

**ATTACHMENT**

# **PUBLIC COMMUNICATIONS IMPLEMENTATION PLAN**

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## INTRODUCTION:

NRC is engaged in a significant culture change. Currently, the NRC is evaluating the benefit of measuring outcomes against a set of four criteria. These criteria are: 1) maintaining safety, 2) reducing unnecessary regulatory burden, 3) increasing efficiency and effectiveness, and 4) increasing public confidence. These criteria guided the staff in developing this implementation plan for the public communications initiative, described in SECY-98-089, especially in terms of increasing public confidence. An important part of establishing public confidence is the nature and quality of our public communications. Early identification of public concerns and timeliness of our communications are important responsibilities in establishing public confidence. Improving timeliness in communications means including the public at the beginning of a decision process, instead of as an afterthought. In order to achieve this, an integral part of our planning will consist of looking at how we communicate with the public and involving them early in our planning.

The staff recognizes that the methods of communicating to the public, with clarity and sensitivity, are as important as the content of the message. The Commission directed that the plan include general principles for effective communications with the public which are simple. Examples are being able to tell citizens what risk licensees pose to them, how safe the facilities are, and how those risks might be judged. The unifying theme of the tasks that will be performed to enhance public communications will be clarity and sensitivity to public concerns. The staff will be asked to try to put themselves in the position of an intelligent, but technically uninformed member of the public. What if that staff member had to evaluate a risk posed from an unfamiliar source? This risk could be a biological weapons storage facility in their neighborhood or a shipment of toxic chemical waste through their town. What questions would they need to have answered to provide reassurance of the safety of the activity? The staff will be asked to keep these questions in mind as they develop communications products in response to the recommendations in SECY-98-089.

SECY-98-089 divided the public communications recommendations into five broad categories: (1) clarity and timeliness of communications, (2) the public involvement process, (3) responsiveness to public inquiries, (4) public access to information, and (5) public outreach. The recommendations from SECY-98-089 were further refined into tasks in each of the five categories.

To improve clarity and timeliness of communications, tasks were approved to make written and spoken language more understandable. These included reviewing staff training in public communications, providing tutorials for public meetings, and including Executive Summaries in high profile reports. Tasks were also approved that expanded the plain English glossary and encouraged staff use. A task was approved to review Senior Executive Service (SES) and non-SES performance appraisals to encourage clear communications and responsiveness to the public. Tasks were also approved to aid the staff in becoming more proactive in reacting promptly to concerns and developing grass roots systems for early warning. These tasks included enhancing communications with local governments, providing balance in conveying findings, and providing early warning of serious public concerns.

To improve the public involvement process, tasks were approved to encourage early public involvement in rulemaking. Tasks include developing a Public Involvement Handbook and a training course on its use. Tasks were also approved to encourage public involvement in rulemaking plans and to ask staff to refine lists of stakeholders. In addition, tasks were approved to encourage public involvement exploration and to encourage regional staff to share

successful communications practices.

To improve responsiveness to public inquiries, tasks were approved to give the staff guidance on handling correspondence in a timely, responsive manner. Tasks include requiring notification of delays in correspondence and providing guidance to the staff on handling e-mails.

To improve public access to information, tasks were approved to update the agency strategy for providing information in an electronic age. Tasks include updating the agency public communications strategy and reassessing the information required from licensees.

To improve public outreach, tasks were approved to educate the public without being promotional, and to broaden the staff knowledge of the entire agency. Tasks include developing standard and informational presentations, establishing a central audiovisual library, and expanding the student corner of the NRC website. Tasks were also approved to establish a speaker's bureau and encourage NRC technical staff to become familiar with all aspects of agency operations.

#### DISCUSSION:

In developing a more specific implementation plan, we examined the direction given in SECY-98-089 and the corresponding Staff Requirements Memorandum (SRM). Four principal themes were identified: 1) develop a short and flexible implementation plan, 2) ensure offices and regions have the responsibility for implementation of this plan, 3) integrate tasks into existing programs to maximize the use of limited resources, and 4) focus on clarity and sensitivity to public concerns. The following discussion provides details on how the implementation plan incorporates the four themes.

The staff was directed by the Commission to provide a short and flexible implementation plan, that includes general principles for effective communications and a series of milestones which can be easily implemented. We have solicited input from office and regional staff to develop this plan, which provided flexibility in the plan for addressing specific office needs. This helped us define a specific product for each approved task, specify a responsible individual in each office, and set a milestone schedule. The tasks are described in detail in the pages that follow. The tasks from SECY-98-089 are listed in a summary table in the appendix.

In their recommendations, the Executive Council (EC) suggested that the responsibility for implementing the methodology should reside with the program offices and regions. For this reason, we identified a responsible individual for tasks in the affected office, and solicited input from the individuals into the development of the implementation plan. By asking offices to take responsibility for the individual tasks, the implementation of this plan can be incorporated into the operating plans and budgets of the individual offices as envisioned by the EC recommendations.

The EC also recommended exploring what tasks could be performed in a manner that would have little resource impact and could be integrated into existing programs. For that reason, many of the tasks build on refining or revising what is already available. In many cases, there has already been progress on some of the tasks, with the offices moving forward on tasks that require minimal resource commitments. There are, however, significant unbudgeted costs associated with some tasks, such as training, development of a Public Involvement Handbook and development of videotapes. These initiatives will be considered in the upcoming FY2001

budget review based on their likely contribution to public confidence goals and costs.

The principal products of this implementation plan are guidance to the staff, training classes, the Public Involvement Handbook (Task IIB2), and presentation materials. These public involvement tools will prepare the staff to convey information effectively to the public. Techniques for communicating risk to the public will be presented in the products developed under this implementation plan. This type of guidance will be presented in the Public Involvement Handbook, and the training classes that will use the Handbook as a teaching aid.

The fundamental purpose of the plan is to improve external communications, but some tasks focus on improving our internal communications, to support stronger external communications. There are other initiatives underway that focus more on improving internal communications, but are not discussed in depth in this paper. This implementation plan has been closely coordinated with the other initiatives.

