

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
1	A Stable Regulator in a Dynamic Environment	National Energy Institute (NEI)	<p>The plan contains a significant level of focus on additional staffing needs, training, knowledge transfer, and office space. This is recognized as being necessary to support the increased activities supporting new plants, Yucca Mountain licensing and licensing new fuel facilities. What is lacking is any discussion of where the NRC intends to realign resources and focus areas on the key priority activities necessary for NRC to carry out its statutory mandate. This is an action taken by many other organizations in response to challenges and changes driven by the external environment. Continued addition of staff with a critical assessment of current resources against prioritized objectives and goals is fundamental to agency effectiveness.</p>	General comment.
2	A Stable Regulator in a Dynamic Environment	NEI	<p>There are statements in this plan that suggest NRC determines "...adequate safety margin..." during the review of a license application. The NRC review of license amendment requests should primarily focus on licensee's (applicant's) compliance with the NRC regulatory requirements and the plant (facility) licensing basis. The determination of "...an adequate safety margin..." often evolves into a subjective determination by the reviewer(s) that go well beyond the regulatory requirements and licensing basis.</p>	General comment.
3	A Stable Regulator in a Dynamic Environment	NEI	<p>Page 3, Bullet list in the middle of the page The placement of the submittal of the Yucca Mountain license application as second only to new plant applications on the list of changes affecting NRC is welcome and appropriate. This is a positive recognition that preparedness for the Yucca Mountain licensing process will be a major strategic focus for NRC in the next 5 years.</p> <p>Page 3, Bullet list in the middle of the page Revise the third bullet to read as follows: "Increasing quantities of spent nuclear fuel will be held in interim storage at reactor sites or transported to centralized interim storage sites awaiting permanent disposal". As worded this bullet could be construed to refer to both high and low level "radioactive waste". These situations are distinctly different and should not be mixed. If NRC foresees significant changes in the low level waste area in the next 5 years, these should be a separate item, although such changes are not likely to be significant enough to warrant being on this high level list. Also, the recommended change above uses "increasing" as having a more representative connotation than "larger" and more sharply distinguishes between at reactor and centralized interim storage.</p>	Comments incorporated.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
4	A Stable Regulator in a Dynamic Environment	NEI	<p>Page 4, Continued paragraph at top of the page Add the following sentence prior to the last sentence and after "...knowledge management." "In keeping with this approach, the agency is committed to assuring that all staff is highly trained in the technical disciplines relating to their duties, the regulatory processes which govern agency actions, and the regulatory principles inherent in making the agency a strong, independent, stable, and predictable regulator." The reason for this addition is that it is important, particularly in light of all the new hires coming into NRC, that this plan recognize that it will require far more than just attracting and retaining knowledgeable staff and giving them a satisfying workplace/office space to maintain the standard of excellence being sought in this plan. And while continuing training in technical areas is an obvious need, the value of training in how to be an effective regulator should not be underestimated.</p> <p>Page 4, Recommendation for new paragraph following continued paragraph at top of the page On page 3 NRC has mentioned its desire to be a "stable and predictable" regulator. Central to achieving this goal are having effective regulatory processes in place and assuring that these processes are adhered to. It would be worthwhile at this point, to develop a few sentences talking about NRC's vision for stability and predictability. This text should talk not only about having and adhering to structured processes, but should discuss how all new regulatory initiatives should be developed in accordance with these processes, open to public review and comment, and how NRC is committed to considering and being responsive to stakeholder input before implementing any new initiative.</p>	Comments incorporated.
5	Key External Factors	NEI	<p>Page 21, Significant Operating Incident This factor and the one dealing with "Significant Terrorist Incident" suggest a reactive element to such events. As mentioned previously a disciplined evaluation will be necessary to understand what occurred, could it have been prevented, what are the lessons learned, etc.</p>	OE comments address to some degree.
6	Key External Factors	NEI	<p>Page 21, Timing of a Department of Energy... The 2nd to last sentence should be deleted. NRC is already fully staffed up for the Yucca Mountain licensing process and should, therefore, not face any future resource allocation decisions related to the timing of the Department's application as inferred by this sentence.</p>	Proposal conflicts with an internal NRC organizational comment.
7	Key External Factors	NEI	<p>Page 22, Global Nuclear Energy Partnership (GNEP) This section should be retitled to read "advanced Fuel Cycle Development, as work in this area is likely to proceed regardless of the fate of DOE's specific GNEP initiative, similarly, the first part of the first sentence should be reworded to say "The Department of Energy has proposed to recycle..."</p>	Comments incorporated.
8	Key External Factors	NEI	<p>Page 22, Pandemic We believe that specific regulatory action must be taken by the NRC to ensure nuclear power plants will continue to operate during such an outbreak.</p>	Comments incorporated.
9	Organizational Excellence	NEI	<p>Page 14, Recommendation for new 2nd bullet Consistent with comments above about thoroughly reflecting what NRC intends to do to assure regulatory stability and predictability, add a new bullet – and its important enough to be second on the list – stating; "Make all new regulatory initiatives available for public review and comment prior to implementation of the initiative and be responsive to stakeholder input received on such initiatives."</p>	Comments incorporated.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
10	Organizational Excellence	NEI	Page 15, Discussion, 1st paragraph In the second sentence reword "...workload is likely to include licensing requests of unprecedented technical complexity, including a..." to more simply say "...workload is likely to include licensing requests for a..." The term "unprecedented technical complexity" is unnecessary and does not accurately describe two of the three things being referred to, new plant designs have, in fact, been simplified over those for existing reactors and, although a repository involves a wider range of technical disciplines than a reactor, the disposal of used fuel in Yucca Mountain is not more complex than the operation of a reactor. Also, while the third item on the list – advanced reactors/new fuel cycle technologies may be more complex than what exists in today's nuclear industry, even this level of complexity may not be completely without precedent when one looks at other fields such as biotechnology and computers.	Comments incorporated.
11	Organizational Excellence	NEI	Page 15, Discussion, 2nd paragraph The Results Act requires federal agencies to submit performance reports to the Office of Management and Budget containing a review of performance goals achieved, an evaluation of current performance relative the time frame of the submitted report, a description of performance goals not achieved, and assessment of effectiveness involving accountability. From a standpoint of completeness we recommend the NRC make these annual reports available to external stakeholders.	Comments incorporated.
12	Organizational Excellence	NEI	Page 15, Effectiveness Strategies Consistent with the comments above, this section needs to include specific actions and activities that address NRC's vision of regulatory stability and predictability including training of staff on regulatory process and principles.	Staff regulatory proficiency added under Human Capital.
13	Organizational Excellence	NEI	Page 16, Selected Activities to Support Effectiveness Strategies The process for stakeholder involvement in submitting comments on NRC regulatory actions involving rulemaking and generic communications needs to be improved. There have been numerous examples where stakeholder comments have been dismissed by NRC staff without an adequate discussion of the rational or reasoning behind the disposition of a stakeholder comments.	Previous NEI comment under Openness Activities that was accepted should address this. NRC has a rulemaking process that complies with the Administrative Procedures Act with respect to stakeholder comments.
14	Organizational Excellence	NEI	Page 18, 1st Full paragraph In the 5th sentence, consistent with the comments above concerning stable and predictable regulatory environment, add the words "and regulatory process proficiency" after "technical excellence"	Comments incorporated.
15	Organizational Excellence	NEI	Page 20, Human Capital Again, consistent with the comments above concerning a stable and predictable regulatory environment, the section on "Human Capital" should specifically discuss training on regulatory process and principles.	Comments incorporated.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
16	Safety	NEI	<p>Page 5, Strategic Outcomes The outcomes listed here are not necessarily within NRC's direct control nor are they achievable. It is difficult to determine how NRC objectives and goals would "prevent" something from occurring. A more appropriate term in "minimize" or "reduce." This may appear to be a subtle change but, it avoids the potentially reactive response to an event that immediately focuses on prevention as opposed to a more disciplined evaluation of understanding what occurred, could it have been prevented, what are the lessons learned, etc.</p> <p>Page 5, Discussion, 3rd paragraph Clarification is necessary. NRC's safety mission is to assure licensee compliance with NRC regulations and by doing so establish reasonable assurance that public health and safety is protected. The NRC cannot establish "adequate safety margins" and acceptable levels of licensee performance without a more comprehensive application of risk-informed, performance-based principles to the balance of NRC programs, processes and activities. That has not been achieved. In the first sentence, either delete the words "as appropriate" or moving them forward so that the sentence reads "use, as appropriate, of risk-informed and performance based regulations." As the sentence is currently constructed, it implies that NRC will always use risk-informed regulations but will only use performance-based regulations as appropriate. These two principles should be applied consistently across the board.</p>	<p>"Prevent" was specifically selected by NRC senior management.</p> <p>Second comment incorporated.</p>
17	Safety	NEI	<p>Page 6, 4th Full paragraph Change "the NRC faces a major challenge as the Department of Energy prepares to submit an..." to "The agency is also preparing for the review of the Department of Energy's anticipated...". The reason for this change is that NRC should describe the repository and new plant license applications in consistent terms. Yes, there are challenges in both areas, but to describe the new plant activities as simply preparations while describing the Yucca activities as major challenges faced almost seems to foreshadow that NRC does not expect the latter to go as well. Given all of the preparation they have put into Yucca over the last 20 years, they should be able to express at least as much confidence in this area.</p> <p>The sentence "additionally, the Nation will continue to require that the continued safe management..." should be revised to read "additionally, the Nation will require that the continued safe management..." (editorial, eliminates redundancy).</p> <p>Add at the end of the 5th sentence, after the word "installations" add the phrase "in a risk-informed and performance-based manner consistent with the approach NRC takes to regulating reactors". This change is needed so that NRC explicitly recognizes, in its strategic plan, the need for regulatory consistency as a basis for a commitment to address the current inconsistencies where lower risk dry cask activities are more stringently regulated than many higher risk reactor activities.</p>	<p>Comments incorporated.</p>
18	Safety	NEI	<p>Page 8, Means to Support Safety Strategies, 1st bullet The NRC review of license amendment requests should primarily focus on licensee's (applicant's) compliance with the NRC regulatory requirements and the plant (facility) licensing basis. The determination of "...an adequate safety margin..." often evolves into a subjective determination by the reviewer(s) that go well beyond the regulatory requirements and licensing basis.</p>	<p>Added after "...an adequate safety margin..."; "consistent with the agency's rules and regulations."</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
19	Safety	NEI	<p>Page 9, 1st Full bullet - The licensee rather than the conducts emergency preparedness exercises. Suggest the word "Conduct" be replaced with "Participate in" which is more accurate.</p> <p>3rd Full bullet - Add the following sentences "Assure that these programs and policies are adhered for all new regulatory initiatives. Such initiatives will be subject to public review and comment and NRC will be responsive to stakeholder input received." This change is consistent with the new paragraph recommendation above so that this plan is clear as to what is meant by "stable and predictable regulation"</p> <p>6th Full bullet - Revise "...begin regulatory activity when the expected application for the Yucca Mountain repository is received" to read "begin review of the expected application for the Yucca Mountain repository when it is received". The reason for this change is that the term "regulatory activity" is too vague and overly broad. Until the review is complete and a construction authorization issued for Yucca Mountain, NRC's role will be limited to application review as there will be nothing yet to regulate.</p>	Comments incorporated.
20	Safety	NEI	<p>Page 9, 7th. Full bullet - Add a sentence at the end stating "Apply risk insights gained from spent fuel dry storage PRA's in these reviews and inspections in a manner consistent with the application of these insights in reactor regulation." The reason for this change is that it is important that NRC begin applying risk-informed, performance-based, principles in this area consistent with the manner in which these principles are applied in reactor regulation. Currently, this is not the case as lower risk dry storage activities are regulated as stringently as many higher risk reactor activities.</p> <p>8th Full bullet - Replace "spent-fuel transportation packages" with "multi-purpose transportation, aging, and disposal (TAD) spent fuel packages" and add the word "transportation" before "accident conditions." This change will make this bullet consistent with NRC's publicly stated intent to do this test (known as the Package Performance Study) with a TAD canister. Also, replace the words "verify designs and modeling capability" with "to provide public demonstration of design performance and modeling capability in accordance with established regulations." This second change more accurately reflects and bounds the purpose of the test.</p>	<p>7th bullet comments incorporated.</p> <p>8th. Bullet comments appears to conflict with SFST comments.</p>
21	Safety	NEI	<p>Page 10, 2nd Bullet This statement is misleading. NRC does not "develop" consensus standards. The NRC staff participates in a number of standards development organizations (SDOs). The development of voluntary consensus standards is the responsibility of these organizations.</p> <p>Page 10, Security Goal Strategic Outcome Although the concept of prevention is commendable it is not practical or directly achievable. Minimizing or reducing the number of instances is more practical. Refer to previous comments on Strategic Outcomes.</p>	<p>First comment incorporated.</p> <p>Second commit conflicts with explicit NRC senior management direction to use the word 'prevent'.</p>
22	Security	NEI	<p>Page 12, 3rd Bullet Change the term "safeguards" to "security" to be more precise. This item appears to address force-on-force exercises which are conducted every three years at each plant site. The statement about "support functions" needs clarification as it appears to suggest an expansion within the context of force-on-force exercises.</p> <p>Page 12, 4th Bullet This item also needs clarification. It is not clear what additional security assessments will be needed to be conducted beyond the periodic exercises mentioned previously. Comprehensive reviews, RAMCAPs and B5b analyses have been completed for each site.</p>	Comments incorporated.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
23	A Stable Regulator in a Dynamic Environment	NRC - FSME	Page 3: We suggest the use of a consistent phrase, either "high-level nuclear waste" (first paragraph) or "high-level radioactive waste" (second bullet).	Comment disposition deferred until after review by Office Directors.
24	Organizational Excellence	NRC - FSME	Page 13: See third paragraph under Discussion, it is not necessary to capitalize "Web."	Comments incorporated.
25	Organizational Excellence	NRC - FSME	Page 16 and 17: We suggest the use of a consistent phrase, either "continuous improvement" (page 16, second bullet) or "continual improvement" (page 17, first line at top of the page).	Comments incorporated.
