



**The Honorable Jeffrey S. Merrifield**

**Commissioner**

**U. S. Nuclear Regulatory Commission**

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

# Today's Regulatory Environment

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

# Five-week Hiatus

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

# Communication Challenges

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- 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



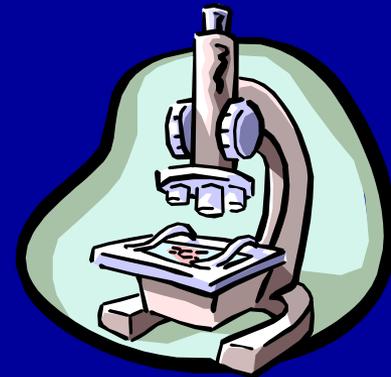
# Challenges

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Communications

Oversight



# Internal Communications

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- 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

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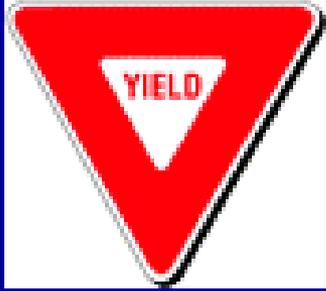
- Economics over Safety - Wrong Message
- Safety always 1<sup>st</sup> – Right Message

# Oversight

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- 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

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- Operating Experience
- Communications
- Complacency
- Economics over Safety

# Challenges

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

# Risk-Informed Regulation

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- 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

