

DSI-4
20



NRC STRATEGIC ASSESSMENT AND REBASELINING INITIATIVE

DIRECTION SETTING ISSUE COMMENT FORM

NAME RONALD G. FROSS

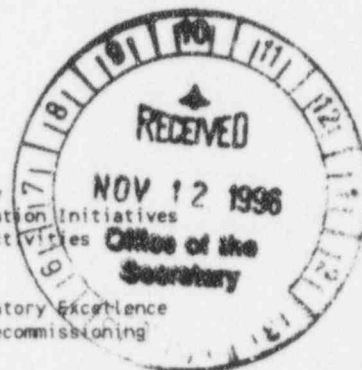
PHONE NO. (913) 296-1569

AFFILIATION KDHE

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: I recommend NRC adopt a revised option 3 including reimbursement alternative #2 with expanded interaction with all state radiation control programs.

Statements in the DSI under option 4 are incorrect when they state that NRC is not authorized to provide technical and training ^{assistance} to the Agreement States at NRC's expense. Article 6 of Section 234 ^{of NEA} states that the Commission is also authorized to provide training, without charge, to ... any State ... as the Commission deems appropriate."

"It is also an incorrect implication of the DSI that Agreement States provide no service to other licensees in the nation. States provide significant staff time and overhead expenses to maintain compatible programs. Kansas staff hours for technical training amounted to more than 300 hours last year. More than a man-month was also spent by senior staff in preparation of standardized radiation protection Federal courses attended by NRC staff and provided training to NRC staff. These hours, if costed at NRC's rate of \$133/hr would equate to over \$100,000. That is approximately 1/10 of the total NRC estimate of expenses for all state training. The question of interactions ~~between~~ between NRC and the states is also clearly defined in article 6 of section 234. "The Commission is authorized and directed to cooperate with the States in the formulation of standards... to assure that State and Commission programs... will be coordinated and compatible."

180039

over

Commissioner Gurotus in the keynote speech to the All Agreement State Meeting provided several other examples of Agreement State services to the NRC and the nation's citizens. I wish to continue the excellent working relationship with the NRC that began in 1964 when Kansas became the 9th Agreement State. I trust the Commission will find a way to meet its ^{own} organizational goal to "Meet our commitments, exceed expectations, and do what is right." We will do our part to assist the Commission in protecting ^{all} individuals from unnecessary radiation.