26	Planned Program Evaluations	NRC - FSME	Page 23: Under the heading, Integrated Materials Performance Evaluation Program Reviews of Selected NRC Regional Offices, add to the line for Expected Completion Date: "Region I in FY 2010, Region III in FY 2012."	Reviews beyond FY 2009 intentionally not included, given that only those evaluations for the first 3 years need to be cited.
27	Safety	NRC - FSME	Page 5: Insert a comma before "rulemaking" in the second paragraph under "discussion."	Comments incorporated.
28	Safety	NRC - FSME	Page 7: At the first sentence of the first paragraph following the bullets, change "Indian Tribal governments" to "Tribal governments."	Comments incorporated.
29	Safety	NRC - FSME	Page 9: In the first full bullet, change "Tribal agencies" to "Tribal governments."	Comments incorporated.
30	About the NRC	NRC - NRR	Include 'research and test reactors' in the second and third paragraphs under About the NRC.	Comments incorporated.
31	Planned Program Evaluations	NRC - NRR	Additional descriptive language for the Planned Program Reviews under Reactor Oversight Program and "Management" Work Planning Process.	Comments incorporated.
32	Safety	NRC - NRR	First Safety Means - NEPA passed in 1969, not 1970.	Comments incorporated.
33	Safety	NRC - NRR	Additional Safety Means - "Maintain a safety framework of rules, regulatory guidance, and standard review plans that promotes licensee compliance with underlying safety principles and stakeholder understanding [Supports Strategy 8]."	Comments incorporated.
34	Safety	NRC - NRR	4th. Paragraph under Discussion: Insert "analyzing" before domestic and international.	Comments incorporated.
35	Safety	NRC - NRR	7th. Paragraph under Discussion: replace "accomplishing" with "conduct"	Comments incorporated.
36	Safety	NRC - NRR	Delete ', instrumentation and controls' from 5th paragraph under Safety Discussion.	Comments incorporated.
37	Key External Factors	NRC - OE	Receipt of New Reactor License Applications: -1st sentence suggest deleting the words "as well as for nuclear operating personnel" because it is redundant with "and licensees." - last sentence: suggest adding "loss of expertise due to retirements of an aging workforce..."	First comment same as Commissioner Lyons'; second one incorporated.
38	Key External Factors	NRC - OE	Significant Operating Incident: suggest adding the word "some" in front of the word "initiatives" in that it may not effect all initiatives.	Comments incorporated.
39	Key External Factors	NRC - OE	Significant Terrorist Incident: suggest adding to the last sentence. ...for security at U.S. nuclear power plants and other licensee facilities.	Comments incorporated.
40	Key External Factors	NRC - OE	Timing of DOE Application for HLW Repository of Yucca.....: 2nd sent. suggest replacing "no later than" June 2008, with "by."	Comments incorporated.
41	Mission/Vision	NRC - OE	Pg. 4: Add the following words to the sentence after Appendix C: "The NRC's mission, vision, strategic objective.....follow.	Comments incorporated.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
42	Organizational Excellence	NRC - OE	Pg. 13, Organizational Excellence Objectives to Achieve the Strategic Goals: Suggest an introductory paragraph for this section, before describing the objectives, that is similar to the wording on pg. 4, 1st paragraph under Organization of the Strategic Plan.	Editorial comment incorporated.
43	Organizational Excellence	NRC - OE	Pg. 14, last bullet: Suggest rewording as: Provide stakeholders with information regarding the agency's security activities that will not compromise-classified,.....	Comments incorporated.
44	Organizational Excellence	NRC - OE	Pg. 15, Effectiveness: Suggest rewording as: NRC actions are of high quality, efficient, and realistic, and to enable the safe and beneficial uses of radioactive materials.	Comment accepted though it revises existing language reflects Commission SRM for the Framework.
45	Organizational Excellence	NRC - OE	<p>Pg. 15, Discussion,</p> <p>-3rd para.:</p> <ul style="list-style-type: none"> - Suggest adding an example for the individual level and the agency-wide level. - Suggest rewording 3rd sentence as: "With respect to the next generation of nuclear reactors, effectiveness refers to the scope and technical sufficiency of the application review including reaching reliable conclusions." <p>-3rd para. Use of "Efficiency" 1st word in next to last sentence and 1st word in 4th para.: Should this be changed to "Effectiveness?" There doesn't seem to be a clear distinction between the use of the words "efficiency and effectiveness."</p>	<p>Only middle comment incorporated.</p> <p>Use of efficiency and effectiveness reflects OMB guidance on these.</p>
46	Organizational Excellence	NRC - OE	Pg. 16, 3rd bullet: Suggest rewording as: "Use risk-informed.....consistent with the level of risk."	Comments incorporated.
47	Organizational Excellence	NRC - OE	Pg. 16, 9th bullet: Suggest rewording as: "Participate in information exchanges and pursue cooperative research....., to provide views on technical.....	Comments incorporated.
48	Organizational Excellence	NRC - OE	<p>Pg. 18 4th para. last sentence, Suggest rewording as: "The quality of the agency's....fees borne by licensees, as well as on the public's tax burden.</p> <p>Pg. 18, #5. Suggest rewording as: Use innovative strategies to recruit, develop, and retain a high quality diverse workforce including, in senior staff and managerial positions.</p>	Comments incorporated.
49	Organizational Excellence	NRC - OE	Pg. 20, Financial Information, 1st bullet: Suggest adding additional wording to indicate some of the characteristics the new systems would need to meet.	Comment not accepted; too detailed for Strategic Plan. Annual Performance Budget and Performance and Accountability Report covers this topic.
50	Safety	NRC - OE	<p>Pgs. (5-7): starting with the 4th paragraph under Discussion on pg. 5: Future challenges paragraph lists the future challenges topics in an order that is not consistent with the order of the ensuing paragraphs and it doesn't list or mischaracterizes some of the topics in the ensuing paras. List the challenges topics in the order they appear in the ensuing paras.</p> <p>Suggest adding a last sentence to the end of the Future challenges paragraph which states: "A brief description of each of the challenges follows."</p>	Comments incorporated.
51	Safety	NRC - OE	Pg. 8 Means to Support Safety Strategies: Suggest rewording the 2nd sentence as follows to be reflect the ensuing bullets: The major programs include rulemaking, licensing, technical reviews and inspection, oversight, incident response and emergency preparedness, domestic and international information exchange and cooperation, the Agreement States program, and research programs.	Comments incorporated.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
52	Safety	NRC - OE	Pg. 9, 3rd bullet: Suggest the following rewording: Establish and maintain stable and predictable regulatory programs and policies for all licensees.	Comments incorporated.
53	Safety	NRC - OE	Pg. 9, 4th bullet: Suggest the following rewording to reflect language used on the Differing Views web page: "Maintain an open, collaborative working environment that encourages all employees and contractors to raise safety issues and differing views without fear of retaliation."	Comments incorporated.
54	Organization of the Strategic Plan	NRC - RG I	An overall suggestion to improve format and readability - It would be helpful to number the goals and objectives throughout the plan (presumably that will be done later).	Comment not accepted; may give the impression of prioritizing the Goals.
55	Organization of the Strategic Plan	NRC - RG I	Finally, the Strategic Plan is a lengthy, detailed document that will likely not appeal to a wide audience. Does the NRC also intend to condense the Plan down to a summary that will fit on a double-sided, one page color brochure? Such a brochure would greatly enhance staff readership, as well as readership outside the NRC.	This is an issue internal to NRC.
56	Organizational Excellence	NRC - RG I	Consider adding references to Knowledge Management (KM) and Knowledge Transfer (KT) activities as a vital component of the NRC's Strategic Plan for FY 2007 - FY 2012. KM/KT could possibly be added under either Organizational Effectiveness strategies or Operational Excellence strategies toward achieving the Strategic goals. KM and KT are proactive measures, whereas the Lessons Learned activities discussed are largely reactive.	Knowledge management is already mentioned under Operational Excellence and Human Capital.
57	Organizational Excellence	NRC - RG I	Page 19 - under IT/IM - 8th bullet - consider adding the phrase..."that NRC business can be conducted effectively and efficiently" - before "and develop ..." in the sentence. Although information security is a serious consideration, it should not substantially hinder operations if at all possible. Information security enables NRC to conduct its business without the risk of information loss. However, there will always some small risk that cannot be mitigated, but must accepted to continue operations efficiently.	Comments incorporated.
58	Organizational Excellence	NRC - RG I	With the two strategic goals of Safety & Security, the new plan has Organizational Excellence Objectives to achieve these goals. However, effective implementation of the FOIA process is not specifically mentioned and deserves reference in the Strategic Plan given its resource-intensive nature and its importance to public openness.	Comments incorporated.
59	Organizational Excellence	NRC - RG I	Page 19 - under IT/IM - 2nd bullet - Electronic Information Exchange (EIE) should be explicitly captured in this bullet.	Comments incorporated.
60	Organizational Excellence	NRC - RG I	New metrics may be necessary to address office space requirements and financial accountability as these issues are included in the operational excellence objective.	The revised Strategic Plan is intentionally structured to eliminate the need for such metrics outside of operating plans.
61	Organizational Excellence	NRC - RG I	Currently, operating plan metrics are associated with one of the five current strategic plan goals. If the new structure applies to the FY 2008 operating plan, the operating plan and metrics report will need to be revised to show which goal (safety or security) applies to the planned activities and metrics. It will be helpful if the EDO guidance for the FY 2008 operating plan and internal control plan clarify this issue, and specify whether it is necessary to associate the planned activities and metrics with the new organizational excellence objectives (i.e., openness, effectiveness, timeliness, and operational excellence).	This is an issue internal to NRC.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
62	Organizational Excellence	NRC - SFST	<p>On page 14, suggest changing "Host public meetings at NRC Headquarters, in Nevada, and along major transportation corridors regarding the proposed high-level radioactive waste repository at Yucca Mountain, including workshops to assist in furthering an understanding of NRC's regulatory role" to "Host public meetings at NRC Headquarters and in Nevada and other affected states, and along major transportation corridors regarding the licensing of a proposed high-level radioactive waste repository at Yucca Mountain, including workshops to assist in furthering an understanding of NRC's regulatory role.</p> <p>Continue to support stakeholder meetings, as requested, on the safety of spent fuel shipments to Yucca Mountain... " The text as currently written implies that the NRC will host public meetings on transportation to Yucca Mountain. This may not be appropriate since shipments to Yucca Mountain will not be conducted by NRC licensees but by DOE or its contractors. Also, the decision as to which transportation corridors might be used has not been formally made by DOE. The current text implies that we might already know or be involved in the selection of such corridors. It is appropriate to add a bullet to mention that the NRC has and is always willing to discuss the relationship of its role in transportation safety to that of DOE, DOT and State and local governments.</p>	Comments incorporated.
63	Safety	NRC - SFST	<p>On Page 9, suggest changing "Conduct testing of spent fuel transportation packages under accident conditions to verify designs and modeling capability..." to "Conduct demonstration testing of a representative spent fuel transportation packages design under accident conditions to verify designs package performance and modeling capability."</p> <p>As currently written the text could be interpreted to imply that the NRC requires physical testing to approve the design of shipping packages. Rather, this text applies to the Office of Research's package performance study in which a representative transportation package, that has already been certified by the NRC, would be subjected to a simulated rail accident to measure its performance during a severe "real-life" accident..</p>	Comments incorporated.
64	A Stable Regulator in a Dynamic Environment	NRC employee	<p>On pages 3 (para 6) and 13 (para 3 under discussion), reference is made to education of the public. This may come across as condescending and the inclusion of the term does not appear to add substance to the text.</p> <p>Suggested Changes: p. 3, para 6, delete, "- and education of -". p. 13, para 3 under discussion, delete, "to educate and"</p>	Comments incorporated.
65	About the NRC	NRC employee	<p>I suggest that the 3rd paragraph on pg. 2, in the section "About the NRC," be expanded to observe that the NRC also issues "early site permits, and reactor design certifications." And that the same paragraph should also include in the specific list that follows: "2 (soon to be 3) early site permits, 4 reactor design certifications" that have been issued to date. These permits and certifications could also be addressed in a separate sentence or paragraph.</p>	Comments incorporated.
66	About the NRC	NRC employee	<p>Page 2, last paragraph, suggest add "disposal" to the list of activities licensees are directly involved in. The sentences reads like "Because licensees are directly involved in the transfer, receipt, manufacturing, production, acquisition, utilization and disposal of nuclear material..."</p>	Comments incorporated.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
67	About the NRC and A Stable Regulator in a Dynamic Environment	NRC employee	<p>The draft strategic plan, in a number of places in the text (e.g., pp. 2, 4, 5 and 7), limits the scope of NRC activities to “civilian” uses of nuclear materials. NRC regulatory authority also extends to some military activities, e.g., regulation of facilities that manufacture fuel for the Navy program.</p> <p>P.2, 1st para: the text could be revised as follows: “The NRC was established to regulate the commercial, selected military, industrial, academic, and medial uses of nuclear materials in order to ...”</p> <p>P.2, 1st para: the text could be revised as follows: “The NRC was established to regulate the commercial, selected military, industrial, academic, and medial uses of nuclear materials in order to ...”</p> <p>P.2, 3rd para: delete “civilian” without any other change.</p> <p>P.4, Mission para: delete “civilian” without any other change.</p> <p>P.4, Strategic Objective para: delete “civilian” without any other change.</p> <p>P.5, 1st para under “discussion”: delete “for civilian purposes”</p> <p>P. 5, 2nd para under “discussion”: delete “civilian” without any other change.</p> <p>p. 7, 2nd bullet: delete “civilian” without any other change.</p>	<p>First comment incorporated.</p> <p>Second commit conflicts with Commission SRM on the Framework.</p> <p>Deletion of 'civilian' conflicts with NRC policy.</p>
68	Discussion	NRC employee	<p>p. 7, 2nd bullet: see suggested change below.</p> <p>Suggested change: revise text to read, “License individuals and organizations that intend to use radioactive materials in a safe manner and for beneficial purposes.” [Instead of the text: “License individuals and organizations that intend to use radioactive materials for safe and beneficial civilian purposes.”] [“Civilian” deleted per earlier comment.]</p>	Deletion of 'civilian' conflicts with NRC policy.
69	Glossary	NRC employee	Expanded definition of Effectiveness in the text and in the Glossary.	Uncertain what commenter intends.
