



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555
January 11, 2000

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MEMORANDUM TO: Annette Vietti-Cook, Secretary

FROM: Nils J. Diaz *[Signature]*

SUBJECT: COMSECY-99-036 -- DRAFT NUCLEAR WASTE SAFETY
CHAPTER OF THE STRATEGIC PLAN AND COMSECY-
99-038 -- DRAFT NUCLEAR MATERIALS SAFETY
CHAPTER OF THE STRATEGIC PLAN

The staff has clearly invested considerable effort in developing these draft strategic plan chapters; however, I remain concerned about the eventual length of the entire plan. An overly lengthy strategic plan would be unwieldy and, therefore, unnecessarily burdensome to understand and implement. The staff should continue strive for conciseness and clarity as it refines and compiles the plan's chapters into a whole.

Additionally, the staff should address the following specific concerns.

- The level of detail of portions of the strategic plan, particularly in the discussions of strategies, is more in line with the detail that should be found in the agency's performance plan. In simplifying the strategic plan, the staff should clarify the distinctions between the two plans, and should consider relocating some of the performance measures to the performance plan.
- The draft plans acknowledge that many of the strategic goals are beyond the NRC's ability to control, yet many of the related strategic goal measures and their metrics are stated in absolute terms, i.e., "zero." The use of "zero" as a metric is inconsistent with our limited span of control. Either the metrics should be changed to something other than "zero," or the associated measures should have caveats added that refer to regulatory failures.
- A large amount of material is repeated in the Materials and Waste chapters, especially in the performance goals relating to public confidence and the efficiency, effectiveness, and realism of NRC activities and decisions. The staff should eliminate such repetition as it compiles the entire strategic plan.

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- The paragraph on the agency's mandate to protect the common defense and security (see page 5 of the Materials chapter) should be augmented with a discussion of the NRC's role in the export and import of materials. This function is the clearest statutory mandate we have in the international area, and adding such a discussion would provide a stronger linkage between the Materials chapter and the yet-to-come International chapter.
- On page 9 of the Materials chapter, the performance measure of "zero" accidental criticalities should be deleted. Criticality, even if unintended, is merely an occurrence that may or may not have public health and safety or environmental consequences. The agency's focus should instead be on the consequences of such events, and the draft plan already contains sufficient performance measures to address such consequences.

cc: Chairman Meserve
Commissioner Dicus
Commissioner McGaffigan
Commissioner Merrifield
EDO