

DSI-24-20



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U.S. Nuclear Regulatory Commission
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In light of the time constraints I am commenting on selected DSI's. ~~Remove~~ My focus is on the key points instead of bureaucratic stories told in the DSI's. I have been a bureaucrat for the last 30 years I understand your thoughts.

DSI-2 NRC should take over the responsibility of overseeing the DOE nuclear safety. This strategy should provide NRC opportunity to grow, challenge the current employees which challenge is needed desperately. NRC is getting stagnant, rusty and lazy. The morale of the agency is at the lowest point and managers have no idea about what to do about this situation. Therefore, do not miss this opportunity to energize NRC and its employees. This strategy will disturb the comfortable and comfort the disturbed ones. This strategy will sharpen the skills of the NRC employees and they will be better prepared for the advanced reactors reviews.

DSI-3 NRC should bite the bullet and propose new Congressional legislation which clearly states that facilities regulated by NRC should be exempt from EPA regulations. Both agencies (NRC, EPA) are wasting tremendous amounts of resources in fighting this territorial fight and OMB is watching the show and paying a tremendous ~~price~~ price for the show while doing nothing about it. NRC should go to Vice President

Gore and ask him to stop this bickering, save government resources and improve NRC & EPA, DOE effectiveness.

This issue cannot be solved by NRC, EPA or DOE unless public and industry is willing to pay big price for it. Congress/White House should get involved in resolving the childish bickering between NRC and EPA. I am sure there are other agencies who will join the NRC's crusade in this area.

DSI-5 NRC should get out of the LLW program and let the states, EPA deal with it. This should save resources for the industry and the NRC. The Department of Transportation should deal with transporting LLW, because they have the responsibility. NRC should consult the local and Federal government's agencies on a request basis and let them pay the consulting fees.

DSI-6 DOE has the responsibility of handling the final disposal. Let DOE handle it. NRC should deal with temporary storage of waste at power reactor sites and no further. NRC should keep abreast of the technology development and the activities undertaken by the DOE, Congress, and industry. NRC should take some actions to straighten out some internal problems between NMSS and NRR. Who is responsible for what at reactor sites? NMSS has no experts who are trained in regulating reactors. Similarly, NRR has no experts who trained in regulating non reactor facilities; therefore, any and all activities related to reactors, for example, dry

fuel storage facilities, handling of casks inside the reactors (plants) should be handled by NRC. MMSS has no experts who are knowledgeable with reactors and, thus they are continuing to make significant mistakes in this area. Please "clean house" NRC in this area.

DSI-7 NRC should get out of the nuclear material program. NRC should establish standards and regulatory guides and let the states handle it in their own ways. Hospitals, X-ray labs are licensed by the states and they are responsible for protecting their people. NRC has not made any major contribution in this area for the last several years except for increasing the regulatory burdens on the states and the industry.

DSI-9 NRC recently issued a reactor decommissioning rule to be implemented across the board (Power or non power facilities). No decommissioning plans for releasing the sites should be required for NRC review. Industry is intelligent and made up of business people who can meet the performance standards. There is no need for the extensive decommissioning plan reviews by the NRC for the non reactor facilities is needed. Now the NRC should come up with a site release criteria for nuclear facilities regulated by the NRC independent from the EPA. Please read my DSI-3 comments. NRC should regulate reactor and non reactor facilities with one regulation currently used for the reactors. You have staff of 50 persons working in the non reactor facility reviews + managers. Implementation of this

proposed strategy should save NRC 50% of its resources in this area. Industry would not need to spend 10 to \$20 million to determine whether or not a reactor site is clean for its release. The reason for such extensive effort being required by the industry is because NRC is out of control and the commission is not paying any attention. Definitely NRC should implement option 3 and reduce the regulatory burdens on the industry and save resources for the NRC.

