



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 18, 1979

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CORR

Mrs. Leona Cook
204 Chesterfield Court
Midland, Michigan 48640

Dear Mrs. Cook:

We promised to report to you on what the Commission is doing to alleviate the kinds of difficulties you and your family encountered in assuming a resident inspection post. Your insight has certainly helped the Commission focus on the personal and family sacrifices that have been faced by inspectors while relocating, working as a resident inspector, and living in the community as a visible NRC representative.

The Office of Inspection and Enforcement (OIE) has just completed its review of the types of hardships your family encountered, with particular emphasis on ways that the agency may alleviate them. The enclosed copy of that review responds to each issue raised in your letter (Enclosure 1). Also enclosed for your information is a copy of a recent OIE report on issues concerning the early implementation of the Resident Inspection Program (Enclosure 2). Parts of this report elaborate on many of the issues you raised (e.g., isolation, no daily professional interaction with NRC peers and transfer of duty stations and household moves). As the enclosures indicate, we have made some progress and present practices are improving compared to those you experienced. For some of the problems we have not yet decided on specific solutions, but are looking at possible alternatives, some of which may require legislative action. We will pursue early resolution of these problems.

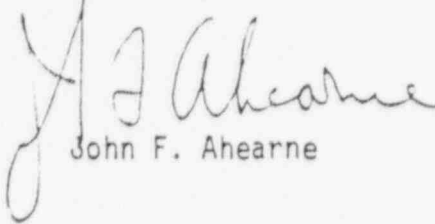
One of the most important mechanisms adopted since last writing you may be the recent designation of a full-time staff contact for the Resident Inspection Program (Mr. Elliot Greher, telephone (301) 492-7042). He is defining potential and actual program problems and is directing attention to finding the best solutions. I also expect a heightened emphasis on communications among resident inspectors, their regional counterparts and those in headquarters monitoring the program. Hopefully, ways can be developed to include the families of residents into this communications scheme. Mr. Greher also will serve as the open line of communication with resident inspectors and their families, which you requested.

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Thank you again for writing to us and for giving us the benefit of your insight into one of the most important NRC programs. I will take whatever actions I can to minimize the personal problems of resident inspectors and their families.

Sincerely,

A handwritten signature in cursive script, appearing to read "J F Ahearne".

John F. Ahearne

Enclosures

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ISSUES RAISED BY LEONA COOK

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(Reference Mrs. Cook's Letter to Chairman Hendrie, June 11, 1979)

Delays in Making Assignments

Issue: Inspectors have - on the basis of informal notification of their new resident assignment - begun the process of moving and then experienced delays in receiving official reporting dates. These delays have greatly inconvenienced them, even causing financial loss.

The process of getting initial OMB and Congressional approval of the Revised Inspection Program was an reiterative process that did create repeated start/stop orders and delays. IE plans for implementing first round assignments were interrupted and delayed on several occasions due to budgetary constraints. In retrospect, our interest in prompt implementation may have led to premature indication to the individual inspectors that moves were imminent.

Resolution: Long range planning and adequate legislative and budgetary authority is now available. The delays in receiving official notification of an assignment are not expected with present procedures: a selection is made from qualified applicants for a specific site; the Regional Director informs the selected individual, in writing, of his appointment and latest reporting date; this is immediately followed by a confirming letter from the Division of Organization and Personnel; and shortly thereafter, information about agency transfer of duty station policies and benefits is sent by Administration's Travel Services Branch. We are currently developing an assignment check list to assure these and other related matters are handled in a timely way. This list should be in use by the end of December.

Moving Families to Sites

Moving household goods have been beset with errors and outright incompetence.

The success with moves have varied considerably. Some individuals report that their move was handled well while others report significant problems. KRC has little control over the government-wide rules and regulations for moving the government's civilian employees. However, we are now in a better position to instruct residents on these moves and alert them to problems that can be avoided.

Resolution: Administration's Travel Services Branch and the Regional Office staff have become more knowledgeable about the pitfalls associated with Transfer of Duty Stations. Residents are being briefed on their rights and authority over movers. We will continue collecting and updating information from resident inspectors to better understand and earlier identify general problems and to assist in requesting necessary changes in procedures.

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Financial Loss

Issue: Resident inspectors have claimed they have suffered financial loss from selling their homes, moving their household goods, and from changes in equity and tax liability associated with moving.

