

OhioEPA

March 28, 1985

The Honorable Nunzio J. Palladino
Chairman
Nuclear Regulatory Commission
Washington, D.C. 20555

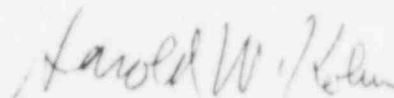
Dear Dr. Palladino

I just received and read the comments of the ACRS about creating an organization like the NTSB (National Transportation Safety Board) for nuclear safety to investigate nuclear events. I would oppose the creation of such a board for precisely the reasons given by committee member Axtmann. I would like to take this opportunity to underscore his remark about the responsibility of the commission itself. When the commission assumes authority, with that authority goes a certain degree of responsibility. Thus, to a certain extent, the commission itself is responsible for any nuclear event. This is a concept which seems to have escaped notice again and again. As Axtmann points out, it is hardly appropriate for the commission to sit in judgement against itself. This appears to be one of the lessons not learned at Three Mile Island.

It seems questionable to me that the creation of such a board is even desirable, given the present rate of nuclear events worth investigating, but even if it were, the question arises, where would such a board come from? To have it appointed by the NRC is manifestly silly, for the reasons given above. The President has no expertise in this area, nor does our congress. (You don't vote on nuclear safety). My past experience leads me to suggest that you look towards the OTA (Office of Technology Assessment), the ACRS, or the OMB (Office of Management and Budget) since their comments and reports have, in the past, provided me with the most accurate and impartial assessment of nuclear problems.

Thank you for the opportunity to comment on this matter.

Yours sincerely



Harold W. Kohn, PhD.
Staff Scientist
Ohio EPA

HK/s

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Harold W. Kohn

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ACTION OFFICE:

ACRS

AUTHOR:

Harold W. Kohn

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Ohio EPA

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ADDRESSEE:

Palladino

SUBJECT:

Comments on the ACRS comments about creating an organization like the NTSB (Nat'l Trans Safety Bd) for nuc safety to investigate nuc events

ACTION:

Appropriate

DISTRIBUTION:

RF

SPECIAL HANDLING:

None

SIGNATURE DATE:

FOR THE COMMISSION: Billie