

Washington Public Power Supply System

3000 George Washington Way P.O. Box 968 Richland, Washington 99352-0968 (509)372-5000

Docket No. 50-508

G03-85-701

November 27, 1985

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

Subject: NRC REORGANIZATION

Reference: Letter (G03-85-262) D. W. Mazur to H. R. Denton,
"Resolution of Key Licensing Issues - Geology/Seismology",
dated May 13, 1985

The Supply System has been informed of the pending NRC reorganization of the Office of Nuclear Reactor Regulation. We have some concerns regarding NRC's future ability to effectively exercise its very important role of evaluating seismic hazards and determining nuclear power plant seismic design requirements. The concerns grow out of what we understand to be the impending decision to disperse the geosciences staff through newly created directorates organized along the lines of the NSSS vendors.

We believe that one unintended result of this dispersement may be the loss of effective management control over the vitally important area of seismic hazard evaluation. As we understand it, under the proposed organization, individual geosciences personnel would no longer report to management with the level of background, expertise, and experience in the geosciences area as is presently the case. This could result in the lack of an institutional memory at NRC as to the practical judgments made in the past regarding the appropriate design bases for engineered structures of nuclear power facilities. This is particularly the case if, as a result of the reorganization, NRC will be forced to rely on outside consultants for geotechnical decisions.

The Supply System is presently conducting work in response to questions posed by the NRC regarding potential effects of a subduction zone earthquake in the Pacific Northwest. This represents a unique and technically complex issue requiring a broad base of specific technical expertise, tempered with professional judgment regarding appropriate seismic design requirements, by those with geosciences experience within

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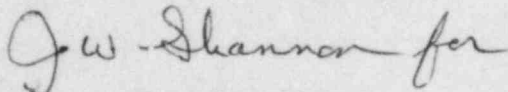
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the NRC. As you are aware, WNP-3 is at present about 76% complete and represents a \$2.5 billion investment to the rate payers of the Northwest. Decisions related to the future restart of the plant may be significantly influenced by NRC positions on the subduction zone earthquake question. Consequently, the impending reorganization could have a direct and substantial impact on the Supply System's vital interests.

We are not suggesting that your proposed organization be modified simply to accommodate specific plants with outstanding geoscience issues. Rather, we are proposing to meet and discuss with you and your staff the possibility of establishing a special working group of individuals from within the NRC with geosciences expertise to review the issues that the NRC has raised on our docket. This proposed group would retain the strengths of the present organization in a way adequate for the review of this critical and complex technical area, provide a basis for firm control by NRC management over the decision making process for geosciences issues, and minimize the need to rely on outside consultants. This recommendation is contingent on your favorable response to our May 1985 letter (referenced). In that letter, we requested your commitment to proceed with resolution of these issues per our proposed schedule. We also noted that resolution of these outstanding geosciences issues is critical to the Supply System's plans for WNP-3.

I will contact you in the near future to set a meeting time when we can discuss the establishment of a working group as discussed above.

Very truly yours,



D. W. Mazur, Managing Director

cc: WJ Dircks/NRC
JA Adams/NESCO
RM Boucher/PP&L
WL Bryan/WWP
J. Crnich/Ebasco - Elma
Ebasco/Elma
GW Knighton/NRC
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