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COMMENTS ON NRC STRATEGIC ASSESSMENT: INTERNATIONAL ACTIVITIES

It is a privilege for the Comisión Nacional de Seguridad Nuclear y Salvaguardias (CNSNS) to have the opportunity to express its views on the direction setting issue No. 20, International Activities, as part of the USNRC strategic assessment and rebaseling of its regulatory activities. At the outset, it should be make clear that the assertions hereafter mentioned come out as a result of our own experience through the long past cooperation between both agencies and also, on our perception of the role played by the USNRC in the various international organizations dealing with regulatory and nuclear safety matters.

The paper as it is does not seem to omit any fundamental considerations that may substantially influence its outcome. However, we have noticed that although it is quite understandable the priority that the USNRC has placed on the FSU and CEE countries, particularly in connection with assistance, no mention is made of the successful actions of the USNRC in this regard to support the nuclear programs of other countries. A point in case is México. As it is well known the assistance provided by the USNRC to México along with the regulatory exchange held by both agencies have had a fundamental impact for this country to develop a robust and healthy regulatory framework whose visible results can be already assessed if one considers the highly successful performance of the Laguna Verde NPP and the international safety standards acomplished so far.

We regret that, out of humbleness, no word is said about the distinguished leadership played by the USNRC in the international forums. At least from an outsider point of view the initiatives and proposals advanced by the american regulatory organization have greatly contributed to pave the way for a safer world wide use of nuclear power. The missing of this USNRC leadership at the international level would result in a grave drawback for the nuclear industry as a whole, including of course the american one. Proposals like the formation of an International Nuclear Regulators Forum, advanced by chairman Jackson recently, besides strenthening the USNRC leadership contribute to improve the ways and practices to conduct the regulatory activities, and therefore they are welcomed.

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We do understand the need for the USNRC to assess its current activities in order to redefine the basic nature of its work, furthermore we recognize that the assumptions and projections for internal and external factors discussed in the paper are accurate enough as to provide a solid basis for the strategic planning presently being carried out at the USNRC. However, we believe that the assumptions and projections, no matter how accurate they are, by themselves do not suffice to set up an internal and external organization's policy to face the forthcoming challenges unless they are coupled to an explicit firm commitment to excel. There is no doubt in our mind that this commitment has been in the past the driving force behind the leadership displayed by USNRC. In this trend of though we would like, if we may, to see a USNRC making the future for the rest of us to follow, rather than a passive agency merely reacting to the local and global environmental changes.

From what we have said above it should be quite clear by now that we fully share the commission's preliminary views on this direction setting issue. Furthermore we look forward for the commission to favour this view in its final decision.