

DSI-20

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From: Serguei Rutchkine <stmo@online.ru>
To: James Shea <JRS@nrc.gov>
Date: 11/5/96 10:00am
Subject: Re: NRC strategic assessment -Reply

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Dear James,

Awfully sorry for the trouble. Hope it works now.
Serguei



At 08:46 05.11.96 -0500, you wrote:

>Serguei,
>
>I checked with my local expert and he said your message should be sent to us in ASCII
>format - that this always works for us. Can you send it that way?
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Dear Mr. Shea,

Here are my comments on the "Strategic Assessment Issue: 20. International Activities". To start with I wholeheartedly support the NRC's idea to have arranged the world-wide hearings of its future policies using different communication channels, including INTERNET.

I wish other national nuclear regulatory authorities followed the suite.

1. I share the Commissioners' preliminary opinion favouring Option 4: Conduct activities of benefit to NRC's domestic mission and US interests. Under the present-day objectives and constraints it looks most justified and realistic. In to-day's world US can not achieve a domestic mission without meeting the national interests. Therefore you can not afford just starting to sunset overall NRC's international activities without upsetting its mission.
2. If we assume that the present scope and level of NRC's activities are to be maintained at least in the near future it does not mean that they do not require a rethinking process. They

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do. Out of four basic international functions the exchange and assistance are most labour-intensive (in terms of FTUs). Therefore if someone seek budget savings or expanded programmes within the 0-growth budget or better returns on the same investments (improved efficiency of the efforts) they should do a research of these two functions first.

I am not so ambitious as to try to analyse the NRC's international programmes to identify their strengths and areas for improvement and suggest comprehensive corrective actions. But I feel like sharing some of my observations after many years of work for the FSU Mission to the IAEA, FSU Nuclear Regulatory Body (GAN) and WANO. The observations are related to these two key areas - exchange and assistance.

3. Regulatory exchange.

Your Chairman's initiative to establish the International Nuclear Regulators Forum deserves a very thorough attention. Honestly, I do not know much about specifics of the initiative, but conclude just from general considerations.

The Forum, if established, will not be the first opportunity for national regulators to meet, exchange information, assist the needy, set-up personal contacts, etc. Even to-day there are lots of opportunities for them to do the job both bilaterally and multilaterally (through the IAEA, NEA, EU, etc.). You know them all. The Nuclear Safety Convention is the latest development in this area.

I hope that one of the directive-setting issues of the initiative is to provide a framework and criteria for assessing the effectiveness of the national and international efforts to bring national regulatory programmes all over the world up to the world standards. The policies and practices must not necessarily be the same in different countries. I believe they can not be the same. But they have to provide enough assurances to the world (let it be the Forum) that the national regulatory quality, no matter what, has been steadily improving. To me this is the final objective of any regulatory exchange, and until there are the criteria developed and the framework established I am not sure an additional Forum will serve the purpose.

On the operational side I believe INPO approach and experience in this area is very interesting. They worked out "Performance objectives and criteria", plant performance indicators and other things, which they use to track and assess the performance of

American plants. The plant evaluation programme based on regular performance-dependent peer reviews of each of the sites is in the core of the process. It goes without saying that one can not just transfer the methodology to the nuclear regulators world. But it deserves being known and accounted of by the regulators in pursuing their ends.

4. International assistance. I feel like attracting your attention to three issues.

A. Objective-oriented assistance. I'm absolutely convinced that the driving force behind western assistance programmes with the FSU and CEE countries is your safety and business concerns. Nuclear industry is international because we are sailing the same boat. The stakes are high. You want to help us to take preventive corrective actions in the nuclear energy sector to stay in the business in your own countries and even expand it to the East if the political climate is right. I appreciate your intentions.

But every now and then objectives of specific assistance contracts are merely stated in the contract and not supported by elaborate programmes developed by the recipient and approved of by the donor before the contract is signed. There must be adequate controls ensuring the objective is met. And met not only at the end of the contract, but in the long run as well; the equipment and technology is there and used as intended, the personnel trained are functioning and building up on the assistance, and so on and so forth. There are even cases when basically a contract is a grant, sort of a charity to the recipient from a wealthy friend. This is not right.

Any contract must be objective-oriented, with all the consequences and controls resulting therefrom. He who pays the piper, calls the tune. It means at anyone time the donor must be sure that money is used in the most efficient manner and there is no way for it to be misused or even wasted. Otherwise it may happen to be the case, when the road to Hell is paved with good intentions.

B. Co-ordination of international assistance programmes. There is no need to expand on it. The nuclear world is full with hundreds, if not thousands of different technical assistance programmes. Lots of international organisations, governmental agencies, research institutions, private companies are involved into bilateral and multilateral assistance projects both on the operational and regulatory sides. There have been extensive efforts applied by different parties to co-ordinate them, but not terribly successfully.

This is not only a question of efficient use of the assistance money, which is important by itself. This is also a matter of shaping the right business-like attitude of specific recipients towards the assistance in principle. Some donor has to take the lead to make the breakthrough. It may be an international forum or a governmental organisation. Why not NRC ? You've got all the reputation and experience in the world. Might it be another idea of your Chairman's behind the International Nuclear Regulators Forum ?

C. Expanded use of contractors. Till recently I did not realise how high the role of contractors is in actual implementation of technical assistance programmes. And this is good for different reasons. First of all it allows to minimise the use of the donors' own intellectual resources without negative effects on the volume and scope of assistance. Secondly, this approach potentially takes the best advantage of the expertise of lots of institutions and private companies operating in the nuclear area if accomplished on a competitive basis. I believe this approach is promising. I would only recommend the donors use contractors more extensively for QA and QC purposes to make sure that the donors' intentions have been translated into practice.

Please do not hesitate to contact me if you might believe that I or my colleagues could be helpful. You are always welcome.
Best regards. Serguei Rouchkine

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