The agency is also involved in the President's Plain Language Action Plan, to improve our external communications. Many of the approved tasks in the public communications implementation plan can help us fulfill our commitments in the Plain Language Action Plan. By following the guidance given in the Plain Language Action Plan, the products developed from the tasks will help us to improve the quality, clarity, and credibility of agency communications. Specific tasks that will help us fulfill these commitments are:

- Task IA3 - High profile reports - inclusion of an executive summary in plain English
- Task IA4 - Public meetings - inclusion of a brief tutorial
- Task IB1 - Update glossary of nuclear expressions on NRC web page
- Task IB2 - Distribute the glossary to all NRC employees with guidance to limit use of jargon
- Task IB3 - Convey findings in a balanced way, neither overstating nor minimizing concerns
- Task IC1 - Include a performance appraisal element for public communications

Various activities within the Plain Language Action Plan will provide improvement in our public communications. These activities include guidance to the staff on the use of plain language in all of our documents as well as a comment page on our external web site that solicits feedback from the public on the clarity of our documents. As mentioned in the discussion page for Task IIA1, all rulemaking packages will solicit comments on the clarity of our rules after 1/1/99. This feedback from the public should provide the staff with an opportunity to improve communications in areas that the public finds especially troublesome.

#### FUTURE OF PLAN:

This paper conveys the February 1999 version of this implementation plan. It is expected that it will take over two years to complete the tasks with specific milestones. Some of the tasks will be ongoing, but the staff does not expect this implementation plan to continue indefinitely. Instead, the staff expects that the focus and tasks of this implementation plan will become institutionalized in our processes of public communications. The part of this plan that will continue is that the DEDE will continue to be responsible for ensuring the staff pursues a strong public communications program. The tasks of this plan will be monitored over time to see that its commitments are realized. To ensure that this implementation plan is meeting the objectives of SECY-98-089 and the associated SRM, the DEDE will review the progress of the tasks and provide a report to the Commission on July 1, 1999.

# **I Clarity and Timeliness of Communications**

## **Issue IA: Make written and spoken language more understandable**

### **IA1/IA2: Training - improved communications techniques**

Recommendation: HR, in cooperation with OPA, should review existing training activities to determine how the responsibilities and techniques for public communication can be incorporated effectively and efficiently and to the extent possible within existing resources. After this review, the specific costs of developing, providing and receiving any new training activities deemed necessary will be identified.

Lead office: OPA (Beecher)  
Support Offices: HR (Mason)

Product: Review of existing training activities

Status: After review between Eileen Mason, HR, and William Beecher, OPA, it was agreed there are no courses currently available at the NRC which fulfill the objectives of this CCC proposal. The class that is similar in content is a three-day course on Communications for NRC Inspectors, and that could be revised to become a Communications for NRC Regulators course. However, a three-day course would require a significant expenditure of staff time for attendance. A Media Workshop course, to discuss how staff can deal with the press, is available on request, but that doesn't approach the objective of the CCC proposal either.

Both Ms. Mason and Mr. Beecher support two new courses: one half-day course aimed at motivating and getting buy-in from the core of supervisors who oversee staff reports and public presentations on the need for improving public communications, and one full-day course involving hands-on instruction of supervisors with each of their teams. This course would demonstrate and provide practice in the most effective way to write reports that are understandable to members of the general public.

The course for supervisors is envisioned as a large, somewhat interactive lecture involving about 100 supervisors at a time. Four in one year would essentially cover the supervisory population.

The hands-on sessions would be in small groups, scheduled as needed, throughout the year.

#### Milestone(s):

Design and develop half-day seminar for supervisors September 1999

Estimated resources \$12K

Estimated attendance costs: 0.8 FTE for attendance in FY2000

Design and develop small one-day workshop for supervisors and their staffs on improving clarity of written communications September 1999

Estimated resources: \$25K

Estimated attendance costs: 3.6 FTE for attendance as part of integrated training schedule

Funds for design and development of both courses have been earmarked in HR's current budget. Both courses would be delivered in coordination with our overall integrated training schedule.

## **I Clarity and Timeliness of Communications**

**Issue IA: Make written and spoken language more understandable**

**IA3: High profile reports (inclusion of executive summary in plain English) and public meetings (brief tutorial)**

Recommendation: Office of Nuclear Reactor Regulation (NRR) and Office of Nuclear Material Safety and Safeguards (NMSS) should revise applicable guidance documents to require an Executive Summary in “plain English” for high profile reports such as AITs, IITs, SETs, DETs, OSTs and RATIs. DEDE will review current guidance on conducting public meetings to identify potential for improvement.

Lead offices: NRR (Newberry), NMSS (Surmeier), EDO (Lund)

Product: Review and revise of applicable guidance documents

Status: Some guidance for high profile reports currently requires an Executive Summary. For example, this is true for reports covered by NRC Inspection Manual Chapter 0610 and the Incident Investigation Manual (NUREG-1303). In addition, NRC Inspection Manual Chapter 0610 provides guidance on inspection report style, suggesting many plain language principles. Each office will need to systematically review all applicable guidance to incorporate requirements for an Executive Summary and use of plain language in high profile reports. EDO staff will review current guidance on conducting public meetings to identify potential for improvement.

Milestone(s): Review and revision by 12/99



## **I Clarity and Timeliness of Communications**

**Issue IA: Make written and spoken language more understandable**

**IA4: Revision of Management Directive 3.5 “Public Attendance at Certain Meetings Involving the NRC Staff” and 3.7 “Distribution of Unclassified and Contractor-Generated Documents”**

Recommendation: The DEDE should review applicable guidance documents and recommend changes.

Lead office: EDO (Lund)

Product: Review and revise of applicable guidance documents/announcement of changes via memorandum from the Executive Director for Operations (EDO)

Status: EDO staff will review Management Directive (MD) 3.5 “Public Attendance at Certain Meetings Involving the NRC Staff” and 3.7 “Distribution of Unclassified and Contractor-Generated Documents.” The staff will recommend changes consistent with Issue IA3.