We have received reports of financial loss being sustained by many resident inspectors, although Mrs. Cook's estimate is higher than most. These losses appear to come primarily from real estate transactions, but may also include inadequate reimbursement for moving expenses. Although government reimbursements may have been adequate several years ago, the current real estate market may exacerbate a resident inspector's moving losses. For instance, real estate fees to sell houses may exceed GSA reimbursement limits or the local real estate market is so slow that houses cannot be sold at a fair price in the desired time frame.

Resolution: Although many residents have complained about inadequate move reimbursement, specific data is not available comparing actual costs to actual reimbursements. IE is prepared to survey resident inspectors and other IE inspectors to compare actual costs vs. actual reimbursement. The analysis of this survey will be completed by February 28, 1980. The delay is due to Privacy Act requirements in setting up a system of records. Solutions to any disparities can then be developed and proposed. We expect to submit a report on our findings and recommendations for alleviating some or all of these problems by March 1980.

Family Orientation

Issue: NRC should establish an orientation program for families of resident inspectors.

Resolution: We are currently developing a half-day orientation program to be provided in each Regional Office. Families of resident inspectors would be informed about the goals and objectives of the Resident Program, the standards of conduct and work schedule, and what can be expected in moving to and establishing a home in the area. These orientation sessions will begin in December 1979. We also intend to prepare "Post" reports describing the educational, social, and other amenities in each site area. The first two examples will be produced in January 1980 and, if well received, each Regional Office will prepare similar reports for each of its sites. By January 1980 we expect to make a decision about sponsoring a Resident Inspector Newsletter. A large portion of the Newsletter could be devoted to the interests of inspector families.

Attacks on Resident Inspector Integrity

Issue: The NRC should make a statement of defense when an inspector's integrity is attacked. When and how should this be done?

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Mr. Cook was accused by Mr. Myron Cherry in November 1978 of being "co-opted" by Consumers Power Company. These charges were published in the local papers. Until the matter was investigated by OIA, no statement of defense was made by NRC on behalf of Mr. Cook. The OIA investigation took about six months and did not substantiate Mr. Cherry's allegation. The OIA report has not been released to the public but a note was sent to the ASLB noting the final determination. Our agency's present practice of having another NRC office conduct an independent investigation may be prudent. Nevertheless, if the investigation takes too long to complete or the final report is not released, we may be doing an injustice to the inspector. We feel Mr. Cook, his family, and any other inspector wrongly accused should be publicly exonerated as soon as possible.

Resolution: We expect instances of unsubstantiated accusations will continue to occur and recognize that prompt action on the part of NRC is appropriate. Any special investigations into allegations of resident inspector misconduct will be given priority in line with a goal of completing that investigation in one month. How to announce the results of those inspections is an important concern, and we will review the possible alternatives in more detail. Since the number of allegations is expected to be low and the factual circumstances varied, future allegations will likely be dealt with on a case-by-case basis.

Feelings of Professional Insecurity and Isolation

Issue: Resident inspectors are out of the mainstream of NRC activities and feel they can too easily be subject to political pressures or become a scapegoat.

We are not aware of any NRC wavering on continuing and strengthening the Resident Inspection Program, but a person's perception can be drastically different when they are located (and to some extent isolated) 800 miles from where the decisions are being made. Mrs. Cook's feelings can easily be understood considering the atmosphere at Midland, the accusations against her husband, and the financial pressures. Nevertheless, the resident inspector is in the limelight and has implicitly assumed responsibility for the day-to-day regulation oversight to assure plant safety. Despite technical and administrative support from the regional offices and from headquarters, the resident inspector is "the NRC" at that site. It is only natural that the resident inspector may be viewed by the public as accountable when problems occur. The NRC recognizes it may have to confront this problem from time to time.

Resolution: The recent designation of a staff contact having close connections with those responsible for implementing the Resident Program provides a mechanism for answering questions promptly and with authority. Our expectations for more organized communications between residents, regional personnel and headquarters personnel should also alleviate such concerns. Even the isolation may be lessened, at least at operating sites, by having two or more inspectors at each site.

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Additional Contact with Local Media and Congress

Issue: Public affairs on the Resident Program should not cease once the site is manned. Communications with Congress can be improved.

