

EDO Principal Correspondence Control

FROM: DUE: / /

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FINAL REPLY:

David A. Lochbaum
Union of Concerned Scientists

TO:

Norry, DEDM

FOR SIGNATURE OF :

** GRN **

CRC NO:

DESC:

Comments on NRC Public Meeting Feedback Form

ROUTING:

Travers
Paperiello
Kane
Reiter
Craig
Burns
Collins, NRR
Tracy, NRR
Federline, NMSS
Zimmerman, NRR
Sheron, NRR
Camerson, OGC
Beecher, OCA

DATE: 04/11/01

ASSIGNED TO:

EDO

CONTACT:

Norry

SPECIAL INSTRUCTIONS OR REMARKS:

For Appropriate Action.



Union of Concerned Scientists

April 5, 2001

Mrs. Patricia G. Norry
Deputy Executive Director for Management Services
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: COMMENTS ON NRC PUBLIC MEETING FEEDBACK FORM

Dear Mrs. Norry:

Thank you for arranging and conducting yesterday's workshop on public participation. I came to the workshop optimistic that it would help facilitate tangible improvements in how the agency interfaces with its various external stakeholders. I left the meeting feeling as optimistic, if not even more optimistic.

The only area of pessimism that I carried away from the workshop was the point I alluded to in my opening remarks. I believe that a root cause for much of the public participation problems stems from the general NRC staff mindset that the public is *to* be communicated to instead of communicated *with*. My perception keeps getting reaffirmed. Yesterday, Mr. Luis Reyes expressed his interest in the workshop as to becoming better at making the public aware of NRC activities. Mr. Hubert Miller and Chairman Richard Meserve independently asked me last month how, shy of training her to be a nuclear engineer, the agency could communicate with Congresswoman Sue Kelly. I have the impression that many NRC staffers view the agency as a transmitter and the public as a receiver of information. It is a mistake to view the public solely as "information sponges."

My pessimism comes from my concern that the NRC staff seems to think that its problems can be solved by communicating better to the public; making the public more aware and making Congresswoman Kelly understand what she'd "get" if she was a nuclear engineer. While the agency can and should improve its outward communications capabilities, the major problem is that the NRC staff does not value input received from the public. The NRC staff all too often views public meetings as opportunities for public stakeholders to *speak* as opposed to opportunities for the NRC staff to *listen*. I firmly believe that this difference is the reason that the NRC staff does not do a good job of considering and responding to public comments. It simply isn't listening often enough.

There are exceptions. Just this morning, I attended a public meeting between the NRC staff and NEI on plant security. Mr. Glenn Tracy conducted this meeting as he has for several prior meetings. Mr. Tracy and his staff listened to comments from me and other public stakeholders this morning and demonstrated a clear understanding for views we had expressed at earlier meetings. It is readily apparent that Mr. Tracy and his staff are considering our views as well as those of NEI and internal stakeholders as they work through the security issues. It is a good example of meaningful public participation.

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It is my hope, albeit with some skepticism, that the kinds of public meetings conducted by Mr. Tracy and his staff will become the rule rather than the exception at NRC. Until then, as I responded to Commissioner Merrifield during the December briefing, it will be frustrating to me and other public stakeholders knowing that the NRC can do better, but is not.

The hardest job during the workshop had to be that of its facilitator, Mr. Chip Cameron. The many stakeholders had much to say and Mr. Cameron did a fine job of giving everyone a fair opportunity to be heard.

During the workshop, you specifically asked me for comments about the NRC Public Meeting Feedback form. Here are my comments in response to that request:

1. Question 1 seems to mix two themes; namely, who are you and why are you attending. Responses (a) and (b) deal with the characterization of the individual while responses (c) and (d) deal with the interests of the individual. I'd recommend eliminating the interests responses and broadening the characterization responses to include (i) representatives of state agencies, (ii) representatives of the media, (iii) representatives of non-NRC federal agencies (e.g., EPA, FEMA, etc).
2. Question 4 could be revised to read, "Have you attended at NRC meeting of this type before?"
3. A new question could be added between existing questions 4 and 5 to ask:

N. Did you travel a long distance to attend this meeting?
 a. Yes b. No
4. A new question could be added between existing questions 5 and 6 to ask:

N. Was the meeting starting time and duration convenient?
 a. Yes b. No
5. Question 14 should be revised to include the following response option: e. I was not given an opportunity to express concerns

Sincerely,



David A. Lochbaum
Nuclear Safety Engineer
Union of Concerned Scientists
Washington Office