



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D. C. 20555

July 11, 1983

Mr. William J. Dircks, Executive Director
for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Dircks:

SUBJECT: ACRS COMMENTS ON THE NRR PILOT PROGRAM FOR DECENTRALIZATION
OF OPERATING REACTOR LICENSING ACTIVITIES

During its 279th meeting, July 7-9, 1983, the ACRS was briefed on the pilot approach to the decentralization of operating reactor licensing activities that is being recommended by the Office of Nuclear Reactor Regulation (NRR). This approach is described in a letter from Mr. Harold Denton to you dated June 14, 1983, the subject of which is "Decentralization of Operating Reactor Licensing Activities." We understand that you have directed NRR to solicit our comments and to respond to them during the process of preparing a Commission briefing paper on the approach. This letter provides our comments on the NRR approach, about which we still have reservations. We understand that the Commission has suggested a pilot program that differs significantly from the approach recommended by NRR.

Our letter dated May 16, 1983 to Chairman Palladino on the subject of regionalization listed six major concerns with the decentralization plan that was being proposed at that time. A copy of that letter is attached. The approach recommended by NRR is responsive to several of these concerns, but not to all. For ease of reference, we have organized our present comments according to the six concerns identified in the May 16th letter.


1. Dilution of technical talent: We are still concerned that the NRR Headquarters technical review staff may be unacceptably reduced if total NRR resources remain constant, as is likely. We question the statement made during the briefing mentioned above that a decentralized organization can use limited resources more efficiently.
2. Fragmentation of multidisciplinary interaction: Although we are encouraged that the recommended approach no longer includes the transfer of the project management function to the Regional Offices, we are still concerned that interaction between Regional and Headquarters personnel will be difficult. We agree that the project managers are best located at Headquarters, where the majority of work will be done, but their interaction with reviewers will be more difficult than with a completely centralized organization.

3. Division and confusion of authority between NRC Headquarters and the Regional Offices: Since the recommended approach retains licensing authority within NRR Headquarters, this concern is apparently resolved. The only possible confusion of authority that might still remain is over the reviewers themselves, as discussed in the next item.
4. Lack of uniformity among the Regions: This is still a valid concern with the recommended approach, although to a lesser degree than with the earlier proposal. Will reviewers located in the Regional Offices still be part of an NRR review branch, or will they be managed by Regional personnel? Unless they are still under Headquarters management, the potential for nonuniformity exists.
5. Maintenance of lines of communication: This concern is still valid for those plant-specific problem areas handled by the Regional Offices. As with the previous concern, however, the extent of the potential problem is less than with the earlier proposal.
6. Decisions on which issues have significance beyond a specific Region: This concern has been resolved, if it is indeed true that all issues will be processed by Headquarters staff before they are assigned to the Regional Offices for action.

The Committee is still concerned that regionalization of operating reactor licensing activities could have a detrimental effect on reactor safety. The approach that is currently being recommended by NRR is a significant improvement over the earlier proposal. It is possible that the proposed pilot program, which we hope would be administered so as to be reversible if unsuccessful, could identify ways to resolve our concerns. If such a pilot program is undertaken, the ACRS would like an opportunity to comment on the issues that are identified for resolution by the Regional Offices.

It is worth emphasizing that the NRR Staff preparing this plan operated under a ground rule which required them to take as a given the Commission position favoring regionalization. We have, of course, expressed doubts about that position, and would like to see an argument for a positive impact on safety as a basis for the proposed moves. We further believe, as mentioned in our letter of May 16, 1983, that some consideration of the Academy report on the Federal Aviation Administration is appropriate, if only to explain why it is not relevant to NRC.

Sincerely,



J. J. Ray
Chairman

Attachment:

[*] "ACRS Report on Regionalization," dated 5/16/83

[*] See pages 2885-2886, Volume V