

NUCLEAR REGULATORY COMMISSION

ORIGINAL

RETURN TO SECRETARIAT RECORDS  
COMMISSION MEETING

---

---

In the Matter of: PUBLIC MEETING

DISCUSSION OF POLICY AND PLANNING GUIDANCE

---

---

DATE: December 8, 1981 PAGES: 1 - 44  
AT: Washington, D. C.

RETURN TO SECRETARIAT RECORDS

ALDERSON  REPORTING

400 Virginia Ave., S.W. Washington, D. C. 20024

Telephone: (202) 554-2345

1 UNITED STATES OF AMERICA  
2 NUCLEAR REGULATORY COMMISSION

3  
4 DISCUSSION OF POLICY AND PLANNING GUIDANCE

5  
6 PUBLIC MEETING

7  
8  
9 Nuclear Regulatory Commission  
10 Room 1130  
11 1717 H Street, N. W.  
12 Washington, D. C.

13 Tuesday, December 8, 1981

14 The Commission convened, pursuant to notice, at

15 2:10 p.m.

16 BEFORE:

17 NUNZIO PALLADINO, Chairman of the Commission  
18 VICTOR GILINSKY, Commissioner  
19 PETER BRADFORD, Commissioner  
20 JOHN AHEARNE, Commissioner  
21 THOMAS ROBERTS, Commissioner

22 ALSO PRESENT:

23 S. CHILK  
24 L. BICKWIT  
25 F. REMICK  
J. MURRAY  
K. CORNELL  
W. DIRCKS  
G. EYSYMONTT

\* \* \*

DISCLAIMER

This is an unofficial transcript of a meeting of the United States Nuclear Regulatory Commission held on December 8, 1981 in the Commission's offices at 1717 E Street, N. W., Washington, D. C. The meeting was open to public attendance and observation. This transcript has not been reviewed, corrected, or edited, and it may contain inaccuracies.

The transcript is intended solely for general informational purposes. As provided by 10 CFR 9.103, it is not part of the formal or informal record of decision of the matters discussed. Impressions of opinion in this transcript do not necessarily reflect final determinations or beliefs. No pleading or other paper may be filed with the Commission in any proceeding as the result of or addressed to any statement or argument contained herein, except as the Commission may authorize.

1                                    P R O C E E D I N G S

2                    CHAIRMAN PALLADINO: The meeting will please come  
3 to order.

4                    Today's meeting is to discuss the third draft of  
5 the NRC's proposed policy and planning guidance document.

6                    I apologize for the late delivery of the document,  
7 but you will remember that OPE called to our attention the  
8 possibility that this version might not be available with  
9 much lead time.

10                   Today I would like to see if we can reach  
11 agreement that the document before us adequately covers the  
12 major Commission policies and planning guidance. If we can  
13 agree that the document is generally on target, then we can  
14 establish a process to work out wording changes that remain  
15 to be resolved.

16                   What I would propose is to have OPE working with  
17 EDO and the Commissioners' staffs and the Commissioners  
18 themselves deal with the proposed work changes at the  
19 working level.

20                   While I am hopeful that another Commission meeting  
21 will not be necessary, in the event that there are  
22 unresolved issues that arise from OPE working with the staff  
23 and the Commissioners we can address them at the next  
24 meeting scheduled for December 16th.

25                   After we get final agreement on the wording, I

1 would proposed to get approval of the document by notation  
2 vote.

3           For today's meeting I propose that OPE walk us  
4 through the document identifying the major features at this  
5 point in time, identifying the major changes that have been  
6 made and then open it up for Commission discussion.

7           Any other comments anyone would like to make  
8 before we start?

9           COMMISSIONER BRADFORD: I just want to know where  
10 the cameras are?

11           (Laughter.)

12           CHAIRMAN PALLADINO: Well, we commented on that  
13 earlier. Maybe earlier they misunderstood PPG to be PG&E.

14           (Laughter.)

15           COMMISSIONER GILINSKY: What did you mean when you  
16 said they are going to walk us through and we are going to  
17 comment later? Are we going to go at it page by page?

18           CHAIRMAN PALLADINO: What I was going to suggest  
19 was first to see whether or not this is the general intent,  
20 whether this covers the topics that you think ought to be  
21 covered or whether there are other issues that ought to be  
22 developed.

23           I was going to propose that if we feel it is on  
24 target that we have each Commissioner submit the word  
25 changes and let OPE working with you and your staff get a

1 version that maybe we can vote on.

2           Now if there are basic resolved issues by next  
3 week, we do have scheduled a meeting on the 16th and then I  
4 would say well then we hammer out of the issues on which we  
5 have continuing questions.

6           COMMISSIONER AHEARNE: At least for me, Joe, what  
7 I would like to do sometime this afternoon is ask about  
8 three or four items which I had asked about on the two  
9 previous versions. I don't think the interchange is getting  
10 anywhere and there may just be some fundamental policy  
11 changes involved.

12          CHAIRMAN PALLADINO: Now those kind of issues I  
13 would hope we would address this afternoon.

14          COMMISSIONER GILINSKY: What are the sorts of  
15 things you are talking about?

16          CHAIRMAN PALLADINO: Well, he is going to bring  
17 them up in a minute.

18          COMMISSIONER GILINSKY: Give me a word or two of  
19 warning.

20          (Laughter.)

21          COMMISSIONER AHEARNE: Whether the generic issues  
22 approach ought to be changed and whether we should assume we  
23 are going to get any construction permits.

24          COMMISSIONER GILINSKY: Applications you mean.

25          CHAIRMAN PALLADINO: New applications.

1 COMMISSIONER AHEARNE: Yes.

2 MR. REMICK: Thank you, Mr. Chairman.

3 This is the third version and I assume everybody  
4 has the December 7th version in front of them. Although it  
5 is dated December 7th, there were changes still going into  
6 effect this morning.

7 (Laughter.)

8 I apologize also that you did not have much  
9 advance time to read it, but we did just about as well as we  
10 could.

11 The major changes I think from the previous  
12 versions are in the addition of a section called "Safe  
13 Operation of Licensed Plants" which was at the request of  
14 the Chairman and as a result taking other components that  
15 existed in the earlier drafts and putting some of those  
16 under the "Safe Operatin of Licensed Plants."

17 Then there was another section that had previously  
18 been called "Other Important Steps." That has been retitled  
19 "Improving Related Regulatory Tools" in response to a  
20 request from the Chairman.

21 "International Activities" which was in the second  
22 draft has been put under a category called "Other Policies"  
23 because it did not seem to fit in the others.

24 Another change is the CRBR issue. We had gotten  
25 some conflicting indications from the Commissioners on that

1 and that is currently addressed under "Near-Term Licensing  
2 Problems and Responses that had previously been under the  
3 section called "Other Important Steps."

