COMMISSIONER DICUS' COMMENTS ON COMNJD-99-006 "THE EFFECTS OF INDUSTRY CONSOLIDATION ON NRC OVERSIGHT"

I appreciate Commissioner Diaz's proactive approach for considering process and organizational changes that may improve the effectiveness and efficiency of NRC in a changing industry environment. I believe that the staff should, similarly, be proactive in seeking out areas for further regulatory improvement.

However, the staff should be given sufficient time to evaluate the effect of wide-scale industry consolidation efforts, consider lessons learned and industry performance under the new reactor oversight process, gather stakeholder insights and consider whether pilot activities may be appropriate. This would be a longer term effort that will not be sufficiently complete for use in the upcoming budget cycle.