Milestone(s): The staff will recommend changes consistent with Issue IA3 by 8/99

## **I Clarity and Timeliness of Communications**

**Issue IB: Expand plain English glossary and encourage staff use**

**IB1: Update glossary of nuclear expressions on website**

Recommendation: Once a year OPA should request program offices to provide an update to the glossary of technical terms, acronyms and complex expressions which would then be posted to the NRC website.

Lead office: OPA (Hayden)

Support offices: ALL

Product: Update glossary annually on external and internal web page

Status: The glossary was established on the external website in 9/97. The Glossary of Nuclear Terms exists in a School Programs section under the Public Participation & School Programs hot link. Links to other pages, such as NRC's collection of Abbreviations (NUREG-0544), will be considered as appropriate. OPA will solicit input from all NRC offices, and will update the glossary on the Web at least yearly. OPA will notify the staff when the glossary is updated and solicit additional input.

Milestone(s): Glossary established 9/97, updates planned annually. Reminder to staff that glossary is available on website will be issued 3/99.

## **I Clarity and Timeliness of Communications**

**Issue IB: Expand plain English glossary and encourage staff use**

**IB2: Publicize glossary**

Recommendation: OPA should inform the staff when the updated glossary has been posted on the home page.

Lead office: OPA (Hayden)

Support office: OCIO

Product: See Task IB1, "Update glossary"

Status: See Task IB1, "Update glossary"

Milestone(s): See Task IB1, "Update glossary"

## **I Clarity and Timeliness of Communications**

**Issue IB: Expand plain English glossary and encourage staff use**

**IB3: Conveying findings in a balanced way**

Recommendation: Encourage both the Commission and topmost NRC management to periodically stress to staff the need for conveying NRC findings not only clearly but in a carefully balanced way, neither overstating nor minimizing our concerns. This message should also be reinforced in training, guidance documents for writing reports and in preparation for public meetings.

Lead office: EDO (Lund)

Product: Review and revise training and guidance documents for writing reports and preparation for public meetings

Status: Balance (context) is currently discussed in the following documents:

- ▶ NRC Inspection Manual Chapter 0610 (issue date 6/22/98), and
- ▶ Sam Collin's (12/1/98) memorandum to Frank Miraglia on NRR's response to Task IVB1, that summarized the review of information required from licensees.

EDO staff will provide a review and revision of training and guidance documents for writing reports (MD 3.7) and for preparing for public meetings (MD 3.5). An appropriate message on balance will be included in the documents.

Milestone(s): Review and revise by 6/99

## **I Clarity and Timeliness of Communications**

**Issue IB: Expand plain English glossary and encourage staff use**

**IB4: OPA/staff coordination**

Recommendation: Public Affairs officers should obtain technical staff's initial evaluation of events before discussing an event with the public or the media, ensuring there is not speculation on second and third order scenarios. Technical staff, in writing about an event in a format that will be posted on the Internet, should discuss their description with a Public Affairs officer to assure clarity and sensitivity to public perceptions. OPA should reflect this practice in appropriate guidance and procedures documents.

Lead office: OPA (Beecher)

Product: Issue affirmative statements from the Executive Director for Operations (EDO), OPA Director, and Regional Administrators (RAs) reminding staff to coordinate public communications

Status: This, essentially, was a reaffirmation of what is happening today in the field offices--closer interactions between technical staff with OPA officers. It reminds OPA personnel they should get the staff's initial evaluation of an event before dealing with the press and should not speculate on second and third order scenarios. It was also hortatory in that it encouraged technical staff, in writing about an event in a format that would go public--as on NRC's website--they should discuss their descriptions with OPA officers to ensure they convey to the public with sensitivity what they intended to convey. All this is underway in all four regions.

This message could be reinforced by the EDO at his weekly staff conferences from time to time, by the OPA director during his weekly conference call, and by the Regional Administrators at their staff meetings.

As a product for this task, the EDO, the director of OPA and the RAs will issue affirmative statements to each of their staffs reminding them this is the way they are expected to interact. In this case, OPA will coordinate the issuing of affirmative statements from the EDO, OPA director, and RAs reminding staff to coordinate public communications.

Milestone(s): Affirmative statements will be issued by 3/99

## **I Clarity and Timeliness of Communications**

**Issue IC: Treat public as a most important client**

**IC1: Performance appraisal element for public communications**

Recommendation: HR should review existing Senior Executive Service (SES) and non-SES elements and provide suggested modifications for use by managers in developing future appraisal criteria. This criterion will ensure rating on effectiveness in clear communications (oral and written) and responsiveness to the public.

Lead office: HR (Mason)

Product: Review SES and non-SES elements and provide suggested modifications

Status: Rating factors already address effectiveness in clear communications and responsiveness to public in SES appraisals, but not in non-SES appraisals. HR will review wording for SES appraisals and will develop standard wording for non-SES appraisals.

Milestone(s): Review and suggested modifications by 6/99

## **I Clarity and Timeliness of Communications**

**Issue ID: Become more proactive in reacting promptly to concerns**

**ID1: Early warning of serious public concerns**

Recommendation: As a regular feature at the Executive Director's weekly Friday staff conference, query the Agency's top managers for issues of potentially serious public concern looming on the horizon that ought to be considered on an intra-agency basis.

Lead office: OPA (Beecher)

Support office: EDO

Product: Suggestion to EDO Friday staff meeting attendees to bring up potentially serious public concern issues

Status: On Friday, January 22, 1999, William Beecher, Director of OPA, urged the senior managers to be alert to small problems looming on the horizon. He suggested discussing the problems at the EDO's staff conference. Mr. Beecher said he would take responsibility for looking into such reports and, as appropriate, making recommendations on what actions might be taken to resolve such problems early.

