



REQUEST REPLY BY 7/15/99

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

COMSECY-99-024

July 7, 1999

RELEASSED TO THE PDR
12/17/99 DKW
date Initials

MEMORANDUM TO: Chairman Dicus
Commissioner Diaz
Commissioner McGaffigan
Commissioner Merrifield

FROM: Jesse L. Funches *Jesse Funches*
Chief Financial Officer

SUBJECT: DRAFT REACTOR SAFETY CHAPTER OF THE STRATEGIC PLAN

On May 26, 1999, I provided the Commission with the staff's plans and schedule for revising the Reactor Safety Chapter of the Strategic Plan. You will recall that the Strategic Plan is likely to be a topic at the next Senate oversight hearing planned for September 1999. In accordance with the staff's schedule, Attachment 1 provides an overview that places the development of the Reactor Safety Chapter in context and Attachment 2 provides the draft Reactor Safety Chapter of the Strategic Plan. A plan to evaluate the appropriateness of implementing the Arthur Andersen recommendations for use agencywide and a plan to complete the revisions to the entire Strategic Plan will be provided to the Commission later this month.

We believe the draft Reactor Safety Chapter of the Strategic Plan demonstrates that we have incorporated the extensive change activities, which have occurred during the past 18 months, into our future planning and performance management. While significant work is yet to be finished, particularly in specifying performance measures, the identification of external factors, and overall data verification and validation, we believe an opportunity to interact with stakeholders will help advance our thinking. As noted in the Overview, the Commission need not formally endorse the Reactor Safety Chapter until it is provided as part of the formal update of the entire Strategic Plan this Fall. However, since the staff will continue to devote attention to improving the Reactor Safety Chapter and it will be used as a model for other arenas, we would appreciate early Commission feedback on significant issues or concerns.

At this time we are seeking Commission approval to release the document to stakeholders for public comment and in preparation for a mid-August stakeholder's workshop. We plan to invite INPO, NEI, GAO, UCS, OMB, Public Citizen, State representatives, and Congressional staff to the workshop. We will also release the document for agency staff comment. A schedule for completing the Reactor Safety Chapter is provided at Attachment 3.

The Working Group which developed the Reactor Safety Chapter, led by Frank Miraglia, will be scheduling a briefing for Commissioner Assistants to provide an overview of the staff's efforts

*Approved subject to the
attached comments.*

*Cheta Joy Dicus
July 23, 1999*

PDR COMMISS NRCC

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**CHAIRMAN COMMENTS ON THE REACTOR SAFETY
STRATEGIC PLAN CHAPTER (COMSECY-99-024)**

1. As applicable, the draft FY 2001 Budget/Performance Plan should be revised to reflect the changes resulting from stakeholder comments and this COMSECY prior to submission to OMB.
2. Page 5: retain the page, eliminate the text, and note that the Chairman's message will be provided with the final strategic plan. Context for this document (2nd and 3rd paragraphs) should be included elsewhere in the document, in the overview, or in the transmittal.
3. Page 8, first sentence: consider deleting the word "strategic." The management goals will be utilized to achieve all agency goals.
4. Page 9, first sentence: consider revising statement to read: "The NRC has organized the strategic goals, performance goals, and strategies for achieving our mission into the following four strategic arenas."
5. Page 10, first paragraph: refers to paradigm shift and how goals, measures, and strategies link to agency programs and activities, and refers to schematic on page 34; page one of the NRC Strategic Planning Model also discusses this linkage; the schematic should be revised to be consistent with the narrative and reflect the linkage/s to agency programs and activities. In addition, consideration should be given to showing the relationship of the strategies to the performance goals and the performance goals to the strategic goals (consideration that both arrows go both ways). See attached mark-up.
6. Page 11: need the date for when the Safety Philosophy was endorsed by the Commission.
7. Page 13, 20, 23, 23: Strategic goal reference should be consistent with language in the strategic goal on pages 7 and 10 (pgs. 13, 20, 23, 26 do not include promote the common defense and security).
8. Page 19: Performance goal measure#4: should be reevaluated to clarify the intent of the measure. Staff should evaluate the intended term of "*substantiated*" breakdown of physical security and "*substantial*" breakdown of physical security. See abnormal occurrence criteria I.C.2, 3 and 4.
9. Pages 19, 22, 24, and 29: It is unclear whether some of the performance goals reflect a target for the strategic plan period (or remainder of the strategic plan period) or whether they reflect a specific target for each fiscal year within the strategic plan period. This should be clarified prior to release for comment.
10. Pages 19, 22, 24, and 29: It is unclear what the expectations are for stakeholder input and the scope of their review of these measures (e.g., whether stakeholder review is to react to the measures provided and to provide input where placeholders are indicated, or if the review and input scope is broader and additionally includes