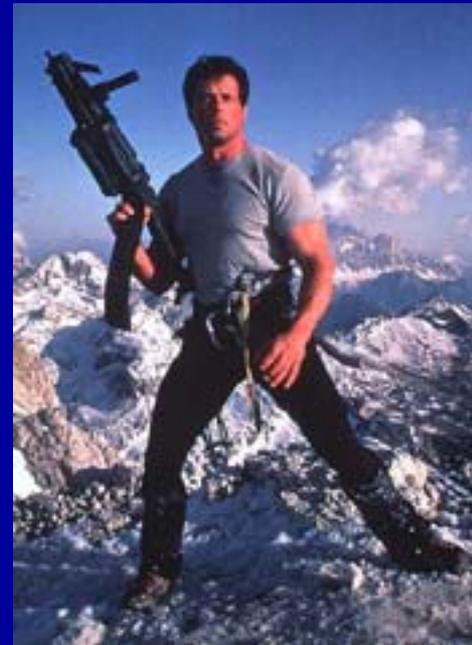


- Risk communication

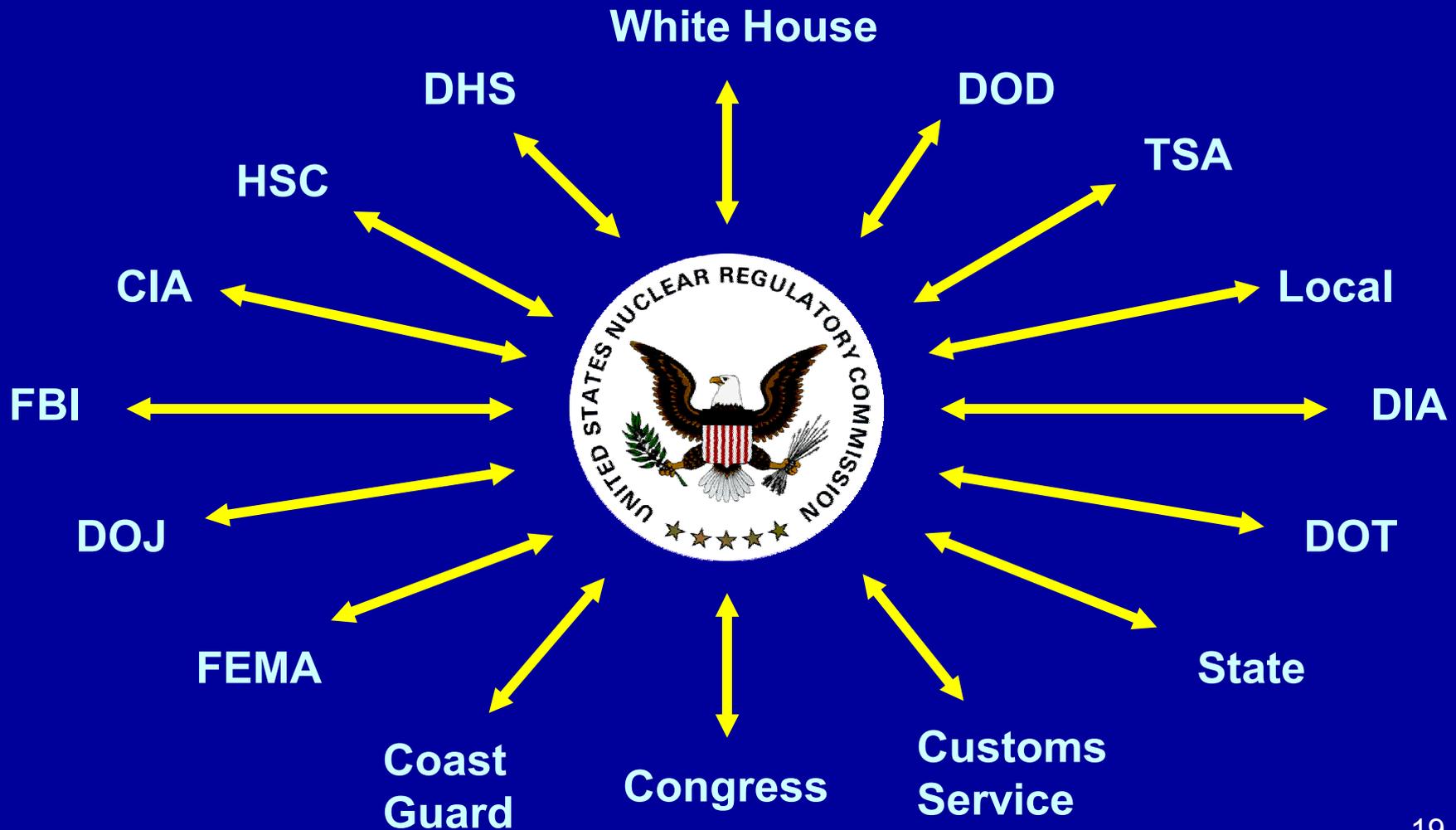
vs. Safety communication

# Security ?

# Perception vs. Reality



# Communication Efforts



# Challenges

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- 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

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# 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

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**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

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- 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

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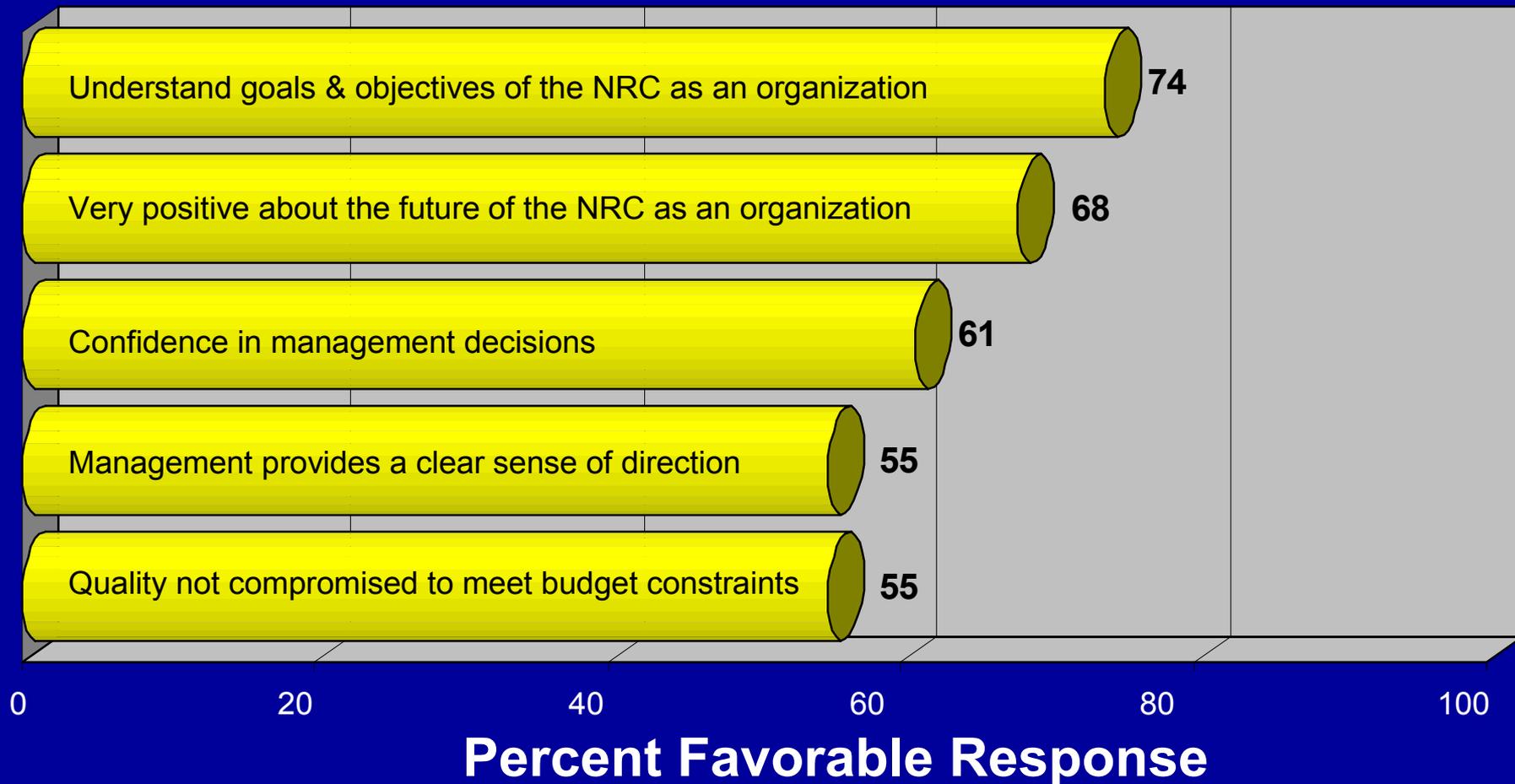
- Recurrent root cause of plants in difficulty
- Industry must instill a safety culture at all levels
- Establish a safety conscious work environment

