



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

NOV 8 1979

MEMORANDUM FOR: Norman M. Haller, Director  
Office of Management and Program Analysis

FROM: William J. Dircks, Director  
Office of Nuclear Material Safety and Safeguards

SUBJECT: DRAFT PAPER ON NRC ORGANIZATIONAL OPTIONS FOR  
EMERGENCY PREPAREDNESS

We have completed our review of MPA's draft entitled "NRC Organizational Options for Emergency Preparedness," and agree in principle with the draft conclusions. Centralization in one or more offices of many of NRC's emergency planning and response functions could result in a substantial improvement in emergency planning and response capability in this agency. Your draft reiterates some of the serious problems which were set out in SECY 79-499 and the Kemeny Commission Report, and recognizes that any proposed reorganization will not, in itself, solve NRC's emergency planning problems.

Clearly, the present draft could not, because of time and manpower constraints, completely define the complex interrelationships between the proposed "central office" for emergency planning and the program offices and their licensing responsibilities. It does, however, present a starting point for the considerable effort needed by all the offices concerned to work out the lines of responsibility and functional relationships which must be established. In considering organizational options, NRC must be extremely careful not to lose sight of the health and safety licensing responsibilities of NMSS and NRR. There are many aspects of planning for and responding to emergencies which require an in-depth technical understanding of the licensees' operations. For this reason proposing to remove from NRR and NMSS those aspects of emergency planning and response which deal closely with their respective licensee operations is unacceptable.

A major problem in discussing or planning for emergencies appears to be the inability to obtain a simultaneous comprehension of the interrelationships between various participants, multiplicity of phases, and functional divisions of the problem. The EDO Emergency Planning Task Force developed such comprehensions of NRC problems in emergency planning through the application of a disciplined analytical approach. In that analytical

8001250 063

approach, the players or participants are the regulators, the licensees, the State/local participants, and Federal agencies other than NRC. The phases of emergency planning or emergency preparedness are the planning, licensing, implementation and testing, and the actual emergency response. All of the players and the phases are intertwined by the following dimensions: responsibilities, needs, objectives, activities, products, organizations, and interface. Therefore, the various aspects of emergency planning can be viewed as a multi-dimensional matrix. A description of the analytical framework and the resulting matrix used by the Emergency Planning Task Force Working Group is enclosed. This enclosure in effect describes NRC's pre-TMI emergency preparedness posture. The utilization of the same analytical approach would facilitate a useful redefinition of emergency planning functions and functional responsibilities and their optimum disposition among the various participants, including various existing or proposed organizations in NRC. We welcome the opportunity to work with you and others in such an effort.

*William J. Dircks*  
William J. Dircks, Director  
Office of Nuclear Material Safety  
and Safeguards

Enclosure: As stated

cc: H. Denton, NRR  
S. Levine, RES  
R. Minogue, SD  
V. Stello, IE  
R. Ryan, SP  
L. V. Gossick, EDO  
R. Smith, D/EDO  
T. Rehm, Asst. to EDO  
H. Shapar, ELD  
D. Donoghue, ADM