4           So that is a very brief summary of changes without  
5 saying that this went from page so and so to ---

6           COMMISSIONER BRADFORD: The last one the has moved  
7 from the front to the back and then back to the front again.

8           MR. REMICK: That is right, yes.

9           COMMISSIONER AHEARNE: For the most part, as best  
10 as I can tell, other than what you just mentioned, there are  
11 very few other changes. The locations are shifted around to  
12 try to get a more readable document.

13           MR. REMICK: Not major changes. Certainly the  
14 pressurized thermal shock is a new item that is in here at  
15 the request of the Chairman, but they are mostly wording  
16 changes in our attempt to respond to comments we received  
17 from either Commissioners or from EDO.

18           CHAIRMAN PALLADINO: Are you ready for comments  
19 and questions?

20           MR. REMICK: Yes.

21           CHAIRMAN PALLADINO: Do you want to start, John?

22           COMMISSIONER GILINSKY: That was the overview?

23           (Laughter.)

24           CHAIRMAN PALLADINO: I said brief -- (Simultaneous  
25 Conversations - Inaudible).



1 (Laughter.)

2 COMMISSIONER AHEARNE: On page 7, at the bottom of  
3 the Planning Guidance, in talking about the staff reviews  
4 and public hearing schedule, I had rasied a question in one  
5 of my comments on whether the staff planning should be based  
6 on independent NRC estimates of construction completion  
7 dates.

8 COMMISSIONER GILINSKY: Yes.

9 COMMISSIONER AHEARNE: If there was a filter  
10 somewhere this did not seem to pass through.

11 (Laughter.)

12 CHAIRMAN PALLADINO: I think I was the filter.

13 (Laughter.)

14 COMMISSIONER AHEARNE: Although I realize it is a  
15 contentious subject, I think that we have now had another  
16 cycle of eight or nine months in which once again, as in  
17 every time that I can tell in going over the back history of  
18 of AEC and NRC, every time the issue comes up the staff's  
19 estimates turn out to be much better than the licensee  
20 estimates.

21 CHAIRMAN PALLADINO: My feeling on the subject is  
22 that I didn't want to get into the bind of whether we do it  
23 on the basis of what the owners say is going to be the  
24 completion date or on the basis of what we say because I  
25 think for some reports we have been directed to base it on

1 the owner's construction dates. In the long planning,  
2 though, I think we have to use the best information we have  
3 at hand.

4 COMMISSIONER AHEARNE: Let me turn it and ask a  
5 question.

6 Bill, on what basis is the staff making their  
7 estimates?

8 CHAIRMAN PALLADINO: Estimates for what, John?

9 COMMISSIONER AHEARNE: When they are scheduling  
10 their staff -- (Simultaneous Conversations - Inaudible).

11 MR. DIRCKS: For the SER's we are still basing it  
12 on the applicant's dates. That is for the SER's.

13 COMMISSIONER BRADFORD: Joe, you said for some  
14 reports we have been directed to use the applicant's. I had  
15 thought that, too.

16 CHAIRMAN PALLADINO: I thought that was for the  
17 Bevill ---

18 COMMISSIONER BRADFORD: I had thought that and  
19 then tried to verify it and couldn't find any verification.  
20 I am away at the end of investigating with the conclusion  
21 that we had imposed it more on ourselves ---

22 COMMISSIONER AHEARNE: I think Joe Hendrie made  
23 that change.

24 COMMISSIONER BRADFORD: --- and that it didn't  
25 come from the committee.

1           CHAIRMAN PALLADINO: I gather it came out of one  
2 of the hearings where they asked why we were making our  
3 assumptions and why didn't we ---

4           COMMISSIONER BRADFORD: There certainly was a  
5 hearing where that was discussed, but as I now understand it  
6 I think the decision actually to use the applicant's dates  
7 came from within the Commission rather than from the  
8 committee.

9           COMMISSIONER GILINSKY: It was just an effort to  
10 avoid getting into a lot of arguments and avoid criticism.

11          CHAIRMAN PALLADINO: That is what I gathered, but  
12 I thought it came out of the hearing in which that was an  
13 important point in the hearing.

14          COMMISSIONER GILINSKY: The subject of the hearing.

15          COMMISSIONER AHEARNE: It was an important issue  
16 in the hearing.

17          MR. DIRCKS: But they did direct us when we  
18 submitted the Bevill Report, the monthly Bevill Report to  
19 use as the basis for calculating delays the applicant's  
20 dates.

21          COMMISSIONER BRADFORD: By "they" do you mean the  
22 committee, Bill?

23          MR. DIRCKS: The committee.

24          COMMISSIONER BRADFORD: Is that in writing  
25 somewhere, because I tried once before to find that?

1 MR. DIRCKS: I would have to go dig it out.

2 COMMISSIONER GILINSKY: Well, but even if they  
3 did, in that report we would indicate that many months of  
4 delay.

5 COMMISSIONER AHEARNE: The issue I am trying to  
6 raise is that as we try to put NRR staff on licensing  
7 reviews and budget their time and efforts I think it is  
8 important to try to use the best planning that we have  
9 available. Experience shows us the best planning are the  
10 NRC estimates and they can be quite substantially different.

11 MR. DIRCKS: We use generally the applicant's  
12 dates and plan back from there. Where we see a contentious  
13 hearing or where we see a hearing that may not be that  
14 contentious we make adjustments back off the applicant's  
15 dates. We just take it as a general starting line and then  
16 adjust it up and down from that starting line.

17 COMMISSIONER AHEARNE: I understand.

18 CHAIRMAN PALLADINO: If you would like to put  
19 something in there to that extent.

20 COMMISSIONER GILINSKY: At a minimum, it seems to  
21 me, we want to be sure that we do have independent NRC  
22 estimates of construction completion dates because of a  
23 period of I think nine months we were not developing it.

24 MR. REMICK: We have that now.

25 MR. DIRCKS: But we have that now.

1 CHAIRMAN PALLADINO: Suppose we put in there that  
2 we use the best available information which may be  
3 interpreted by the staff to be something different from  
4 what ---

5 COMMISSIONER AHEARNE: I would prefer somehow to  
6 make it clear that the staff will make their own estimates.

7 COMMISSIONER GILINSKY: Suppose we simply say that  
8 the staff will make its own independent estimates.

9 CHAIRMAN PALLADINO: All right.

10 COMMISSIONER AHEARNE: That would satisfy me.

11 MR. REMICK: What you had proposed before,  
12 Commissioner Ahearne, was staff planning should be based on  
13 independent NRC estimates of construction completion dates.

