



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

March 4, 1985

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

FROM: James G. Keppler, Regional Administrator, Region III

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

This is in response to your February 15, 1985 memorandum on this subject.

Region III was interviewed by several of the authors of the report. Our principal staff had diverse views regarding the need and advisability of establishing a statutory Office of Nuclear Safety (ONS). The report has not changed these views.

Those in favor of such an office agree with many of the views of the reports authors. Particularly, a dedicated, independent group may perform better event investigations; certainly they will be perceived to do so by those who objectively view nuclear actions, and it may increase public, media, and congressional confidence in the nuclear industry.

On the other hand others believe that the current review of events is being done in a quality manner, notwithstanding the event investigation improvements suggested by the report. In fact we question some of the suggested improvements. For example:

1. probable causes are being determined. We require this to justify continued operation and it is being used to determine corrective action.
2. there has been no interference of NRC investigations by other investigations in Region III.
3. licensee bias is not believed to be a problem, because the Resident inspector and Regional event reviews preclude it.
4. there has been no bias by Region III in reviewing events, and we note the report has not identified a bias.
5. that considering the diverse groups which review licensee notification of events, an ONS would not identify events any more timely than is being done now.

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We are also concerned with the source of the FTE to perform this function and the impact the ONS would have on Regional FTE as a result of potential questions from the ONS. It is not apparent that current Regional FTE would be reduced if an ONS is formed, since the cause of events must be determined and corrective actions must be taken to justify continued operation and subsequent enforcement action must be taken where appropriate.

If you have any questions or desire clarification of these comments, please contact me or A. Bert Davis of my staff.


James G. Keppler
Regional Administrator

cc: H. R. Denton, NRR
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