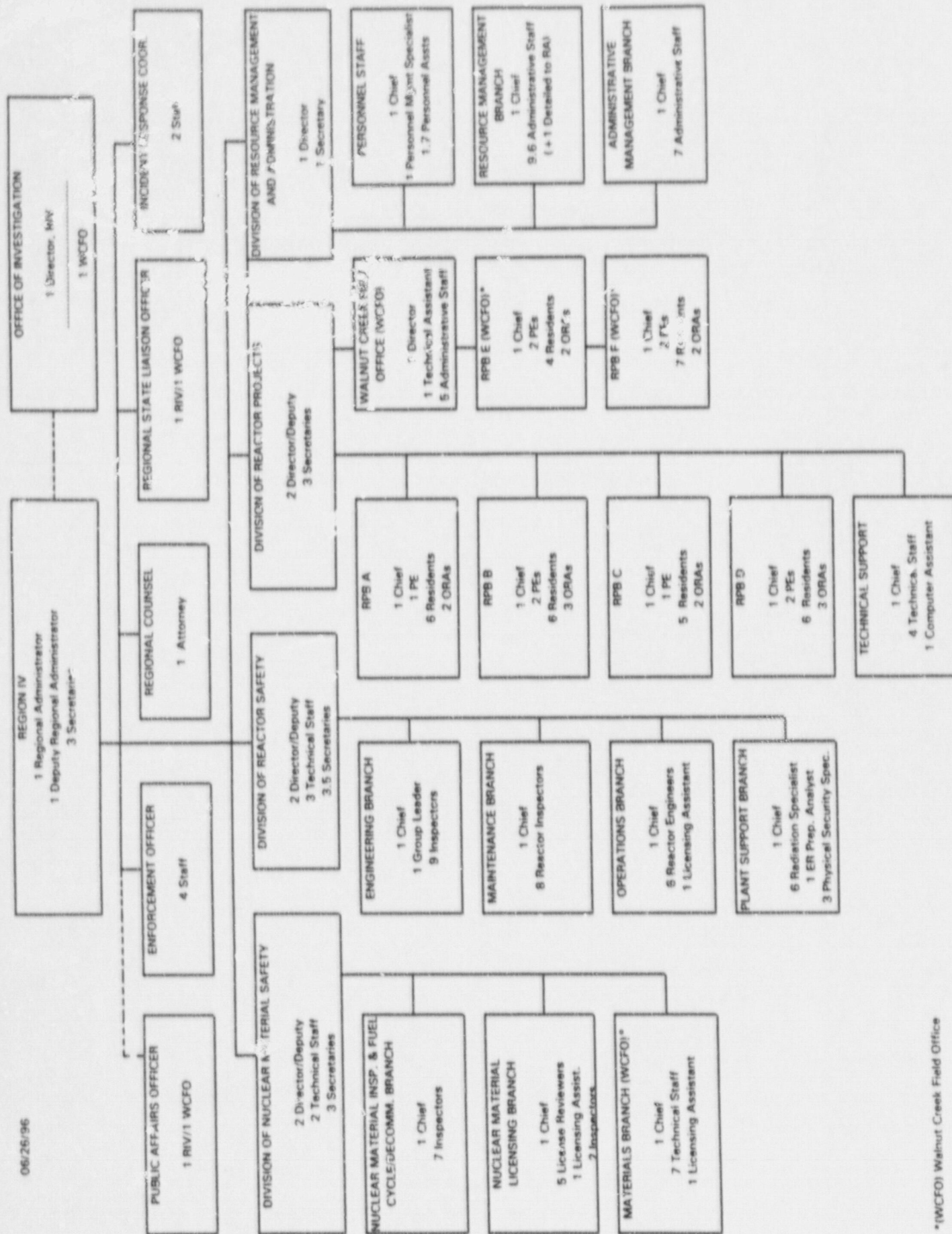
used by the RIV and OI:WCFO, the OI reports of investigation are transmitted via electronic mail, while exhibits and other documents necessary to support an investigation are either faxed or sent via overnight mail.

