



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

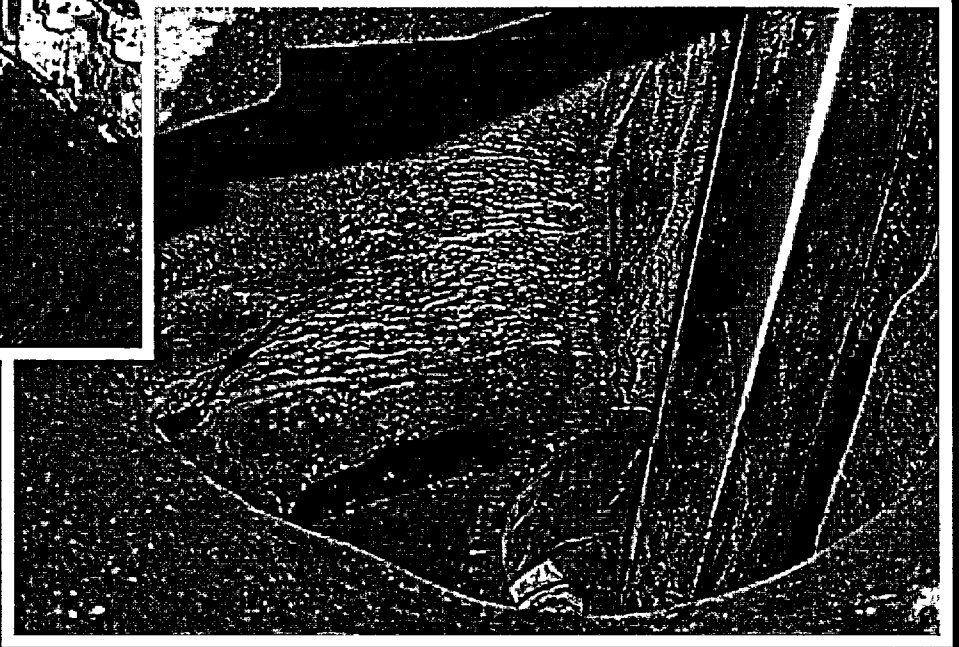
Five-week Hiatus

- 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

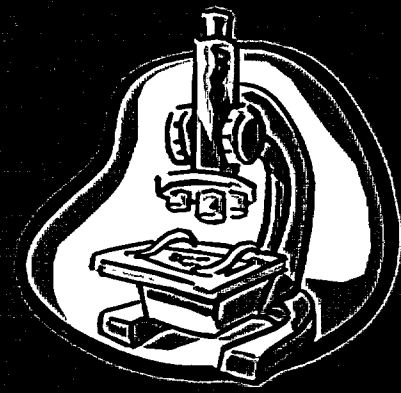


Challenges



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



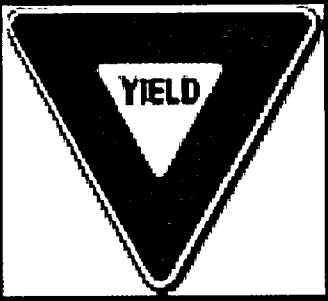
Messages

- Economics over Safety - Wrong Message
- Safety always 1st – Right Message

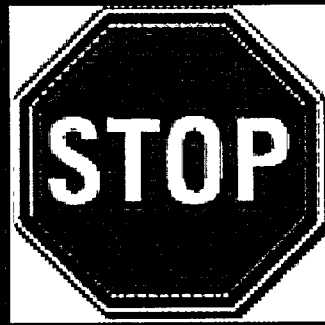
Oversight

- 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

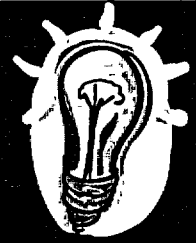
Challenges

