

# PUBLIC SUBMISSION

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## General Comment

See attached file(s)

## Attachments

Comments by NPK Re. NRC Draft Strategic Plan\_3-2014

**SUNSI Review Complete**  
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Add= R. Baum (rgb1)

## **Comments by N. Prasad Kadambi Ph.D. P.E., Ex-NRC Employee**

### **Comment 1:**

Under "Objective 1.1: Prevent and mitigate accidents, ensure radiation safety, and protect the environment." and within "Strategies and Contributing Activities" modify bullet 1.1-2 to recognize that NRC remains committed to following OMB Circular A-119 and will work with the Nuclear Energy Standards Coordination Collaborative to improve standardization in nuclear technology. It is suggested that this bullet read as follows:

"Participate in the development of domestic consensus codes and standards and international standards to ensure that they are soundly based. Work with the Nuclear Energy Standards Coordination Collaborative consistent with OMB Circular A-119 to improve standardization in nuclear technology, and determine whether substantial safety improvements can be identified and incorporated in NRC requirements."

### **Comment 2:**

Under "Contributing Activities" within "Regulatory Effectiveness Strategy 2:" add as the second bullet the following:

"Bring to a conclusion the work initiated in response to the Near Term Task Force under Recommendation 1, as well as the work by the Risk Management Task Force (which produced NUREG-2150), to propose an integrated risk management regulatory framework for nuclear power facilities. The integration provided by such a framework will address, at a minimum, safety margins, defense-in-depth, and cost-benefit analyses."

### **Comment 3:**

The "Glossary" in the draft Strategic Plan does not contain the definition of "Defense-in-Depth." Such a definition was part of all previous versions of the Strategic Plan and has been used as a reference cited in numerous publications. A source of some confusion has been the discrepancy between the definition in the Strategic Plan and the one that occurs in the NRC website's Glossary. This opportunity should be used to incorporate consistent definitions. It would be quite acceptable to continue to use the current definition as follows:

"Defense-in-Depth: An element of the NRC's safety philosophy that employs successive compensatory measures to prevent accidents or lessen the effects of damage if a malfunction or accident occurs at a nuclear facility. The NRC's safety philosophy ensures that the public is adequately protected and that emergency plans surrounding a nuclear facility are well conceived and will work. Moreover, the philosophy ensures that safety will not be wholly dependent on any single element of the design, construction, maintenance, or operation of a nuclear facility."