Since the WCFO encompasses such a large geographic area, the presence of OI in provides for a more realistic response time to all licensees located on the west coast, Hawaii and Alaska and the trust territory of the Pacific. This situation could be compounded if the NRC assumes regulatory responsibility for some of the Department of Energy facilities and licensees. In fact, it could result in the need for additional OI resources assigned to the WCFO.

Finally, with the recent Commission focus on discrimination/whistleblower complaints, especially high priority cases, there is more reason to maintain an OI presence in the WCFO. We have learned through experience the importance of interviewing allegeders in these types of cases and being timely in the disposition of discrimination issues. It is helpful to have a working relationship with the various Department of Labor offices, who initially conduct a fact finding inquiry into alleged discrimination issues. Continued OI presence in the WCFO would enable us to be more responsive to these types of issues.

In summary, it has been beneficial to the NRC, in general, and OI in particular, to have an agent in the WCFO with extensive experience and the ability to work independent of the region with minimal supervision. This presence has enabled OI to be more effective in the pursuit of potential wrongdoing issues and work more efficiently with the staff to address and resolve issues of mutual concern. Because of this presence, OI:RIV has been able to effectively focus the use of the agent force more efficiently, thereby avoiding the cost of additional travel to the WCFO area. Therefore, we would recommend the Commission maintain an OI presence in the WCFO.

06/26/96



\* (WCFO) Walnut Creek Field Office





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

August 20, 1997

MEMORANDUM TO: Jesse L. Funches  
Chief Financial Officer

FROM: Shirley Ann Jackson *Shirley Ann Jackson*

SUBJECT: FY 1999 - 2001 BUDGET PROPOSAL FOR NRC SALARIES AND EXPENSES APPROPRIATION

I have reviewed the FY 1999-2001 budget proposed by the Executive Council and after consultation with the Commission, I am providing the following guidance. The Commission approves the proposed reprogramming and current estimate for FY 1998, subject to the Commission's review of the basis for reprogramming of resources. Within 30 days, the staff should provide the Commission with detailed information outlining the reductions and increases which comprise the reprogramming assumed in FY 1998. After the Commission receives the additional information on the bases for the proposed reprogramming, the Commission will provide separate views on reprogramming, on the use of carryover funds from FY 1997, and on the final FY 1998 budget. Any changes to the distribution of funds in FY 1998 which result from this review should be provided to OMB for consideration during their review of the NRC budget request.

The Commission supports the funding of the ADAMS system in FY 1998, which will ensure full implementation by the year 2000. The ADAMS system is a vital infrastructure requirement that will provide the agency the capability to increase efficiency and program effectiveness. The full 1998 funding of the ADAMS system should also mitigate the need to renovate the NUDOCs system and avoid some Year 2000 expenses. The FY 1998 program reductions that should be taken to offset the additional funds requirement of the ADAMS system are included in Attachment 2.

The Commission believes that the budget submitted to OMB for the Salaries and Expenses appropriation for FY 1999 should be \$490 million and 2919 FTE's. The program guidance and adjustments to meet the revised resource level that are to be incorporated in the NRC FY 1999 budget are provided in Attachments 1 and 2. The staff should plan to reach the FY 1999 FTE level through attrition.

The FY 1999 funding level for the Salary and Expenses appropriation represents an increase in the budget of \$13.5 million above the FY 1998 level. Three factors warrant an increase in the FY 1999 Salary and Expenses appropriation. These factors should be clearly articulated to OMB to obtain support and approval of our budget submission. First, the agency's budget (Salaries and Expenses and IG appropriations) during the past five years (FY 1994-FY 1998), has been well below the agency's obligations and outlays for this time period. This is because the NRC has been aggressively managing funds in order to reduce carryover balances to an appropriate level of \$15-20 million. This use of unobligated carryover balances during FY 1994-FY 1998 has resulted in available budget authority averaging almost \$500 million during this

period (\$491.4 million in FY 1997 and \$487.8 million in the FY 1998 President's budget). With the use of \$6.5 million in carryover funds in FY 1998, this drawdown is essentially now over. As a result, we are no longer in a position to rely on a significant level of prior year funds to carry out the agency's programs. I believe this is an important factor that should be thoroughly discussed in the letter to OMI that transmits the FY 1999 budget.

