



DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF RADIATION CONTROL

DSI-23
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November 21, 1996

John C. Hoyle
Secretary of the Commission
Nuclear Regulatory Commission
ATTN: Chief of Docketing and Services Branch
Washington, DC 20555-0001

Dear Mr. Hoyle:

We have reviewed several of the Strategic Assessment Issue Papers and have prepared comments on individual issue papers. These papers are enclosed. We also support the comments of the Organization of Agreement States regarding all issue papers. Thank you for the opportunity to comment on these important direction-setting issues for NRC. The extension to the comment period was also appreciated. If you have questions, do not hesitate to contact me.

Sincerely,

William J. Sinclair, Director
Division of Radiation Control

c: Dianne Nielson, Ph.D., Executive Director, UDEQ
Bob Quillin, Chairman, Organization of Agreement States

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STRATEGIC ASSESSMENT ISSUE PAPER
DSI 23 - ENHANCING REGULATORY EXCELLENCE
STATE OF UTAH COMMENTS

The basic question asked by NRC was: "How can NRC enhance regulatory excellence through maintenance of regulatory standards, rules, and requirements?"

Utah supports Option #2 that initiates a proactive approach to improvement. The Utah Department of Environmental Quality experience with quality management and principles began in 1991 when all employees were instructed in the application of quality principles. As a result of this commitment, major process improvements have occurred within the Department. There has to be a commitment from all levels of the organization to "walk the talk" in order to facilitate the necessary environment which empowers employees.

NRC has embarked on some promising process improvements including business re-engineering of the radioactive materials process. Another positive process improvement was the Integrated Materials Performance Evaluation Program (IMPEP) which was a joint collaboration between NRC and the Agreement States. Other efforts, that are underway or concluded, to address adequacy and compatibility, early entry into rulemaking, and training equivalency have made progress in resolving long standing issues. The production of the document entitled "Good Practices" which detailed success stories of Agreement States being evaluated under IMPEP promote the idea of regulatory excellence.

As previously mentioned in comments related to DSI-4, there are many opportunities available for partnering with Agreement States. Some of the opportunities include inspection of federal facilities, uranium mills, and commercial waste facilities in Utah at no cost to NRC. As a result of a proactive approach, NRC can find different ways to stretch dollars and fulfill the NRC mission with partnering just being one approach. Agreement States are willing to share their successes with quality management with NRC if asked.

Submitted by:

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