70	Glossary	NRC employee	Page 25, the definition of High Level Waste is worded differently from the one given in 10 CFR 63.2. Suggest replacing the current definition with the one that’s currently in 10 CFR 63.2.	Comment disposition deferred until after review by Office Directors.
71	Mission/ Vision	NRC employee	The Mission and Vision of the Strategic Plan should be complemented with the Core Values of the Agency, and its Leadership Philosophy. Maintaining the Core Values in the Strategic Plan is consistent with the Strategic Plans of several other Federal Agencies. The Leadership Philosophy defines how the NRC leads itself to accomplish its mission, considering the nature of our work and own values. The Strategic Plan of the Space and Naval Warfare Systems Command, provides one such example of a Leadership Philosophy, that parallels the way we lead at NRC in many ways.	Commit conflicts with Commission SRM on the Framework.
72	Mission/ Vision	NRC employee	Page 4, after Appendix C, add “mission” and “vision to the sentence to read “The NRC’s mission, vision, strategic objective, goals, and strategic outcomes are as follows:”	Already picked up by another comment.
73	Organization of the Strategic Plan	NRC employee	Proposed Regulatory Goal and proposed new structure for the Plan. Not clear how Openness, Effectiveness, Timeliness, and Operational Excellence inform decision-making. Strategies under each should be considered as acceptance criteria in making program decisions.	Comment conflicts with Commission SRM for the Framework.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
74	Organization of the Strategic Plan	NRC employee	No goal strategy reflects the requirement for NRC to effectively comply with public law, Executive Orders, treaties, conventions, and international agreements. NRC staff must ensure that the NRC remains in compliance with statutory obligations such as the Atomic Energy Act, Nuclear Nonproliferation Treaty, the U.S.-IAEA Safeguards Agreement, Nuclear Cooperation Agreements, the Convention on Nuclear Waste and Safety, the Convention on Physical Protection of Nuclear Materials, among many others.	The section, About the NRC, addresses the statutory requirements for the agency.
75	Organizational Excellence	NRC employee	Page 15, 3rd paragraph under Discussion, 3rd line from the bottom, "Efficiency is related in part ..." Move this sentence to the next paragraph because the third paragraph focuses on effectiveness. Efficiency is discussed in the next (fourth) paragraph.	Comments incorporated.
76	Organizational Excellence	NRC employee	Page 16, #3, instead of minimizing regulatory or jurisdictional overlap, how about eliminating the overlap all together?	Comment not accepted; while desirable, this may not be achievable.
77	Organizational Excellence	NRC employee	Page 20, 3rd bullet under the title Expanded Office Space Capacity, is it beneficial to add the concept of "green" (environmentally friendly) to the list of criteria?	Comments incorporated.
78	Organizational Excellence	NRC employee	<p>Any amplifications that differentiate between the difference between "realistic activities or realistic practices" as compared to implications that realism cost money would clarify the following sentence on page 15. Becoming more realistic, where realism is not needed, is not necessarily conducive to improving our performance and can adversely impact our resources.</p> <p>The drive to improve performance in Government, coupled with increasing demands on the NRC's finite resources, clearly indicates a need for the agency to become more efficient and realistic without compromising high quality in its regulatory activities.</p>	Comment conflicts with Commission SRM for the Framework.
79	Organizational Excellence	NRC employee	We remain concerned with the de-emphasis of "enhancing public confidence", as a strategic goal, or, at the very least, an important regulatory outcome, in this latest proposed revision of the agency's strategic plan. While we understand the rationale given the last time the plan was revised, for replacing "enhancing public confidence" with "openness," we are not persuaded that this change represented an improvement over the original strategic plan language. The wording of the current proposed revision goes still further in diminishing the importance placed on striving for agency actions, processes and decisions that are deserving of public trust and confidence. As best we can tell, the proposed draft plan only mentions public confidence once-on page 13. From our own experience, and that of our international regulatory counterparts, we know that technical excellence, alone, is not enough. As regulators, we must not only do the job right, we must inspire confidence in the public we serve and are charged with protecting, that we are doing the job right. We know only too well that public confidence in our regulatory programs is difficult to measure, and that many of the variables affecting that confidence are outside our direct, or, at times, even our indirect control. That could be said as well, however, of ensuring safety and security. That does not mean that any of these are not still essential and worthy objectives.	Comment not accepted. This issue was deliberated in the last update to the Strategic Plan.
80	Organizational Excellence	NRC employee	We also suggest that the plan avoid use of the expression, "human capital." This term is offensive to those who believe that it is no longer appropriate or legal to view human beings as "capital," at least since slavery was abolished in the U.S. Page 3, penultimate line, change "human capital planning" to "workforce planning." Page 20, top of page: Replace "Human Capital" with "Retain a competent, qualified and motivated workforce" Revise first bullet under this heading to read: "...present and future staffing needs"	Comment not accepted. The term, "human capital," is generally accepted by most Federal agencies, including the Equal Employment Opportunity Commission.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
81	Organizational Excellence	NRC employee	Page 13, 2nd paragraph under Discussion: The fourth sentence should be broken into two sentences and a fifth sentence added as follows: "Public involvement is a key element in the application and licensing process. Stakeholders will have many opportunities to participate in the regulatory process before issuance of a license, construction permit, early site permit, design certification, or combined license. For this participation to be meaningful, stakeholders must have access to clear and understandable information about NRC's role, processes, activities and decision making.	Comments incorporated.
82	Organizational Excellence	NRC employee	Page 14: Top of page: Add a new Openness Strategy, as number 4, and rename the current number 4 as number 5: 4. Communicate about NRC's role, processes, activities and decisions in plain language that is clear and understandable to the public. 5. Conduct early communication with stakeholders..... Page 14: Add another bullet under Selected Activities to Support Openness Strategies, as follows: Provide timely feedback to stakeholders, with specific examples, that explains how stakeholder input and involvement has influenced NRC's regulatory activities and decisions.	Comments incorporated, though second comment similar to another one already accepted..
83	Organizational Excellence	NRC employee	Page 16: Item 3 at top of page should be reworded as follows: "Interact with stakeholders, as appropriate, to minimize regulatory or jurisdictional overlap. Item 5 should be reworded as follows: "Foster innovation at the NRC to improve the NRC's regulatory and communication programs." 1st sentence of penultimate bullet should be reworded to read: "Encourage stakeholders to identify actions that may have resulted in unnecessary cost or uncertainty."	Comments incorporated.
84	Organizational Excellence	NRC employee	Page 17, 3rd bullet under Selected Activities to Support Timeliness Strategies is unclear. What we think is meant could be better expressed as follows: "Promptly review and communicate cases where NRC review and actions with regard to applications or license amendment requests will not meet the agency's timeliness goals..."	Comments incorporated.
85	Safety	NRC employee	Removal of 'as appropriate' from discussion under Safety on risk-informed and performance-based regulations. Removal of 'as appropriate' from the risk-informed strategy under Effectiveness.	Comment picked up by a similar comment that was accepted.
86	Safety	NRC employee	Within the Safety Goal, revise the ninth bullet on activities to support safety strategies to read as follows: "Maintain an open, collaborative working environment that encourages all NRC employees and contractors to promptly voice differing views without fear of retaliation." This wording is consistent with our expectations as described on the Values page of the public web site. http://www.nrc.gov/about-nrc/values.html#open-cwe Using consistent language (i.e., open, collaborative working environment (OCWE)) will help employee recognition and may improve employee support for OCWE initiatives.	Similar to OE comment, which was accepted.
87	Safety	NRC employee	Page 5, first line safety goal, remove this line because it is the same sentence as the Safety under Strategic Goals at the bottom of page 4.	Not accepted; the second instance is used to begin the Safety Goal section.
88	Safety	NRC employee	Page 5, 3 rd bullet under Strategic Outcomes , should serious injuries be added to the list? In another word, rephrase the third bullet to read "prevent the occurrence of any acute radiation exposures resulting in <u>serious injuries or fatalities</u> ."	'Serious injuries' falls below the Strategic Outcome level. It is, rather, a performance metric.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
89	Safety	NRC employee	Page 6, last full paragraph, line 6, "Additionally, the Nation.... Even after the repository is licensed and ready to receive HLW." The way this sentence is written now gives the impression that a decision to license the geological repository has already been reached. Suggest removing the second half of the sentence to read: "Additionally, the Nation will continue to require that the continued safe management of interim storage capacity for spent nuclear fuel must be available." In another word, the storage of SNF will be safe with or without the repository, but there is no need to couple the safe storage of SNF to the future of the repository.	Comments incorporated.
90	Safety	NRC employee	Page 5, 3rd paragraph under Discussion, last sentence. This sentence does not read correctly, suggest the following: In carrying out its safety mission, the NRC conducts activities and uses a full range of actions, as necessary, to ensure that a licensee's performance does not fall below acceptable levels.	Similar to comment from Commissioner Lyons.
91	Safety	NRC employee	Having as a strategic outcome for the safety goal "Prevent the occurrence of any inadvertent criticality events" makes sense for NRC operating facilities, but is not necessarily a sensible outcome for NRC-regulated waste disposal. For instance, having that as an explicit outcome contradicts 10 CFR 63, a risk-informed and performance-based regulation, where criticality is not required to be prevented for postclosure performance. The current strategic goal has been used by NRC criticality staff to conduct activities and focus their efforts to uphold the strategic outcome, regardless of what is required by the regulation. Perhaps a disclaimer to this strategic outcome that it is not necessarily applicable to waste disposal or an explanation of the relationship of the strategic outcomes relative to existing regulations or new regulations could be added, so as to ensure agency resources are focused on "realistic activities".	Comment disposition deferred until after review by Office Directors.
92	Safety	NRC employee	The phrase "appropriately conservative and realistic practices that provide an adequate margin of safety" on page 7 should be defined, or at a minimum the concept of adequate margin of safety should be defined.	Per NEI comment - Added after "...an adequate safety margin..."; "consistent with the agency's rules and regulations."
93	Safety	NRC employee	Page 5, 2nd paragraph, 2nd ,3rd and 4th sentences, under Discussion: "...the agency maintains vigilance..." and "The NRC continually seeks to identify and resolve potential safety issues..." and "The NRC also uses enforcement actions..."	Comments incorporated.
94	Safety	NRC employee	Page 6, 4th full paragraph, 1st sentence: "The NRC faces a major challenge as it prepares for the Department of Energy's application..."	Similar to NEI comment.
95	Safety and Security	NRC employee	Pages 5 and 10, Redraft "Strategic Outcomes," along the lines of the following: "Reactors operate safely without any accidents" and "Radioactive waste is managed and disposed safely, without releases of radioactive materials that result in significant exposures or adverse environmental impacts."	Strategic Outcomes reflect deliberations of senior NRC management and the Commission.
96	Security	NRC employee	"Security Goal" applies to nuclear facilities as well as to radioactive materials, as is reflected in the supporting strategic plan text. Suggested Changes: On p.4 and p. 10, the "security goal" be modified to add the words, "and use of nuclear facilities" to read: "Ensure adequate protection in the secure use and management of radioactive materials and in the use of nuclear facilities."	Existing language reflect the deliberations of senior NRC management and the Commission.
97	Security	NRC employee	Page 12, 7th bullet, task Force should be Task Force.	Comments incorporated.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
98		NRC employee	The tone of the plan is basically "restrictive" rather than "permissive." As a regulatory agency I understand that it is not our role to "advance the peaceful uses of atomic energy." However, from the tone of the current draft we could best achieve our goal by terminating every license issued. Clearly that is not what we intend to say. The plan should reflect that we wish to permit the peaceful uses of atomic energy as far as possible within the confines of what we have defined as "safe" and "secure."	General comment.
99	About the NRC	NRR - SFST	Page 2. The current number of licensed ISFSIs is 46 (there were 45 ISFSIs at the end of 2006, with one addition so far in 2007). Recommend changing "...the NRC issues licenses and oversees licensees for ... an increasing number of independent spent fuel storage installations (currently 46)."	Comments incorporated.
100	A Stable Regulator in a Dynamic Environment	Private citizen	A Stable Regulator in a Dynamic Environment, 3rd paragraph: Change "and promoting" to read "and to promote."	Comments incorporated.
101	A Stable Regulator in a Dynamic Environment	Private citizen	A Stable Regulator in a Dynamic Environment, 4th paragraph, 1st sentence: The sentence would make more sense if it were reworded as follows: "The Strategic Plan also reflects that the agency's core functions continue to be accurately defined by the agency's Safety and Security goals, as well as their associated strategic outcomes, thereby ensuring that the goals and outcomes remain essentially unchanged."	Comments incorporated with revised language.
102	A Stable Regulator in a Dynamic Environment	Private citizen	A Stable Regulator in a Dynamic Environment, 5th paragraph, 4th bullet: The statement, "The NRC will continue to.," is not a "change," as implied in the lead-in statement for the bullets. Also, The lead-in statement implication that the activity in this bullet is "likely" is inappropriate. Surely, it's certain, not likely.	Comments incorporated.
103	A Stable Regulator in a Dynamic Environment	Private citizen	A Stable Regulator in a Dynamic Environment, 6th paragraph: Regarding the use of the term "changes described above," see comment 3.	Comments incorporated.
104	A Stable Regulator in a Dynamic Environment	Private citizen	Page 3 - second paragraph - says NRC must obtain additional resources to meet an increasing workload, etc. Comment: This paragraph should be revised to also focus on increasing efficiency. In challenging times, a taxpayer- or ratepayer-funded agency should be focused on how to do more with the resources available - rather than just look for more resources. While this thought appears later in the plan, it should be more visible "up front."	Comments incorporated.
105	A Stable Regulator in a Dynamic Environment	Private citizen	In the next five years, the Nation is likely to see the following changes occur: (add) Data management capabilities and relational data model understanding will improve as relational database technology and paper documentation systems migrate into data-centric formats, modes and software methods to replace paper. Practically, it will become more difficult to maintain large plant design bases without comprehensive, relational electronic media like computer-networked file server databases. Basis: Advances in relational database technology and design, combined with file server networks have made traditional paper-based systems obsolete. Continued paper-based systems use as a primary source of data will lead to data errors with potentially serious safety consequences.	Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
106	A Stable Regulator in a Dynamic Environment	Private citizen	Changes in the regulatory environment also require that the agency's human capital planning includes provisions for knowledge management (capture, documentation and transfer),... (note) With the same labor market pool, labor productivity will be critical. There will be less available labor to waste on inefficient processes or design models.	Knowledge management is already mentioned under Operational Excellence and Human Capital.