Second, the FY 1999 budget proposal includes resources to perform new initiatives that NRC will be conducting to provide regulatory assistance to DOE. In FY 1999, the budget increases by \$2 million to work with DOE on the Tank Waste Remediation System at Hanford. During FY 2000, resources increase by \$1 million and 9 FTE to begin reviewing the application for a mixed oxide fuel fabrication facility. The proposal also includes \$2.6 million and 15 FTE that are needed in FY 1999 to continue the pilot program to test regulatory concepts for external regulation at three initial facilities and five new non-Defense program facilities. We can not assume these new activities at the expense of our ongoing regulatory programs. A third consideration is inflation. Inflation, at nearly 3 percent, represents an increase of approximately \$13 million above the FY 1998 level.

Attachments: As stated

cc: Commissioner Dicus  
Commissioner Diaz  
Commissioner McGaffigan  
J. Callan, EDO  
A. Galante, CIO



The Commission approves the FY 1999 -2001 budget proposal (Scenario 1) subject to the following comments and changes.

A. Program Assumptions

1. The budget should not assume that the Office of State programs will be integrated with NMSS.
2. The approval of this budget reflects a decision on the part of the Commission to close the Walnut Creek Field Office effective no later than October 1, 1998. The staff is directed to develop a closure plan and submit it to the Commission no later than December 1, 1997. The staff should undertake a, appropriate discussion with NTEU relative to the implementation of this decision. The plan should assume that all affected employees will be offered a position within the agency.
3. The Commission is currently considering or will be considering papers that may result in the identification of certain programs and activities that could be removed from the fee-based portion of the budget. The staff should expeditiously move forward, when the Commission has made final decisions on the resources to be moved from the fee base or to establish reimbursable agreements, to develop a written proposal to OMB which should be submitted before OMB completes its review of the FY 1999 Budget.

B. Program Activities That Should be Augmented in the FY 1999- 2001 Budget

The budget for reactor and material related rulemakings should be increased by 2 FTE in recognition that staff should continue to conduct rulemaking intended to provide added regulatory flexibility and burden reductions to licensees. The Research rulemaking plan should be adjusted to provide an appropriate balance of rulemaking that are necessary for safety and/or burden reduction.

To avoid a substantial increase in the operating reactor licensing action inventory, 15 FTE should be added beginning in FY 1999 to review and approve licensing actions. These additional resources should be planned for work on plant-specific licensing actions. In particular, staff is encouraged to place high priority on Technical Specification conversions and risk-informed and safety significant amendment requests.

C. Programs or Activities That Should be Reduced or Eliminated from the FY 1999 - 2001 Budget

The reason for including the Scenarios was to provide the Commission the information necessary to: (1) establish the budget which would be the request to OMB and Congress (Scenario 1 as modified by Commission decision) and, (2) to allow for decision making at this time on where reductions should be taken, if OMB or Congress provides a lower level from the NRC request (Scenarios 2-4). The Commission has concluded that the reductions presented as part of Scenario 2 or 3 to the Executive Council proposal should be made as shown in Attachment 2.

D. Adjustments to the remaining activities in the Scenarios.

The Commission is reviewing the prioritization of the remaining reductions, outlined in Scenario 2 and 3, that would be taken should the OMB or Congress direct a reduction in the FY 1999 - 2001 budget. The Commission will provide additional guidance to the staff on these matters.