14 COMMISSIONER GILINSKY: Well, the first step  
15 toward that is to --- (Simultaneous Conversations -  
16 Inaudible).

17 COMMISSIONER AHEARNE: Right. I will be willing  
18 to accept that the NRC will make their own estimates.

19 CHAIRMAN PALLADINO: Is that generally agreeable?

20 COMMISSIONER BRADFORD: Yes.

21 (Commissioners Ahearne, Roberts, Gilinsky nodding  
22 affirmatively.)

23 COMMISSIONER AHEARNE: The next question I have  
24 has to do with page 11. Here I was more trying to  
25 understand what was being proposed than making necessarily a

1 recommended change.

2           This has to do with Item No. 2 in which it is  
3 addressing all generic issues. There are two sentences I  
4 would like to raise a question on.

5           One is the second sentence which says: "Issues  
6 included in the present program which are not directly  
7 related to the NRC regulatory requirements will be  
8 eliminated."

9           Then towards the end of that on the next page in  
10 No. 2 it says: "The revised program will establish criteria  
11 for adding new issues."

12           My questions are, first, is there a belief that  
13 there are issues now in the program which are not directly  
14 related to the regulatory requirements?

15           Then the second question was what was wrong with  
16 the current criteria for adding new issues?

17           MR. REMICK: My understanding of the first  
18 question was that there are items that perhaps should not be  
19 generic issues. Now whether they are unrelated to current  
20 regulatory requirements, that I am not sure. There have  
21 been arguments that there are issues, generic issues that  
22 should no longer be on the list, but whether they are  
23 unrelated to regulatory requirements, that I am not sure if  
24 that is the thing.

25           CHAIRMAN PALLADINO: Weren't there categories one,

1 two and three on the action plan -- (Simultaneous  
2 Conversations - Inaudible).

3 MR. DIRCKS: I would have to check, but there may  
4 be things in there, generic issues, as we go back, like the  
5 socio-economic impact problem that could be called related  
6 to the NEPA side of that.

7 COMMISSIONER AHEARNE: There is a generic issue on  
8 the -- (Simultaneous Conversations - Inaudible).

9 MR. DIRCKS: I said, if my memory is right, there  
10 are issues related to those NEPA issues such as  
11 socio-economic ---

12 COMMISSIONER AHEARNE: There may be issues related  
13 to NEPA issues. For myself personally I would agree that  
14 those don't rise to the level of importance of safety. But  
15 they do relate to our regulatory requirements because NEPA  
16 is under our regulatory requirements.

17 MR. DIRCKS: I did not pick those words, related  
18 to regulatory requirements. All I am doing is trying to  
19 help clarify it.

20 COMMISSIONER AHEARNE: The question I had raised  
21 back in the November commenting really was what issues now  
22 included are not directly related to NRC regulatory  
23 requirements because at least my memory of them are all of  
24 the items are directly related to the regulatory  
25 requirements. That doesn't mean that some of them are of

1 lower priority and perhaps we ought to rescrub through and  
2 drop some of them out. That is a different issue than the  
3 way this is phrased.

4 CHAIRMAN PALLADINO: I took it that that is what  
5 they were trying to say here.

6 COMMISSIONER AHEARNE: If the point is that the  
7 Commission will revisit the list of generic items and review  
8 whether they should be dropped, something like that, I agree  
9 with that. But the way it was phrased ---

10 MR. REMICK: To the best of my knowledge, that is  
11 the intent of the statement and it is consistent with when  
12 you last routed that to the staff. You indicated you wanted  
13 to look at those.

14 COMMISSIONER AHEARNE: Yes.

15 CHAIRMAN PALLADINO: Well, can we try to reword  
16 that?

17 MR. REMICK: Sure.

18 CHAIRMAN PALLADINO: That is a good point.

19 COMMISSIONER AHEARNE: Similarly in the  
20 established criteria for adding new issues I think what you  
21 are saying is there ought to be perhaps a revision of  
22 criteria or re-examination of the criteria. But there are  
23 criteria.

24 MR. REMICK: There are criteria that exist; that  
25 is correct. I guess it would be helpful if the Commission



1 felt that those were satisfactory then I think that  
2 statement need not be there.

3 COMMISSIONER AHEARNE: It wasn't clear to me  
4 whether the writer didn't realize there were criteria  
5 because we are going to established criteria.

6 CHAIRMAN PALLADINO: Can we revise that sentence  
7 to indicate review the criteria because as part of the  
8 generic review committee we did want to use new tools to  
9 look at some of these requirements and it really ends up as  
10 being a modification of the criteria.

11 MR. REMICK: So what is your suggestion, Mr.  
12 Chairman? I missed that.

13 CHAIRMAN PALLADINO: The criteria for setting  
14 priorities will be reviewed and possibly revised.

15 COMMISSIONER AHEARNE: That would be fine.

16 CHAIRMAN PALLADINO: You say you want to go back  
17 to page 11?

18 COMMISSIONER GILINSKY: Yes, at the top. This is  
19 a matter of interest. You have got this committee an Deputy  
20 Executive Director and you tell him he is supposed to assume  
21 a powerful role in reviewing and recommending and so on.  
22 Now that is okay, except we don't use those words anywhere  
23 else that I know of in talking about, I don't know what,  
24 quality assurance or anything else.

25 It seems to me there ought to be a certain mesh.

1 If we are going to use words like this then we ought to use  
2 them there. If we aren't, then maybe we could just say he  
3 is expected to, I don't know, but I think he is expected to  
4 review and recommend actions in the full range of generic  
5 requirements considered by the agency, including backfitting.

6 CHAIRMAN PALLADINO: He is expected to assume an  
7 important rule. I stumbled on "powerful" I remember myself  
8 and almost came back and suggested that it sounded like too  
9 powerful a word.

10 (Laughter.)

11 COMMISSIONER GILINSKY: Well, at least that.  
12 Well, anyway, I think there ought to be a balance.

13 MR. REMICK: I guess I don't completely understand  
14 the balance you are referring to. I can see that certainly  
15 "powerful" ---

16 COMMISSIONER GILINSKY: Well, we don't see anybody  
17 here who is to exert a powerful role over the quality  
18 assurance program to make sure -- (Simultaneous  
19 Conversations - Inaudible).

20 CHAIRMAN PALLADINO: Incidentally, we did move  
21 up. As a matter of fact, after reflecting on some of the  
22 things that happened in our discussions with the  
23 subcommittee, we thought that we ought to move up to a place  
24 of prominence the safety operation of licensed plants and  
25 this was intended to give that kind of balance.

1 I do agree with you that "powerful" seems like an  
2 unusual word to use.

3 COMMISSIONER BRADFORD: Central maybe.

4 COMMISSIONER GILINSKY: Yes. It is good  
5 considering who is the "DEDROGR."

6 (Laughter.)