107	Glossary	Private citizen	Glossary: "Diversity" should be defined as follows: a concept whereby each employee is considered a unique individual and is not categorized by differences in culture, ethnicity, race, gender, national origin, religion, disability, sexual orientation, education, experiences, opinions, or beliefs. "Unique" should mean not subject to classification or categorization. Your definition of "diversity" equates "unique" to belonging to some combination of pre-defined category . "Diversity Management" should mean creating a work environment wherein differences in culture, ethnicity, race, gender, national origin, religion, disability, sexual orientation, education, experiences, opinions, and beliefs can contribute in a positive way to the accomplishment of the agency's mission, as well as creating a work environment wherein those differences will not have a negative effect on the accomplishment of the agency's mission.	Comments incorporated with revised language.
108	Glossary	Private citizen	Glossary, Regulatory Framework, aspect (3): Change to read: "(3) regulatory guides, and review plans and other documents that clarify and guide the application of NRC regulations."	Comments incorporated.
109	GNEP	Private citizen	I wish to comment on the strategic plan regarding GNEP as a way to reprocess nuclear fuel. The processes proposed are not proliferation-resistant... even though that is a GENEPP goal. We would not want Iran to have it, because of the level of possible danger involved from misuse. The same logic means that it is not appropriate for our use unless absolute safe processes are perfected or there is no danger that our nearby sites are not adequately protected.. The threat of terrorism continues to be real. But quite apart from that is the ongoing concern that Hanford and other sites are already far behind in their reprocessing schedule with no hope of catching up very soon. Further, the methods used are allowing seepage into the ground water and into the Columbia River. The 30 year Moratorium of the United States of reprocessing has really worked and no non- nuclear weapons state has started reprocessing since the US stopped in the 70's. If we reprocess, chances are other nations will adopt the practice! Let's not risk that, but take leadership again in non-reprocessing.	Title changed to "Advanced Fuel Cycle Development" per NEI comments. GNEP still mentioned because, whether adopted or not, it will still be a factor influencing the agency's work.
110	GNEP	Private citizen	I would like you to know that I am strongly opposed to the GNEP program and recommend that the NRC not plan for it. Some of the reasons I am so strongly against it are: The GNEP is exorbitantly expensive. It would add waste to already incredibly polluted sites, such as Hanford, Washington, which is already the most contaminated reprocessing site in the western hemisphere. It would degrade public health in that reprocessing is the most polluting part of the nuclear cycle. Reprocessing would open the door to other countries reprocessing which of course gives them materials to make their own nuclear weapons.	Title changed to "Advanced Fuel Cycle Development" per NEI comments. GNEP still mentioned because, whether adopted or not, it will still be a factor influencing the agency's work.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
111	GNEP	Private citizen	<p>Please do not include the Global Nuclear Energy Partnership (GNEP) in your strategic plan. We need to be disarming and cleaning up the mess from existing nuclear plants and past weapons production, not proliferating more weapons and restarting the nuclear energy program.</p> <p>Safety and oversight are lacking in all our nuclear programs. As two of many examples, I mention last week's accidental transport of nuclear warheads from Minot Air Force Base (AFB) in North Dakota, to Barksdale AFB in Louisiana and the Department of Energy's (DOE's) loss of 14 computers containing classified and highly sensitive information relating to our nuclear programs (mentioned in the March 2007 DOE Inspector General's report). Moreover, 'reprocessing' is unproven, exorbitantly expensive, and increases the chances that material will be available to terrorists for a dirty bomb.</p>	Title changed to "Advanced Fuel Cycle Development" per NEI comments. GNEP still mentioned because, whether adopted or not, it will still be a factor influencing the agency's work.
112	GNEP	Private citizen	<p>At a public town hall meeting held in May of this year in the city council chamber of Athens, Ohio, the director of SODI (Southern Ohio Diversification Initiative) Greg Simonton repeatedly denied that the federal government and the GNEP proposal hold any plans for interim storage of nuclear waste. He stated that radioactive materials would "only be accepted for reprocessing and then moved out of the Piketon facility." Now, in the five year draft plan being released by NRC, I see the following words in the third "planning assumption": "Larger quantities of radioactive waste will be held in interim storage or transported to interim storage sites awaiting permanent disposal."</p> <p>Interim storage is *not* the same as reprocessing. This seems to contradict the statements by Mr. Simonton. If interim storage is actually being considered, should not the citizens in the affected area be fully informed about this and given a chance to hold public hearings on this question?</p>	Title changed to "Advanced Fuel Cycle Development" per NEI comments. GNEP still mentioned because, whether adopted or not, it will still be a factor influencing the agency's work.
113	GNEP	Private citizen	<p>The Nuclear Regulatory Commission (NRC) should leave out any planning for the speculative GNEP program.</p> <p>Resuming dangerous nuclear waste reprocessing in the United States under the Global Nuclear Energy Partnership (GNEP) program is NOT "recycling" and sends the wrong message to other nations, whose reprocessing of nuclear waste could lead to nuclear weapons in those countries.</p> <p>This process is not only exorbitantly expensive (a 1999 study by the National Academy of Sciences estimates that GNEP will cost \$280 billion plus at least \$100 billion for waste disposal), but also increases the risk that bomb-grade nuclear material will fall into terrorists hands. The U.S. already has FAR too much debt and not nearly enough education, homes and health care for our citizens. Where are the priorities, I ask you???</p> <p>In addition, the DOE is considering Hanford (located in WA on the Columbia River) as a location for this terrible GNEP program. Clean up at Hanford is almost a decade behind schedule and \$8 billion over budget (so far!). WA voters requested that no new waste be brought to Hanford before current waste is cleaned up, but GNEP would bring as much as 63,000 metric tons of waste to Hanford. PLEASE do not allow the GNEP program to go forward!!</p>	Title changed to "Advanced Fuel Cycle Development" per NEI comments. GNEP still mentioned because, whether adopted or not, it will still be a factor influencing the agency's work.
114	GNEP	Private citizen	<p>The section on planning for the highly speculative, expensive, and dangerous GNEP, or global Nuclear Energy Partnership, should be left out. This is a program that should not proceed due to the risk of nuclear proliferation, high cost, and unmanageable waste.</p>	Title changed to "Advanced Fuel Cycle Development" per NEI comments. GNEP still mentioned because, whether adopted or not, it will still be a factor influencing the agency's work.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
115	GNEP	Private citizen	<p>NRC's Draft Strategic Plan (NUREG-1614, Vol. 4), covering Fiscal Years 2007-2012 includes preparation for the licensing of unspecified facilities under DOE's GNEP program. As Dennis Spurgeon, head of the GNEP program, has made clear in congressional testimony, no reprocessing facility or advanced burner reactor will be ready for deployment until after an extensive R&D program. Thus, even if a reluctant Congress funds the program, there will be no GNEP licensing actions within the next five or even ten years. (Hearing before the House Energy and Water Appropriations Subcommittee, March 28, 2007).</p> <p>Now, however, we find that NRC's strategic plan for the next five years includes as "planning assumptions" that unspecified GNEP facilities will require licensing action in the next five years, and that "Larger quantities of radioactive waste will be held in interim storage or transported to interim storage sites awaiting permanent disposal." These "assumptions" can only be a reference to the old DOE plan, Congressional authorization for which has expired, to foist a centralized SNF storage facility on the unwilling community at Piketon, under the cover of GNEP, or under some new cover provided by NRC.</p>	<p>Title changed to "Advanced Fuel Cycle Development" per NEI comments. GNEP still mentioned because, whether adopted or not, it will still be a factor influencing the agency's work.</p>
116	GNEP	Private citizen	<p>DOE and NRC cannot have it both ways. You cannot, on the one hand, deny the existence of a spent nuclear fuel storage plan for Ohio, in hopes of winning our crucial votes for the 2008 election, while, on the other hand, proceeding to spend our tax money on the regulatory preparations for just such a plan. If DOE has told NRC, contrary to its assertions to Congress, that it has pending plans for a centralized SNF storage facility, then disclose those documents to the Piketon community. Now, please. If DOE has not made such representations to NRC, then remove centralized SNF storage and GNEP from the five year NRC strategic plan. Now, please.</p> <p>And please provide this community with an explanation of the contradiction. NRC should clarify in its strategic plan whether it understands centralized SNF storage to be a part of the GNEP program, or not. NRC should also be cognizant of the abysmal history of DOE attempting to foist centralized SNF storage facilities on unwilling host communities. In the cases of Nevada and Tennessee, Congress had to intervene to make those states off-limits to the agency. In the Utah case, the Department of Interior had to intervene as a protector of Indian lands. Does NRC really want a repetition of this experience in Ohio?</p>	<p>Title changed to "Advanced Fuel Cycle Development" per NEI comments. GNEP still mentioned because, whether adopted or not, it will still be a factor influencing the agency's work.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
117	GNEP	Private citizen	<p>We urge NRC to omit any planning for the speculative Global Nuclear Energy Partnership (GNEP) program, as inclusion of specific plans remains premature.</p> <p>Given its costs, proliferation risks and environmental impacts, GNEP remains an uncertain program that is facing increasing skepticism from Congress and has received a notably lackluster reception from U.S. industry despite considerable high-level DOE efforts to promote the program.</p> <p>NRC Commissioners have already directed Staff not to engage in any major effort on GNEP at this time, as "the U.S. Department of Energy has not yet defined the advanced technology nor the scope of its GNEP program." Clearly, the Commissioners are highly skeptical that DOE will be ready to submit a license request for either a reprocessing, fuel fabrication or fast reactor facility by FY 2012.</p> <p>In the unlikely event that DOE is able eventually to overcome the obstacles that have delayed the implementation of GNEP, we support the NRC taking an active and unambiguous role in licensing and regulating any resulting facilities, including research, spent fuel storage, and reprocessing facilities, as well as any proposed fast reactors. Licensing, however, will certainly not be an issue in the next five years. Therefore, NRC should omit GNEP plans from its five-year Strategic Plan.</p>	Title changed to "Advanced Fuel Cycle Development" per NEI comments. GNEP still mentioned because, whether adopted or not, it will still be a factor influencing the agency's work.
118	Key External Factors	Private citizen	Appendix A, 1st sentence: Suggest changing "equation" to "mix" because no equation is described.	Comments incorporated.
119	Key External Factors	Private citizen	Appendix A, 2nd sentence: Aren't "managing change" and "transition" the same? Suggest deleting "and transition."	Comments incorporated.
120	Key External Factors	Private citizen	Appendix A, 1st topic: Suggest changing "Receipt of New Reactor License Applications" to "Competition for Qualified Personnel."	Comment not accepted - new reactor license applications is the driver for the competition for qualified personnel.
121	Key External Factors	Private citizen	Appendix A, Significant Operating Incident (Domestic or International), last sentence: Change to read: ".could, potentially, require a response that could consume considerable agency resources."	Comments incorporated.
122	Key External Factors	Private citizen	Appendix A, Significant Terrorist Incident, 1st sentence: Change "NRC" to "NRC's."	Comments incorporated.
123	Key External Factors	Private citizen	Appendix A, Significant Terrorist Incident, 3rd sentence: (Non sequitur): The phrase, "could result in similar changes in the NRC's priorities," doesn't seem to fit because no "changes" are identified in the prior sentence. Should the phrase be, "could result in similar impacts to the NRC's priorities and, potentially, changes in U.S. policy . ?"	Comments incorporated.
124	Key External Factors	Private citizen	Appendix A, Legislative Issues, 3rd sentence: Change "are" to "is."	Comments incorporated.
125	Key External Factors	Private citizen	Appendix A, Legislative Issues, last sentence: Change "agency's" to "agency."	Comments incorporated.
126	Key External Factors	Private citizen	Appendix A, Pandemic, 2nd sentence: Suggest changing "for responding" to "to respond."	Comments incorporated.
127	Organization of the Strategic Plan	Private citizen	The document would be much more user-friendly if the sections were outline-numbered.	Comment not accepted; may give the impression of prioritizing the Goals.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
128	Organizational Excellence	Private citizen	NRC staff should publish clearly defined schedules with incremental activities for each task regarding combined license application reviews and be sufficiently staffed to allocate supplemental resources, when needed, to meet the schedule. NRC progress and performance in meeting schedule milestones should be tracked with a monthly status report and reviewed on a quarterly basis with all stakeholders to assure predictability in reviews of each applicant's licensing action request. Ownership and accountability regarding schedule milestones should be emphasized.	Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.
129	Organizational Excellence	Private citizen	NRC states that in the interest of Human Capital, it will "ensure that each office has a knowledge management philosophy to retain knowledge that may otherwise been lost through attrition." This is an important goal, particularly for the next generation of regulating personnel and new nuclear plants. Unfortunately after 27 years of aggressive collection of operating experience from nuclear plants and other nuclear facilities, it is becoming more and more difficult to retrieve the detailed technical insights from the vast, low value ore of the operating experience reports. INPO made some effort to condense operating experience into a structured summary for troubleshooting support, but that effort was stopped in 1993. INPO has issued information on operating experience by area, but these are mostly long reading lists rather than useful summaries and tend to be from the "20,000 foot management level. EPRI has included troubleshooting guidance in its Maintenance Application Guides, and this is very useful (though not always available to NRC personnel). However, there are many lessons that still need to be summarized to support technical needs. Collecting and consolidating the detailed lessons and insights, especially of the potential failure modes, is not particularly difficult but requires a certain mental bent. After all, it was possible for myself to do this at INPO, and I was considered to be a below average employee. I encourage you to encourage the industry to do a better job of developing consolidated summaries of operating experience insights and lessons. Both NRC and the nuclear industry in general needs the capability of getting to the insights of operating experience in a rapid manner. Being able to get at the potential failure modes would give a tremendous advantage for properly resolving problems.	Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.
