



Organization of Agreement States

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

Roland Fletcher, Chair-Elect
Thomas Hill, Secretary

October 21, 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

DIRECTION SETTING ISSUE 13

"ROLE OF INDUSTRY"

Issue

In performing its regulatory responsibilities, what consideration should NRC give to industry activities?

Preferred Option

Option 4 -- Of the options described this seems to be the best approach for involving the industry and maintaining credibility with the public. Several states have successfully implemented programs to get active participation of professional groups and the public in rulemaking activities. Meeting and interacting on a regular basis with professional societies and groups such as the health physicists and medical physicists to get their input and to resolve specific regulatory issues have been very successful. In some cases expanded self-assessments may be coupled with longer inspection intervals. However, it would be difficult to have industry groups self-policing without significant changes in the present regulatory structure and culture.

DSI-13

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NRC STRATEGIC ASSESSMENT AND REBASELINING INITIATIVE

DIRECTION SETTING ISSUE COMMENT FORM

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AFFILIATION Org. of Agreement States

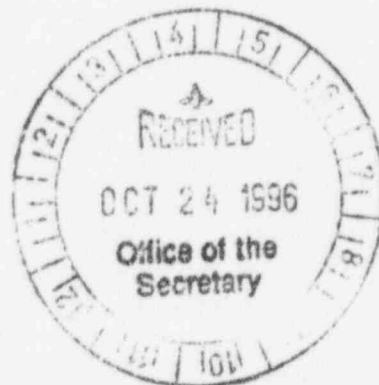
PLEASE CHECK ONLY ONE:

- ☐ 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

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DSI/3