



**The Honorable Jeffrey S. Merrifield**

**Commissioner**

**U. S. Nuclear Regulatory Commission**

**What's Communication  
got to do with it?**

# Today's Regulatory Environment

- Events of September 11, 2001
  - Security
  - Emergency Planning
- Davis-Besse

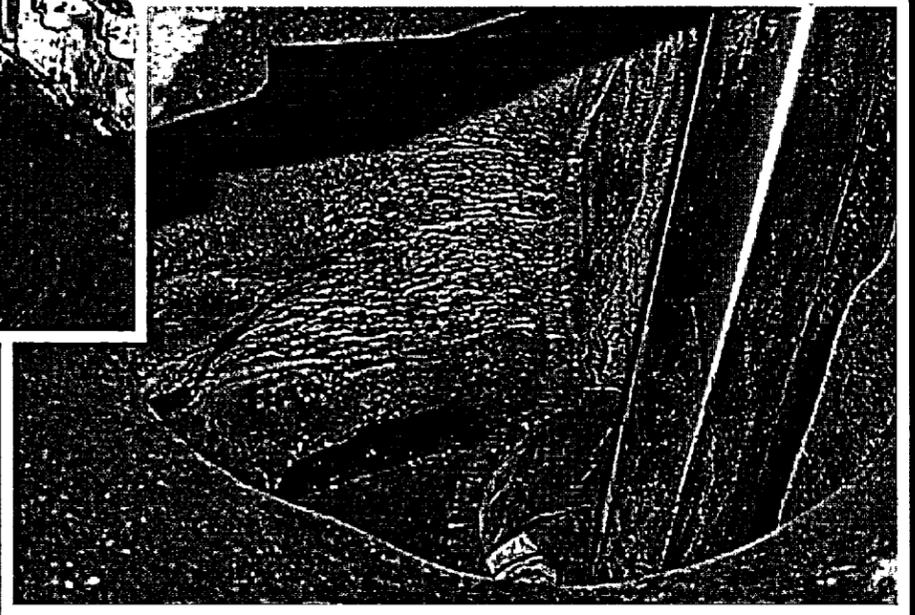
# Five-week Hiatus

- Effective communication methods of private and public organizations
- Clear messages to large and diverse community groups

# Communication Challenges

- History
  - Emergence from the Atomic Energy Commission
- External
  - Promote the role of the Agency
  - Engender public confidence
- Internal
  - Effectively communicate within the Agency

# Davis-Besse

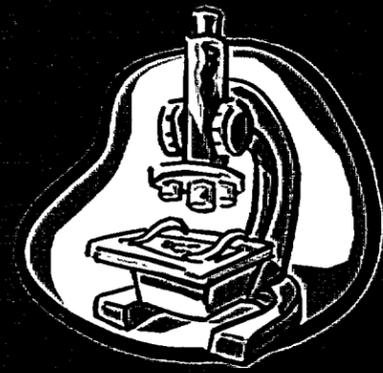


# Challenges



# Communications

# Oversight



# Internal Communications

- Technical knowledge does not trump ineffectual communications
- Organizational failure, not individual
- Headquarters, Region and Resident Inspectors
- Lack of effective engagement
- Integration of relevant foreign & domestic information

# External Communications

- Staff's decision to allow inspection delay
- Monday morning quarter-backing
- Unexpected discovery of cavity
- Actual control rod drive mechanism cracking results were consistent with the staff's safety analysis



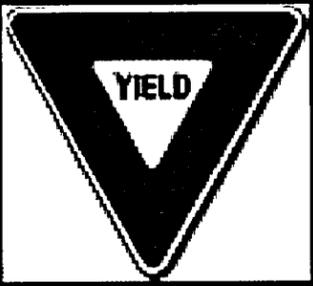
# Messages

- Economics over Safety - Wrong Message
- Safety always 1<sup>st</sup> – Right Message

# Oversight

- Lessons Learned Task Force
  - Over 7000 hours
  - 1/3 of recommendations associated with inspection procedures and guidance
- Reactor Oversight Program
  - Improvement over predecessor
  - Living program
  - Not there yet

# Focus



It's unacceptable to have all the signs there, but not be able to read the writing on the wall



# Industry's Part

- Operating Experience
- Communications
- Complacency
- Economics over Safety

# Challenges

- Identify and fix weaknesses
- Institutionalize the improvements
- Never repeat the mistakes
- Public confidence

# Risk-Informed Regulation

- Effective Communications
  - Internal & External
- Public Perception
  - Risk Informed = Reduced Burden = Reduced Regulatory Effectiveness
  - Skeptical

# Focus



- Risk Informed = Enhanced Safety
  - Focus resources on safety significant issues
  - Configuration management – Maintenance Rule