130	Organizational Excellence	Private citizen	Timeliness: NRC decision making process is well reasoned, justified, and decisions are made in a timely fashion to ensure safety and security. Making information that supports decision-making more centrally available and accessible should improve access to critical information improving time to develop derivative information. NRC may want to consider closing the regulatory loop for those submitting recommendations or changes to rules, policies and procedures. Currently suggestions generally receive no feedback response to submitters'.	Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
131	Organizational Excellence	Private citizen	<p>Operational Excellence Strategies</p> <p>4. Conduct the NRC's information technology and information management activities to improve the productivity, effectiveness and efficiency of agency programs and operations, and enhance the utility and accessibility of information for all users inside and outside the agency.</p> <p>Advanced technologies that offer tested improvement to nuclear generation should be evaluated for transfer to stem obsolescence caused by regulatory inertia. Specifically, licensees are reluctant to try any new technology until they've been give NRC's green light. Thus many effective technologies like distributed control systems, or centrifugal or rotary air compressors that offer substantial improvements over their nuclear equivalents, remain to see widespread application in nuclear industry. For data management, licensees remain committed to text document systems for critical attribute data management at a time when other industries and agencies have started migration to more advanced relational structures. NRC should encourage licensees to take measured risks in non-safety areas to develop technologies that promise to improve long term nuclear safety. Information access today is largely through document titles and PDF files. Critical attributes should be mapped to a common data structure to speed and integrate the access and logical organization of design data by plant type. Methods that implement risk-informed guidance such as 50.69SSC, Risk-informed Categorization and Treatment of SSC, should be made more actionable by relating new risk-informed methods with historical deterministic guidelines ones.</p> <p>Some practices will remain essentially deterministic at their final implementation. In some cases, risk-informed implementation method (e.g., actionable method) remains yet to develop. Others have deterministic final steps. For example, the dedication procurement of subassembly parts under 10CFR50 A&B, "dedication," historically used a deterministic interpretation of the FSAR DBA safety events to identify ("dedicate") parts requirements subject to 10CFR50 A&B rules. This process will still to apply under 10CFR50.69; new plant designs will have to dedicate all parts below the SSC level of the most detailed PRA – or procure entire SSC generally to the same all encompassing 10CFR50 requirements across the board. The latter choice leaves the dedication decision process for the successful supplier bidder who accepts the procurement requisition specification, and gets a Purchase Order. In each case, detailed PRA can develop parts safety requirements to the component subassembly level, removing this need and specification development requirement. NRC processes should identify actionable methods that identify how licensees and/or their suppliers should comply with complex requirements – simply. In every case, both should take full advantage of the efficiencies offered by retaining completed analysis retrievably for future access and reuse on later work.</p> <p>Standardization of designs should be considered for processes and information used in the nuclear industry. Operating experience remains highly dependent on source submitters, and is not available to the general public since the Institute of Nuclear Power Operations maintains the information. Industry failure data should be as available as NRC generic communications reports.</p>	<p>Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
132	Organizational Excellence	Private citizen	<p>Operational Excellence Strategies</p> <p>5. Use innovative strategies to recruit, develop, and retain diverse employees, and increase the diversity of employees in senior and managerial positions to achieve a high quality, diverse work force. So called Generation-X employees will expect more hot-linked and relationally tied information management tools that are more like advanced server applications on the web. The lack of new data management structures and continued dependence on documentation in PDF or other hardcopy files will place more workers in obsolete information management environments. This will place NRC at a disadvantage from an employee retention perspective. Furthermore, the nuclear industry follows NRC lead in information management practices. Industry organizations like NIRMA (Nuclear Information Records Management Association) remain firmly implanted in the use of microfiche and other obsolete technology in large part because of the continued nuclear operation organizations dependence on hard copy documentation. NRC should lead the way to develop better information structures because of its position in nuclear technology management. NRC should encourage industry along the same path by creating innovative method to accomplish the same ends as formerly done by rote "nuking it out" methods. NRC should encourage more industry innovation to maintain a diverse, creative workforce. NRC might want to consider exchange programs with other highly-technical, high risk regulatory agencies like DOE, DOD FAA, and FDA to share experiences and perspectives managing public risk.</p>	<p>Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.</p>
133	Organizational Excellence	Private citizen	<p>Operational Excellence Strategies</p> <p>7. Sustain a learning environment that provides continuing improvement in performance through knowledge management, performance feedback, training, coaching and mentoring. Knowledge management will be the most pressing developmental area the NRC faces with resumption of reactor design, licensing and construction and the absence of substantial changes in the processes used to accomplish these activities since the last generation of power plants was constructed. Although Engineering CAD (Computer Aided Design) systems have gained tremendous power in the past two decades, their use ends at the development of designs. They don't allow only limited integration with the other structures on which they depend, like safety rules (10CFR50 A & B, for example). They neither allow operating entities economies of scale nor improved safety by integrating derivative systems like procurement specifications (which are based on high level design requirements' SSC components), scheduled maintenance and operations monitoring treatments, and tag out configuration controls. The lack of design basis integration is the single most critical nuclear plant design challenge today. Since TMI there has been a continued, regular occurrence of nuclear plants unintentionally operating outside their design basis (in ignorance) that can only be attributed to the complexities and finer nuances of nuclear plant configuration management. Data duplication and complexity tracing back to the design basis should be simplified to avoid loss of critical operating information.</p>	<p>Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
134	Organizational Excellence	Private citizen	<p>Operational Excellence Strategies</p> <p>9. Provide accurate, timely, and useful financial information to agency managers for effective decision-making. While licensee financial controls are outside the direct purview of the NRC, continuing on a deregulation path, even if limited, operating nuclear plant's financial health needs to be assured. Under-funding nuclear plants could affect safety. To assure cost effectiveness and safety, NRC should encourage licensees to measure plant SSC level expenses, performance-basing all their financial cost-benefit metrics. This would assure plant expenses (or lack thereof) are measurable at system, train and even SSC level in meaningful ways to benchmark with comparable units and others. In short, in a competitive market NRC should encourage licensees to maintain the financial cost-benefit metrics that justify – and compare – all performance expenses.</p>	<p>Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.</p>
135	Organizational Excellence	Private citizen	<p>Selected Activities to Support Operational Excellence Information Technology/Information Management</p> <ul style="list-style-type: none"> • Improve information management processes, such as information dissemination and knowledge management. [Supports Strategies 3 and 4] <p>Standard plant designs selection should be complemented with the development of a standard licensing framework structured around networked, server-based relational data. The licensing of the design under the Combined Operating License could then be measured for degree of compliance to a standard, be it a Westinghouse AP-1000, GE ESBWR or other standard design approved under Part 52 with a Design Control Document. This would facilitate the simplification and standardization of reporting under 50.65, the maintenance rule, which is a significant nuclear plant/NRC staff manual personnel burden. A standard design and format would facilitate automated data input of maintenance preventable function failures and system availability to assess performance.</p> <ul style="list-style-type: none"> • Improve internal and external electronic information access and delivery systems. [Supports Strategies 3 and 4]The integration of the critical attributes from fundamentallicensing documents into a relationally linked form would provide the framework under which all information could be more readily accessed and used without the extensive experience requirements that new younger employees will lack. This will improve regulation and safety, while allowing more effective use of resources. 	<p>Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
136	Organizational Excellence	Private citizen	<p>Selected Activities to Support Operational Excellence Information Technology/Information Management</p> <ul style="list-style-type: none"> • Systematically evaluate, improve, integrate, and automate selected regulatory and support processes from beginning to end, considering the needs of all process participants and using the most effective redesign approaches and technologies. [Supports Strategies 3 and 4] <p>New plant licensing should attempt to provide an integral framework on a per unit design basis that allows integration of all regulatory processes from beginning to end. This should anticipate aligning all design basis maintenance activities from beginning to end, from the initiation of design under the top level regulatory criteria to the final release of the site for unrestricted use after decommissioning, many years later. In between, it should cover all design updates, revisions to rules, codes and standards, equipment replacements, operating experience, and other requirements needed to both maintain the design basis and automatically generate all operating treatments – operating procedures, tag-outs, procurement specifications, scheduled maintenance requirements, SSC risk classification, and other critical operating information based upon critical design attributes that are relationally linked.</p> <ul style="list-style-type: none"> • Apply information technology/information management (IT/IM) to meet high-priority business needs (e.g., new reactors, fuel cycle facilities, the high-level waste repository proceeding, homeland security). [Supports Strategies 3 and 4] Automating the design cycle will improve not only licensee, but NRC regulatory and business needs for those programs deemed priorities by Congress and the President. 	<p>Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
137	Organizational Excellence	Private citizen	<p>Selected Activities to Support Operational Excellence Information Technology/Information Management</p> <ul style="list-style-type: none"> • Seek common solutions, reduce duplication, and promote sharing of data, systems, and service components across the agency. [Supports Strategies 3 and 4] <p>By developing a common information management regulatory framework, NRC would achieve significant synergies of licensing while allowing separate unique designs to go forward where economics dictated. For example, a common framework would support PWR, BWR and MHRs (or any other new design, for that matter) within a common set of metrics that allow cross-comparisons of performance based on the fundamental design control document. This would allow NRC to quickly identify performance outliers by quickly screening irrelevant site specific design features to get to fundamental performance. Enhanced data tools will make the oversight process more transparent, and facilitate the movement into a more design data centric framework that is more flexible by tying performance information more directly into networked performance monitoring systems</p> <ul style="list-style-type: none"> • Influence Federal initiatives that are applicable to the NRC and expeditiously adopt such IT solutions where they provide sufficient return on investment. [Supports Strategies 3 and 4] <p>Because many federal and state agencies, indeed whole industries grapple with similar information technology issues, yet lack the fundamental commitment framework of the nuclear industry, they can't be effective integrating uniform server-based critical attribute data systems. For example, both DOD and VA need methods to move medical records for critical injured defense personnel from forward areas to treatment facilities. Lacking critical attribute-based personnel injury records, treatment suffers. Agencies can't move hardcopy records with injured personal with certainty. Similar issues abound across the federal agencies like FDA, DOD (hardware), FBI, and NSA. Better data structure models elude network information designers for a variety of reasons, such as larger and more complex frameworks. Nuclear industry records have commensurate complexity but intense public interest in their accuracy, quality and safety based upon the regulatory framework in which they reside.</p>	<p>Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.</p>
138	Organizational Excellence	Private citizen	<p>Selected Activities to Support Operational Excellence Information Technology/Information Management</p> <ul style="list-style-type: none"> • Build shared services into the IT infrastructure to reduce costs of applications that require these services. [Supports Strategy 4] <p>Integration should begin at the design level with a common architecture and a goal to link in a common framework as experience is gained. Because efforts to link the entire design basis across all designs is so large, the first step should be at the individual design level within a common framework relational structure.</p> <ul style="list-style-type: none"> • Expand and strengthen information security capabilities to ensure that effective information protection is in place, and develop and communicate policies regarding security. [Supports Strategy 4] <p>Developing a common framework, each Part 52 plant design could eventually move to an NRC –controlled server. At that point, access controls could allow the same data security structures to provide information access based upon need, but restricted for safeguards based upon the logon authority of the user. This could eventually place most information where it is most accessible, useful but still controlled. In closing, the NRC public or industry input forum should also provide a means to notify applicants that their messages have been received, and are in the agency's docket. At present, there is no way for the submitter of a complaint or suggestion to know their communication has been received (that we're aware of). NRC should consider closing the loop to track inputs to their source to final disposition. This could be entirely by web.</p>	<p>Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
139	Planned Program Evaluations	Private citizen	Appendix B, Operator Licensing Program, 1st sentence: change, "10 CFR Part 55 and the guidance in.," to read, "10 CFR Part 55, the guidance in. ."	Comments incorporated.
140	Planned Program Evaluations	Private citizen	Appendix B, Operator Licensing Program, Scope, 2nd sentence: The terms "each year" and "the alternate years" are incompatible, as used in the sentence.	Comments not accepted. Not clear that this is, in fact, incompatible.
141	Planned Program Evaluations	Private citizen	Appendix B, Work Planning Process, 1st sentence, clause (2): change, "adding, deleting and or modifying current services" to read, "adding, deleting or modifying current services."	Comments incorporated.
142	Planned Program Evaluations	Private citizen	Appendix B, Work Planning Process: The "Objective" contains details that should be under "Scope," and the "Scope" statement is more appropriate for the "Objective."	Comments incorporated.
143	Planned Program Evaluations	Private citizen	Appendix B, Decommissioning and Low-Level Waste Management Dose Modeling and Performance Assessment Approaches Review, last sentence: Insert "to determine" between "codes/models" and "if they are up-to-date."	Comments incorporated.
144	Planned Program Evaluations	Private citizen	Appendix B, Integrated Materials Performance Evaluation Program Reviews of selected NRC Regional Offices: Capitalize "selected."	Comments incorporated.
145	Planned Program Evaluations	Private citizen	Appendix B, Integrated Materials Performance Evaluation Program Reviews of selected NRC Regional Offices, 1st paragraph: Shouldn't the name of Management Directive 5.6 be, "Integrated Materials Performance Evaluation Program (IMPEP)?"	Comments incorporated.
146	Planned Program Evaluations	Private citizen	Appendix B, Integrated Materials Performance Evaluation Program Reviews of selected NRC Regional Offices, Scope, 1st sentence: Shouldn't "Technical Quality of Incidents and Allegations" be "Technical Quality of Incident and Allegation Investigations?"	Comments not accepted. Language was proposed by the program office.
147	Safety	Private citizen	NRC management should establish measurable goals for creating an infrastructure that reduces the duration of the combined license application review. Combined license application reviews and approval should be based on a reference COLA should be scheduled for an 18 month duration.	Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.
148	Safety	Private citizen	Sufficient NRC resources should be allocated to develop Branch Technical Positions for newly issued Standard Review Plan (SRP) requirements. NRC should issue staff guidance (e.g., ISG process) for resolution of generic issues regarding combined license applications.	Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.
149	Safety	Private citizen	Expedient understanding of NRC needs and concerns should be the goal for communicating with licensees. Technical issues with COLAs should first be raised with the applicant in tel-cons in order to promote timeliness of NRC reviews. The NRC staff should issue draft RAIs via E-mail to facilitate those tel-cons. Reducing the number of RAIs is an industry goal and should be an NRC goal. The NRC staff should work to assure applicants correctly understand the RAI when an RAI is needed.	Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.
150	Safety	Private citizen	NRC staff should focus more resources on team based inspections at applicant's offices and site location in order to increase efficiency and effectiveness of NRC review processes. Increasing face-to-face interactions between licensee staff and NRC staff will promote better understanding of NRC staff expectations and a higher level of licensee compliance with those expectations.	Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.
