



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

December 20, 1983

Honorable Nunzio J. Palladino
Chairman
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

SUBJECT: ACRS REPORT ON THE DECENTRALIZATION OF NRC REGULATORY ACTIVITIES

Dear Dr. Palladino:

The ACRS continues to maintain an interest in the proposed decentralization of NRC regulatory functions. As stated in our letters of May 16 and July 17, 1983, our concerns are focussed on a possible negative impact on safety -- we have no desire to intrude on NRC management prerogatives. There was a Committee discussion of the subject on December 16, 1983, following a Subcommittee meeting on December 14 in which we had the benefit of a useful discussion with the NRC Staff. We also had the documents, SECY-83-422, "Decentralization of Operating Reactor Licensing Activities," and SECY-83-452, "Policy Statement on Regionalization."

The Policy Statement strongly implies that the decentralization process will continue indefinitely. For example, such words as "to enlarge," "build-up their licensing capability," "gradual expansion," etc. are used. It is our understanding that this is not the intent of the Commission. We believe the Policy Statement should indicate clearly that it is not the intent to expand decentralization further during the two-year trial period.

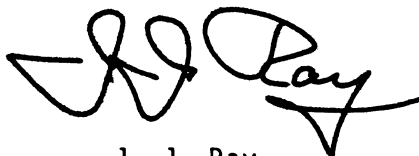
We endorse the development of an audit program to measure the success of the pilot program. The criteria proposed in the Policy Statement to be used to evaluate the pilot program should include indicators which will assess any safety implications of the pilot program. We believe that such indicators can be developed.

The Policy Statement does not clearly distinguish between, and in certain cases confuses, those licensing actions that are being transferred to the regions only for technical review and those which have been, or will be, transferred with full authority for decision making. Editorial clarification and consistency are needed if licensees and the public are to understand the Commission policy on decentralization.

There is inconsistency in wording as to whether the Commission intends to include two operating power reactors or two power stations in each of three regions in the pilot program. We believe the wording should indicate two stations in each of three regions to provide the Commission with maximum flexibility regarding the number of reactors to be included.

In view of the reduced scope of the proposed decentralization policy, we do not wish to raise any objection to the proposed pilot program. We do wish to be kept informed of the progress of the program, the progress of the audit, and any progress in assessing the impact of the program on safety.

Sincerely,

A handwritten signature in black ink, appearing to read "J. J. Ray". The signature is stylized with large, sweeping loops and a long horizontal stroke at the end.

J. J. Ray
Chairman

References:

1. SECY-83-452, "Policy Statement on Regionalization," November 4, 1983.
2. SECY-83-422, "Decentralization of Operating Reactor Licensing Activities," October 14, 1983.