Milestone(s): Suggestion to EDO Friday staff meeting attendees by 1/22/99 (completed)

## **I Clarity and Timeliness of Communications**

### **Issue IE: Develop grass roots system for early warning**

#### **IE1: Public involvement training**

Recommendation: Modify existing training courses for license reviewers, inspectors, and technical project managers to include discussions of the need to bring budding issues of public concern to NRC management at the earliest time.

Lead office: HR (Mason)

Product: Review and modify existing training courses for license reviewers, inspectors, and technical project managers

Status: (See Issue IA1) As with the review of training resources in Task IA1, HR is reviewing existing courses to maximize their effectiveness. This review will be performed within 3 months after the Public Involvement Handbook is developed. The handbook will provide guidance on the type of training that will be required. Implementation and training strategy for public involvement training will be developed after the Public Involvement Handbook is completed.

Milestone(s): Review and modification of existing training courses - 3 months after completion of Public Involvement Handbook



## **I Clarity and Timeliness of Communications**

**Issue IE: Develop grass roots system for early warning**

**IE2: Communications with local governments**

Recommendation: Regional Administrators and program managers should periodically review their procedures for notification of local government officials to ensure good communications continue.

Lead office: RAs

Support office: Office of State Programs (OSP) - (Droggitis)

Product: Review procedures for notification of local governments to ensure good communications continue

Status: As noted in SECY-98-089, this recommendation does not fully acknowledge the significant ongoing activities with local governments. The activities are in areas such as previous SALP meetings, watch list plants, service list distributions and areas of local interest. RAs, with the help of the State Liaison Officers in each region, will review procedures and compare these procedures with other regions (see Task IIB4) to ensure good communications practices are shared between regions.

Milestone(s): Review will be completed 4/99

## **II The Public Involvement Process**

### **Issue IIA: Plan early public involvement in rulemaking**

#### **IIA1: Public involvement in rulemaking plans**

Recommendation: Public involvement should be considered in developing rulemaking plans. For some “high interest” rulemakings, more detailed planning for public involvement may be necessary.

Lead office: ADM (Meyer)

Support Office: NRR, NMSS

Product: Include request for public comment on new rules

Status: David Meyer, Rules and Directives Branch Chief, has communicated the requirements for plain language in rules to his staff. In addition, he is developing a training seminar with the help of Eileen Mason in HR. This training seminar will provide NRC rulemaking project managers additional guidance in plain language writing skills. He expects this training seminar to be provided in the April-May 1999 timeframe for the approximately 50 NRC staff who are lead authors of rulemaking actions.

The NRC has received a significant amount of feedback on draft rules from the public. This feedback has been provided through the posting of these proposed rules on the Technical Conference portion of the NRC rulemaking web site. Draft rules that have not yet been published, but have been approved by NRC management, have been available to the public in this manner since the summer of 1998.

Additionally, we are soliciting feedback from the public with respect to Plain Language in rulemaking packages with a standard paragraph included in all proposed rules. Since January 1, 1999, all published proposed rules have included the following standard paragraph:

“The Presidential Memorandum dated June 1, 1998, entitled, “Plain Language in Government Writing,” directed that the Federal government’s writing be in plain language. The NRC requests comments on this proposed rule specifically with respect to the clarity and effectiveness of the language used. Comments should be sent to the address listed above.”

Milestone(s): Request for public comment on new rules since 1/1/99 (completed)

## **II The Public Involvement Process**

### **Issue IIA: Plan early public involvement in rulemaking**

#### **IIA3: Public involvement exploration at weekly EDO staff meetings**

Recommendation: Actions or events which may necessitate additional public involvement should be routinely explored at weekly EDO staff meetings.

Lead Office: EDO

Support Offices: OGC (Cameron)

Product: Direction to explore actions or events which may necessitate additional public involvement

Status: SECY-98-089 suggested that OPA regularly attends EDO staff meetings and this is an appropriate question for the OPA representative to raise. OGC will actually take the lead on this task, to explore public involvement for certain issues. The action in this task is to give appropriate verbal direction from the EDO to the senior managers.

Milestone(s): Verbal direction from the EDO to senior managers by 3/99

## **II The Public Involvement Process**

### **Issue IIB: Develop comprehensive plan for public involvement**

#### **IIB1: Preparation of public involvement plans**

Recommendation: Major initiatives, such as a proposed reactor decommissioning, should require preparation of a public involvement plan.

Lead offices: OGC (Cameron), RAs, NRR, NMSS, RES, OSP, OPA, ADM

Product: Implementation plan will follow development of Public Involvement Handbook

Status: SECY-98-089 recommended that the actions to implement this recommendation should follow development of the Public Involvement Handbook. Based on this recommendation, OGC and OPA will develop an implementation plan within 3 months after the development of the handbook.

Milestone(s): Implementation plan will be prepared 3 months after development of Public Involvement Handbook

## II The Public Involvement Process

### Issue IIB: Develop comprehensive plan for public involvement

#### IIB2: Public Involvement Handbook

Recommendation: Develop a Public Involvement Handbook for the staff for use both in a new training course and as a handy reference in implementing public involvement activities.

Lead office: OGC (Cameron)

Support offices: HR, OPA

Product: Develop a Public Involvement Handbook

Status: A public involvement handbook was prepared by SES candidate program participants in 1995. There have been concerns about how wide the distribution for this handbook has been, and how “user-friendly” the handbook is for the readers. Chip Cameron of OGC developed an implementation plan that not only revises and expands the current handbook, but also ties it to training and information dissemination activities. One strategy is based on the bulk of the work being performed in-house by Mr. Cameron. The other strategy is to have a contractor write the handbook. He believes that a small amount of contract funds (approximately \$40K) to have an outside expert develop the Handbook would not only get us a product substantially sooner, but they could also more effectively incorporate the range of public participation experience from other governments agencies and private companies. We recommend that the handbook be developed by a contractor. For a relatively minor cost, the development schedule can be accelerated significantly, and the product will reflect successful public involvement practices from other entities. Milestone schedules for each approach are given below (for a February 15, 1999 starting date).