Presently a press release to the local media is made for new residents. Periodic, additional releases about the Resident and his duties may be helpful.

We believe that the Agency has and is adequately informing Congress about the Resident Inspection Program; however, it may be worthwhile providing additional information to those individual Congressmen in whose districts resident sites are located.

Resolution: Discussions will be held with the Office of Public Affairs and Office of Congressional Affairs to consider expanded and continuing contacts with local media and local Congressmen.

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REPORT ON ISSUES RAISED IN
THE EARLY IMPLEMENTATION OF THE
RESIDENT INSPECTOR PROGRAM

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BACKGROUND

The Resident Inspector Program was first conceived nearly 3 years ago in an attempt to improve federal oversight of the nuclear industry. Before that, in June 1974, the Office of Inspection and Enforcement initiated a trial program to evaluate the concept of assigning inspectors to locations near nuclear power reactors. In this two year trial, two NRC inspectors were assigned to locations from which they were able to inspect a total of four reactor sites. The evaluation of this trial program--SECY 77-138--concluded that the concept of resident inspection is viable because it can provide a number of significant benefits, principally those relating to the efficient and effective use of an inspector's time.

A special study group was established in 1977 to evaluate inspection alternatives. Their first product was a paper describing and evaluating four alternative resident inspector concepts. The paper recommended the concept of full-time onsite inspectors, what is now called the Resident Inspector Program, as the preferred alternative.

The qualitative evaluation for this chosen alternative - locating an inspector at each site - cited both positive and negative features:

- "Develop considerable familiarity with the licensee facility"
- "without periodic reassignment, however, an inspector might not gain the breadth of experience that comes from exposure to a number of different facilities"
- "providing formal training to onsite inspectors would pose practical logistics problems"
- "onsite inspectors would also lose the daily professional interaction with NRC peers"
- "inspectors would be able to conduct inspections at various times during the (facility's) daily work cycle"
- "inspector presence onsite would be significantly increased"
- (inspector presence) "could be selectively applied to emphasize safety-related licensee activities"
- "inspection activities would be essentially unannounced"
- "ample opportunity to detect and verify correction of matters of safety concern"
- "this approach offers greater risk of loss of inspector objectivity"

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- "potential for inspector involvement in the licensee's internal decision-making process"
- "the inspector might find professional and social peers only among the licensee employees"
- "increased inspector presence onsite...should have a positive influence on (licensee) motivation"
- "the activities available for inspection should be sufficient to make full and meaningful use of the inspector's time."

Resident inspection was initiated in the late spring of 1978 with the manning of 15 operating reactor sites, 5 reactor construction sites and 2 fuel facility sites. The negative technical features were still evident: reduced exposure to many facilities, difficulty in providing training, no daily professional interaction with NRC peers, risk of objectivity loss (or licensee "capture"), and involvement in licensee decision-making. Negative personal factors were also evident: 24 hour on-call status and licensee employees being the only professional and social peers. To these was added a new and often devastating experience -- transfer of duty station and a household move in accordance with government regulations.

Following the experience with TMI, IE proposed an expanded resident inspector program. Such a program would increase inspector presence by significantly increasing the numbers of resident inspectors assigned to each site. It would permit daily checks of critical safety systems. It would provide for more routine inspection of licensee operations on swing shifts, back shifts and weekends. It would ensure adequate and prompt coverage of incidents. The expanded resident inspector coverage would also alleviate many of the negative features cited above by providing the resident inspector with an NRC peer at the site.

ISSUES

Loss of Objectivity (or "capture") has been the most serious concern about resident inspection even prior to the 1974 to 1976 trial program. Such a loss of objectivity is inherent in a situation where an inspector is in contact with a single licensee on a continual basis while contact with his NRC peers is infrequent at best. Concern about loss of objectivity may even strain the contacts with NRC peers, establishing a feeling that each visiting inspector is spying on the resident inspector. IE managers' and supervisors' concern for loss of objectivity was the single major objection to initiating the resident inspector program. Similar concerns were expressed as the number one issue by inspection management in other Federal agencies. (See the IE contracted study of other agency inspection and enforcement experiences: NUREG/CR-0051 and NUREG/CR-0052, "Evaluation of Inspection and Enforcement Programs of Other Regulatory, Safety, and Professional Organizations".)