151	Safety	Private citizen	A resident inspection team, stationed at new reactor sites or licensee offices, should be considered as a means to expedite new reactor site licensing. An onsite presence promotes both better communication and public confidence in the NRC staff. This team would be focused on NRC inspection manual requirements applicable to construction activities and ITAAC closure.	Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
152	Safety	Private citizen	Safety Goal (top of page 5) seems redundant to Safety Strategic Goal directly preceding.	Comments not accepted. Second instance of the Safety Goal definition is the header for the Safety Goal section.
153	Safety	Private citizen	Strategic Outcomes, Discussion (page 5), 4th paragraph, 1st sentence ("Future challenges to the agency are expected to require adjustment to both internal and external factors, such as the use of risk-informed and, as appropriate, performance-based regulations.") Which example in the sentence is an internal factor, and which is an external factor?	Comments incorporated with revised language.
154	Safety	Private citizen	Strategic Outcomes, Discussion (page 5), 4th paragraph, 2nd sentence" Replace phrase, "and domestic and international operating experience," with: "and review of domestic and international operating experience. ."	Similar to comment from NRC-NRR, which was accepted.
155	Safety	Private citizen	Page 7- Sentence beginning "Certain States..." Rather than "comparable" it should be "compatible" programs.	Comments not accepted. The use of 'coordinated' captures the concept of 'compatible'.
156	Safety	Private citizen	Page 8 - "The major programs include rulemaking, licensing, oversight and incident response, including key activities such as the Agreement States program, and ongoing research programs." This sentence is confusing because it use the phrase major programs and then programs as key activities. As written it implies that the agreement state program and the research program are key activities of the rulemaking, oversight and incident response programs. While each may be a key activity of a couple of them the two are not key activities of all of them.	Proposed language from OE may address this comment.
157	Safety	Private citizen	Page 9 - "Use information from integrated safety analyses implementing..." Shouldn't it be "to implement"?	Comment not accepted; 'implementing' begins a subordinate clause.
158	Safety	Private citizen	Page 10 - "Develop consensus standards with ... to be used by nuclear industry and international organizations to incorporate improvements ... NRC regulations." Shouldn't it be "and to incorporate" otherwise it reads as if the nuclear industry and international organizations are going to improve NRC regulations.	Comment not accepted; refers to technical standards, not NRC regulations.
159	Safety	Private citizen	Page 10 - Rather than the NRC "maintains" the security of sources it should be the NRC "ensures" - licensees actually maintain the security.	Comments incorporated.
160	Safety	Private citizen	Page 11- Does the NRC actually formulate foreign policy guidance? Contribute, advise, comment or review may be more appropriate.	Comments incorporated.
161	Safety	Private citizen	<p>Safety Goal Strategies</p> <p>1. Develop, maintain, and implement licensing and regulatory programs for reactors, fuel facilities, materials users, spent fuel management, uranium recovery, decommissioning and waste-related activities to ensure the protection of public health, safety, and the environment. (note) Reactors regulatory programs will require more efficient use of resources to improve programs with fewer available personnel. Reactor regulatory program development should strive to simplify, clarify and streamline complex programs like those for Appendix B deterministic licensing SSC treatment requirements.</p> <p>2. Prepare for and manage the review of applications for new power reactors while continuing to ensure the safe operation of existing plants.-(note) New power reactor licensing needs to become more comprehensive and faster at the same time. Methods like standardization and repetitive work use will need to do more with less. Lessons learned from new interest areas like new reactor licensing should be used to improve existing fleet programs.</p>	Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
162	Safety	Private citizen	<p>Safety Goal Strategies</p> <p>5. Use sound science and state-of-the-art methods to establish risk-informed and, where appropriate, performance-based regulations. (add) Assist licensees develop simple actionable methods that implement risk-informed, performance based regulations. (note) Using other similar consensus process standards, like the FAA-endorsed Air Transport Associations (ATA)'s MSG-3, Operator/Manufacturer Scheduled Maintenance Development, and industry experience, NRC should attempt to extend and simplify current regulations. The MSG-3 significance is providing FAA-endorsed consensus, actionable guidance to implement risk-based maintenance plan development for the airline industry.</p> <p>8. Oversee licensee safety performance through inspections, investigations, enforcement, and performance assessment activities. Use oversight operations to assist licensees develop better, more actionable risk-informed methods. Basis: Current guidance is very confusing and complex for licensees. Ideally, risk-informed methods should translate into transparent actionable methods that licensee personnel can use to implement risk-informed regulations.</p>	<p>Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
163	Safety	Private citizen	<p>Means to Support Safety Strategies</p> <p>Use sound science and state-of-the-art methods to establish risk-informed and, where appropriate, performance-based regulations. NRC policy should investigate and apply similar programs in other high-risk, regulated industries and the most advanced technologies available, where they have already been developed and are shown to be effective.</p> <p>Developing better regulatory risk structures to access and compare risk-informed equipment classifications, and relate those back to design would more-openly identify concerns that could pose safety risk. Portraying these in objective risk formats (“will cause xxx.yyy% increase...”) versus speculative format (“might cause”, or “could cause” ...) should become a licensee communications operational goal.</p> <p>Risk-informed regulatory approaches lack the simple safety-related/non safety related dichotomy of traditional deterministic licensing. To complete SSC classification, other organizations (NEI, INPO, ASME...) have attempted to fill gaps left when rules like 50.69, 50.65, or even traditional Part 50 Appendix A & B exclude the discussion of balance of plant equipment in risk considerations. INPO created critical equipment attempting to fill that gap. The Maintenance Rule applies risk to equipment lacking direct single failure safety threat in recognition of multiple failure event possibility. The upshot is SSC classification schemes that elevate much equipment into safety-related (or safety-significant) SSC classification on the basis of multiple failures. For traditionally non-safety related equipment, this places more equipment under the Maintenance Rule coverage, on the basis it could change the Power Output schedule planned for the facility in multiple failures. For procurements, this increases the number of SSC that must meet full 10CFR50 A&B requirements under old licensing. While the availability of a full-scope PRA corrects this situation, it only applies for new construction (which must have full PRA). Even new plant, full-scope PRAs rarely go below the SSC level into subassembly part internal failure events. Without part level PRA, all-encompassing, pervasive new plant SSC procurements prospects under Part 50 Appendix A & B (now Part 52) are very real. New plant procurements could become prohibitively expensive like the operating fleet’s. NRC should look at other risk management frameworks, like those developed by the ATA and endorsed by FAA (MSG-3(4), “Scheduled Maintenance Development”) to see what lessons learned could transfer to simplify nuclear risk management SSC categorization and treatments. Highly-redundant safety-critical applications need simple actionable guidance to categorize SSC and select special treatments. NRC should identify a framework whereby the new plant license holder can develop SSC internal event failure-mode identification to select special treatments, and confirm that this reduces simply to dedication practice – like that called for by 50.69, the IDP (Independent Decisions Panels). Finally, NRC should create a comprehensive list of SSC special treatments by type, placed in one location, for reference by designers and operator-maintainers so that they may readily assess SSC special treatment requirements available quickly based on safety classification.</p> <p>At least three equipment risk categorization schemes compete with each other. Through consensus groups, NRC should encourage industry identifying a common schema that could be used simply, in conjunction with single point failure, to uniformly classify SSC safety risk. NRC should encourage the use of simple data structures that incorporate standardization into readily retrievable, consolidated formats. They should reduce SSC safety categorization (re)interpretation, while assessing safety function consequences to the lowest part subassembly level. Currently, Part 50 “dedication” process requires these steps. To improve consistency, operationalizing methods should be a practical implementation goal. Completed analysis should be retained in retrievable format for consistent reference.</p>	<p>Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
164	Safety	Private citizen	<p>Means to Support Safety Strategies</p> <p>Review licensing requests (e.g., new applications, amendments, renewals, decommissioning, termination) to confirm that they provide an adequate margin of safety and are consistent with regulatory requirements, and conduct environmental reviews, as appropriate, to ensure actions comply with the National Environmental Policy Act of 1970. [Supports Strategies 1 and 2]</p> <p>Implement, review, and refine the Reactor Oversight Process,...</p> <p>Maintain an environment in which safety issues and differing views can be openly identified without fear of retaliation. [Supports Strategies 1, 3, and 5]</p> <p>NRC should encourage third party perspectives sharing licensee performance information. Contractors offer many insights into standard industry practices and specific licensee performance and practices. Soliciting candid opinions from contract organizations about license performance would also improve balance in licensee-subcontractor relationships, thereby encouraging more openness from contractors who may have performance concerns.</p>	These comments are covered under Openness.
165		Private citizen	"We are opposed to any program which will create more waste products and endanger us all by example and by adding to nuclear weapons stockpiles."	Comments not accepted. Issue is beyond the scope of the Strategic Plan.
166		Private citizen	NRC project managers should work to coordinate reviews being performed by multiple NRC line organizations to assure each organization is aware of the total scope of review activities, that ownership of responsibilities is clearly established, and work to avoid duplication of reviews.	Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.
167		Private citizen	It is reprehensibly irresponsible for a government agency that has the primary mission to safeguard the public to propose any project that generates new nuclear waste when we have no place to safely store the already existing nuclear waste.	Comments not accepted. Issue is beyond the scope of the Strategic Plan.
168		Private citizen	<p>As a concerned citizen, I feel compelled to urge the NRC to consider all long range effects of any changes made to current regulations.</p> <p>The citizens of Colorado are being faced with the very real possibility of uranium mining in northeastern Weld county. A state where water is as valuable as gold, is faced with a large Canadian corporation utilizing millions of gallons of water to utilize the in-situ mining process to mine uranium and do what with the by-products? The water that is at risk, the Fox-Laramie aquifer extends from northern Colorado to the southern portion of the state. Once this aquifer is disturbed, drained and contaminated, there is no turning back.</p> <p>This is why I plead with you to keep your standards high, prevent contamination of our water, air and ground while looking at the hazardous waste that is produced by the mining industry.</p>	Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
169		Private citizen	<p>This is a request that you include in the strategic plan, and in business practice, a special license, and appropriate application fee, to cover the importation of blue topaz and other irradiated stones. I am a blue topaz importer, and the way things are now, the NRC has basically put me out of that business due to their inappropriately high application fee for a license.</p> <ol style="list-style-type: none"> 1. The blue topaz I have been importing is not radioactive. (I had it tested.) However, there is that slim possibility that future shipments may be, and it may be that my suppliers would be unaware of it too. 2. I looked into getting a license to prevent me from becoming a criminal or having future shipments seized by Customs if such were to happen, and learned the license application fee is \$10,400.00. 3. Boom. I'm out of the blue topaz business, just like that. <p>I have a very small business, and simply cannot afford that kind of a fee. I would have to sell something like \$3,000 worth of blue topaz per month to justify such an overhead cost. I simply am not in that league.</p> <p>I'm sure there are many other importers that are in the same situation. Yes, I understand that the NRC wants to control radioactive items, and well they should. However, blue topaz has not been proven to pose a public health risk. I would think that if I am willing to go to the expense of monitoring my imports for radiation, which I am, that the application fee for a license should be within reach and a special allowance made for small businesses such as mine. If the application fee were \$500.00, I would do it. However, \$10,400 is just ridiculous! (The state will provide me with their license for free.)</p> <p>These are the options left to me. 1. Stop importing blue topaz (thanks a lot for ending that business) or 2. Continue to import blue topaz and risk breaking the law or having my package seized by Customs (I certainly could not afford that.)</p> <p>Isn't the government supposed to promote economic activities? Isn't that how they get paid (taxes collected on economic activities)? What's wrong with this picture? You want to create a blue topaz monopoly and force all the little guys to buy from the big boys who can afford such a license. That's simply not right. It is discriminatory, pure and simple.</p>	<p>Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.</p>
170		Private citizen	<p>It appears to me that the only reason that Europe is here today is but the Grace of God. If it were not for the thousands of men who died in the Soviet Union we may not have a Europe we could visit for the next 1000 years.</p> <p>What will be in place to prevent the core from going to ground water in the event that it escapes the primary reactor?</p> <p>I believe that it is not if another Chernobyl will occur but when? I hope I am up wind when this happens. The pollution from Coal, Natural gas and all other alternatives is not worth the chance of a major nuclear catastrophe. Will these be located down wind from the world? Please do not build any in Mexico, South Oklahoma or Texas. If you do only have disasters when the wind is out of the North, December through February?</p>	<p>Not clear to what in the Strategic Plan the comment pertains.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
171		Private citizen	<p>USNRC new Strategic Plan to protect the public must retain the BENEFIT of up to 100 mSv/yr (see Pollycove, Luckey, Cuttler, Muckerheide and many others presenting hormesis to Doctors for Disaster Preparedness meetings, freely downloaded at www.ddponline.org).</p> <p>It harms the public to deprive it of enough background radiation (whether from waste or medical sources), for longevity and resistance to cancer. This is clear in animal and cell experimentation as well as being where there is more radiation: nuclear shipyards, higher home radon, Denver, etc. Do not deprive the public of a supplement apparently as essential as vitamins.</p>	Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.
172		Private citizen	<p>If you are serious about comments you will</p> <ul style="list-style-type: none"> a.. post a draft strategic plan online b.. create a means for commenting online c.. you will post all professional content comments for all to see. 	Draft was posted online, and comments were accepted electronically. Comment disposition is to be available upon request.
173		Private citizen	<p>Other aspects of the draft Strategic Plan are problematic. Another planning "assumption" is that "The NRC will continue to coordinate with a wide array of Federal, State, local and Tribal agencies related to license renewal, new reactor licensing, homeland security, emergency planning and protection of the environment." Conspicuously missing from this list is compliance with historic preservation laws. In the USEC licensing case it became obvious that NRC staff is unschooled in preservation practice and law, that NRC has no mechanism for resolving preservation problems that arise in relation to DOE facilities, and that the Federal Preservation Officer at NRC is a non-functioning entity. ...</p> <p>In rural Appalachia, Piketon is also among the poorest of the DOE complex communities. Despite the fact that Piketon obviously qualifies as an environmental justice community as defined by the USEPA, the Presidential directive on environmental justice has never been applied to Piketon, by either DOE or NRC. We contend that this situation is illegal. Number one in NRC's Strategic Five Year Plan should be a commitment to implement federal law that has been so far neglected, including the National Historic Preservation Act and the President's Directive on Environmental Justice.</p>	Comments not accepted. This is an operational issue that falls below the threshold of an agency Strategic Plan.
