



NUCLEAR ENERGY INSTITUTE

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December 18, 2003

Mr. Michael T. Lesar  
Chief, Rules and Directives Branch  
MS-T6-D59  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

11/24/03  
65 FR 65968  
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SUBJECT: Draft NRC Strategic Plan for Fiscal Years 2004-2009

Dear Mr. Lesar:

The Nuclear Energy Institute<sup>1</sup> appreciates the opportunity to comment on the subject document. The Strategic Plan (the plan) can be a useful guide in the regulatory decision-making process over the next several years. Given the number and importance of decisions the agency will make in this time period, it is critical that the plan provide clear and relevant direction.

The goals in the NRC's previous strategic plan were most visibly used to assess proposals by the staff to the Commission. In this application, the goals were useful in providing policy direction. We presume that the goals in the plan under review will be used similarly once finalized.

We strongly support the general goals in the plan on Safety, Security, Effectiveness, and Openness. Clearly, the protection of public health and safety and the environment has always been the top priority of the agency, and should remain so. The events of September 11, 2001 made homeland security an ongoing national concern. Given nuclear energy's importance to the critical infrastructure in the U.S., it is appropriate for the agency to reflect this concern in the plan. Beyond being a general goal in the plan, Effectiveness may be the best measure of day-to-

<sup>1</sup> NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including regulatory aspects of generic operational and technical issues. NEI members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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day NRC performance. We welcome the addition of the new attributes, realistic and timely, to this goal which should have a positive impact on the agency's decision-making process. With regard to Openness, the NRC has made great strides in recent years to make the regulatory process more open. The reactor oversight process and use of the internet to share performance data and inspection results, and communications regarding Davis Besse are great examples of this success. This goal should serve to continue the agency's progress.

The new goal on Management Excellence is an important addition to the strategic plan. While the NRC has demonstrated its ability in certain areas to effectively manage its activities, especially when senior management attention is directly focused on an activity, there are too many examples of activities that languish when management attention is diverted to other areas. We understand the need to seek input from both internal and external stakeholders and the importance of developing a consensus on regulatory decisions. However, this is not a substitute for strong leadership, clear delineation of responsibility and accountability for individual managers, and closer coordination and communication within and between offices. We believe these elements should be added to the strategies and means to achieve Management Excellence.

We appreciate the opportunity to comment on the plan. If there are any questions on our comments, please contact me or Tony Pietrangelo.

Sincerely,

  
Stephen D. Floyd