7 (Simultaneous Conversations - Inaudible).

8 COMMISSIONER AHEARNE: Page 14, at the bottom of  
9 the page. I would like to get clear what it is that we are  
10 directing the staff in their planning to plan for. We are  
11 saying that they should plan for increased use of  
12 standardization and early siting in connection with one-step  
13 licensing. They the proposal is starting in FY-84.

14 Now does that mean that we are saying that the  
15 staff should begin planning, in other words, put in staffing  
16 requests, assuming that there will be construction permit  
17 applications coming in in FY-84?

18 MR. REMICK: In essence it says in Fiscal Year '84  
19 it needs to be prepared in case any come in, and I must  
20 admit that, yes.

21 COMMISSIONER AHEARNE: But in planning guidance if  
22 you are putting together your resources, if you filter it  
23 down to NRR and are putting together resources, is this now  
24 Commission guidance that they should put in "X" people that  
25 should be there now to handle new construction permit

1 applications in FY-'84?

2 MR. REMICK: I can't differ that you would  
3 interpret that -- (Simultaneous Conversations - Inaudible).

4 COMMISSIONER AHEARNE: I am serious. If that what  
5 it means?

6 (Laughter.)

7 MR. REMICK: I understand what you are saying. It  
8 says to be prepared just in case -- (Simultaneous  
9 Conversations - Inaudible).

10 COMMISSIONER GILINSKY: Well, does this mean just  
11 sort of knowing that it could come or what? I mean, what is  
12 it that you would do?

13 MR. REMICK: The assumption is that there would be  
14 approval for standardized plant design, one-step licensing  
15 and so forth. This is telling the staff that by '84 they  
16 should be in a position to handle such requests if they come.

17 COMMISSIONER GILINSKY: Well, aren't they in a  
18 position right now? If somebody comes in with that full  
19 application they will review it just the way they  
20 review -- (Simultaneous Conversations - Inaudible).

21 COMMISSIONER AHEARNE: They couldn't do one-step  
22 licensing.

23 COMMISSIONER GILINSKY: Why not?

24 CHAIRMAN PALLADINO: Let me tell you where ---

25 COMMISSIONER AHEARNE: (Simultaneous Conversations

1 - Inaudible).

2 COMMISSIONER GILINSKY: Well, you are always going  
3 to have another stage but it might be just a minimal stage.

4 CHAIRMAN PALLADINO: Well, I made statements about  
5 standardization in a couple of talks I have make and maybe  
6 this comes from those talks.

7 I do think that we would gain a great deal of  
8 benefit by having standardized plants, and I mean completely  
9 standardized, that are reviewed well in advance and even  
10 maybe go so far as having the necessary certification. What  
11 I was thinking of is we should plan and develop our rules  
12 and regulations and perhaps legislation so that we could  
13 have in place a process that would permit review of a  
14 standardized plant along particular guidelines. I think  
15 one-step licensing is an appropriate one to consider in  
16 connection with standardized plants. That is what I would  
17 see us doing between possibly now and 1984.

18 COMMISSIONER GILINSKY: But what is it we need to  
19 have that we don't have right now?

20 CHAIRMAN PALLADINO: We call for a two-step  
21 licensing process. I think even though you say there will  
22 undoubtedly be a review where you mesh the site and maybe  
23 you also have another review that confirms that the plant  
24 was built according to standardized plant, I think the  
25 wording in setting up these two steps would be considerably

1 different.

2 I was hoping that the background for accomplishing  
3 this would come in part out of this task force. I am  
4 looking ahead to streamlining this policy.

5 COMMISSIONER AHEARNE: I have no difficulty with  
6 anything there other than I was asking the question on, what  
7 were we really telling the staff to do in the way of  
8 resources by starting in FY-84. By starting in FY-84, was  
9 this a way of saying, well, now, you ought to start building  
10 up a construction permit branch? I wasn't sure what ---

11 COMMISSIONER GILINSKY: Are you talking about  
12 rule-making or are you talking about assuming that  
13 legislation will have passed which will ---

14 CHAIRMAN PALLADINO: Well, I don't know what this  
15 particular sentence met. I was trying to give you  
16 background that may have led to this sentence.

17 COMMISSIONER GILINSKY: No, I understand that.  
18 But it seems to me that we now have the flexibility to load  
19 a lot more on the construction permit review and a lot less  
20 on the operating license review to make it pretty close to  
21 one-step licensing.

22 CHAIRMAN PALLADINO: I would see in  
23 standardization also some closer attention to the threshold  
24 at which we would require any changes.

25 COMMISSIONER GILINSKY: Okay, so that is

1 something. We did have an assembly line for standard  
2 designs and it turned out that it mostly dealt with  
3 preliminary designs. So it wasn't all that useful. They  
4 also were gearing up for dealing with final designs.

5 MR. DIRCKS: There is one final design that is  
6 almost ready to be docketed and that is on the GESSAR plant.

7 CHAIRMAN PALLADINO: On the what?

8 MR. DIRCKS: GESSAR, the General Electric plant.

9 CHAIRMAN PALLADINO: Will that be integrated  
10 balance of plant and nuclear steam supply system?

11 MR. DIRCKS: The way it has been pitched to us in  
12 their presentations is it will be a complete plant.

13 COMMISSIONER GILINSKY: There is a system for  
14 doing that and there must be something in there about it  
15 takes to trigger additional requirements. I must say I  
16 don't remember the details on that. That is something that  
17 one can take a look at again.

18 MR. REMICK: There is a interrelationship, too,  
19 between standardization and early site review. If you are  
20 going to do early site review you have to have the envelope  
21 that -- (Simultaneous Conversations - Inaudible).

22 COMMISSIONER GILINSKY: We have a system for early  
23 site review.

24 MR. REMICK: I realize that, but whether it is in  
25 existence now and whether it is up to date and so forth,

1 that I don't know. But you do have to have some kind of an  
2 envelope of factors and so forth that an early site must  
3 meet which is consistent within one or more standardized  
4 plants that might come along. So this interface has to be  
5 there.

6 COMMISSIONER GILINSKY: This could mean anything  
7 between dusting off what we have and getting ready for  
8 --(Simultaneous Conversations - Inaudible).

9 MR. REMICK: (Simultaneous Conversations -  
10 Inaudible).

11 COMMISSIONER AHEARNE: One of the difficulties I  
12 think is that, at least three of us on this side of the  
13 table and I don't know about Tom and Peter, but three of us  
14 weren't really too sure what that meant. It has some  
15 difficulty then in providing planning guidance to the  
16 staff. Maybe if you could expand on that a little bit  
17 rather than being that terse, because I don't disagree with  
18 Bill.

