

NOTATION VOTE

RESPONSE SHEET

RELEASED TO THE PDR

2/4/93

date

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initials

TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION

FROM: COMMISSIONER DE PLANQUE

SUBJECT: SECY-92-337 - RESPONSE TO RECOMMENDATIONS OF
THE MATERIALS REGULATORY REVIEW TASK FORCE

APPROVED xx DISAPPROVED _____ ABSTAIN _____

NOT PARTICIPATING _____ REQUEST DISCUSSION _____

COMMENTS:

See attached comments.

050004

E. Guil de Planque
SIGNATURE

RELEASE VOTE /xx/

December 18, 1992

DATE

WITHHOLD VOTE / /

ENTERED ON "AS" YES xx No _____

9302100424 921218
PDR COMMS NRCC
CORRESPONDENCE PDR

DW07

Commissioner de Planque's comments on SECY-92-337:

First, the Task Force and contributing staff should be commended for a job well done and done on a timely basis.

I support encouraging or even requiring licensee self-assessments as well as increased inspection attention by NRC. However, these activities must be viewed as an effort whose effectiveness will be greatly influenced by the current regulatory framework and its limitations. Thus, I conclude that the highest priority should be on, to use the Chairman's words, "sharpening and upgrading the regulatory basis for assuring safety for major fuel cycle facility licensees."

I concur with Commissioner Curtiss's suggestion that staff should conduct frequent workshops with a narrow focus as a means of developing clearer understandings of what improvements are needed in our regulatory program for these facilities. Licensees should be encouraged to review their own programs to identify good practices. Staff and industry should also seek out and identify practices, procedures and standards used by other industries which process chemical compounds and control the safety and environmental hazards associated with them for possible application to these licensees, e.g., the petrochemical industry.

As staff proceeds with its plan I would encourage interaction between NMSS and NRR, first, to take advantage of NRR experience such as in safety analysis and secondly, as Commissioner Remick notes to assure consistency in regulatory terminology and expectations.

As the staff proceeds with implementing the plan it should carefully monitor the plan's impact upon resources. The annual briefing suggested by Commissioner Curtiss should include discussion of resource impacts.

Staff should monitor developments concerning the potential use of FSU HEU in U.S. facilities and keep the Commission informed of any needs to amend plan priorities in this area, including in the safeguards area.

Finally, while these facilities are primarily the regulatory concern of the NRC, the approaches incorporated into the plan can have applicability to other types of materials licensees including those regulated by the Agreement States. Staff should keep the Agreement State informed of the plan and, as appropriate, invite Agreement State participation in its implementation.