## Reductions to FY 1998 (Scenario 1) Budget

Rank/Office	Activity	FY 1998		FY 1999	
		\$	FTE	\$	FTE
1. CIO	No expansion of WEB services beyond FY 1997 level	220	--	--	--
2. CIO	Reduce IT quality control/assistance activities	--	5	--	--
3. CIO	No improvements to selected IT operations	400	--	--	--
4. ASLBP	Postpone further automation of the hearing process	87	--	112	--
5. ADM	Do not replace Commission hearing room monitors	--	--	200	--
6. SECY	No expansion of the Commission Decision Tracking System	--	--	30	1
8. HR	Reduce NRC staff training 10 percent	300	--	--	--
10. NMSS	Do not monitor DOE efforts to submit a MOX fuel facility application	--	--	--	1
13. RES	Eliminate nuclear materials PRA research support	--	--	600	2
16. OPA	Reduce from 2 to 1 public affairs officers in Region II	--	1	--	1
19. OGC	Less proactive legal advice and less timely legal support	--	3	--	3
20. ADM	Severely curtail selected facilities management activities	--	--	350 <sup>1</sup>	--
21. HR	Cancel temporary secretarial services	345	--	345	--
22. NRR	Delay some topical report reviews	--	--	250 <sup>2</sup>	--
23. ACRS/ ACNW	Reduce Committees' advice to Commission 10 percent	--	3	--	3
24. NRR	Cancel license renewal work not specifically related to applications	--	--	100	3
25. HR	Do not initiate Human Resources Information System (HRIS)	--	--	1,500 <sup>3</sup>	--

<sup>1</sup>The reduction in services should be limited to those activities that would not adversely impact the safety of employees (e.g., snow removal). Reductions should be taken from items such as landscaping, alterations of workstations and window washing.

<sup>2</sup>Topical reports associated with specific licensing actions should receive higher priority to those performed to resolve generic safety issues.

<sup>3</sup>The planning estimate included in the budget reflects a costly system. A Capital Planning and Investment Control (CPIC) cost-benefit analysis should be performed before resources are planned for this activity to consider opportunities for integration with current or other planned systems, such as the Integrated Resource Management System.

26. CIO	Delay high-speed telecommunication with resident sites 1 year	700	—	100	—
27. NRR	Reduce resident inspector development program	—	5	—	3
31. OI	Do not investigate harassment and intimidation cases on more timely basis	—	—	—	1
37. ADM	Cancel on-site elevator maintenance	—	—	315	—
38. CFO	Suspend resident inspector 5-year relocation policy for 2 years	—	—	1,750 <sup>4</sup>	—
40. NRR	Delay resolution of generic safety issues	—	—	—	12
32 & 41. OE	Reduce resources for consistency in reactor non-escalated enforcement actions and harassment intimidation cases	—	—	—	3 <sup>1</sup>
46. ASLBP	Hearings may not be held or decided in a timely manner	—	3	—	5
49. NMSS	Eliminate support for nuclear facility threat assessment	—	—	440	—
51. EDO	Reduce support staff	—	—	—	2
53. RES	Reduce contractor support for earth sciences research	—	—	400 <sup>6</sup>	—
59.	Carryover	—	—	2,500	—
63. RES	Eliminate the Nuclear Safety Journal	—	—	260	—
64. RES	Eliminate the Educational Grants Program	—	—	200	—
65. RES	No contract support for regulatory excellence initiative on cultural assessment	—	—	200	—
RES	Eliminate hydrogen combustion contractor support	—	—	105	—
ADM	Reduce management services (contracts)	—	—	—	3 <sup>7</sup>
HR	Reduce management services (recruitment)	—	—	—	2 <sup>7</sup>
HR	Forego new technology improvement	—	—	100	—

<sup>4</sup>The two-year suspension of the five-year relocation policy could serve as a pilot program to determine whether a longer residence period would be appropriate.

<sup>5</sup>The Commission supports OC's efforts in this area. In recognition that it is important to be consistent as part of our responsibility to be a fair and credible regulator, OC should apply the increase of 5 FTEs in FY 1999 budget to review harassment and intimidation cases and work on consistency in non-escalated enforcement actions as deemed appropriate.

