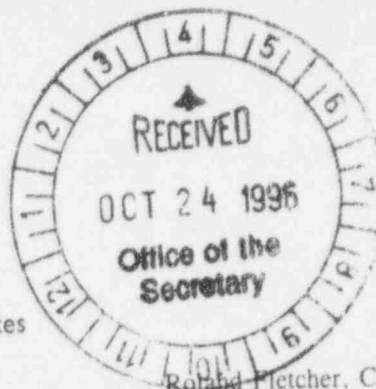




Organization of Agreement States



DSI-20

(18)

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

Roland Fletcher, Chair-Elect
Thomas Hill, Secretary

October 21, 1996

Shirley Jackson, Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Jackson:

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,

Richard A. Ratliff for

Robert Quillin, Chair
Organization of Agreement States
Radiation Control Division
Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

cc: Greta J. Dicus
cc: Kenneth C. Rogers
cc: Nils J. Diaz
cc: Edward McGaffigan, Jr.
cc: Richard L. Bangart

*Note:
On 10/24/96, OAS
submitted a revision
to their comment
on DSI-20.*

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Organization of Agreement States

Comments on

U.S.NRC Strategic Assessment and Rebaselining Initiative

Direction Setting Issue Paper # 20
"International Activities"

We feel that the discussion of international issues has failed to address the involvement Agreement States have in responding to incidents and issues along U.S. borders.

The Agreement States are a resource that the NRC can rely on to respond to radiological incidents resulting from activities in Mexico or Canada as well as incidents resulting from imports from other countries. The issues document discusses reduction in FTEs for NRC activities. The Agreement States have the resources and expertise that the NRC would be giving up under options 1-3. It seems more reasonable to use that expertise as needed rather than to maintain additional FTEs. This applies primarily to incident responses, but other technical issues may arise that would require NRC involvement. The Agreement States may be able to provide the necessary resources and expertise to meet the requirement, especially for the neighboring countries.

Of the options given, we prefer the Option 3 approach because it may free up funds that are currently used for international exchanges. Those funds could be used for other purposes, such as supplying training to Agreement State personnel. The IAEA currently funds international exchanges for training purposes. We have hosted and trained two of the recipients of those grants.

*See 10/24/96 OAS
letter for revised
comment.*