174	Safety	State of Nevada	<p>The Plan states on page 6 that, "[T]he NRC faces a major challenge as the Department of Energy prepares to submit an application to establish the Nation's first repository for high-level radioactive waste at Yucca Mountain, Nevada. The NRC's review of this application will require evaluation of a wide range of technical and scientific analyses and the resolution of various regulatory issues on an expedited schedule. Additionally, the Nation will continue to require that the continued safe management of interim storage capacity for spent nuclear fuel must be available even after the repository is licensed and ready to receive high-level radioactive waste" (emphasis added).</p> <p>Nevada is concerned that the Plan assumes a license will be awarded for DOE's proposed Yucca Mountain high-level radioactive waste repository, and that the wording contained in the paragraph on page 6 of the Plan reflects a pre-judgment on NRC's part. Nevada suggests that the sentence in question be revised to read, "Additionally, whether or not a repository is licensed, the Nation will need the capacity to safely and securely store spent nuclear fuel and other high-level radioactive wastes for long periods of time."</p>	Comments incorporated.
175	Organization of the Strategic Plan	Agreement State	<p>Why is it necessary for NRC to revise, at this time, the existing Strategic Plan that is effective through September of 2010 (FY-2004-2009)? It would probably be more effective to develop this plan a year or in advance to more effectively include any lessons learned, incorporate changes and adjust the strategic goals, as appropriate.</p>	Comment noted; however, update at this time is mandated by statute (e.g., GPRA).

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
176	Organizational Excellence	Agreement State	The NRC's goal of risk-informing the regulatory process is commendable. However, how is NRC going to achieve the goal of enhancing public confidence in the regulatory process (i.e., the Reactor Oversight Process) considering that the concept of risk, and specifically risk assessment, is very complex and difficult for an average member of the public to comprehend?	Comment not accepted. The first sentence under the Openness Discussion and the Openness Strategies address how this is being pursued.
177	Safety	Agreement State	On page 5, under Strategic Outcomes, the word, "prevent" i.e., prevent the occurrence of any nuclear reactor accidents, may not be the appropriate word. How is NRC going to prevent an accident, which could result from a human performance error, lack of adherence to procedures, inadvertent release or discharge of radioactive materials from the power plants, etc? This comment also applies to Security Goal Strategic Outcome on page 10. The statement, "minimizing the possibility of any nuclear reactor accidents, inadvertent criticality events, etc." is more practical	"Prevent" was specifically selected by NRC senior management.
178	Organizational Excellence	ASME	Although, not mentioned specifically in your plan, NRC staff participation in ASME as an international SDO supports your "Organizational Excellence Objectives to achieve the Strategic Goals" by the emphasis placed on Effectiveness and Effectiveness Strategies. NRC staff participation in ASME standards development supports several of the key bullets under this strategy by developing generic solutions for technical/regulatory issues and reducing unnecessary burden on licensees. These are essential elements of success for both ASME and NRC.	Similar to NEI comment.
179	Safety	ASME	ASME understands and appreciates the NRC's "Means to Support These Safety Strategies," as published in the plan recognizing the need to develop consensus standards with professional societies and standard setting organizations to be used by the nuclear industry and international organizations to incorporate improvements into NRC regulations. While we appreciate NRC efforts in recognizing the need to develop consensus standards, it is the endorsement of the latest versions of these documents by NRC that is of much interest to ASME and other SDOs. ASME believes that the latest standards should be used whenever possible to ensure that the latest technology is used in the construction, operation, maintenance, and inspection of nuclear power plants. NRC endorsement of the latest versions of ASME standards enhances our ability to promote public health and safety worldwide. To this end, we suggest that endorsement be added to the second bullet on page 10 of the plan.	Comment not accepted. While NRC participates in the development of consensus standards, endorsement would be contrary to NRC's charter of not promoting the nuclear industry.
180	Key External Factors	Commissioner	Key External Factors: o Aren't power plant operating personnel licensees? o Significant Operating Incident – insert 'public questioning of' between 'increase in' and 'safety and security requirements'.	Comments incorporated.
181	Key External Factors	Commissioner	Key External Factors: Significant Terrorist Threat – description is a departure from agency's evaluation of threat parameters.	Comments incorporated.
182	Key External Factors	Commissioner	Pandemic - Insert at beginning, "The agency has evaluated its response to a pandemic, nevertheless, an outbreak..."	Comments incorporated.
183	Organizational Excellence	Commissioner	Last activity under Information Technology/Information Management – 'nuclear and non-nuclear emergencies'; what other emergencies are there?	Comments incorporated.
184	Organizational Excellence	Commissioner	First bullet under Activities to Support Effectiveness Strategies: is IG really an internal agency resource?	IG is an internal resource, though independent.
185	Organizational Excellence	Commissioner	Six bullet under Activities to Support Effectiveness Strategies: replace 'agree on' with 'develop'.	Comments incorporated.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
186	Safety	Commissioner	Safety Goal Strategic Outcomes – question about ‘resulting in fatalities’ for the 3 rd . Strategic Outcome.	Comment is unclear. Resolution deferred until Commission SRM on Final Strategic Plan.
187	Safety	Commissioner	In the 3 rd . paragraph under the Discussion, Safety Goal, ‘takes using a’ does not make sense.	Replaced with ‘employs’.
188	Safety	Commissioner	Page 6, Discussion, Safety Goal: 3rd. full paragraph – ‘with the regulatory review authority’ reworded to ‘by their’ regulatory review authority’. Last full paragraph – remove ‘to the national repository’ from the end. Last paragraph, first sentence – uranium enrichment and enriching uranium used in the same sentence is redundant.	Comments incorporated.
189	Safety	Commissioner	Last means under Safety – ‘prompt identification and prompt comprehensive correction...’; using ‘prompt’ twice is redundant.	Comments incorporated.
190	Security	Commissioner	First paragraph under the Discussion of the Security Goal: o Add ‘similar to those’ between ‘oversight programs’ and ‘employed’. o Last sentence employs a double negative.	Comments incorporated.
191	Security	Commissioner	Second last paragraph under the Discussion of the Security Goal - delete ‘completed’ before ‘identification of vulnerabilities..”	Comments incorporated.
192	Security	Commissioner	Security Strategy 5 – insert ‘s after licensee.	Comments incorporated.
193	Security	Commissioner	Second last paragraph under the Discussion of the Security Goal - “We don’t license design basis threats”.	Struck out ‘threats’.
194	Security	Commissioner	Fourth Security Means – “Are requirements really subject to threats?”	Comment is unclear. Resolution deferred until Commission SRM on Final Strategic Plan.
195	Organization of the Strategic Plan	Office of Management and Budget (OMB)	A4: Are these your approved PART goals? If not, where do they fit into this structure and why are these operational goals being presented? The Plan...describes the organizational excellence objectives (i.e., openness, effectiveness, timeliness, and operational excellence) to support the strategic goals of safety and security. (p. 4)	Under the FY 2008-FY 2013 Strategic Plan, the agency strategic goals will be Safety and Security. As a result, the goals for programs subject to PART will also be Safety and Security. Although Openness, Timeliness, Effectiveness, and Operational Excellence are no longer considered goals and are not supported by associated performance measures, they will be referenced to describe the means by which the agency will support its strategic goals.
196	Strategic Goals	OMB	A6: What is the purpose of adding this additional text to the goal? Safety B Ensure adequate protection of public health and safety and the environment. Security B Ensure adequate protection in the secure use and management of radioactive materials (p. 4)	The Commission believes that adding the term “adequate” is necessary in order to provide clarity. In particular, the lack of such language might carry the impression that our goals include the elimination of all risk.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
197	Strategic Outcomes	OMB	<p>A8: Why do these all start with "prevent"? Preventing these are outside the scope and control of NRC, aren't they? NRC regulates to create an environment to minimize the chances. It is Homeland's responsibility to do the prevention...</p> <p>Prevent the occurrence of any nuclear reactor accidents. Prevent the occurrence of any inadvertent criticality events... (p. 5)</p>	<p>For planning purposes, outcomes are not considered to be entirely within the control of the agency. The agency undertakes actions which affect the environment in such a way that the desired outcome is achieved. The NRC undertakes its regulatory process with the anticipated outcome of preventing accidents, exposures to radioactive materials, etc. If an accident is not prevented, the agency would not achieve its stated goal. For the NRC's strategic planning purposes, we do not believe that this has anything to do with the Department of Homeland Security's activities.</p>
198	Strategic Outcomes	OMB	<p>A9: Why are we getting to the individual goal level here? Why were these chosen there are many PART goals. Which PARTs included these goals?</p> <p>Prevent the occurrence of any nuclear reactor accidents. Prevent the occurrence of any inadvertent criticality events... (p. 5)</p>	<p>These are the NRC's long-term Safety Goal strategic outcome measures. They are reflected in the PART reviews conducted for all of NRC's programs.</p>
199	Safety	OMB	<p>A12: Not all the apps will cover these new reactor types, correct?</p> <p>The agency is preparing for the review of applications to construct and operate a new generation of nuclear plants...a dedicated organization has been created in the Region II office...will be responsible for the execution of on-site reactor construction inspection activities across the country. (p. 6)</p>	<p>Correct, not all the applications will cover the NRC-approved reactor designs. Potential licensees not using these designs, however, must accept that their applications will not be processed in the expedited manner that Combined Operating License applications will be handled under 10 CFR 52.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
200	Safety	OMB	<p>A13: Has this happened yet? When was it approved (which Budget)? Was it created from scratch or was it the result of a reorganization and reprioritization within NRC?</p> <p>In addition, a dedicated organization has been created established in the II office in Atlanta, Georgia, that will be responsible for the execution of on-site reactor construction inspection activities across the country. (p. 6)</p>	<p>In an effort to increase efficiency and effectiveness, the Commission decided in April 2006 to concentrate NRC on-site reactor construction activities in one location at Region II. Responsibility for operating and new reactors, as well as new fuel facilities and Watts Bar Unit 2 activities, are focused at Region II. The majority of new reactor construction is expected to take place in the Southern part of the United States, making Region II the most practical organizational location. The concentration of construction activities in Region II was established primarily by an internal reorganization. In support of New Reactors, 8 FTE were reallocated in the FY 2008 current estimate to better support developmental activities in the construction and vendor inspection program for site visits, public meetings, program development and inspector training. For these particular activities, the FY 2009 FTE request remains consistent with the FY 2008 current estimate FTE level of 26 FTE (additional 8 FTE over the FY 2008 President's Budget). To begin to ramp up for the necessary activities geared toward eventual new reactor construction, the FY 2009 budget request includes additional space in Region II to accommodate the expected growth in on-site reactor construction activities.</p>
201	Safety	OMB	<p>A14: Expedited from what baseline?</p> <p>The NRC's review of this application will require evaluation of a wide range of technical and scientific analyses and the resolution of various regulatory issues on an expedited schedule. (p. 6)</p>	<p>The word expedited has been deleted and replaced with the word "challenging".</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
202	Safety	OMB	<p>A15: The MOX facility in SC? This was mentioned in the FY 2004 plan. Why is it not done?</p> <p>Further, the NRC is reviewing a license application for a mixed oxide fuel facility that would use plutonium salvaged from decommissioned nuclear weapons to fabricate fuel assemblies for use in nuclear power plants as a technique to reduce existing quantities of weapons usable materials. (p. 6)</p>	<p>The NRC is licensing the Mixed Oxide Fuel Fabrication Facility (MFFF) in Aiken, SC in two phases. The first phase was an application for a Construction Authorization. This phase was completed and an authorization to begin construction was issued in March 2005. The second phase is a License Application (LA) to Possess and Use Radioactive Material. The LA for this phase was submitted in September 2006 and is presently being reviewed by the NRC.</p>
203	Safety	OMB	<p>A16: OVERALL COMMENT: For some reason, all the apostrophes have been converted to equal signs in this version. Ensure correction is made throughout.</p>	<p>The version that was sent to OMB has issues that resulted from sending the document electronically. The final editing process has removed these errant characters.</p>
204	safety	OMB	<p>A18: Which existing program is this? Or, is it a new proposal?</p> <p>Conduct a program for the identification and resolution of reactor, fuel cycle, materials, and radioactive waste generic issues. (p. 9)</p>	<p>All of the agency's programs and subprograms identify and resolve generic issues as part of the regulatory process. Generic safety issues are issues that have been identified as having potential safety significance at a number of nuclear power plants.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
205	Security	OMB	<p>A21: What is this? It sounds like a formal/regular review and report.</p> <p>Another challenge facing the NRC and its licensees is the implementation of the recommendations arising from the NRC=s completed identification of vulnerabilities and mitigating strategies at licensed facilities. (p. 10)</p>	<p>Vulnerability Assessments (VAs), currently referred to as Security Assessments (SAs), are formal, systematic evaluations in which qualitative and quantitative techniques are applied to determine potential vulnerabilities to radiological sabotage, theft or diversion of radioactive materials. VAs are used to identify effective countermeasures or mitigating measures to protect specific targets. The NRC also uses VAs to confirm the effectiveness of the mitigating strategies such as the confirmation regarding Commission orders to nuclear power plants in February 2002. Furthermore, these assessments, both past and future, are continually used to develop additional mitigating measures for NRC licensees to implement and to assist national efforts to enhance infrastructure protection. Following the terrorist attacks on September 11, 2001, the NRC promptly assessed the potential for and consequences of aircraft attack on a nuclear power plant by terrorists.</p>
206	Security	OMB	<p>A24: Which law requires this be done on a 3yr cycle? Has NRC always achieved this regularity?</p> <p>On a 3-year cycle, conduct safeguards performance evaluations at every applicable nuclear facility to assess each licensee=s protective-strategy capabilities.. (p. 12)</p>	<p>The Energy Policy Act of 2005 is the law that requires the three-year cycle. The NRC has maintained this schedule to conduct safeguards performance evaluations.</p>
207	Security	OMB	<p>A25: Where in law is this required? How is this different than the safeguards evaluations mentioned above? Why in NRC now calling these "security" assessments when they used to be called "vulnerability" assessments?</p> <p>Conduct security assessments and determine the consequences of a range of threats against existing safety, safeguards, and security requirements. (p. 12)</p>	<p>The NRC uses the term "Security Assessments" in reference to the same activities formerly stated as "Vulnerability Assessments" in order to more clearly and accurately describe these comprehensive activities that are broader than just an assessment of vulnerabilities of a particular site or facility.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
208	Security	OMB	<p>A26: This was listed in the previous strategic plan. Why is it not finished yet?</p> <p>Collaborate with the Department of Energy and other agencies to develop and complete implementation of a national registry of radioactive sources of concern (p. 12)</p>	<p>A national registry of significant radioactive sources, updated annually, has been implemented for some time. Deployment of the National Source Tracking System, which will provide tracking of transactions, including transfer and possession of sources, originally planned for late FY07, has been postponed by introduction of emergent information security technologies. System deployment is now planned for late CY08.</p>
209	Security	OMB	<p>A27: What does this mean? GNEP?</p> <p>Support U.S. government goals to secure nuclear materials internationally through bilateral agreements to support material control and accounting programs. (p. 12)</p>	<p>NRC's cooperation internationally extends beyond GNEP. Such cooperation involves nuclear reactor, materials, and waste safety and security issues. If GNEP were authorized, it would be among such international cooperation activities.</p>
210	Organizational Excellence	OMB	<p>A38 Isn't NRC the one who establishes the regulatory environment? How can NRC be responding to it? Does this mean the industry environment?</p> <p>Effectiveness Strategies ...4. Anticipate challenges and promptly evaluate and respond to changes in the regulatory and technical environment.</p>	<p>NRC understands changes in the "regulatory and technical environment" to mean industry trends, changes in which organizations apply for licenses, and technical drivers for the industry and regulations.</p>
211	Organizational Excellence	OMB	<p>A43: Do we have 300's for these upgrades? Are they full replacements or upgrades to existing systems?</p> <p>Replace several of the agency's financial systems, including the NRC's core accounting system (the Federal Financial System), the License Fee Billing System, and the Human Resources Management System. (p. 20)</p>	<p>The agency has submitted 300s for these upgrades. Fee billing is rolled into the Core Financial System Replacement Project 300 and there is a separate 300 for the HRMS T&L upgrade. The Core Financial System Replacement Project is a full replacement of core accounting (FFS) and Fee Billing Systems. The HRMS T&L is technically an upgrade from Version 7.5 to Version 9.0, however, the newer version is so different that it is very similar to a full replacement effort. As a result, the HRMS T&L Replacement Project is not a simple upgrade but a major undertaking which will involve new hardware, operating system, web accessibility and greatly expanded software capability.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
212	Appendix	OMB	A44: This is arguably not as significant as the other issues listed. Emergency Preparedness and Incident Response (Appendix A Key Factors p. 17)	How other federal, state, local and Tribal agencies pursue emergency preparedness and incident response strategies may affect NRC's activities in this area significantly, and yet are outside NRC control.