- Plain English, not technical jargon

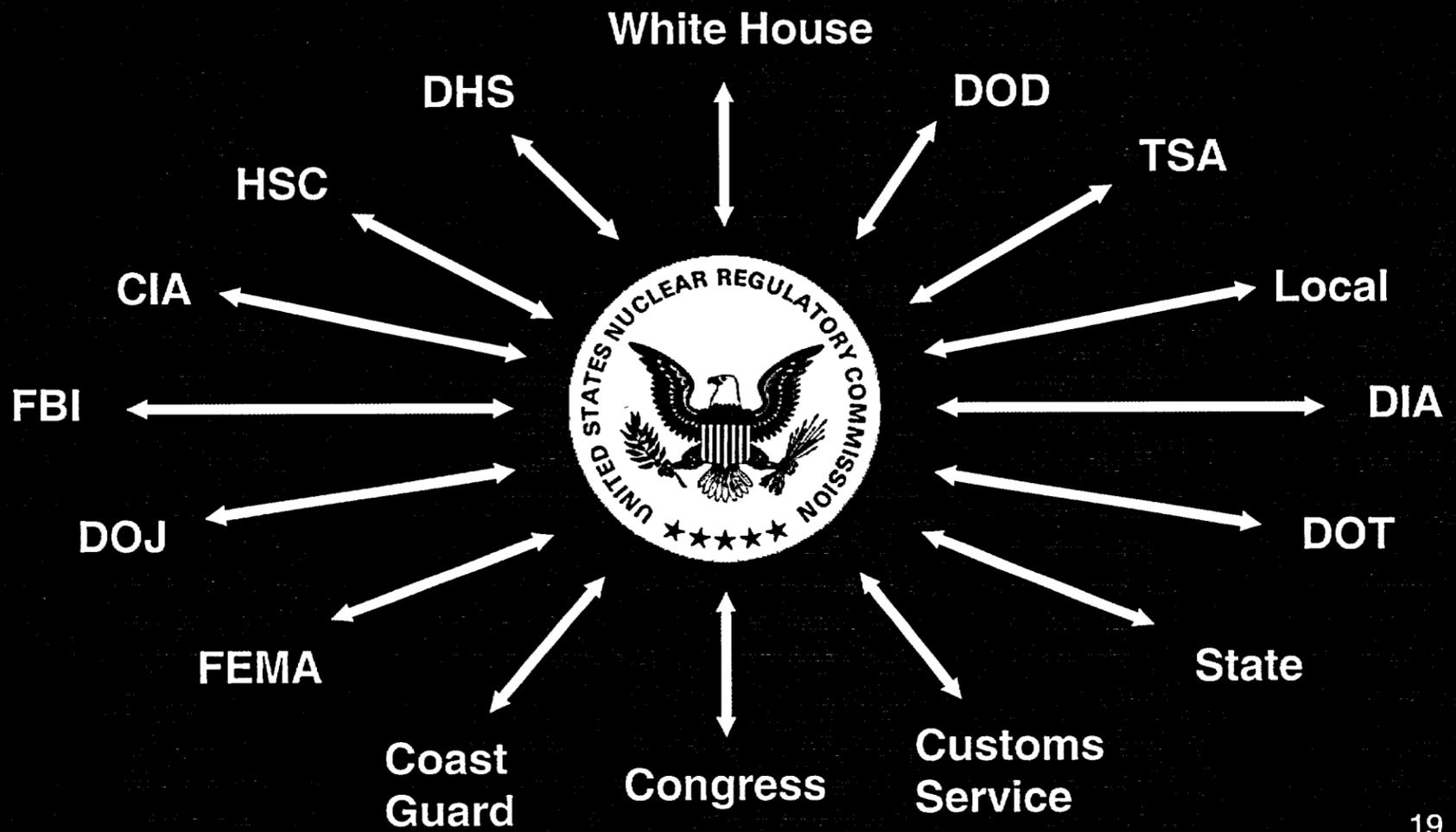
- Risk communication  
vs. Safety communication

# Security?

Perception  
vs.  
**Reality**



# Communication Efforts



# Challenges

- Revisions to security requirements & procedures
- Many public experts
- Access to real information based on
  - Proper clearances
  - Need-to-know
- Limitations
- “Trust Me”

**Trust Me!  
I'm with the  
Government.**





# Focus



The Commission and our staff must do a better job of articulating what is being done without revealing sensitive information

# Design Basis Threat

## Responsibilities?

**Civilian guard forces**

**vs.**

**Government forces**

# Focus



- Enemies of the State (10 C.F.R. 50.13)
  - Turkey Point decision (Siegel vs. AEC)
  - 1968 District of Columbia Court of Appeals
- Integrated licensee and government response

# Force-on-Force Exercises

Which is it?