<sup>6</sup>OC should ensure that the remaining contract funds are used to maintain a core capability in this area.

<sup>7</sup>In response to a question on the FY 1999-2001 budget proposal, staff indicated that implementation of a streamlining initiative will allow the reduction of 3 FTEs in contract management in FY 1999. Human Resources (HR) indicated that a 50 percent reduction in recruitment tips and a reduction in staff support of HR scheduling, interview travel processing and vacancy announcement processing would result in a savings of 2 FTEs in HR. These reductions in management services should be reflected beginning in the FY 1999 budget.



IP	Reduce international activities	-	-	-	2 <sup>4</sup>
NRR	Reflect shutdown of Maine Yankee	-	-	-	3
CIO	Savings from implementing ADAMS in FY 98	-	-	183	-
	<b>SUBTOTAL</b>	<b>2,052</b>	<b>20</b>	<b>10,040</b>	<b>50</b>
38	Salaries and Benefits for FTE	1,800		4,750	
	<b>TOTAL</b>	<b>3,852</b>		<b>14,790</b>	

<sup>4</sup>The OIP's prioritization of activities that is being conducted in response to Commission direction on Direction Setting Issue 20 should reflect this impact.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 18, 1997

MEMORANDUM TO: Ellis W. Merschoff  
Regional Administrator  
Region IV

FROM: L. Joseph Callan *[Signature]*  
Executive Director for Operations

SUBJECT: TRANSITION OF WALNUT CREEK FIELD OFFICE (WCFO)  
ACTIVITIES TO ARLINGTON, TEXAS

It is important to assure an effective and efficient implementation of the Commission's decision to close the Region IV Field Office in Walnut Creek, California, by October 1, 1998. Transition activities must be carefully planned and fully coordinated among appropriate offices. In that regard, I am assigning the following responsibilities:

Senior Management Direction and Oversight

You, as Region IV Regional Administrator, will be responsible for overall transition planning and implementation. You should call on support from appropriate NRC program and administrative offices as necessary to assure a smooth transition.

Closure Working Group

A WCFO Closure Working Group will be established to prepare the Field Office Closure Plan. The working group shall include up to six management and six NTEU representatives. The Management representatives are Jim Dyer, Deputy Regional Administrator, Region IV; Don Hassell, Assistant General Counsel for Administration; Kathleen Hamill, Director, Division of Resource Management and Administration, Region IV; Howard Wong, Branch Chief, Region IV; Frank Wenslawski, Branch Chief, Region IV; and Mike Fox, Chief, Organization and Labor Relations, Office of Human Resources. In addition, the Chief Financial Officer will appoint a representative to assist the Group on financial matters. The Working Group will coordinate with the Region IV Labor



Management Partnership Committee and/or the Agency Labor Management Partnership Committee only on those issues clearly within their purview. In order to meet the December 1, 1997, date for submission to the Commission the Closure Plan should be forwarded to my office no later than November 17, 1997.

Once the general closure plan has been developed, appropriate program managers and staff will prepare a more detailed transition plan to address all of the logistical arrangements, e.g., file transfers, licensee notifications, facility closure, etc.

Patricia Norry, Deputy Executive Director for Management Services, will be responsible for coordinating Headquarters support for transition planning and implementation activities. She will report to me and the NRC Executive Council each week on our progress in effectively completing this transition.

cc: DEDM  
DEDR  
DEDE  
CFO  
CIO  
Office Directors  
Regional Administrators

WCFO CLOSURE WORKING GROUP

MANAGEMENT REPRESENTATIVES

Jim Dyer  
Kathleen Hamill  
Mike Fox  
Don Hassell  
Howard Wong  
Frank Wenslawski

NTEU REPRESENTATIVES

Bruce Earnest  
Dean Kunihiro  
Dyle Acker  
Jim Montgomery  
Steve McCrory  
Louis Carson

OFFICE OF THE CHIEF FINANCIAL OFFICER

Melanie Garver  
Mary Matheson



## REGION IV