DSI-10 I believe and NRC knows that future reactors will only be constructed on foreign lands in the near future. Therefore, NRC should not waste its resources in creating a big review staff in this area. Let Research monitor and keep a breast of technology or fund a national lab to do this task and issue annual reports on the status. A team of five would more than adequate to perform the function and even could complete the on going reviews. I am not sure that utilities or vendors receiving certificates for the approved designs in the 90's will be able to construct these designed plants in the ~~21st~~ 21st century without extensive reviews again 5-10-15 years from now.

DSIs 16, 17, 18 and 19 NRC is a management heavy, bureaucratic machine. The Commission should flatten the organization so that the office director would have only two layers of management between the office director and the first line workers. This means no section chiefs and no deputies. Each working unit in the area of engineering and scientific disciplines should not be more than 15 persons, supervised

by an SES manager. Second line supervisors should be division ~~Directors~~ reporting to the office directors. Each Division Director can have 7 to 10 units. This type of organizational structure should reduce a lot of bureaucracy and increase effectiveness. Next question is to hold these managers responsible and accountable for their actions. Keep the good ones and get rid of the bad ones — return them back to GG scale. NRC management must change its management style to go into the next century.

The next issue is the over head staff (Administrative, Contracting, payroll etc.) NRC's overhead cost is approximately 200%; that means an average employee is making between 40 to 50 dollars per hour. I know this rate is high. NRC is billing the industry 123 dollars an hour that means 83 dollars is overhead. Industry overhead is generally 100 to 150 percent for the organizations compared to the size of the NRC. Therefore commission should focus on this inconsistency.

- DSI-20 NRC should continue to be involved in international policy - making organizations and learn from the foreign experiences through international technical exchanges.
- DSI-21 Flat fee is the way to go - NRC and the industry (Licensees) should save money in the long run. I believe NRC fee process is very cumbersome and costing the licensee's NRC significant resources. Simply once a year flat fees should be revised on actual ~~in~~ expenses.
- DSI-22 Research is an important resource for the NRC and the industry - the focus needs to be adjusted on applied research only.

DSI-24

The new decommissioning regulation is a step in the right direction. Please change the requirements of the site release decommissioning plan review and approval by the NRC to meet the final site release criteria. See my comments on DSI-9. However, the management/implementation of decommissioning rule on reactors should be carried out by the NRC and on the facilities by the NMSS. These programs should be conducted from the head quarters. Inspections and on site reviews will be a needed element for the success of this program. Therefore regional office cannot carry the dual form with the same inspectors. Regional priorities are heavily weighted by the operating reactors; therefore, regions should not be required to review on site technical evaluations/50-59 reviews otherwise they are going to make mistakes. Similarly NMSS should not be involved in the reactor decommissioning program, because the necessary expertise is kept in NRC. Dual unit reactor sites, where one reactor is shutdown and one operating having two NRC organizations (NMSS & NRC) regulating the same utility does not make sense and is not very cost effective for the NRC or the utilities. Again in many cases these units have common systems and often the safety significance of the events is not properly evaluated by the two organizations because of their missions. Therefore, it should be one organization administering/managing the reactor decommissioning program for the reactors and similarly one organization should be administering/managing the facility decommissioning program. In my opinion NRC should be in charge of reactors and NMSS should be in charge of facilities as designed by the commission. These two organizations have the necessary culture and expertise

to deal with these two programs effectively and efficiently. NRR has always been responsible for reactor construction, ^{and} operation and should be responsible for decommissioning the reactors. Similarly NMSS ~~has~~ has been responsible for facility (Materials) for construction and operation and should be responsible for decommissioning ~~the~~ facilities. NRC customers (Utilities, Vendors) are accustomed to dealing with organizations in their respective fashion NMSS and NRR. Both parties know each others' expectations, cultures, processes, procedures, regulations and organizations/management styles. Why change them now? I believe this separation is important for the successful implementation of the decommissioning rule. I support option 2.

Conclusion: I hope these comments are helpful to the commission and the staff. I wish that NRC will make the decisions ~~to~~ effectively to move the agency into the 21st century.

Comments

By No ~~name~~ name.