



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

December 11, 1979

Honorable John F. Ahearne  
Chairman  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Dr. Ahearne:

The following comments are provided in response to your letter of October 3, 1979 regarding the adequacy of procedures for transmitting recommendations and questions generated by the ACRS, its subcommittees, and its individual members to the NRC Staff and the subsequent staff responses.

The ACRS realizes that its procedures and practices for transmitting recommendations and questions to the NRC Staff, and to the Commission itself, have been deficient in some respects. Steps have been and are being taken to correct this, both by the ACRS itself and in cooperation with the NRC Staff. For example, in 1976 the Committee and the then Director of Licensing agreed on a procedure to obtain clarification of ACRS recommendations when needed. This procedure has been used only sparingly by the NRC Staff. The Committee is aware of the need to indicate priorities more specifically and to describe more clearly the basis for its concerns and questions and the degree of importance that it attaches to them.

Although there have been significant problems with the nature and timeliness of the NRC Staff's response to ACRS concerns, the Committee believes that changes in its procedures, together with one or more of the changes in the NRC Staff's procedures now being considered, will be of help in improving the present situation.

It must be noted, however, that many of the ACRS recommendations are formally addressed to the Commission itself, in accordance with the statutory requirement that the ACRS advise the Commission. In many cases, these reports are simply referred by the Commission to the NRC Staff for action or response. In most of these cases, this procedure is appropriate. However, there are some circumstances in which the recommendations involve matters of policy or are such that action or specific attention by the Commission itself, particularly an indication of priority and authorization of appropriate resources, is required. The degree to which these reports receive the attention of the Commission has not always been apparent.

Sincerely,

Max W. Carbon  
Chairman