

September 5, 2006

Mr. Horst Greczmiel
Associate Director for NEPA Oversight
Council on Environmental Quality
Executive Office of the President
722 Jackson Place, N.W.
Washington, D.C. 20503

Mr. Greczmiel:

This is in response to the Council on Environmental Quality's (CEQ) Notice and Request for Comments regarding Environmental Management Systems (EMS) and the National Environmental Policy Act (NEPA) (71 FR 40520).

The proposed guide "Aligning the Complementary Processes of Environmental Management Systems and the National Environmental Policy Act," characteristically reflects the integration of EMS and NEPA for Federal natural resource and land management agencies in the Executive Branch. The U. S. Nuclear Regulatory Commission's (NRC) actions and activities are distinctly regulatory in nature. As we have identified in the past, the NRC does not have mission responsibilities to manage natural resources or land for the Federal government. Consequently, our regulatory activities do not fit the model of EMS and complementary principles, such as "adaptive management" or "mitigated findings of no significant impact."

We appreciate the opportunity to comment on this matter, but recognize that it does not apply to agencies outside of the Executive Branch. If you have any questions, please contact me at 301-415-3340 or Mr. Osiris Siurano of my staff. Mr. Siurano can be reached at 301-415-2307 or e-mail: osp@nrc.gov.

Sincerely,

/RA/

Janet R. Schlueter, Director
Office of State and Tribal Programs