Milestone schedule for in-house development:

Identify all relevant NRC materials	March 19, 1999
Develop outline of hand book	April 9, 1999
Complete evaluation of the public participation experience of other agencies and organizations	August 15, 1999
Draft Handbook complete and circulated for review	December 31, 1999
Comments in from internal review	January 31, 2000
Develop plan for “roll out” of the Handbook	January 31, 2000
Final Handbook	March 30, 2000

Milestone schedule for contractor development:

Draft Handbook complete and circulated for review	September 1, 1999
Final Handbook	October 31, 1999

(Estimated costs: approximately \$40K for contractor support.)

Recommended approach is to use a contractor for handbook development

## **II The Public Involvement Process**

### **Issue IIB: Develop comprehensive plan for public involvement**

#### **Issue IIB3: Stakeholder lists**

Recommendation: Each organization within NRC should continue to maintain their own lists of stakeholders based on the specific program, issue or site. Offices will be requested to refine these lists in the course of implementing existing programs and projects.

Lead office: EDO (Lund)

Product: Each organization will continue to maintain and refine their own lists in the course of implementing existing programs and projects; DEDE will make determination if additional action is necessary

Status: This recommendation was reduced in scope by the EC from the original CCC recommendation. Compilation of specialized lists of stakeholder contacts with interest in various NRC regulatory activities was suggested in the original recommendation. The EC recognized that this would be a substantial initial and ongoing effort in terms of agency resources, so it recommended a refinement of existing lists.

The DEDE recognizes that resources for an agency-wide list would include detailing a individual responsible for the collection, organization, and maintenance of such a database of contacts. In addition, the individual would have to develop strategies to ensure staff awareness of the database and staff use of the database.

The EDO staff has taken a quick look at how the offices create and maintain stakeholder lists. In many cases the stakeholders tend to be self-identifying, and the offices seem to know where their weaknesses are in identifying stakeholders. There are also activities underway to help the staff understand how to identify stakeholders for "high interest" issues, namely the Arthur Andersen self-study that the program offices are participating in. Based on these ongoing activities, the EDO staff recommend that this task be revisited in 7/99 to determine if further action is warranted on this task.

Milestone(s): Revisit in 7/99

## **II The Public Involvement Process**

### **Issue IIB: Develop comprehensive plan for public involvement**

#### **IIB4: Regional best practices**

Recommendation: Apply uniformly in all regions public involvement initiatives that have proven successful in one. Regional Public Affairs Officers (PAO) should compose best practices and OPA should distribute a consolidated list of ideas.

Lead offices: OPA (Beecher, regional PAO's)

Product: Regional PAO's should compose best practices and OPA should distribute a consolidated list of ideas

Status: Direction to PAO's to compose a list of best practices will come from NRC Headquarters OPA, who will distribute a consolidated list of ideas. Regional administrators meet once per year, following senior management meeting. The next meeting is scheduled for 6/99. Regional best practices should be an agenda item for this meeting. This would also be a good forum for discussing other ways to communicate between the regions.

Milestone(s): Quarterly, beginning third quarter FY99

## **II The Public Involvement Process**

### **Issue IIC: Special training course to increase staff understanding**

#### **IIC1: Public involvement processes training course**

Recommendation: The Commission should establish an NRC-specific training course on the objectives, design, and implementation of public involvement processes. (From Issue IA1: In reviewing existing training courses, efforts should be made to ensure that best public involvement practices are included in current curricula. If special training is deemed necessary, this should be proposed, with rationale and projected costs provided.)

Lead office: HR (Mason)

Support Offices: OPA, OGC

Product: Contractor-led public involvement processes class was given June 9 - 11, 1998; product is developed but revision is recommended

Status: A contractor-led public involvement processes class was given on June 9 - 11, 1998. The class is now an off-the-shelf product that can be used currently for public involvement processes training. Ms. Mason noted that the content of the class could be improved, and should be consistent with the information and direction provided in the Public Involvement Handbook. The the Public Involvement Handbook, when developed, could also be used as a training aid for the class. The class will be reviewed for consistency and comprehensiveness within three months after the development of the Public Involvement Handbook.

Milestone(s): Review of class curriculum within three months after development of the Public Involvement Handbook



### **III Responsiveness to Public Inquiries**

**Issue IIIA: Handle all correspondence in a timely, responsive manner**

**IIIA2: Notification of delays in correspondence**

Recommendation: Require that in the case of Commission correspondence on substantive issues, when a significant delay is deemed necessary, that the party who wrote the letter of inquiry should be informed by phone, mail or e-mail of a delay, given an explanation, and provided a best estimate on when to expect a response. Management Directive 3.57 "Principal Correspondence" should be amended to include this requirement, including a mechanism for requesting extensions when necessary.

Lead offices: SECY, EDO (Lund)

Support office: CIO

Product: Guidance for responsiveness already exists in MD 3.57; will provide reminder to staff from DEDE of this requirement

Status: This type of guidance already exists in Management Directive 3.57. The guidance requires notification of the correspondence originator if delays greater than 15 days are anticipated. DEDE will provide reminder to staff of this requirement by 3/99.

Milestone(s): Reminder from DEDE by 3/99

### **III Responsiveness to Public Inquiries**

#### **Issue IIIB: Develop a policy for handling e-mail**

##### **IIIB1: Screening process for e-mails**

Recommendation: Establish screening process to apply when e-mails first come in. The procedures for handling e-mail need to be amplified. The EDO will organize a working group to address this issue.

##### **IIIB2: Responsiveness to e-mails**

Recommendation: If an e-mail is treated as an allegation or tabbed for a written agency response, the recipient should so inform the sender. Also, a mailing address should be requested if one is not provided and, if necessary, a substantive clarification should be sought at that time.

##### **IIIB3: Informing appropriate NRC offices of e-mails**

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Recommendation: Inform other appropriate NRC offices of the communication -- for instance, OCA if the requester is a Congressional staffer, OPA if the questions come from a reporter.