IE has initiated a variety of mechanisms to limit and identify losses of objectivity. Prospective resident inspectors are selected with the idea of minimizing

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this concern; only balanced, mature but independent inspectors have been chosen for site assignments. Previous employment at the site or with that utility management is a reason for rejecting an applicant for a specific site. The pre-transfer training for prospective resident inspectors warns about "capture" and suggests precautions to be taken. A code of conduct was issued which establishes very strict limitations on relationships between inspectors and licensees, forbidding most social contacts and even carpooling arrangements. Frequent contact and oversight by Regional supervisors is directed to detecting incipient "capture". Periodic travel back to Regional Offices provides an opportunity for reemphasizing the concern about "capture". A separate audit group, the Performance Appraisal Team (PAT), has the function of assessing whether inspector objectivity is being maintained. PAT will accomplish this by periodic audit inspections of each licensee. Resident assignments are to be limited to 3 years at any one site as "capture" appears more probable in longer assignments.

Nevertheless, the most effective way of assuring against "capture" is to provide a peer with whom the resident inspector can interact. This was consistently the recommendation of other agencies with a resident inspector program (see NUREG CR-0051). The expanded resident inspector program provides such a peer at operating reactor sites. Each site will now have a minimum of 2 resident inspectors. Meanwhile, the careful selection process will continue, as will the training and retraining emphasis. Close resident oversight will also continue. On the other hand, some of the elements in the code of conduct may be eased and assignments may be lengthened to as long as five years.

Isolation from the NRC is the second concern. In fact feelings of isolation and "capture" can very rapidly become cause and effect. The remote location of most reactor facilities inevitably strengthens feelings of isolation as does lengthening assignment as a resident or reassignments from one site to another.

IE's response to isolation has been nonspecific; the program is too new for situations to have surfaced that require a solution. General solutions have been adopted. Regions are beginning to schedule periodic meetings bringing together resident inspectors to discuss site and office issues among themselves and with Regional management. A Headquarters staffer is usually invited to these meetings to participate as both a listener and as a discussion leader. Resident inspectors receive copies of the IE Daily Reports, that is, the reports generated daily by each Regional Office. We may eventually abstract these daily reports along with other, appropriate information so as to reduce the duplication and volume of such reading without reducing content. Supervisors maintain frequent contact with their residents. Usually, 3 or 4 sites are assigned to each supervisor and telephone contact can be a daily occurrence. The Regional staff coordinates the inspection activities for a site, scheduling the various Region-based specialists that go to each site and the combination of inspection by resident and regional inspectors. Nevertheless, at the site the resident inspector holds a unique position. He may participate in entry interviews for region-based inspectors and must participate in - and even lead - exit interviews. This participation also should engender a feeling of belonging to the total regional inspection program.

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A Headquarters contact has been designated to whom residents and regional people can turn for information or to resolve problems. He has sent current residents a letter informing them of his availability by phone, either in the office or at home. He plans to continue sending such letters during the next 12 to 18 months, thru full-scale implementation of the program. He also has plans to visit with residents at their sites. During these visits he will discuss their modus operandi to both keep himself "calibrated" on how they are handling the job and to spot generic problems. He expects to host seminars in Headquarters where groups of residents can discuss their experiences and problems. He will attend many of the regional gatherings of residents so as to become acquainted with many residents, particularly those he can't personally visit.

Nevertheless, the best way to prevent feelings of isolation is to assign additional inspectors to a site. The expanded program's minimum of 2 inspectors at pre-operating and operating site helps solve the isolation problem in addition to its basic purpose of increasing onsite inspection and its prime advantage of reducing concerns for "capture". All operating sites manned by the end of FY 1980 will meet this 2 person minimum. Five sites will have 3 resident inspectors. Site offices are also expected to have part-time clerical assistance. With a complement of 3 to 4 NRC employees, feelings of isolation could be nonexistent.

Reduced Exposure to Many Facilities arises naturally from a resident assignment. Exposure to different facilities that comes from inspecting them results in a broad background and balanced judgement that is invaluable. It is a basic and positive attribute of a Region-based inspection program. Currently, lead residents have two or more years of experience as a Region-based resident and have obtained this multifacility exposure. On the other hand, many of those hired for the expanded program, the second and third inspectors at a site, will not have such experience. Those inspectors will be hired directly to a site so as to achieve manning commitments and to reduce household move problems. Even for those with prior exposure and experience at other sites, and surely for those with (at best) limited exposure, a resident assignment will mean reduced exposure.