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

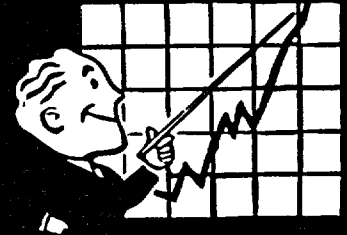
Risk-Informed Regulation

- 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

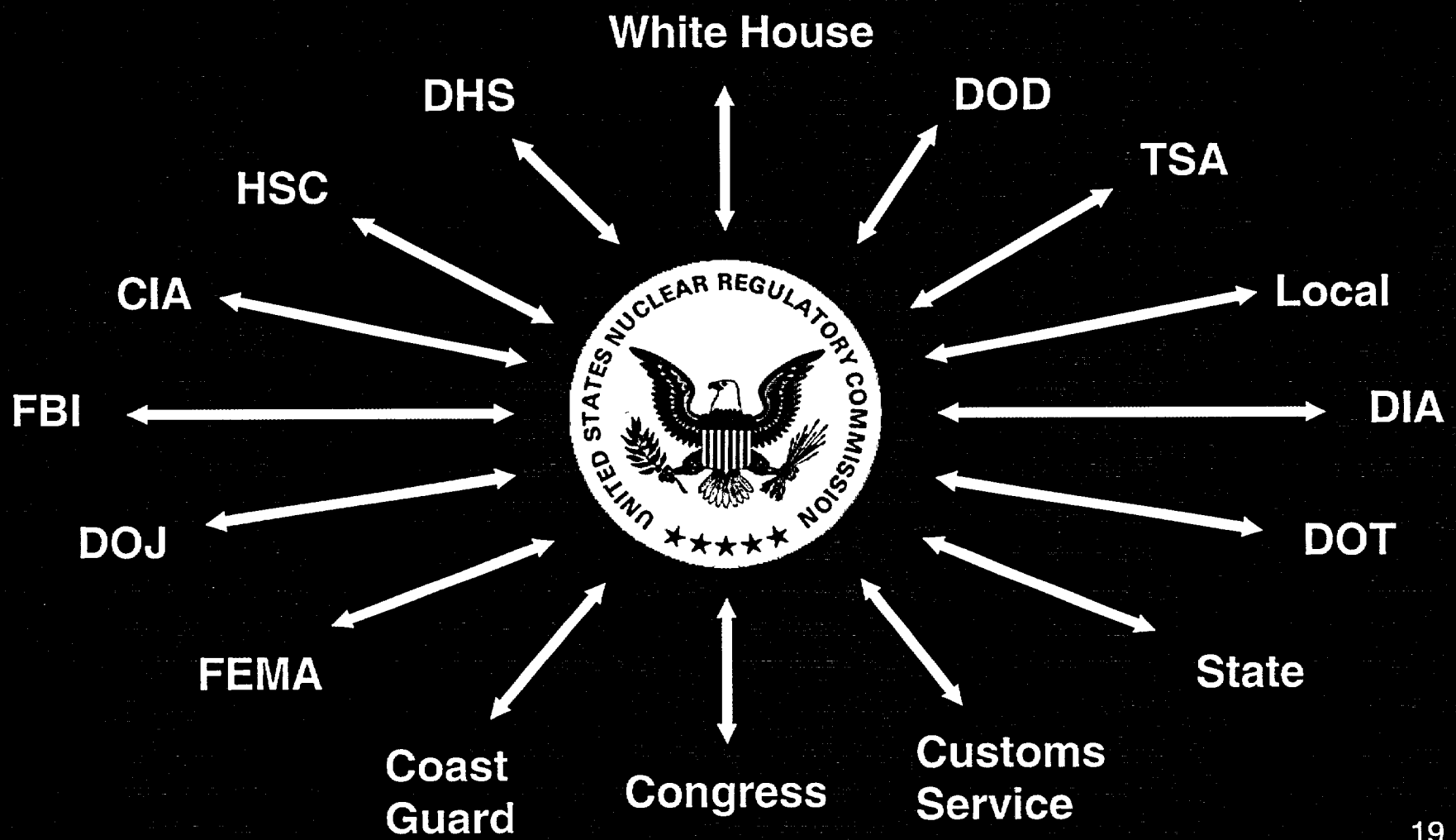
- Risk communication
vs. Safety communication

Security?

Perception
vs.
Reality



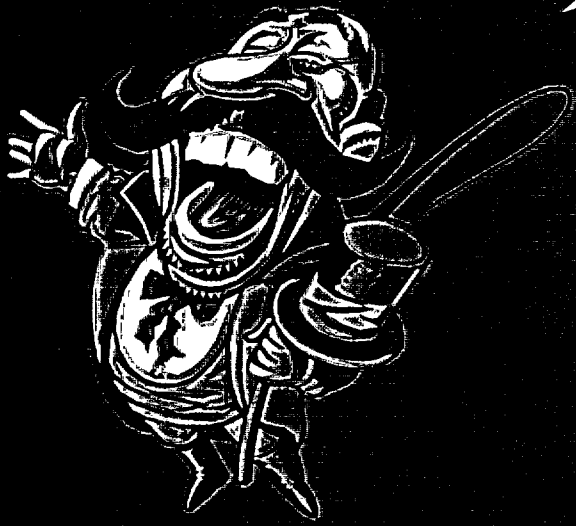
Communication Efforts



Challenges

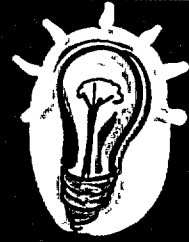
- Revisions to security requirements & procedures
- Many public experts
- Access to real information based on
 - Proper clearances
 - Need-to-know
- Limitations
- “Trust Me”