##### **IIIB4: Handling general information e-mails**

Recommendation: If an e-mail comes from a student wanting background information for a school paper, or from someone interested in general information, it could be forwarded to OPA for a response.

##### **IIIB5: Policy and procedural guidance for e-mails**

Recommendation: Management Directive 3.57 should be revised to incorporate the Commission's policy on the handling of e-mails. The new policy could be announced in a memorandum from the EDO to the staff.

Lead office: EDO (Lund)

Product: Establish working group to establish procedures

Status: A working group will be established by the OEDO, as suggested in the recommendation, to review applicable procedures and revise as necessary. This working group will contain representatives from OCIO, ADM, NRR (Allegations Advisor), and Document Control Desk staff at a minimum. The working group will explore coordination and overlap of this task with implementation of ADAMS.

Milestone(s): Establish working group 3/99

## **IV Public Access to Information**

### **Issue IVA: Update strategy for providing information in electronic age**

#### **IVA1: Updated public communications strategy**

Recommendation: Evaluate the differing ways NRC information is provided to the public and, in light of the advent of ADAMS and internet access in public libraries, suggest an updated strategy for Commission consideration.

Lead office: CIO (Scattolini)

Product: The intent of this recommendation is already addressed in activities tied to the implementation of ADAMS. These activities include the end of the Local Public Document Room (LPDR) program and implementation of the Electronic Information Exchange.

Status: This updated strategy is already underway as part of the implementation plan for Agencywide Documents Access and Management System (ADAMS). Two different activities for implementing these changes can be found in the Local Public Document Room Rule Changes and the Electronic Information Exchange.

Concurrent with the implementation of ADAMS, NRC will discontinue furnishing paper and microfiche copies of its publicly available records to the NRC Public Document Room (PDR) and the Local Public Document Rooms (LPDRs). There is a proposed Direct Final Rule titled "Electronic Availability of NRC Public Records and Ending of NRC Local Public Document Room Program" with the staff for comment that explains these changes. The target date for implementation of these changes is tied closely to the implementation schedule for public availability of ADAMS (currently targeted for 10/99).

As part of the ADAMS project, there is a three phase approach to implement Electronic Information Exchange (EIE) at the NRC. In March of 1999, The Office of the Secretary and The Atomic Safety Licensing Board Panel will be participating in a pilot project of submitting hearing documents to the NRC. This pilot will involve approximately 10 correspondents who will submit hearing documents that are digitally signed and date stamped and electronically submitted to the NRC. By July of 1999 the pilot will have be expanded to a program that will include all licensing submittals made under 10 CFR Part 50 - Domestic Licensing of Production and Utilization Facilities and will have approximately 1,000 participants. After evaluation of the expanded EIE program, a rulemaking will be developed in the Fall of 1999. This rulemaking will allow NRC correspondents to submit to or receive documents from the NRC in an electronic form.

Milestone(s): No milestones tracked under this implementation plan; both LPDR changes and EIE implementation tied to ADAMS implementation (public access targeted for 10/99)

## **IV Public Access to Information**

### **Issue IVB: Reassess what plant information is required**

#### **IVB1: Information required from licensees**

Recommendation: Review the information required of licensees by the program offices to determine what is required for safety oversight in plant status reports, Preliminary Notifications and other reports.

Lead office: EDO

Support offices: NRR (Marsh)

Product: Review information requested by program office to determine what is required

Status: NRR performed the review of the information required of licensees, and transmitted their findings in a memorandum dated 12/1/98. A memorandum was sent from the DEDE to the Director of NRR on 1/19/99, approving implementation of recommendations described in the memorandum.

NRR noted that the plant restart date was considered business information, not safety-related data. NRR elected to delete the requirement for plant restart date from the Plant Status Reports effective 11/2/98. Other recommendations were made in their review. One recommendation was eliminate superfluous reports. Another was to protect the identity of individuals involved in fitness-for-duty issues. A third recommendation was to utilize morning reports for dissemination of generic technical information that does not rise to threshold of information notice. These recommendations will be implemented by NRR through changes to guidance and procedures.

NRR proposed long term implementation through inspection manual chapter revisions (MC 0230, MC 1120, region implementing procedures). The revisions will be coordinated with ADAMS requirements for report preparation. The long term implementation is planned for 12/99.

Additional recommendations in the NRR review suggested better communications training and improving clarity in communications. These recommendations will be addressed in training tasks associated with this implementation plan (see Issue IA1).

Milestone(s): Review completed 12/98; revisions in guidance to reflect recommendations by 12/99

## **V Public Outreach**

### **Issue VA: Educate public without being promotional**

#### **VA1: Standard presentations and informational publications**

Recommendation: Clearly delineate NRC's educational responsibility and limits through the development of standard presentations and informational publications maintained at NRC headquarters.

#### **VA2: Establish a central audiovisual library**

Recommendation: Establish a central audiovisual library at NRC Headquarters to serve the entire agency, including field offices, in implementing a more proactive outreach program. Develop and maintain standardized presentations and informational publications.

#### **VA3: Update and expand standardized publications and presentations**

Recommendation: Continue current efforts in the development of standardized publications and presentations. These efforts should be updated and expanded, and attempts should be made to make the public more aware of the availability of such material, perhaps by notices on the NRC website.

Lead office: OPA (Landau)

Product: Development of presentations and publications; develop and maintain audiovisual library; update and expand current efforts; make public aware of availability via website (as resources allow)

Status: The EC recommendation in SECY-98-089 stated that although this was a desirable long term goal, it should be implemented as existing resources allow. Existing resources have allowed some progress on the above tasks. OPA, with the assistance of ADM, has already started work on this task by developing the audiovisual (AV) library. OPA sent out a Network Announcement that asked the staff for photographs and other visual aids that could be scanned into a digital library. Several hundred photos were received, and ADM worked with a contractor to scan in photographs received from the announcement. The initial set of photographs will be ready for use by the staff by 5/99. ADM will continue to add photographs as they are received and resources allow. ADM will put forms to request material from the AV library on the ADM web page on the internal web site. Viewgraphs and diagrams will follow in the AV library with no target date established at this time.

