

D850813

Honorable Nunzio J. Palladino  
Chairman  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Dr. Palladino:

SUBJECT: ACRS STATUS REPORT ON LONG RANGE PLANNING

During its 304th meeting, August 8-10, 1985, the ACRS heard and discussed a status report from its Subcommittee on the Long Range Plan for NRC. The Subcommittee has been working for the last several months to assist the Commission with its long range planning efforts, and this letter reports on that effort. In our study to date, we have had the benefit of formal advice from several people (see Attachment). Their remarks were transcribed, and we commend them to the members of your staff who will be engaged in planning activities in the future. We also benefited from informal discussions with Congressional and OMB staff members.

The ACRS believes that the NRC should have a Long Range Plan (LRP) which should incorporate strategic planning and which should attempt to look at least five years into the future and should give consideration to a longer period. In our view, strategic planning includes, among other things, an attempt to forecast the future in terms of its effect on the NRC's function; an effort by the Commissioners to determine and prioritize the objectives which, in their judgment, are most important for the agency for the time period in question; an attempt to anticipate the weaknesses in either the NRC or in the nuclear regulatory system as a whole which may prevent the agency or nation from meeting desired goals; and an effort by the Commissioners to develop a strategy that will allow the NRC to meet in a timely fashion the objectives they deem to be important. This strategy may involve not only matters internal to the agency but also efforts to shape the future outside the agency to minimize weaknesses or eliminate problems.

We believe the strategic element of long range planning is important for many reasons including:

- . The exercise of establishing a plan should help the Commissioners develop consistent, agency goals.
- . The existence of a plan could lead to more deliberate regulation and could lend stability to the entire regulatory process.
- . A plan could allow a more efficient allocation of resources.
- . A plan will help the Commissioners in explaining and justifying their programs to the Congress and the Executive Branch.
- . The existence of a plan will help to ensure that future problems

are anticipated and resolved in a timely fashion.

We believe that the development of an LRP can and should proceed in a structured fashion -- that one should not simply sit down and compile a list of objectives. We believe that it is very simple to list more objectives than can possibly be fulfilled in a given period of time, that strategy and tactics will quickly become intermixed by this approach, that some important objectives will be overlooked, that it will be difficult to prioritize objectives, and so on. One of those interviewed suggested a structure which could be followed and which would seem to have considerable merit. However, we are not well versed in this area, and we suggest that you might profit from use of an expert in strategic planning.

A point brought out forcefully by several of those we interviewed was that the ACRS, while it has an important contribution to make in NRC long range planning, cannot and should not itself try to develop a plan. We concur. They recommended that an LRP should be the product of the Commissioners themselves -- that it should come from their minds and that, while staff effort is needed, staff can only assist.

Consequently, it is our intention to focus our future efforts on two primary areas. First, as you have requested, we intend to assist the Office of Policy Evaluation by providing input to the development of the five-year plan which you have assigned to them. However, on occasion, we may find it appropriate to provide input through formal correspondence directly with you. Second, we will continue our effort to address several important safety issues, ones of either a technical nature or ones arising from the regulatory process, and provide input that may be helpful to you either in connection with the current five-year plan or in longer range planning. We would expect to submit reports over a several-month period, beginning possibly by the end of this year.

In closing, we wish to support you and the other Commissioners in your initiative in the long range planning area. We believe that the NRC

1 See Transcript, Subcommittee on Long Range Plan for the NRC, July 10, 1985, Testimony by Dr. Roger Mattson, pp. 138-221

will be among a minority of federal regulatory agencies engaged in protection of public health and safety with such a plan, and we believe you are demonstrating worthwhile leadership.

Sincerely,

David A. Ward  
Chairman

Attachment:  
List of Persons Interviewed Regarding  
NRC Long Range Plan

ATTACHMENT

LIST OF PERSONS INTERVIEWED REGARDING NRC LONG RANGE PLAN

John F. Ahearne  
(former NRC Chairman)  
Vice-President  
Resources for the Future

Mr. James Knight  
Acting Director  
Division of Engineering  
Nuclear Reactor Regulation  
U. S. Nuclear Regulatory  
Commission

Mr. Floyd Culler  
President  
Electric Power Research  
Institute

Dr. Roger Mattson  
Vice-President  
International Energy  
Associates, Ltd.

Mr. John Taylor  
Vice-President  
Electric Power Research  
Institute

Mr. William McDowell  
NRC Audit Group  
General Accounting Office

Mr. Carl Giesler  
Vice-President  
Wisconsin Public Service  
Corporation

Mr. Warren Owen  
Executive Vice-President  
Duke Power Company

Mr. John West  
Vice-President  
(retired)  
Combustion Engineering  
Corporation

→