19 CHAIRMAN PALLADINO: Well, why don't we try it.  
20 It may be that we will want it for examining the current  
21 plans for handling standardized plants.

22 COMMISSIONER GILINSKY: All of this seems to deal  
23 with the construction permit process or improving the  
24 licensing process for new applications. Is that what this  
25 was all about?



1 MR. REMICK: It would be new applications if they  
2 are standardized presumably.

3 COMMISSIONER GILINSKY: Is this whole page about  
4 new construction permit applications?

5 MR. EYSYMONTT: The language under "A" really is  
6 broader than that.

7 CHAIRMAN PALLADINO: What was that?

8 MR. EYSYMONTT: I say the language under the  
9 "Policy" appears to be broader than just new applications.  
10 The first sentence. It covers the entire licensing process.

11 CHAIRMAN PALLADINO: My own feeling is that with  
12 regard to improving the licensing process it really is  
13 looking ahead to new plants because I think all of the  
14 operating licenses that we have coming up are going to be  
15 reviewed basically under our present plans. The few CPs  
16 that we have are really geared to the old way of doing  
17 things.

18 Now if there are some incidental steps taken to  
19 improve the hearing process or anything along the way, I  
20 would still count them as being our present concept. I was  
21 taking this to mean looking ahead to the future.

22 COMMISSIONER AHEARNE: We might even go back to  
23 the previous version which had the phrase "make the present  
24 licensing process for new construction permit applications  
25 more efficient."

1 CHAIRMAN PALLADINO: I don't know how that got  
2 out. I don't think I took it out.

3 (Simultaneous Conversations - Inaudible).

4 COMMISSIONER AHEARNE: That was on page 12.

5 CHAIRMAN PALLADINO: Let me see if I took it out.

6 (Simultaneous Conversations - Inaudible)

7 CHAIRMAN PALLADINO: My staff took it out.

8 (Laughter.)

9 COMMISSIONER AHEARNE: The next question I have  
10 was on page 16. No, that is a minor question and I can  
11 clarify that with the staff.

12 On page 22. The first question is under "Planning  
13 Guidance" No. 1. This is more a question of trying to  
14 understand the floating process at the moment. This has  
15 changed several times and now it reads: "The NRC staff will  
16 review its QA efforts and propose an agency-wide plan by  
17 early '82."

18 COMMISSIONER GILINSKY: You are on which page now?

19 COMMISSIONER AHEARNE: This is page 22, Item No. 1.

20 An earlier version had pulling it altogether in a  
21 single office. I agree with the proposal of a plan rather  
22 than an accomplishment, but I wondered did this mean that  
23 pulling it together in a single office is not longer to be  
24 considered or does that just mean that that would be one of  
25 the options that would be considered?

1 MR. REMICK: That would be one of the options but  
2 not to limit it to that or not tie it down at the moment.

3 COMMISSIONER AHEARNE: But it certainly would  
4 incorporate that.

5 MR. REMICK: It was not intended to preclude ---

6 CHAIRMAN PALLADINO: What did you have in mind in  
7 putting them all in one office? You mean all the  
8 construction, all the operation, all QA, the design and  
9 everything?

10 COMMISSIONER AHEARNE: Don't turn to me, Joe.

11 (Laughter.)

12 COMMISSIONER AHEARNE: It is an earlier version  
13 --(Simultaneous Conversations - Inaudible).

14 MR. EYSYMONTT: (Inaudible.)

15 CHAIRMAN PALLADINO: I had some question on the  
16 other version also.

17 MR. DIRCKS: We are taking a look at all the QA  
18 activities as you noted. One of the options we are  
19 considering, and it may actually turn into a proposal, is  
20 that we pick up QA, that is the QA activities which are  
21 currently scattered across at least three offices and talk  
22 about the advantages or disadvantages of putting them into  
23 one office.

24 CHAIRMAN PALLADINO: Which three offices?

25 MR. DIRCKS: We have I&E, NRR and Research and

1 Standards. Because of the relatively small numbers of  
2 people in each office it really doesn't form a central core  
3 that you can get at and hold someone responsible for. We  
4 tried various coordinative activities such as a QA task  
5 force or a QA working group and it hasn't worked out. When  
6 problems of QA come up, I find it very difficult to turn to  
7 one official and say tell me about the problem. I have to  
8 call in four or five people and none of them have paid that  
9 much attention to a relatively small problem.

10 I don't want to prejudge it, but I have asked them  
11 to take a look at pulling all these things together and  
12 giving one office a designated responsibility.

13 CHAIRMAN PALLADINO: Would one office be able to  
14 handle all the various aspects?

15 MR. DIRCKS: Yes.

16 CHAIRMAN PALLADINO: That would just give it a  
17 need for different coordination towards the NRR person --  
18 (Simultaneous Conversations - Inaudible)

19 MR. DIRCKS: QA, the NRR sort of drops out of it  
20 after the review of the plant. NRR has maybe two and a half  
21 to three people engaged in QA activities. I am even  
22 thinking that moving those two or three people would not  
23 cripple it.

24 CHAIRMAN PALLADINO: Well, that still would be  
25 possible under this Item No. 1.

1 COMMISSIONER AHEARNE: I don't disagree with the  
2 way it was phrased, but I wanted to ask a question because  
3 it did change and I had a concern that it might in this  
4 change mean the elimination of that proposal which sounded  
5 like a pretty good proposal.

6 MR. DIRCKS: It is still bubbling along.

7 COMMISSIONER AHEARNE: Fine.

8 MR. DIRCKS: We will get something --

9 (Simultaneous Conversations - Inaudible).

10 COMMISSIONER AHEARNE: The last question I had was  
11 on No. 3, the second sentence of No. 3. I understand where  
12 it came from, but I just hoped that perhaps the Chairman  
13 could say a few words about what his concept was.

14 CHAIRMAN PALLADINO: I asked for this to be put in.

15 (Laughter.)

16 CHAIRMAN PALLADINO: The way I perceived it was  
17 that looking at the way major corporations work they have  
18 financial audits of their fiscal responsibilities and this  
19 is because management just can't go and make sure that  
20 everything is going on right.

21 COMMISSIONER AHEARNE: Sure.

22 CHAIRMAN PALLADINO: Recognizing that the  
23 interface between the utility and all the subcontractors is  
24 a cause of major difficulty in some cases, I thought it  
25 would be appropriate therefore to have a parallel

1 independent audit of the quality assurance programs by the  
2 utility to make sure that it is getting the kind of plant  
3 that it ought to have, that it contracted for and that it  
4 needs.