# NRC Challenges

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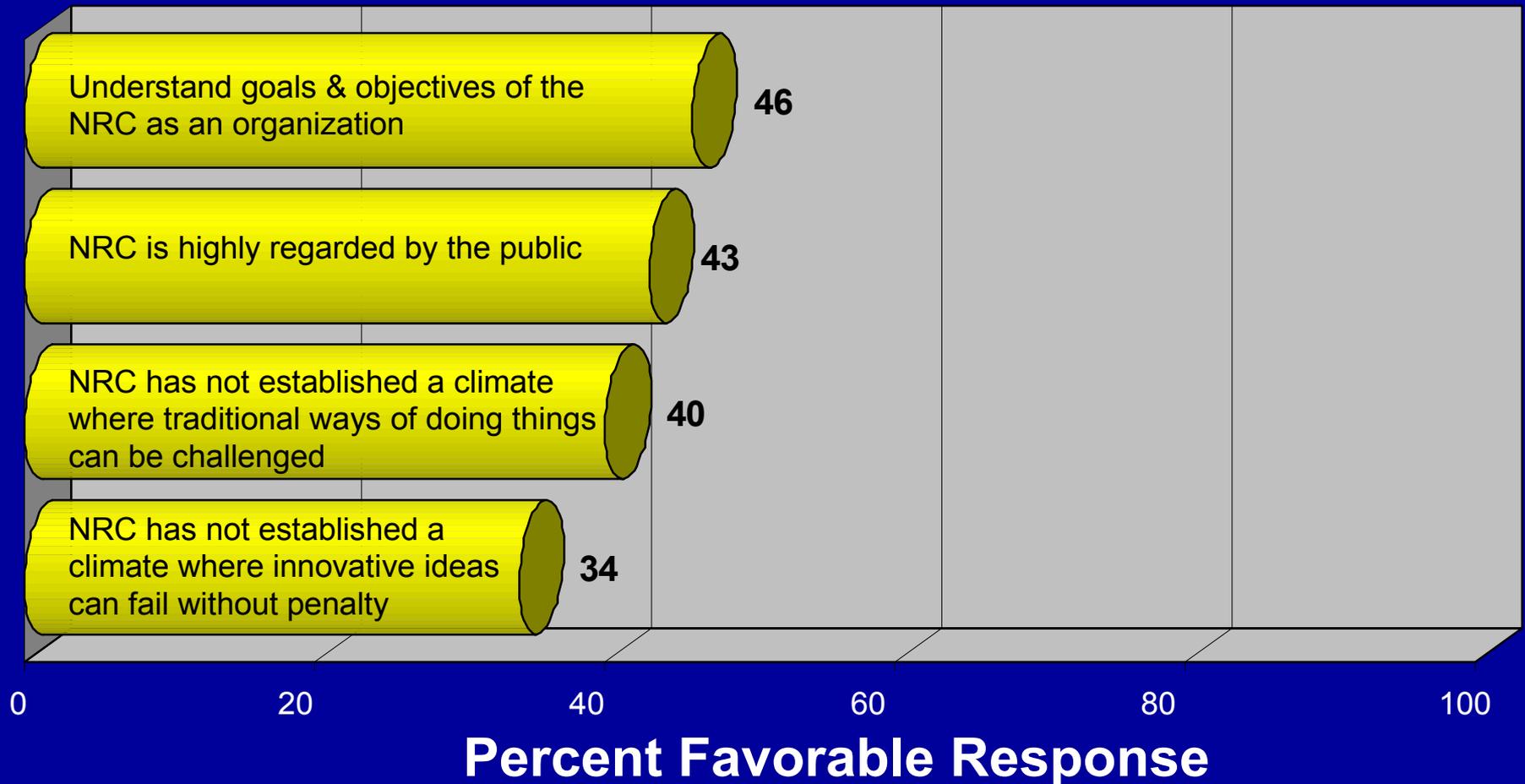
- NRC must expect of itself what it expects of those whose activities we oversee and regulate
- OIG “Safety Culture and Climate” survey
- Commission must clearly articulate a vision for the Agency

# 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

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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

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- 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

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

# Can you hear me now?