Another task recommends providing standard presentation materials for staff use. We are aware that branches and divisions have standard "off-the-shelf" presentation materials for a wide range of topics that are used to explain office business to visitors. An effort will be made to collect these standard presentations, and make them available from a central point, with a target date of 8/99.

This effort will need to be coordinated with the OCIO, to see if this effort will have to be interfaced with the implementation of ADAMS.

Milestone(s): Initial phase of AV library (photographs) ready: 5/99

## **V Public Outreach**

**Issue VA: Educate public without being promotional**

**VA4: Expand student corner of NRC website**

Recommendation: Expand the award-winning student corner of the website.

Lead office: OPA (Landau)

Product: Expand the student corner (as resources allow)

Status: The EC recommendation in SECY-98-089 stated that although this was a desirable long term goal, it should be implemented as existing resources allow. This has been already implemented as an ongoing small effort, and the student corner will be expanded in 5/99.

Milestone(s): Placing expanded student corner on website by 5/99

## **V Public Outreach**

**Issue VA: Educate public without being promotional**

**VA5: Establish a speaker's bureau**

Recommendation: Establish a Speaker's Bureau to arrange presentations to local groups such as the League of Women Voters, PTAs, Rotary and Lions Clubs, etc. Use materials contained in the audio-visual library.

Lead office: OPA (Landau)

Product: Establish a speaker's bureau (as resources allow)

Status: The EC recommendation in SECY-98-089 stated that although this was a desirable long term goal, it should be implemented as existing resources allow. There is some voluntary activity on this task by Resident Inspectors. Efforts on expanding this task will be deferred until 7/99, when this task will be reconsidered.

Milestone(s): Effort will be reconsidered 7/99

## **V Public Outreach**

### **Issue VA: Educate public without being promotional**

#### **VA7: Encourage use of audiovisual materials**

Recommendation: Encourage use of audiovisual materials: during media briefings on events; in public announcements and meetings; under emergency situations; and during other appropriate briefings, training, and speaking opportunities. An informational video on the transportation of spent fuel, which provides a balanced, factual discussion of the precautions provided during transport, the high standards required of transport containers, and worldwide experience in the transport of radioactive material, is one example of how a video would help address public questions and concerns.

Lead office: OPA (Landau)

Product: To be implemented on an ad hoc basis as resources allow

Status: The EC recommendation in SECY-98-089 stated that this recommendation should be implemented on an ad hoc basis for high profile projects as part of the public involvement plan. The video on transportation of spent fuel was projected and budgeted for FY 1999, and then again for FY 2000. The budget request, \$100,000 for the video development, has been deferred. Due to the high costs of developing videotapes on specific subjects, topics will be considered by OPA as resources allow.

Milestone(s): AV materials will be developed (see VA1); no milestones for videos  
(Estimated costs: up to \$100K for videotape development)



## **V Public Outreach**

**Issue VB: Broaden staff knowledge of the entire agency**

**VB1: Orientation and refresher training**

Recommendation: Encourage initial and refresher training for NRC technical staff on "NRC: What It Is and What It Does." Also, encourage staff to read the NRC Annual Report and Information Digest.

Lead office: HR (Mason)

Product: HR to review past attendance and recommend attendance strategies

Status: HR will review past attendance for this training course, and recommend attendance strategies which will maximize benefits within existing costs by 6/99. HR will also encourage staff to read the NRC Annual Report and Information Digest via a Yellow Announcement by that date.

Milestone(s): Review past attendance and provide recommendation by 6/99

## **APPENDIX**

CCC Recommendation	Topic	Lead/ Support Office	Product	Person(s) Responsible	Milestone(s)	Attach. page number
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IA1/IA2	Training - Improved Communications Techniques	OPA/HR	Review of existing training activities	Beecher/ Mason	Review: 1/99 Design/develop training: 9/99	4
IA3	High Profile Reports - Inclusion of Executive Summary in Plain English Public Meetings - Inclusion of brief "tutorial"	NRR, NMSS, EDO	Review and revision of applicable guidance documents	Newberry (NRR); Surmeier (NMSS); Lund (EDO)	12/99	5
IA4	Revision of Management Directive 3.5 "Public Attendance at Certain Meetings Involving the NRC Staff" and 3.7 "Distribution of Unclassified and Contractor-Generated Documents"	EDO	Review and revision of applicable guidance documents/ Announcement of changes from memorandum from EDO	Lund	8/99	6
IB1	Update glossary of nuclear expressions on NRC web page	OPA/ ALL	Update glossary annually on external and internal web page	Hayden	Glossary established 9/97, will be updated annually	7
IB2	Publicize glossary	OPA/ CIO	Establish glossary on NRC web page	Hayden	Posted 9/97 reminder 3/99	8

CCC Recommendation	Topic	Lead/ Support Office	Product	Person(s) Responsible	Milestone(s)	Attach. page number
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IB3	Conveying findings in a balanced way	EDO	Review and revision of training and guidance documents for writing reports and preparation for public meetings	Lund	6/99	9
IB4	OPA/Staff Coordination on public communications	OPA	Issue affirmative statements from EDO, OPA Director, and RAs reminding staff to coordinate public communications	Beecher	3/99	10
IC1	Performance appraisal element for public communications	HR	Review SES and non-SES elements and provide suggested modifications	Mason	6/99	11
IC2	Policy statement on public as one of our most valued clients	OPA	Will be addressed by development of implementation plan for SECY-98-089			
IC3	Reinforcement of IC2 to staff	EDO	See IC2			

