



NRC STRATEGIC ASSESSMENT AND REBASELINING INITIATIVE

DIRECTION SETTING ISSUE COMMENT FORM

NAME Richard RatliffPHONE NO. (512) 534-6688AFFILIATION Org of Agreement States

PLEASE CHECK ONLY ONE:

- ☐ DSI 2 - Oversight of the Department of Energy
☐ DSI 4 - NRC's Relationship with Agreement States
☐ DSI 5 - Low-Level Waste
☐ DSI 6 - High-Level Waste
☐ DSI 7 - Materials/Medical Oversight
☐ DSI 9 - Decommissioning - Non Reactor Facilities
☐ DSI 10 - Reactor Licensing for Future Applicants
☐ DSI 11 - Operating Reactor Program Oversight
☐ DSI 12 - Risk-Informed, Performance-Based Regulation

- ☐ DSI 13 - Role of Industry
☐ DSI 14 - Public Communication Initiatives
☒ DSI 20 - International Activities
☐ DSI 21 - Fees
☐ DSI 22 - Research
☐ DSI 23 - Enhancing Regulatory Excellence
☐ DSI 24 - Power Reactor Decommissioning
☐ General

COMMENT:

Attached - modified 2nd paragraph from
the comments sent to NRC Oct 21, 1996.

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Organization of Agreement States

Robert Quillin, Chair
Richard A. Ratliff, P.E., Past Chair

Roland Fletcher, Chair-Elect
Thomas Hill, Secretary

October 24, 1996

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sirs:

As you know, there are currently 29 states that have entered agreements with the NRC under Section 274 of the Atomic Energy Act of 1954. The agreement state program is an excellent example of the ability of states to conduct regulatory programs in an effective and efficient manner. The Organization of Agreement States (OAS) provides a vehicle for Agreement States to interact on common issues that affect individual states or all 29 Agreement States.

The OAS has received comments from individual Agreement States on the Direction Setting Issue Papers issued as part of the NRC's Strategic Assessment of Regulatory Activities. These comments have been summarized for each of the Direction Setting Issue Papers and are attached for consideration in this matter. Many of the individual Agreement States will provide state specific comments as well.

If you have any questions, please contact me.

Sincerely,

Robert Quillin, Chair
Organization of Agreement States
Radiation Control Division
Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Organization of Agreement States

Comments on

U.S.NRC Strategic Assessment and Rebaselining Initiative

Direction Setting Issue Paper # 20

"International Activities"

We feel that the discussion of international issues has failed to address the involvement Agreement States have in responding to incidents and issues along U.S. borders.

The Agreement States are a resource that the NRC can rely on to respond to radiological incidents resulting from activities in Mexico or Canada as well as incidents resulting from imports from other countries. The issues document discusses reduction in FTEs for NRC activities. The Agreement States have the resources and expertise that the NRC would be giving up under options 1-3. It seems more reasonable to use that expertise as needed rather than to maintain additional FTEs. This applies primarily to incident responses, but other technical issues may arise that would require NRC involvement. The Agreement States may be able to provide the necessary resources and expertise to meet the requirement, especially for the neighboring countries.

Preferred Option

Option 3 -- This approach could free up funds that are currently used for international exchanges so that those funds could be used for other purposes such as providing training to Agreement State personnel. The IAEA currently funds programs for training people from outside the United States; several of the Agreement States, including California and Texas, have hosted and provided extended training to IAEA fellows from foreign regulatory programs. Unfortunately IAEA does not fund Agreement State personnel to go for similar training. With the extensive reliance the NRC has placed upon the Agreement States to respond to incidents and issues involving NRC licensees, international operators, and the borders of the United States (especially the border with Mexico where all the states are Agreement States), we feel it is appropriate that the NRC continue to fund training for Agreement State responders.