

COMMENTS ON NRC STRATEGIC ASSESSMENT:
INTERNATIONAL ACTIVITIES



Basic logic and structure of the paper:

NRC's mission: to protect the public health and safety, the environment, and the common defense and security, as well as U.S. national interest

A. Direction- Setting Issue:

What is the appropriate role of NRC in the development and implementation of policies on international nuclear matters?

Subsumed Issues 1:

How active, visible, and high level a role should NRC play in contributing to the development of U.S. Government policies on international issues with its competence?

Subsumed Issue 2:

What are the appropriate overall priorities for NRC's program of international activities in the next 5 years?

NRC's international role consists of four main functions:

- 1.** Policy Function
- 2.** Export-Import Function
- 3.** Exchange Function
- 4.** Assistance Function
- 5.** Research

Option 1: Seek to Reduce NRC's International Role to a Minimum

Option 2: Perform NRC's Statutory Role and Limit Other

International Activity to a Minimum

Option 3: Conduct Activities of benefit to NRC's Domestic Mission

Option 4: Conduct Activities of Benefit to NRC's Domestic Mission or U.S. National Interests

Option 5: Expand Activities

Related Issues:

A. *What is the proper approach for NRC to use to support the effort of the former Soviet Union to control its special nuclear material?*

B. *How can NRC's international regulatory information exchange be conducted most efficiently and effectively?*

C. *How should NRC implement provisions of the Convention on Nuclear Safety and the Convention on the Safety of Radioactive Waste Management?*

D. *SRM to SECY-95-154*

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Questions for comments:

What, if any, important considerations may have been omitted from the issue papers?

Logic and structure of the paper is rather complicated and difficult to understand from the first reading. In a contrast with a reader's expectation there is only one direction setting issue which is repeated several times. The subsumed issues and some related issues are of the same importance as the DSI.
Suggestion 1: to reconsider structure of issues.

The paper discusses all important considerations, among others also NRC's mission regarding U.S. national interests. This seems to be the key point in defining an international activities strategy of NRC. However, those national interests are not clearly listed.

Suggestion 2: to define U.S. national interests in the area of nuclear safety from international perspective (e.g. leading role of USA in defining safety and licensing philosophy worldwide, worldwide defense and protection of nuclear industry against antinuclear opposition by means of independent regulatory views, etc.)

Suggestion 3: to point out NRC's policy function which cannot be replaced by any other promoting body

How accurate are the NRC's assumptions and projections for internal and external factors discussed in the issue paper?

Do the Commission's preliminary views associated with each issue paper respond to the current environment and challenges?

The paper doesn't provide clear description of the current environment and challenges and related internal and external factors. Such characteristics should explain and justify U.S. national interests in the area of nuclear safety.

Suggestion 4: to elaborate characteristics of current nuclear safety environment from international perspective

Suggestion 5: to discuss in more details negative impacts if the role of NRC would be reduced .

Conclusion: NRC plays, due to its technical competence, systematic, prescriptive and transparent approach to nuclear safety, an extremely important international role which cannot be replaced by any other body. Reducing this role would be against US national interests. Nuclear safety philosophy would decline from US practices what would have negative impact on US nuclear industry.

Suggestion 6: Commission's preliminary views should be much stronger in their argumentation against reduction of the current role and position of the NRC. Savings of some tens of FTEs cannot compensate real losses of such decision.

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