In place of a broad exposure, resident inspectors will gain in-depth knowledge of their site and facilities. This should encourage directed inspections with a high content of independent observation and verification without a continuing need for expensive pre-inspection preparation. It should be more effective than its predecessor, the Region-based inspection program. Thus, reduced exposure to other facilities may be a sacrifice one must bear to have a resident inspector program.

Nevertheless, such exposure may still be obtainable although at a lower frequency. Resident inspectors will rotate in their assignments and, over time, handle other facilities. Then, they can use what they have learned in the previous assignments with other facilities. Temporary reassignments may be necessary to cover for illness, vacations, and gaps in filling vacant positions at other sites, although most of this coverage will come from the regional office. These will also be broadening experience. Meanwhile new hires will have 9 to 12 months of training which may involve inspections at sites other than the one of which they are assigned. Such other-site inspection is being proposed to specifically broaden their experience.

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Difficulty in Providing Training occurs when there is only one resident at a site. Who covers for him when he is receiving training? While a similar question can be asked of his taking sick or annual leave, his entitlement to these require coverage even if it stretches resources. But training may be viewed as a luxury if resources must be stretched to provide coverage.

Again, the expanded program yields a natural solution by establishing the coverage right at the site. The resident inspectors will be expected to schedule their annual leave and training so that continuous facility coverage can be maintained. Then Regional resources need be stretched to provide coverage only in limited cases, such as extended illness or unplanned vacancies.

Training for experienced residents could be accomplished via self study courses. This was proposed for the pre-expanded program and continues to have value in the expanded program. IE's Training Branch and its contractors would prepare "home study" texts and certifying exams that would be distributed in accordance with a specific schedule for updating resident inspector training. Training new hires will involve integrating Headquarters and simulator courses with Regional Office instruction, self-study, and on-the-job training. Most of this training will take place at the site. Regional supervisors and IE's Training Branch will share the training certification responsibilities.

No Daily Professional Interaction with NRC Peers also reduces the broadened horizons valuable to assessing situations. Contact and discussion with peers provides additional information about a variety of situations and consequently more balanced judgement that can be applied to future situations. It adds to the knowledge already obtained in inspecting many facilities. Of course, the resident inspector has contact with one's peers when a Regional inspector or inspection team visits the site. Similarly, there is almost daily contact with the Regional supervisor. But, the give and take of hallway discussions is missing as are the Regional meetings on topics of current interest.

The expanded resident program does not really ameliorate this issue since all residents at a site are experiencing the same licensee. What differences and knowledge each resident brings in terms of previous experience may soon transfer over to the other resident(s) at the site. They must rely on their Regional contact to serve as a conduit for their experiences and for those of other residents at other sites. It may be desirable to devote more time to telephone description of interesting situations, relying upon the Regional Office contact to remember these and recall similar situations when necessary. Regions may be able to record inspector lectures on unusual situations and distribute them to their resident inspectors and even to other Regions. Periodic get-togethers of residents could feature an adult version of show and tell to encourage dissemination of information on valued experiences.

Involvement in Licensee Decision-Making often arises when the licensee is unsure of his regulatory position. Heretofore, inspectors have been instructed to avoid giving advice. TMI may have shifted either the NRC's position or the licensee's leverage in obtaining advice. With a resident inspector onsite it becomes harder for both him and the NRC to avoid the consequences of not answering requests for advice or of not assuming an even more direct role in licensee decision-making.

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Until there is a clear change in the NRC position, inspectors must avoid giving advice or otherwise participating in the licensee's decision-making process. This will be emphasized in the training of residents, in periodic meetings of residents with regional supervision, and in the resident inspector's handbook.

24-Hour On-Call Status is a desirable feature from the NRC's point of view. It was not necessarily achievable within the original Resident Inspector Program since there was no guarantee that the single resident inspector can be reached when he was not at his duty station or at his residence. The expanded resident program offers a better opportunity to achieve a form of 24-hour coverage at operating plants since 2 or 3 resident inspectors could rotate on-call coverage via a pager/beeper device. From the inspector's point of view, 24-hour on-call status may be a hardship, one that he would assume much more frequently than any regional office-based inspector. But with the expanded program his on-call status could be shared among all the site residents.