5 COMMISSIONER AHEARNE: I had two questions. I  
6 think the idea is good.

7 The first was what did you mean by certified?

8 CHAIRMAN PALLADINO: I don't know if I used the  
9 word "certified," but I was thinking independent audits.

10 COMMISSIONER AHEARNE: I agree with independent  
11 audits.

12 COMMISSIONER GILINSKY: Well, the certified is  
13 important.

14 CHAIRMAN PALLADINO: We don't have things that are  
15 certified ---

16 COMMISSIONER AHEARNE: (Inaudible) (Laughter)

17 COMMISSIONER GILINSKY: An important part of the  
18 license for example of county audits is that there is a  
19 professional -- (Simultaneous Conversations - Inaudible).

20 COMMISSIONER AHEARNE: Yes, but there is.  
21 Absolutely.

22 COMMISSIONER ROBERTS: There aren't any  
23 professional QA auditors, are there?

24 CHAIRMAN PALLADINO: No.

25 COMMISSIONER ROBERTS: I thought that is what John

1 was asking.

2 COMMISSIONER GILINSKY: You are making my point.

3 CHAIRMAN PALLADINO: Well, for the moment I guess  
4 all I could say is competent, independent ---

5 (Laughter.)

6 CHAIRMAN PALLADINO: We don't have any way that I  
7 know of.

8 MR. DIRCKS: It is a matter of style when you say  
9 it that way. I think this is one of the options we are  
10 considering, but if you say it in that way it may turn out  
11 to the uninitiated that the Commission now is directing this.

12 COMMISSIONER AHEARNE: That was the second  
13 question.

14 MR. DIRCKS: Oh, okay.

15 COMMISSIONER AHEARNE: That is the other  
16 question. When we say steps should be taken to see that, is  
17 that a euphemism for saying we shall require?

18 MR. DIRCKS: That is how it could be.

19 COMMISSIONER AHEARNE: Or we will go on  
20 rule-making to put it into place, or we urge? It wasn't  
21 clear to me what it was.

22 CHAIRMAN PALLADINO: I believe about all we could  
23 hope hope to do at the present time is develop ---

24 COMMISSIONER GILINSKY: You are creating an  
25 industry.

1 (Laughter.)

2 (Simultaneous Conversations - Inaudible).

3 MR. REMICK: How about consideration should be  
4 given to.

5 MR. DIRCKS: That would be better.

6 CHAIRMAN PALLADINO: Incidentally, I would like to  
7 look at this wording as compared to what I have used in some  
8 talks because I had given some thought to it.

9 COMMISSIONER AHEARNE: Let me ask, Forrest.

10 MR. REMICK: Yes.

11 COMMISSIONER AHEARNE: Are we telling the staff by  
12 this, staff prepare for us a plan, prepare for us a policy,  
13 or prepare for us a proposed rule, or are we saying staff,  
14 you should go out and carry this message to the industry?

15 COMMISSIONER GILINSKY: The staff should play a  
16 powerful role.

17 (Laughter.)

18 MR. REMICK: We are saying the staff should  
19 consider the former as well as the --(Simultaneous  
20 Conversations - Inaudible).

21 COMMISSIONER AHEARNE: I think that the staff  
22 ought to discuss with the industry and encourage the  
23 industry and explore what can be done in developing it and I  
24 think that this should be clarified a bit.

25 COMMISSIONER ROBERTS: Can I make a comment on



1 this same section. For me personally I am not prepared to  
2 make the blanket indictment of the quality assurance  
3 problems currently plaguing plants under design and  
4 construction. I think recognizing some specific problem  
5 plants is one thing. I think to make the blanket statement  
6 that by inference all plants are plagued by QA problems, I  
7 personally have some difficulty with that.

8 CHAIRMAN PALLADINO: Where is that?

9 COMMISSIONER AHEARNE: Same section.

10 COMMISSIONER ROBERTS: Same section, page 22,  
11 "Planning Guidance," paragraph 3, the first sentence.

12 MR. REMICK: How about "some plants."

13 COMMISSIONER ROBERTS: How about "currently being  
14 experienced by plants under design and construction." That  
15 says there are some problems and it doesn't say that all  
16 plants are plagued by it.

17 COMMISSIONER GILINSKY: That is okay. I guess  
18 what I would say is that where there really are problems NRC  
19 ought to do more than coordinate with industry.

20 Is there something in here that NRC will enforce a  
21 system of discipline?

22 MR. REMICK: In answer to your question we don't  
23 have those words in there, no.

24 (Laughter.)

25 CHAIRMAN PALLADINO: Well, why don't you try to

1 work with Commissioner Gilinsky and see what comes out of  
2 that.

3 MR. REMICK: Fine.

4 CHAIRMAN PALLADINO: I do agree that we should  
5 circumscribe this statement with regard to the extent of the  
6 problems, that they don't apply necessarily to all plants.

7 COMMISSIONER AHEARNE: Tom's words are fine with  
8 me.

9 CHAIRMAN PALLADINO: I think Tom's words are fine.

10 MR. REMICK: Those were "being experienced by  
11 plants" instead of "plagued"?

12 COMMISSIONER ROBERTS: Correct.

13 COMMISSIONER ROBERTS: Well, Vic, I don't have any  
14 problem with your concept. If those clearly are problems I  
15 think we ought to maybe do a little more than coordinate  
16 with them. That is not unreasonable.

17 COMMISSIONER GILINSKY: Right.

18 COMMISSIONER ROBERTS: But a blanket indictment I  
19 don't think is fair.

20 COMMISSIONER GILINSKY: Right.

21 CHAIRMAN PALLADINO: Yes.

22 COMMISSIONER AHEARNE: Actually you have got two  
23 thoughts there. One is developing the approach and the  
24 other is with those plant specific -- (Simultaneous  
25 Conversations - Inaudible).

1 COMMISSIONER GILINSKY: We want surgical strength.

2 (Laughter.)

3 CHAIRMAN PALLADINO: I think you want to work with  
4 the industry to overcome problems, but then you also want to  
5 take steps to enforce -- (Simultaneous Conversations -  
6 Inaudible).

7 COMMISSIONER GILINSKY: Coordinating on developing  
8 means to deal with these problems and so on. At least the  
9 word "coordinate" is right. But when you are talking about  
10 enforcing specific requirements, then I think you need  
11 something more than "coordinate."

12 CHAIRMAN PALLADINO: Vic or Peter, do you have  
13 other areas ---

14 COMMISSIONER GILINSKY: Let's see, I had something  
15 a little further back. Oh, yes, Safety Goal.

16 CHAIRMAN PALLADINO: What page?

17 COMMISSIONER GILINSKY: 19. I am all for safety  
18 goals, but I am not sure if the answer is a safety goal.

19 CHAIRMAN PALLADINO: (Inaudible.)

20 COMMISSIONER GILINSKY: I think we need to become  
21 increasingly specific about what it is we are trying to do  
22 and that may take a variety of forms. I doubt whether it is  
23 going to be one safety goal.