CCC Recommendation	Topic	Lead/ Support Office	Product	Person(s) Responsible	Milestone(s)	Attach. page number
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ID1	Early warning of serious public concerns at weekly EDO staff meetings	OPA/ EDO	Suggestion to EDO Friday staff meeting attendees to bring up potentially serious public concern issues	Beecher	Addressed in 1/22/99 EDO staff meeting	12
ID2	Establish a standing Communications Coordinating Committee or similar group	OPA/ NRR, NMSS, RES, OSP	Not an approved task			
IE1	Public involvement training	HR	Review and modify existing training courses for license reviewers, inspectors, and technical project managers	Mason	Within 3 months of completion of public involvement handbook	13
IE2	Communications with local governments	RAs/ OSP	Review procedures for notification of local governments to ensure good communications continue	Droggitis	Review: 4/99	14

CCC Recommendation	Topic	Lead/ Support Office	Product	Person(s) Responsible	Milestone(s)	Attach. page number
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IIA1	Public involvement in Rulemaking Plans	ADM/ NRR, NMSS	Include request for public comment on new rules	Meyer	1/1/99	15
IIA2	Periodic assessment by division directors of whether a public meeting is required for certain issues	RAs, NRR, NMSS, RES, OSP	Not an approved task			
IIA3	Public involvement exploration at weekly EDO staff meetings	EDO/ OPA	Direction to explore actions or events which may necessitate additional public involvement	Cameron	3/99	16
IIB1	Preparation of public involvement plans	RAs, NRR, NMSS, RES, OSP, OPA, ADM/ OGC	Implementation plan will follow development of Public Involvement Handbook	Cameron	3 months after development of Public Involvement Handbook	17
IIB2	Public Involvement Handbook	OGC/ HR, OPA	Develop a Public Involvement Handbook	Cameron	In-house 3/2000 contractor 10/99	18

CCC Recommendation	Topic	Lead/ Support Office	Product	Person(s) Responsible	Milestone(s)	Attach. page number
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IIB3	Specialized lists of stakeholder contacts	DEDE	Each organization to continue to maintain and refine their own lists in the course of implementing existing programs and projects; DEDE will make determination if additional action is necessary	Lund	Revisit in 7/99	19
IIB4	Regional best practices for public communications	OPA	Regional PAO's should compose best practices and OPA should distribute a consolidated list of ideas	Beecher, regional PAOs	Quarterly, beginning 3 <sup>rd</sup> quarter FY99	20

CCC Recommendation	Topic	Lead/ Support Office	Product	Person(s) Responsible	Milestone(s)	Attach. page number
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IIC1	Public involvement processes training course	HR/OPA, OGC	Contractor-led public involvement processes class was given June 9 - 11, 1998; product is developed but revision is recommended	Mason	Within 3 months of completion of public involvement handbook	21
IID1	Incorporate objectives into Strategic Plan	CFO	Not an approved task			
IID2	Develop and conduct survey of active NRC stakeholders	OGC/ OPA	Not an approved task			
IID3	Revise Management Directive 6.3	ADM/ NRR, NMSS	Not an approved task			
IID4	Annual public meeting with stakeholders	DEDE, OGC, OPA/ Offices, Regions	Not an approved task			
IIIA1	Formal tracking for all correspondence	NRR, NMSS, RES	Not an approved task			



CCC Recommendation	Topic	Lead/ Support Office	Product	Person(s) Responsible	Milestone(s)	Attach. page number
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IIIA2	Notification of delays in correspondence	EDO, SECY/ CIO	Guidance for responsiveness already exists in MD 3.57; will provide reminder to staff from DEDE of this requirement	Lund	3/99	22
IIIB1	Screening process for e-mails	EDO	Establish working group to establish procedures	Lund (chair working group)	Start 3/99	23
IIIB2	Responsiveness to e-mails	NRR/ NMSS, Regions	Establish working group to establish procedures	See IIIB1	See IIIB1	23
IIIB3	Inform appropriate NRC offices of e-mail	ALL	Establish working group to establish procedures	See IIIB1	See IIIB1	23
IIIB4	Handling general information e-mail requests	ALL	Establish working group to establish procedures	See IIIB1	See IIIB1	23
IIIB5	Policy and procedural guidance for e-mails	CIO	Establish working group to establish procedures	See IIIB1	See IIIB1	23

CCC Recommendation	Topic	Lead/ Support Office	Product	Person(s) Responsible	Milestone(s)	Attach. page number
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IVA1	Updated public communications strategy	CIO	No new products envisioned: end of LPDR program and implementation of EIE will be tied to ADAMS implementation	Scattolini	No milestones tied to the LPDR program and EIE will be tracked under this implementation plan	24
IVB1	Information required from licensees	EDO/ NRR	Review of information to determine what is actually required	Marsh	Review completed 12/1/98; revisions to guidance 12/99	25
VA1	Standard presentations and informational publications	OPA	Development of presentations and publications (as resources allow)	Landau	Photos ready: 5/99	26
VA2	Central audiovisual library	OPA	Develop and maintain audiovisual library (as resources allow)	Landau	Photos ready: 5/99	26

CCC Recommendation	Topic	Lead/ Support Office	Product	Person(s) Responsible	Milestone(s)	Attach. page number
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VA3	Update and expand standardized publications and presentations	OPA	Update and expand current efforts, and make public aware of availability via website (as resources allow)	Landau	Photos ready: 5/99	26
VA4	Student corner of the NRC website	OPA	Expand the student corner (as resources allow)	Landau	5/99	27
VA5	Speaker's bureau	OPA	Establish a speaker's bureau ( as resources allow - no current activity, but will be reconsidered as resources allow)	Landau	Effort will be reconsidered 7/99	28
VA6	Early and substantial communications with the public	RAs/ NRR, NMSS	Not an approved task; the EC believed that this would be adequately implemented through other recommendations			

CCC Recommendation	Topic	Lead/ Support Office	Product	Person(s) Responsible	Milestone(s)	Attach. page number
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VA7	Use of audio-visual materials	OPA	To be implemented on an ad hoc basis as resources allow	Landau	see VA1	29
VB1	Initial and refresher training on "NRC: What It Is and What It Does" and encouragement of the staff to read NRC Annual Report and Information Digest	HR	HR to review past attendance and recommend attendance strategies	Mason	6/99	30