the recommendation of measures for all of the performance goals; recommendations to enhance, revise, replace, or eliminate a particular measure that is reflected in the document; and whether to provide general comments and/or specific recommendations). Some concise clarification should be provided prior to or in the performance goal measures boxes prior to release for comment. In addition, this area is the only section that specifically addresses stakeholder input. If it is the area that should be the primary focus of stakeholder input and review, that expectation should also be clear. These two concerns should be addressed in the transmittal, and, as appropriate, in the document.

11. Pages 19, 22, 24, and 29: when the Reactor Safety chapter is completed, the final performance goal measures should reflect the agency's performance targets for the strategic planning period and, by definition, what the agency expects to accomplish in the Reactor Safety arena by the end of the planning period (end of FY 2005).
12. Page 19, paragraph under performance goal measures: Consideration should be given to editing the last sentence from: "...in accordance with NEPA before..." to "in accordance with NEPA and other environmental laws before..."
13. Page 20, 2nd paragraph, 5th line: Revise sentence from "to explain NRC's responsibilities and actions" to "to explain NRC's role, responsibilities, and actions" (this edit supports the narrative provided in the 1st and 2nd strategy).
14. Page 20, 3rd paragraph, 2nd line: add an "s" to the word "incident"
15. Page 20, first strategy, last sentence: Revise sentence from "We will measure and report...." To "We will manage to that performance and will measure and report....."
16. Page 20, second strategy: change "we will report on the safety of nuclear power" to "we will report on the safety of nuclear power facilities."
17. Page 20, 1st strategy: should be italicized.
18. Page 20, 1st strategy: recommendation to include NRC investigations of harassment and intimidation. Also, consideration of including investigations of general wrongdoing.
19. Page 21, replace the 3rd strategy, "We will provide information that is of the highest quality," with the following strategy:

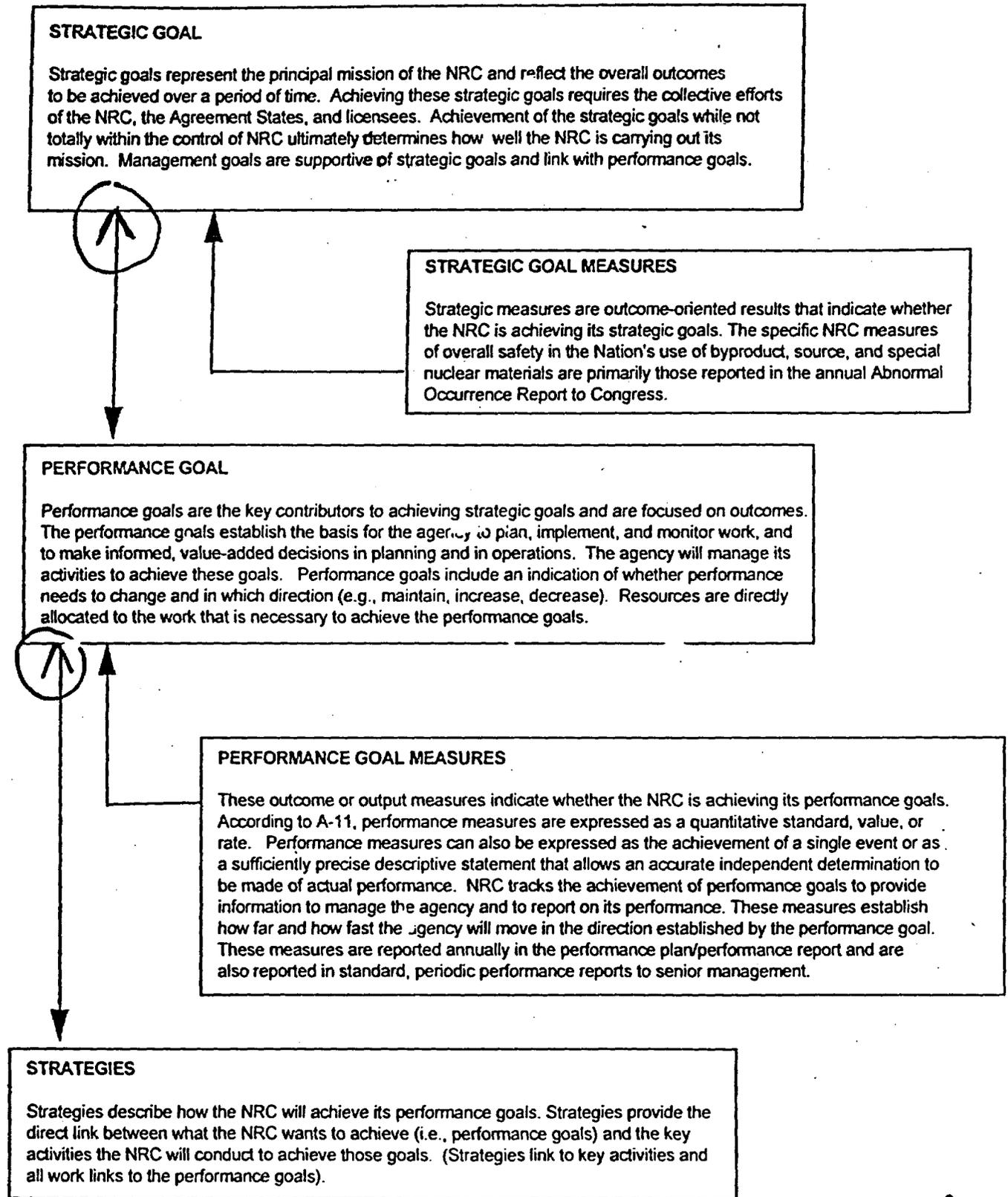
We will present information in a manner that is readily understandable to all stakeholders to avoid unnecessarily raising stakeholder concerns.

Public confidence in the NRC will be enhanced, and we will avoid unnecessarily raising stakeholder concerns if information is placed in its proper safety context and presented in a manner that is easily understood. Our communications with the public will be designed to foster greater understanding of and confidence in our regulatory program. The information we disseminate will be clear, technically sound,

accurate, reliable, objective, timely, and expressed using plain, simple English. All stakeholders should be able to rely on our statements and information.

20. Page 24, first strategy narrative: edit the narrative to reflect the correct tense.
21. Page 30, first paragraph: Edit to include supporting narrative for measures #7, 8, and 9.
22. The NRC's Safety Philosophy page: The second sentence reads, "The principal terms of this regulatory mandata- "protect health and safety." Edit appropriately.

NRC'S PLANNING, BUDGETING, AND PERFORMANCE MANAGEMENT PROCESS PRINCIPAL COMPONENTS OF THE PROGRAM CHAPTERS OF THE STRATEGIC PLAN



AGENCY PROGRAMS & ACTIVITIES

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7-23-99