MEMORANDUM TO: Annette Vietti-Cook, Secretary

FROM: Nils J. Diaz

SUBJECT: COMSECY-99-042 -- DRAFT NUCLEAR REACTOR SAFETY CHAPTER OF THE STRATEGIC PLAN

The Reactor Safety Chapter of the Strategic Plan has been improved by being shortened and more clearly formulated. Consistent with my recent comments on the draft Materials and Waste chapters, I remain concerned about: the eventual length of the entire plan, including the level of detail in many areas; the use of "zero" as a metric, since it is inconsistent with our limited span of control, and; repetition of material among the various sections of the strategic plan.

I do agree that the four performance goals are valuable and necessary concepts. However, as currently formulated, they more closely resemble strategies than specific statements of attainable objectives derived from our statutory mandate. Therefore, in order to clearly link performance goals and agency activities, the staff should more crisply define the performance goals when simplifying the final strategic plan.

As a specific comment, the third external factor on page 17 should be updated to reflect the restructuring (mergers) in the electric utility industry.

cc: Chairman Meserve
Commissioner Dicus
Commissioner McGaffigan
Commissioner Merrifield
EDO
CFO