Regulatory function associated with enforcement

or

Exercise to probe for weaknesses

# Solution

- **Exercise to probe for weaknesses**
  - **Significant weaknesses added to corrective action program**
- **Normal security reviews associated with regulatory functions and potential enforcement**

# Safety Culture

- Important to the safe and successful operation of nuclear power plants
- Regulating safety culture is not appropriate, but NRC intervention may be necessary (i.e. Davis-Besse special inspection)

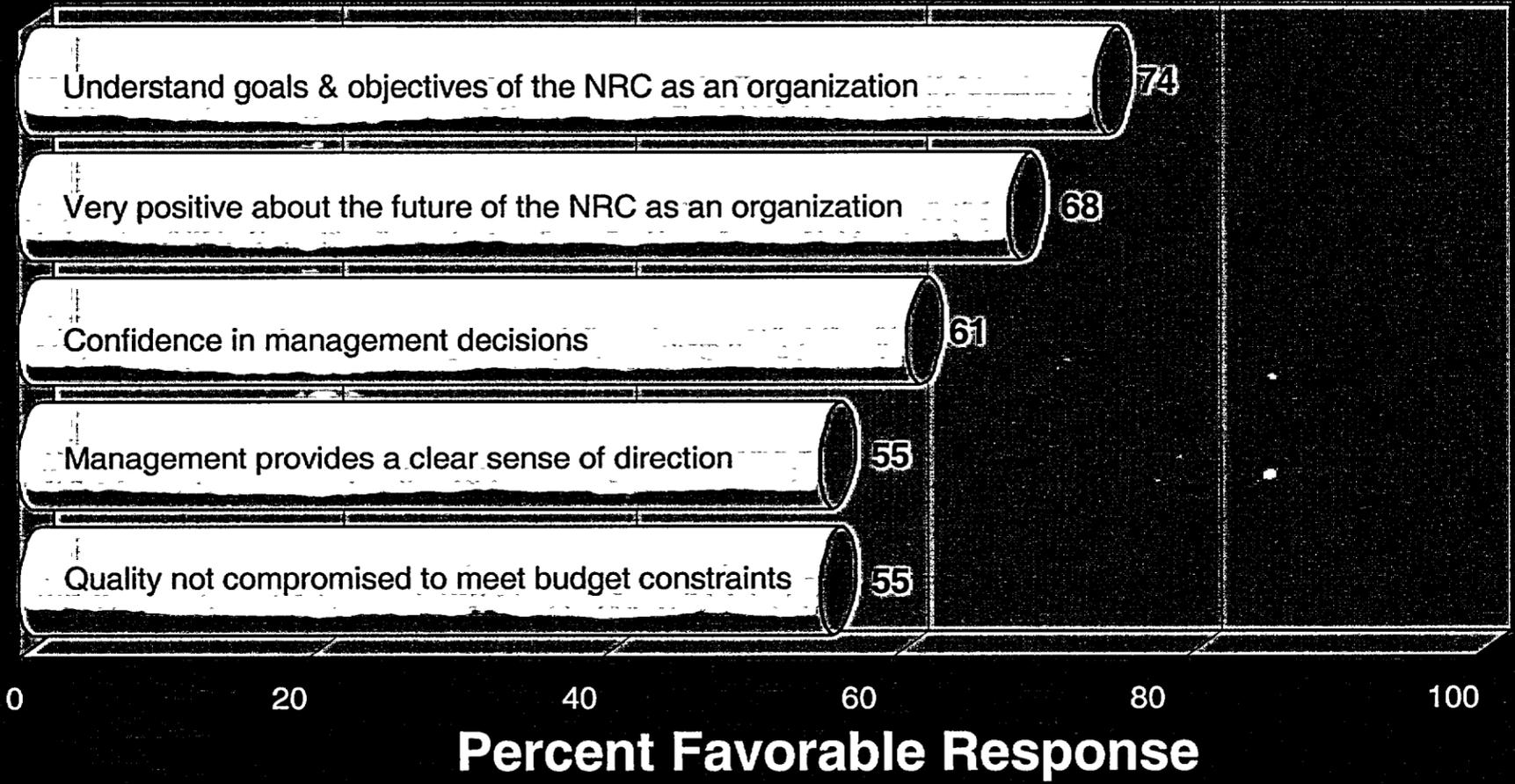
# Industry Challenges

- Recurrent root cause of plants in difficulty
- Industry must instill a safety culture at all levels
- Establish a safety conscious work environment