An associated problem is compensation for such responses when they fall outside the resident's 40-hour work week. NRC personnel policy requires that professionals receive comp time in return for approved overtime. Even at sites with 2 or 3 resident inspectors offering comp time may not be most beneficial to the NRC. Moreover, resident inspectors are usually not able to use accrued comp time. If they do use it, the inspection program might suffer. Cash payments for overtime work would be more beneficial. A proposed amendment to the personnel policy has been recently adopted and IE is currently seeking an exception for resident inspectors under this amendment.

We might pursue that possibility of developing a special salary schedule for resident inspectors predicated on their 24-hour, on-call status and other responsibilities not applicable to the regional inspectors. NRC could seek approval for an early retirement program similar to that offered to military and police functions that serve on an on-call status. These solutions may require legislation.

Licensee Employees Being the Only Professional and Social Peers is an unavoidable problem as long as the inspector's housing choices are limited. At many sites they are not limited and a resident inspector can choose a location where other professional and social peers abound. Even for these sites the resident inspector must be careful to avoid contacts with licensee employees and this may limit some of his social and recreational activities. For some sites, particularly the most remote ones, housing choices are limited. The resident inspector may have to choose between living in a circumscribed manner or in commuting long distances to a larger metropolitan area. In reviewing the housing choices made by current resident inspectors it is obvious that they have adjusted to these restrictions.

A related question concerns car pooling with licensee employees or using licensee busing services. Currently, the resident's code of conduct does not permit them to participate in such car pools and services. If participation in these are not allowed and the gas price crunch continues or worsens, resident

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inspectors may be suffering an exceptional financial hardship. We have requested funds from OMB to provide a four wheel drive, emergency response vehicle for every site. Use of these vehicles for 24-hour on-call readiness could alleviate some of the transportation problems. If such vehicles are to be used for this purpose, however, legislation may be necessary to provide an exception to the prohibition against such use set forth in 31 U.S.C. Sec. 638(c)(2).

Transfer of Duty Stations and Household Moves have been the source of most complaints by resident inspectors. Government regulations and the financial limits they set may not be equal to current costs for some individuals.

Housing in metropolitan areas has increased so much in value that broker fees and other allowed expenses easily exceed the maximum permitted for reimbursement by these regulations: \$8,000. In the Chicago area it is difficult to sell a house because of the net outflow of middleclass families. There is an overabundance of houses on the market. In Philadelphia there is a similar (although lesser) situation. In Texas a usury law limitation on mortgage interest completely dried up mortgage funds. California house prices are the highest in the country, restricting buying and selling opportunities. Similar problems may work against inspectors at the house buying end of the move.

Moving costs have also risen, so that moves often cost more than government regulations allow. It is not difficult for an inspector's possessions to exceed the 11,000 pound limit on married employee moves. GSA restrictions on the choice of movers have too often resulted in damaged possessions because the contract movers used appear incompetent or careless. Per diem allowances for temporary quarters at the new duty station may not match with current hotel costs or provide for long stays due to difficulties in buying houses.

While IE employees have become more adept at working within these rules, the efforts are always time consuming, often frustrating, and frequently costly. Resident inspectors report they have lost considerably in their moves and they do not look forward to a repeat performance. Solutions are necessary to deter an unacceptably high turnover rate when site reassignments begin, perhaps as early as next year. While this implementing period - thru FY 1981 - will have the most moves, the steady state future of the mid 1980's will have 60 to 90 moves, mostly reassignments, every year.

A number of possibilities might be considered. Legislation can be introduced to change the laws and increase allowed limits for reimbursable expense on household moves, either government-wide or as a special case for the NRC. The IAEA methods could be adopted: a guaranteed return to your home region and/or a living allowance in the remote location. Special salary schedules might be considered for resident inspectors so that their overall compensation is comparable to what industry, with its better move reimbursements, would offer. Tours of duty might be stretched - to 5, 6, or 7 years - so as to spread the loss out more.

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It has prepared a survey to more accurately pinpoint the specific problems experienced by resident inspectors who have recently moved. Privacy Act compliance must be obtained prior to distributing the survey. The survey results should indicate which alternatives are the most efficacious in relieving the financial hardships experienced.

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