**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

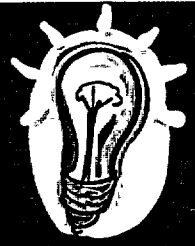
Responsibilities?

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)

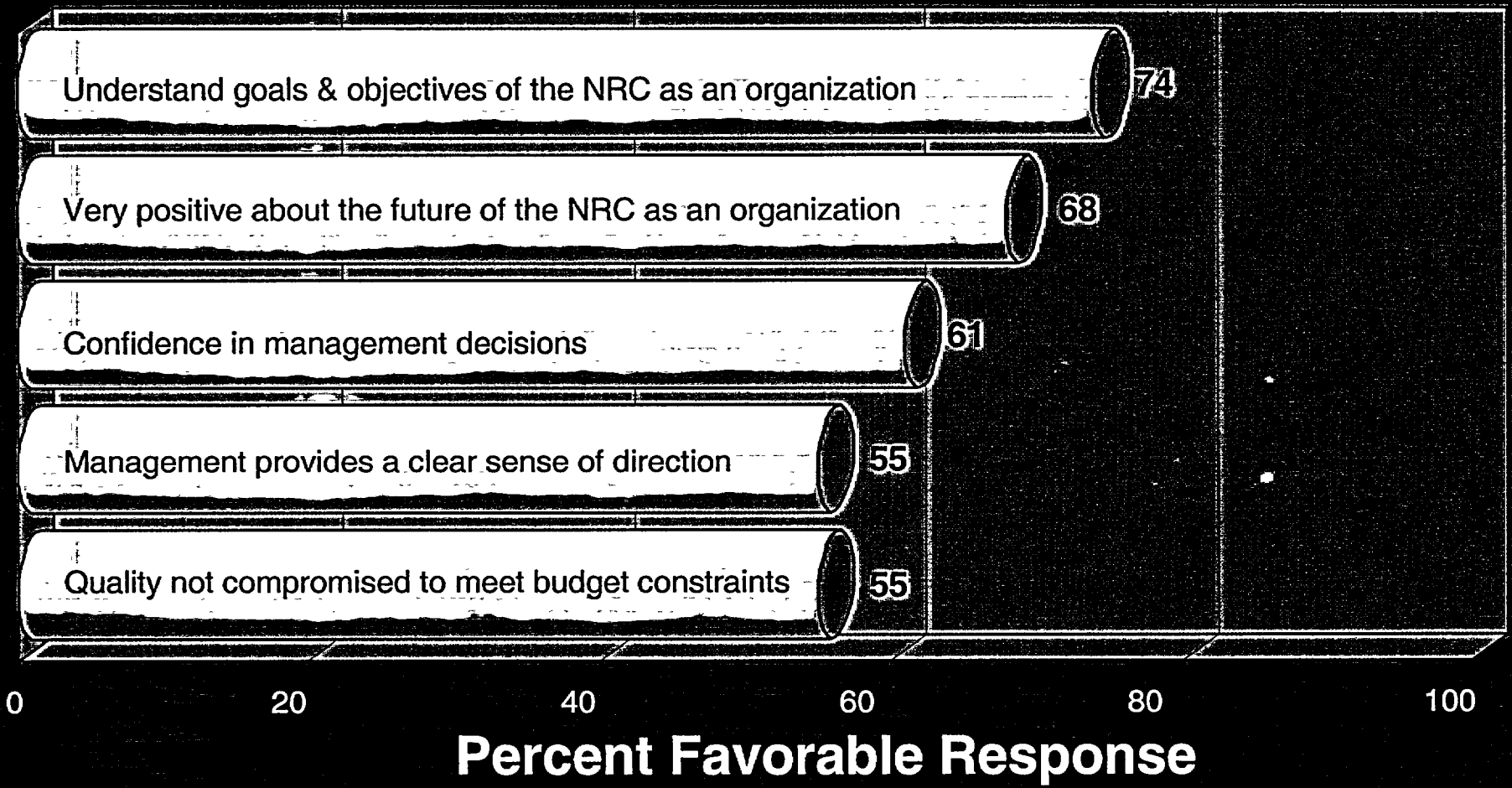
Industry Challenges

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

NRC Challenges