24 CHAIRMAN PALLADINO: As a matter of fact, I think  
25 you had two qualitative safety goals, two quantitative and

1 then you had the limit on the probability of ---

2 COMMISSIONER ROBERTS: --- core melts and then  
3 also the cost benefits.

4 COMMISSIONER AHEARNE: Right.

5 MR. REMICK: So you might say two qualitative and  
6 four numerical guidance.

7 COMMISSIONER GILINSKY: I would say increasingly  
8 specific safety guidance. You will have to use the words  
9 "safety goal" because we have talked about it.

10 MR. REMICK: It could be "develop safety goals."

11 COMMISSIONER GILINSKY: Yes, which will codify  
12 increasingly specific safety guidance, or something like  
13 that.

14 CHAIRMAN PALLADINO: I don't ---

15 COMMISSIONER GILINSKY: It is just that I don't  
16 want it to be "a safety goal."

17 CHAIRMAN PALLADINO: Safety goals with -- what did  
18 you have -- increasing what, specific ---

19 COMMISSIONER GILINSKY: Maybe just saying "safety  
20 goals" is good enough. But that makes it sound like they  
21 are independent ---

22 MR. REMICK: If you look in (2) below we do have  
23 qualitative safety goals and associated numerical guidance.  
24 Is there inconsistency in the document between goal and  
25 goals? I agree it is intended to be just one number.

1 CHAIRMAN PALLADINO: And it isn't.

2 COMMISSIONER GILINSKY: I would be inclined to say  
3 more specific safety guidance. You have got safety goal up  
4 in the title and I would leave that up there, but in the  
5 text I would say "must develop more specific safety  
6 guidance."

7 COMMISSIONER AHEARNE: That tracks with the part  
8 you are taking in the paper itself.

9 COMMISSIONER GILINSKY: I would leave this, but  
10 then just put in here "must develop more specific safety  
11 guidance."

12 MR. REMICK: Instead of "safety goal."

13 COMMISSIONER GILINSKY: Then you need to conform  
14 the other paragraphs below. I wouldn't say "a safety goal."

15 CHAIRMAN PALLADINO: I think making it plural is  
16 more consistent with what we are doing.

17 COMMISSIONER GILINSKY: Yes.

18 Let's see, risk assesement, we say: "Special  
19 attention should be given to using probabilistic assessment  
20 techniques in areas . . . ." I guess I would throw in  
21 something about where the data warrants or something like  
22 that.

23 CHAIRMAN PALLADINO: Oh, yes. I think that is a  
24 good suggestion because a lot of times you can waste a lot  
25 of time if you don't have appropriate data.

1 COMMISSIONER GILINSKY: That is about it I think.

2 COMMISSIONER BRADFORD: In the section on "Waste  
3 Management," I had asked last time how you got the three  
4 sites instead of the five to be characterized. Last year it  
5 said five.

6 MR. REMICK: I think the answer to that is that it  
7 is consistent with what is in at least the Senate bill was  
8 three sites. The other answer we have gotten is that the  
9 staff in their budget is considering three sites.

10 MR. CORNELL: I talked to Jack Martin about this  
11 this morning. Five sites apparently is what the Carter  
12 Administration was talking about over a year ago. In our  
13 current procedural rule we talk about a minimum of three  
14 sites.

15 COMMISSIONER BRADFORD: Our rule has always been  
16 geared to three sites being actually submitted. It was my  
17 understanding that DOE was going to characterize five and  
18 then submit three.

19 MR. CORNELL: My understanding is I guess that the  
20 Administration now is thinking of a minimum of three sites.  
21 Whether they are going beyond, I am not sure, but it is in  
22 our procedural rule at this point a minimum of three.

23 COMMISSIONER BRADFORD: I think there is anything  
24 in our rules that requires them to go beyond three, but I  
25 knew that we had said five last year because DOE had planned

1 to do five.

2 MR. CORNELL: Jack Martin's impression is that  
3 they are looking at three at this point, but they seem to  
4 change ---

5 COMMISSIONER BRADFORD: Well, I don't think they  
6 can go below three with our rule as it stands.

7 COMMISSIONER AHEARNE: Can I ask you a question  
8 related to that since you raised it.

9 CHAIRMAN PALLADINO: What page?

10 COMMISSIONER AHEARNE: It is the same thing. It  
11 is on page 16. The time period that NMSS believes that they  
12 can meet to finish the review, you have three and a half  
13 years in; is that what ---

14 MR. REMICK: This came as a result of a discussion  
15 I had with Jack Martin I think yesterday or the day before.  
16 It is on the assumption that it would be 16 months for an  
17 SER and two years for a hearing coming to three and a half.  
18 He says that is consistent with one of the Senate  
19 committees. I think it is the Environment Committee. He  
20 feels it is reasonable.

21 It is, however, based on the assumption, and Jack  
22 says he has good assurance that that is the way that both  
23 the subcommittees are going, that the FES prepared by DOE  
24 would be accepted by the Commission. It would not have to  
25 be a separate FES. They could rely on the DOE one and he

1 indicates that the word is that the committees are thinking  
2 along that line. He says if that is the case then three and  
3 a half years is consistent with that.

4 COMMISSIONER AHEARNE: And if that is not the case?

5 MR. REMICK: He would say that he has got a  
6 problem because he can see 16 to 18 months for a DES, nine  
7 months for an FES and two years for a hearing which is about  
8 four years.

9 COMMISSIONER AHEARNE: We ought to be explicit.

10 MR. EYSYMONTT: On the assumption that such and  
11 such.

12 COMMISSIONER AHEARNE: Yes.

13 CHAIRMAN PALLADINO: You want to state the  
14 assumption?

15 COMMISSIONER AHEARNE: Well, it turns out from  
16 what he just said that that is a critical assumption.

17 MR. REMICK: It is a critical assumption.

18 MR. DIRCKS: In connection with that, this is a  
19 mixture of basing the program here either on the legislation  
20 that is pending or on the submissions thus far to the waste  
21 confidence proceeding. If you take the waste confidence  
22 proceeding submissions, both DOE and our own, then the dates  
23 change. Instead of mid-FY-84 it would be mid-FY-86.

24 COMMISSIONER AHEARNE: In mid-84 we will have in  
25 place all regulatory guidance and criteria?



1 MR. CORNELL: The confidence proceeding, when you  
2 actually get down to the middle of the paragraph mid-FY-85  
3 becomes '88. If you back off from that you get to '86.

4 CHAIRMAN PALLADINO: This says "may be submitted  
5 to the NRC as early as mid-'85." It doesn't say "will."

6 MR. CORNELL: DOE's current plan, as Jack  
7 indicated to me this morning, was that the the submittal to  
8 the NRC, they are looking at an '88 date and not an '85 date.