213	Appendix	OMB	A45: This application has been accommodated in the above goals. Timing of all license applications will impact workload. Timing of a DOE Application for the High level Waste Repository at Yucca Mountain and Related Activities (Appendix A Key Factors p. 17)	The magnitude of a potential application for High level Waste Repository would affect NRC in such a significant way that the Commission feels it must be highlighted in this section.
214	Appendix	OMB	A47: Is this referring to a pandemic disease? Why would this impact NRC that significantly? What pandemic monitoring would NRC do? The outbreak of a pandemic could significantly impact the NRC's essential functions (p. 22)	The agency has deleted this text from the document.
215	Appendix	OMB	A48: Have these already been contracted? Were the scopes/charges reviewed by anyone outside NRC? Planned Program Evaluations (p. 22)	These program evaluations are all internal self-assessments. The agency plans to conduct two independent program evaluations to inform PART evaluations in FY 2008 and FY 2009.
216	Front Cover	OMB	A1 OVERALL COMMENT: The plan is too long. It should be shortened wherever possible. All	The Commission agrees with this comment and has shortened the Strategic Plan where possible.
217	A Stable Regulator in a Dynamic Environment	OMB	A2 A strategic plan is not the place to suggest the need for additional resources. In order to meet these challenges, the NRC must obtain additional resources to meet an increasing workload, hire and train several hundred new technical staff, update the agency's regulatory review and construction inspection guidelines, and expand its infrastructure to accommodate staff increases. (p.3)	The Commission agrees with this statement and has amended the document to refer to efficiently using its available resources and obtaining additional resources as necessary.
218	Mission	OMB	A5: Unnecessary. Where has this been stated before? If in the last plan, where? Vision : Excellence in licensing and regulating the safe and secure use and management of radioactive materials for the public good. (p.4)	The Commission agrees with your comment and has deleted the vision statement.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
219	Safety	OMB	<p>A10: Isn't the final resolution the responsibility of the reactor owner, not NRC? What is a better way to get that across?</p> <p>The NRC will seek to proactively identify and work with industry to resolve safety issues (p. 5)</p>	<p>The Commission agrees with your comment. The NRC reviews licensee activities and works cooperatively with licensees to address any safety issues that may arise. If the licensee does not address the issue to the agency's satisfaction, the NRC can take any actions, including shutdown of the licensee's operations, necessary to ensure safety. The text has been amended to delete the phrase "work with industry" to address this comment.</p>
220	Safety	OMB	<p>A11: What does this mean? It sounds like NRC tailors all regulatory action to the specific recipient. Is that what NRC wants to communicate? Shouldn't all regulated entities be held to the same standard?</p> <p>The agency's regulatory activities are applied in a graded manner consistent with the risk presented by specific uses .. (p. 5)</p>	<p>The Commission agrees with your comment. The term "graded" has been removed from the document.</p>
221	Safety	OMB	<p>A17: Explanation of their responsibilities is not necessary in a strategic plan.</p> <p>The resident inspectors oversee licensees' day to day activities, while region based and Headquarters inspectors perform individual and team inspections in specialized areas related to nuclear reactor safety and non reactor inspections. (p. 8)</p>	<p>The Commission agrees with this comment and has deleted the explanation of responsibilities.</p>
222	Security	OMB	<p>A20: This is true in any environment.</p> <p>The NRC must remain vigilant in ensuring the common defense and security in an elevated threat environment. (p. 10)</p>	<p>The Commission agrees with this comment. The words "in an elevated threat environment" have been deleted.</p>
223	Organizational Excellence	OMB	<p>[28: Why are these in this plan? Are they PART approved? They are not strategic but rather operational – they outline what NRC should be doing as part of its everyday operation. Suggest deleting them entirely or minimizing the length of the section by deleting some of the strategies text.</p> <p>Organizational Excellence Objectives (p. 12)</p>	<p>The Commission agrees with this comment. The Strategic Plan includes these elements because these objectives describe important means whereby the agency achieves its strategic goals. The length of the section has been minimized by deleting the activities that support the strategies.</p>
224	Organizational Excellence	OMB	<p>A29: Prepare to receive? The plan covers the time when NRC would receive them if they come in as NRC anticipates.</p> <p>Over the next several years, the NRC will prepare to receive license applications for the construction and operation of a number of nuclear power plants, nuclear materials facilities, and a geologic repository. (p. 13)</p>	<p>The Commission agrees with this comment. The words "will prepare" has been replaced with "anticipates".</p>
225	Organizational Excellence	OMB	<p>[30: This whole plan needs to discuss this workload as potential or anticipated, not in terms " will " – it is not guaranteed. NRC should scrub document to ensure this is the consistent message.</p> <p>These activities will generate a great deal of public interest. (p. 13)</p>	<p>The Commission agrees with this comment. The text has been amended to say "NRC expects" to address the comment.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
226	Organizational Excellence	OMB	A31: One of these two sections are not necessary. Strategies section seems to be a list of what NRC should be doing day to day (not strategic). The Activities section includes more detail than is really necessary for something that is not a strategic goal. Selected Activities to Support Openness Strategies (p. 13)	The Commission agrees with this comment. The activities section has been deleted.
227	Organizational Excellence	OMB	A32: Presume this will only happen if Yucca app is received and review begins. Host public meetings at NRC Headquarters, in Nevada, and along major transportation corridors regarding the proposed high-level radioactive waste repository at Yucca Mountain (p. 14)	The Commission agrees with this comment. The activities section that contains this comment has been deleted.
228	Organizational Excellence	OMB	A33: Why haven't these been completed yet? They were listed in the previous strategic plan. Develop communication plans for key program activities. (p. 14)	The activities section that contains this comment has been deleted.
229	Organizational Excellence	OMB	A35: Why still talk about openness under the effectiveness section? Increases in both the frequency and the extent of stakeholder involvement in the NRC's regulatory processes are expected as the agency works to improve openness. (p. 15)	The Commission agrees with this comment. The text that refers to openness here has been deleted.
230	Organizational Excellence	OMB	A36: Of NRC specifically. The drive to improve performance in Government, (p.15)	The Commission agrees with this comment. The text has been deleted.
231	Organizational Excellence	OMB	A37: All activities. a need for the agency to become more efficient and realistic without compromising high quality in its regulatory activities (p15)	The Commission agrees with this comment. The text has been deleted
232	Organizational Excellence	OMB	A39: One of these two sections are not necessary. Strategies section seems to be a list of what NRC should be doing day to day (not strategic). The Activities section includes more detail than is really necessary for something that is not a strategic goal. Selected Activities to Support Effectiveness Strategies (p. 16)	The Commission agrees with this comment. The activities section has been deleted from the Strategic Plan.
233	Organizational Excellence	OMB	A40: This overlaps with the effectiveness and efficiency section above, doesn't it? Timeliness:	The Commission agrees with this comment. The timeliness objective has been combined with the effectiveness objective.
234	Organizational Excellence	OMB	A41: One of these two sections are not necessary. Strategies section seems to be a list of what NRC should be doing day to day (not strategic). The Activities section includes more detail than is really necessary for something that is not a strategic goal. Selected Activities to Support Timeliness Strategies (p. 17)	The Commission agrees with this comment. The activities section has been deleted from the Strategic Plan.
235	Organizational Excellence	OMB	A42: A request does not support the goal – is this saying that if an application is too complex, NRC will alert someone that they will miss their timeliness target? Promptly review and communicate cases where applications or license amendment requests will not support the agency's timeliness goals. (p. 17)	The Commission agrees with this comment. This section has been deleted and the text eliminated.

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
236	Appendix	OMB	<p>A46: It is not clear the effects of GNEP will be significant enough in the next three years (before this plan needs to be revised again) to justify raising it here.</p> <p>GNEP has been proposed by the Department of Energy as a means to recycle (reprocess) nuclear fuel using proliferation-resistant technologies to recover more energy and reduce waste. (p. 22)</p>	<p>The agency agrees with this comment. The language now indicates that Global Nuclear Energy Partnership (GNEP) is only one possible consideration. Whether or not GNEP goes forward, the need for advanced fuel cycle development technologies remains, and GNEP will remain as one area of consideration during this period.</p>
237	A Stable Regulator in a Dynamic Environment	OMB	<p>A3 There no guarantees the agency will expand.</p> <p>...even as the NRC expands, the agency=s mission, vision, and strategic objective remain unchanged... (p. 3)</p>	<p>The Commission considered OMB's comments. However, the agency's environmental scan and the information provided by the agency's stakeholders indicate a need to expand operations to meet the needs of the industry. All of the information that the agency has received to date suggests increased agency activity in the areas of reactors, nuclear materials, and nuclear waste. The Commission believes that the Strategic Plan should reflect this information.</p>
238	Organization of Strategic Plan	OMB	<p>A7 Need to see a crosswalk that demonstrates how each program fits into this new structure. How does the blue book map to this new structure?</p> <p>Safety B Ensure adequate protection of public health and safety and the environment.</p> <p>Security B Ensure adequate protection in the secure use and management of radioactive materials (p. 4)</p>	<p>The Staff considered OMB's comments in a separate context from the Strategic Plan. For the FY 2009 Performance Budget, we have developed a crosswalk laying out NRC programs and their measures (strategic outcomes, performance measures, and output measures) for each Strategic Goal. The Performance Budget also provides information on the Safety and Security activities for each NRC program.</p>

FY 2008-2013 Strategic Plan Comment Resolution Matrix

No.	Category	Commenter	Comment	Disposition
239	Security	OMB	<p>A19: NRC is not responsible for preventing these instances. That's a Homeland job. Shouldn't this outcome be something along the lines of maintain an adequate regulatory framework that minimizes potential for...?</p> <p>Prevent any instances where licensed radioactive materials are used domestically in a manner hostile to the United States. (p. 10)</p>	<p>The Commission considered OMB's comments. However, the original language was kept because the NRC has the primary responsibility under the Atomic Energy Act of 1954, as amended, as well as the Energy Policy Act of 2005 with respect to security associated with the use of nuclear materials by licensees. The Security Goal strategies reflect that the agency cooperates with appropriate partners, including the Department of Homeland Security, on security matters.</p>
240	Security	OMB	<p>A22: Too specific for a strategic plan.</p> <p>Oversee licensee security performance through inspections and force-on-force exercises. (p. 11)</p>	<p>The Commission considered OMB's comments. However, the agency believes that it must emphasize security performance under the Security goal in the Strategic Plan.</p>
241	Security	OMB	<p>A23: This suggests your regulatory framework has to change every time there is a change in the threat environment. Shouldn't the two be somewhat independent, meaning the reg framework should be flexible enough to handle changes in threat level?</p> <p>Assess the threat environment to maintain an adequate regulatory framework (p.11)</p>	<p>The Commission considered OMB's comments. However, the original language was kept. NRC's regulatory framework seeks to reduce regulatory burden while ensuring that regulations are adequate to maintain the Security Strategic Objective. The framework does not change, rather it is designed to adapt to changes in the threat environment.</p>
242	Organizational Excellence	OMB	<p>A34: Why is this not efficiency or at least effectiveness and efficiency? Both are discussed below and both are important.</p> <p>Effectiveness: NRC actions are of high quality, efficient, realistic, and to enable the safe and beneficial uses of radioactive materials. (p. 14)</p>	<p>The Commission considered OMB's comments. However, in this context, it is assumed that Efficiency is included in the broader concept of Effectiveness.</p>