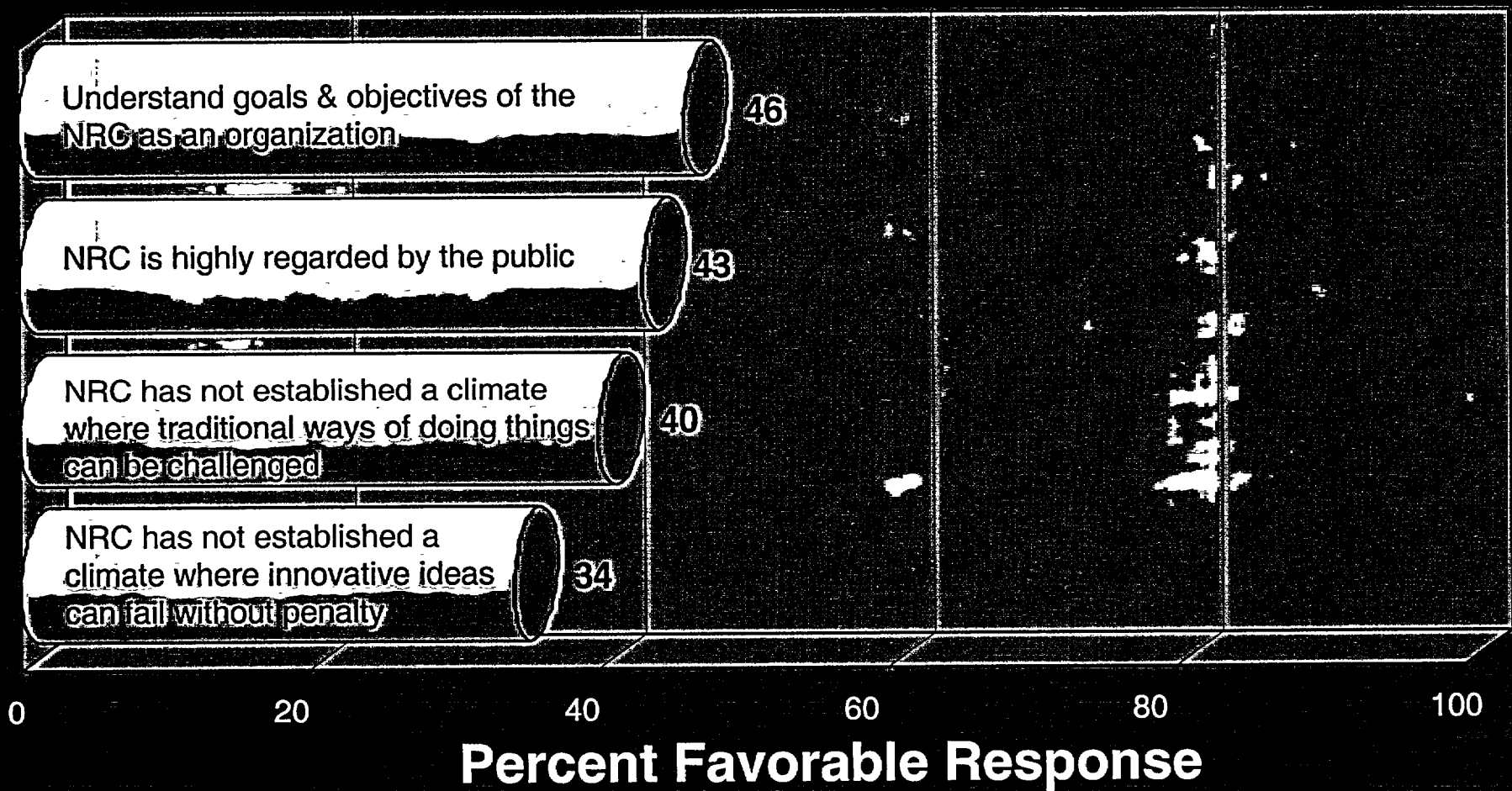
- NRC must expect of itself what it expects of those whose activities we oversee and regulate
- OIG “Safety Culture and Climate” survey
- Commission must clearly articulate a vision for the Agency

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?

