

NOTATION VOTE

RESPONSE SHEET

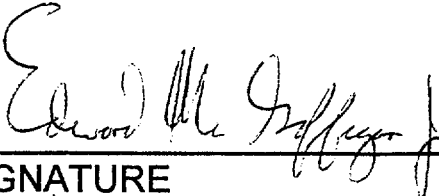
TO: Annette Vietti-Cook, Secretary
FROM: COMMISSIONER MCGAFFIGAN
SUBJECT: **SECY-99-227- N+1 RESIDENT INSPECTOR STAFFING
POLICY**

Approved _____ Disapproved X Abstain _____

Not Participating _____

COMMENTS:

See attached comments.



SIGNATURE
October 22, 1999

DATE

Entered on "AS" Yes X No _____

Commissioner McGaffigan's Comments on SECY-99-227

I disapprove the staff's proposal to change resident staffing policy from the N+1 currently directed by the Commission. I believe it is premature to make such a staffing change before the results of the revised oversight pilot program are assessed. Also, there is no evidence that the decline in resident experience levels reported in SECY-97-285 has been arrested, although the increasing number of sites at which the staff has reduced from N+1 to N under the current policy has the effect of increasing resident experience levels and may make the data in the follow-up SECY paper due at the end of November difficult to interpret. I believe the staff should complete the pilot program, per the SRM for SECY-99-007 and 007A, demonstrate that resident experience levels have stabilized, and then forward recommendations to the Commission.

Should a majority of the Commission approve SECY-99-227 and a policy of N staffing at multi-unit sites, I urge that the N be a "hard N" and a "quality N." Even under the N+1 policy, there have been periods at sites such as North Anna and Palo Verde where the staffing actually was N-1. A resident inspector staff level of N-1 should not be tolerated, yet I fear that significant periods at N-1 could become commonplace under an "N" policy. Also during the N+1 policy, resident staffs have contained individuals whose qualifications and experience prompted licensees to dispute formally the appropriateness of being billed for their time. Licensee managers have commented to me, sometimes at meetings attended by the EDO, that they feel they have ended up training their residents rather than being inspected by peers. This level of inexperience was confirmed by the last report on resident demographics that listed the median experience of resident inspectors as a qualified resident inspector of 0.6 years. Under an "N" policy, the potential impacts of less experienced residents are greater in terms of reduction in Agency oversight of plant operations.

One aspect of the N+1 policy has been the "margin" it has assured in qualified, current, field experienced inspectors to respond to events or other special needs (e.g., Millstone inspections). SECY-99-227 proposes to remove that "margin" from the sites and to centralize it in the Regional offices. Those inspectors would also serve to fill in at sites which otherwise, due to vacation, training, illness, or other events would be at N-1. Thus, I would expect N-1 levels for more than a couple days to be rare, with periods of greater than a week not to be tolerated. Therefore, the staff should provide heightened management oversight on staffing for sites where the number of resident inspectors assigned is N. This might include a Regional weekly or monthly reporting requirement to the EDO of all sites where there are fewer than N inspectors on the job.

With regard to the quality of resident inspectors, I continue to believe that as an Agency we need to make them an important focus of our recruitment and retention efforts. We did the right thing in June when we restored full locality pay for resident inspectors. But, as I have written before, we still need to assess grade levels for the resident corps and for the regional inspectors who will be expected to move from site to site to fill in for residents and senior residents in training, on vacation, etc. In my discussions with the senior staff two years ago, the notion of GG-15 "super" senior residents came up. I still think that is a worthy idea. Our inspectors are becoming ever more important as we revise our programs, and that needs to continue to be reflected in our personnel policies.

E. McGaffigan