9 CHAIRMAN PALLADINO: I think they are possibly  
10 based on the earlier drafts of some of that legislation.

11 MR. DIRCKS: Yes. Then the whole thing would be  
12 based on the legislation. That should be specified.

13 COMMISSIONER AHEARNE: Yes. Let me get one thing  
14 clear though. When we will have in place our guidance as  
15 criteria, is that mid-'84 the legislation driven date or the  
16 date that we currently believe we will have in place all of  
17 our regulatory guidance and criteria?

18 MR. CORNELL: It is the former.

19 COMMISSIONER AHEARNE: I thought it was the latter.

20 MR. CHILK: Jack said they can't make mid-'84.

21 COMMISSIONER AHEARNE: They cannot?

22 CHAIRMAN PALLADINO: Then why should we put it in?

23 COMMISSIONER AHEARNE: We shouldn't be put it here.

24 MR. CHILK: That is why we suggested '86.

25 CHAIRMAN PALLADINO: Did Jack Martin review these

1 dates?

2 MR. CHILK: Yes.

3 CHAIRMAN PALLADINO: But he still went with by  
4 mid-'84?

5 MR. CHILK: No, he does not. '86.

6 COMMISSIONER AHEARNE: Are there any other points  
7 in here that the staff feels that they definitely cannot do?

8 MR. CORNELL: Well, one alternative you have would  
9 be just to start with the NRC will have in place regulatory  
10 guidance and so forth and so on. You might just strike the  
11 date altogether and not -- (Simultaneous Conversations -  
12 Inaudible).

13 CHAIRMAN PALLADINO: You might say "will have  
14 regulatory guidance and criteria in accordance with such  
15 legislation as the Congress may pass."

16 COMMISSIONER AHEARNE: But can we meet the  
17 legislation if they pass the legislation?

18 CHAIRMAN PALLADINO: The later legislation I think  
19 we have a chance of meeting. The earlier one we did not  
20 have a chance of meeting. It is the one they extended to  
21 '88. I think this needs to be re-examined.

22 MR. REMICK: We need some guidance because we get  
23 conflicting signals no matter who we talk to.

24 COMMISSIONER AHEARNE: Let's see if we can be  
25 clear. According to the staff they can make mid-'86. They

1 expect the license application by '88, did you say?

2 MR. REMICK: '88.

3 COMMISSIONER AHEARNE: From the numbers you  
4 mentioned, Forrest, it might take them over four years to do  
5 the review?

6 MR. REMICK: It may if the Commission has to  
7 produce a separate CES/WSE.

8 CHAIRMAN PALLADINO: I have a little problem ---

9 MR. REMICK: As I say, Jack's feeling is it is  
10 going to be as I indicated, and therefore three and a half  
11 years would be an acceptable change from four years. Of  
12 course, if they don't come out that way, then he is back  
13 where he was where he was concerned about two years and nine  
14 months.

15 CHAIRMAN PALLADINO: The problem I have is the  
16 following. They came out with proposed legislation and we  
17 said that the time period was too short and they extended  
18 it. Now, I don't know whether that is going to pass or  
19 not. Whatever the Congress passes, I think we have to gear  
20 up to try to do.

21 That is why I was wondering that maybe we don't  
22 want to put all these dates in here, but indicate that we  
23 should plan on the basis of such legislation as is passed by  
24 the Congress. If we want to put any caveats in there we can  
25 say in such planning we have got to recognize that it takes

1 thus and thus time to do things. But, rather, say we are  
2 going to do what the Congress wants us to do.

3 COMMISSIONER AHEARNE: I would say we would try  
4 our best to meet whatever Congress requires.

5 CHAIRMAN PALLADINO: I was trying to attach it to  
6 the legislation that we have an obligation to try to do what  
7 they say. We should plan on doing what the legislation  
8 passes and make known such obstacles as may exist in the  
9 path, if any.

10 COMMISSIONER AHEARNE: I guess where I fall off of  
11 what you said, Joe, is that if the Congress tell us to do  
12 something that we really can't do, I would feel that I  
13 could't direct the staff to now plan on doing that if they  
14 know they can't do it.

15 CHAIRMAN PALLADINO: If you can't do it, identify  
16 the barriers that exist to doing it.

17 MR. REMICK: Well, it would be helpful I think if  
18 EDO's office could give us a draft with a paragraph that  
19 meets --(Simultaneous Conversations - Inaudible).

20 MR. CORNELL: Yes.

21 COMMISSIONER AHEARNE: Fine.

22 COMMISSIONER AHEARNE: All right.

23 CHAIRMAN PALLADINO: Vic, do you have more?

24 COMMISSIONER GILINSKY: (Nodding negatively.)

25 CHAIRMAN PALLADINO: Peter?

1 COMMISSIONER BRADFORD: (Nodding negatively.)

2 CHAIRMAN PALLADINO: Tom?

3 COMMISSIONER ROBERTS: (Nodding negatively.)

4 CHAIRMAN PALLADINO: Well, I am sure there are  
5 other wording changes that will develop.

6 Let me suggest that you give them Forrest. Then  
7 we will circulate all the changes and see if we are close  
8 enough for a notation vote.

9 MR. REMICK: Could we have those by Friday of this  
10 week? If that reasonable to expect? Otherwise, we are not  
11 sure if we are going to get additional ones. Is that  
12 reasonable?

13 COMMISSIONER GILINSKY: It is reasonable to expect.

14 (Laughter.)

15 CHAIRMAN PALLADINO: Well, let's leave it this  
16 way. If someone has comments and can't them to you by  
17 Friday, how about letting Forrest you can't get them to him  
18 by Friday.

19 COMMISSIONER AHEARNE: Well, I raised all mine  
20 except for one question which I can just take a minute later  
21 and ask you the rest. I have no other comments.

22 CHAIRMAN PALLADINO: Any more on this subject?

23 (No response.)

24 CHAIRMAN PALLADINO: Well, thank you all.

25

1 We will stand adjourned.

2 (Whereupon, at 3:10 p.m., the meeting adjourned.)

3 \* \* \*

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

NUCLEAR REGULATORY COMMISSION

This is to certify that the attached proceedings before the  
COMMISSION MEETING

---

in the matter of: Public Meeting - Discussion of Policy and Planning  
Guidance

Date of Proceeding: December 8, 1981

Docket Number: \_\_\_\_\_

Place of Proceeding: Washington, D. C.

were held as herein appears, and that this is the original transcript  
thereof for the file of the Commission.

Mary C. Simons

Official Reporter (Typed)

*Mary C Simons*

Official Reporter (Signature)