# NRC Challenges

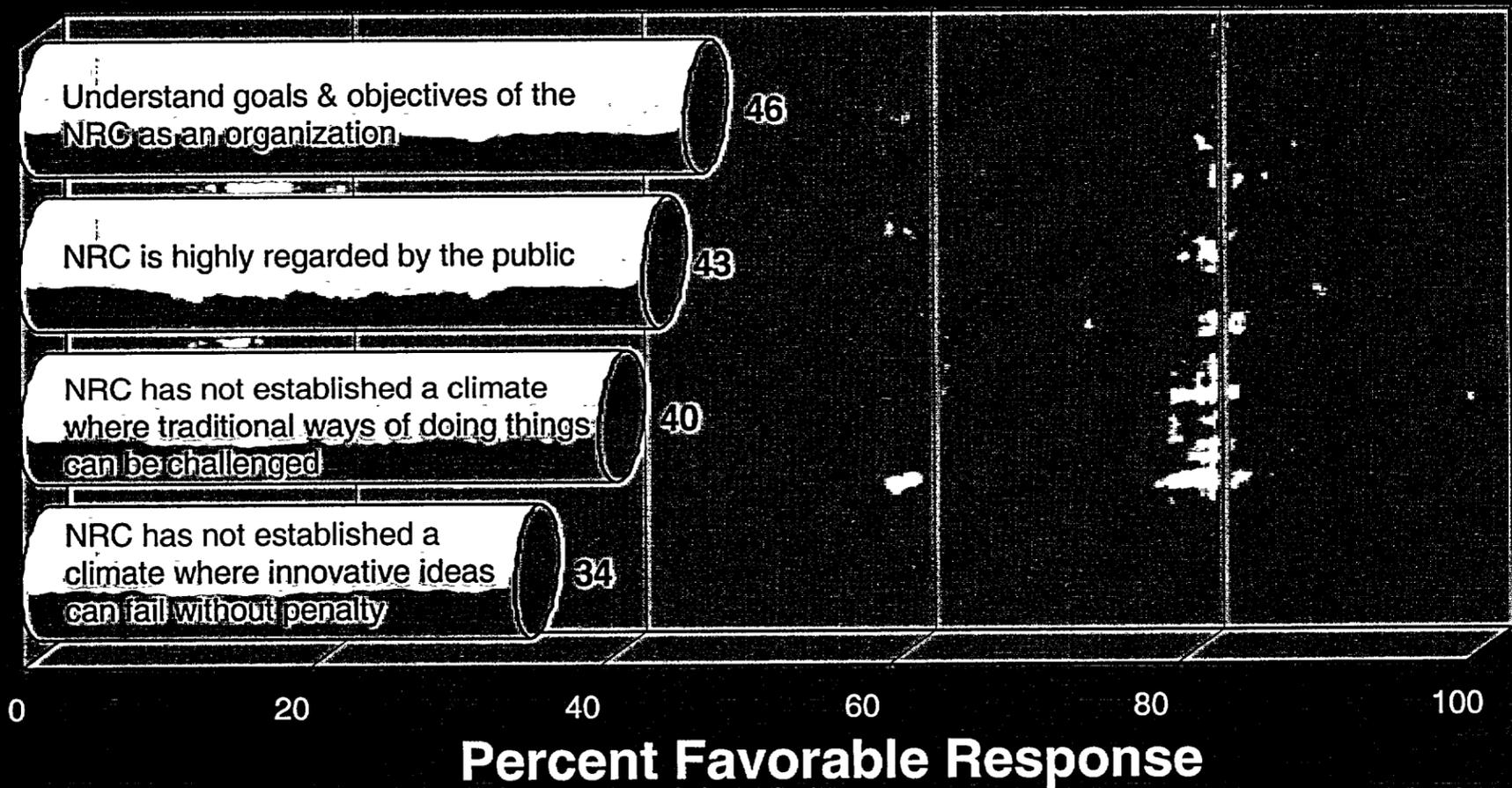
- NRC must expect of itself what it expects of those whose activities we oversee and regulate
- OIG “Safety Culture and Climate” survey
- Commission must clearly articulate a vision for the Agency

# Key Strengths



Results from OIG 2002 Survey of  
NRC's Safety Culture & Climate

# Key Weaknesses



Results from OIG 2002 Survey of  
NRC's Safety Culture & Climate

# NRC Vision

I envision:

Excellence in regulating the safe, smart and secure use of nuclear materials for the public good while setting a standard for others to aspire.

# Achieving Excellence

- The Commission should...
  - Set expectations to continually improve our regulatory programs
  - Evaluate and use domestic and international operational experience and events to enhance our decision making
  - Foster innovation and empower NRC staff to identify enhancements to our regulatory programs
  - Create a work environment which values differing opinions and rewards safety conscious thinking

# Safety Conscious Work Environment

- Discrimination Task Force Group
- Alternative dispute resolution
- Encourage interested stakeholders to participate in developing guidance

# Can you hear me now?

