



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA STREET, N.W.  
ATLANTA, GEORGIA 30323

MAR 21 1985

MEMORANDUM FOR: Clemens J. Heltemes, Jr., Director, Office for Analysis  
and Evaluation of Operational Data

FROM: J. Nelson Grace, Regional Administrator

SUBJECT: STUDY OF THE NEED FOR AN INDEPENDENT AGENCY TO INVESTIGATE  
INCIDENTS AT NUCLEAR POWER PLANTS

It appears that the argument in the report against the establishment of an independent government agency to investigate events are at least as strong as those arguments in favor of it. The report concludes that the NRC investigations are carried out in a generally professional and competent manner, with some exceptions, and appear to satisfy their regulatory objective. The report then identified three main areas for possible improvement. Given the overall conclusion of the report, and recognizing that improvements will always be of value, it is highly questionable whether establishment of another organization is warranted or desirable.

Three areas identified for possible improvement in the report included the timeliness of identification of events and investigation reports; the overlap and interference with each other of the various NRC, INPO, licensee, and equipment vendor investigations; and the perceived adversarial nature of the NRC investigations resulting from their being conducted by the regulation and enforcement staff of the NRC.

Improvement in the timeliness of identification of events and investigation reports can be expected through additional training of and experience gained by those organizational elements already in place to followup on events. Specifically, each Region has established an Operational Programs Section to supplement the Resident Inspectors in event followup. For that matter, the entire Regional Office and other Offices, on request, are available for that support. A Task Interface Agreement establishes the lead office responsible for event followup where more than one office is involved except for the case of AEOD. In the case of AEOD, AEOD has chosen to review certain events independently.

It would seem that timeliness could best be improved through gaining experience and additional training of those organizational elements already in place, not by the addition of another organizational entity.

As for the criticism concerning overlap and interference because of various agencies or parts of agencies being involved, it appears that adding yet another entity would only compound any perceived problems. In addition to the NRC organizational elements already mentioned, ACRS, INPO, ANS, FEMA, DOE, and local

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and State governments could all be involved at one time or another. It is doubtful that any of these entities would relinquish their statutory rights or responsibilities with the establishment of an independent safety organization. In any case, questions from these other organizations have proved helpful mainly because of the different view they may have related to their responsibilities.

As far as the perceived adversarial nature of the current NRC investigations, the report did note that no instance of this type of problem had been identified. The other comments in regard to greater operating experience and training for the investigators, as well as more timely feedback of the results of investigations are issues which, we believe, could be and should be dealt with in the present organization.

In summary, we agree that improvements could be made in the system by better training and as a result of better guidance. Guidance to the industry and our evaluation of post-trip reviews, for instance, have resulted in improvements in this area. Additional guidance in the area of event followup in general could be expected to also yield positive results. Nothing in the report would lead us to the conclusion that an independent safety organization would be needed to solve these perceived problems.



J. Nelson Grace

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