

From: Mindy Landau, ERO
To: communications task force
Date: 5/21/01 5:02PM
Subject: Meeting on May 30

Attached is an agenda and handout for the May 30 meeting of the Communications Task Force. As a reminder, the meeting will be held in T-8F1 from 9-11 a.m. Regions may call in on 301-231-5539, passcode 8639. The primary goal of the meeting is to begin to develop the short and long term actions that can be agreed on and transmitted to the Commission as a result of suggestions received at our April 4 workshop on public participation. Please review the attached public participation issues handout before the meeting so you can come prepared to discuss them in more detail. These public participation issues represent consolidated comments we received from various external groups. The potential solutions are certainly not final; they are meant to be starting points for our discussions. I look forward to seeing/hearing you all at the meeting. If you have any questions, please contact me at 415-8703.

CC: Patricia Norry

M-3
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Communications Task Force
Meeting 5/30
Public Participation Issues

Areas for Improvement:

Activities that are already in progress or that may be resolved with minimal effort

1. General public participation/ public meeting issues:

a. Attitude - NRC staff is sometimes arrogant and assumes the public knows little about the material; need attitude adjustments.

b. Use plain language in slides more often; some slides do not contain enough information.

c. Public statements made by NRC staff are sometimes not agency position, or are incorrect. Staff needs to learn to say, "I don't know but will get back to you."

d. NRC needs to be sensitive when using a local moderator; some have strong ties to industry.

e. At some meetings, NRC sits at a table with the licensee, creating an "us vs. them" perception.

f. There needs to be more balance in participants (at 4/4 meeting, less industry types were represented)

g. Timing: avoid holding meetings at 6:00 during dinnertime.

h. When scheduling meetings, be cognizant of the time difference on the west coast

i. Use video streaming for live meetings with archival access. Telephone access to meetings is a good step, but perhaps is better for listening only, rather than for a roundtable format. Policies should be fixed, not discretionary. If meeting is closed to telephone access, explain why in advance.

j. Meetings held in resorts are often too expensive

k. Consider location of the main players and affected communities - don't schedule meetings in DC for uranium mills located mostly out west.

l. Public sometimes has difficulty requesting a meeting. What is the best method? Should we institute a form?

m. Resident inspectors should initiate, speak at more public meetings

n. Eliminate blanket meeting notices.

Potential resolution: Current training course in communications focuses on these and other issues. These issues should be emphasized at upcoming training sessions. Training will become mandatory for those staff involved in public meeting planning and presenting. Revision of M.D. 3.5 on public meetings can address some of these issues, but that is a long term fix. Staff should receive more timely guidance in this area. (Primer?)

Action: HR; all offices

Potential resolution (I) and (I): Staff currently considering videostreaming, but only for Commission meetings because of cost and technology. Telephone access should be explored. What are the potential costs, technical limitations, number of phone lines, notification requirements. Can it be done at all locations? Some of these items are also covered in our training (?) What is the best method to request a meeting? Is the request tracked by offices?

Action: ADM, HR

2. Security

a. Security guards are not efficient in processing people through the front door for meetings at HQ.

b. There is inconsistent policy with respect to security procedures at meetings held at different locations in the country.

Potential resolution: SEC needs to provide its policy in this area. Once guests pre-register, must they still type in their name and other info in the lobby? What is the current policy regarding security at different meetings? Should we inform the public of current practice in this regard?

Action: ADM

3. Availability and Quality of Information

a. All documents pertaining to one issue should be linked on the web site or located together so the public can have easier and complete access. Also, state how documents relate to each other and state the order of events.

b. Explain NRC's regulatory framework (mission, key legislation, etc.)

c. Meeting notices are hard to find on the web site, and are not descriptive enough. NRC does not utilize technology well; expand meeting agendas, background documents, etc. Give accession #s for relevant information located in ADAMS.

d. Timeliness of posting meeting summaries on the web is not good.

e. Public needs more organizational info about NRC, i.e. Agreement State contacts. Public needs regularly available fact sheets and basic information from NRC. Should be distributed to the public on a regular basis.

*Better
new phone
equipment
More
video
conferencing
Rooms*

*Meeting
guides*

f. Complement the reactor oversight handbook with a short guide describing roles and functions of NRC staff, i.e. resident & regional inspectors, project managers, etc.

Potential resolution: Basic material is already on the web. Some of these problems will be solved with the re-design of the web site, but there are some avenues for short term fixes; capability exists now for posting background docs and agendas on our public meeting web site. Guidance to staff should be given. For the longer term (2 years), plans are in progress for a web-based public meeting site which will link all documents relating to a meeting. Instructions to the staff can be incorporated into revision of M.D. 3.5 on public meetings. Last bullet - NRR may want to consider a short handout or incorporate into next revision of booklet.

Action: OCIO, NRR, all offices

4. Freedom of Information Requests

a. Fees for copying are unfair. Fee waivers are too stringent. NRC should charge licensees for copying as a cost of doing business.

b. FOIA requests are too cumbersome, ask too many intrusive questions.

Potential resolution: FOIA branch needs to state its current policy. Copying fees recently increased - what is our justification? Fees still lower than other agencies (?)

Action: CIO

Activities that are valuable, but may not be able to implement right away

1. General public participation/ public meeting issues:

a. General participation; make it meaningful, not just window dressing. NRC listens, but does not respond to questions or concerns. Comments fall into a "black hole."

b. Access to NRC staff - industry has disproportionate access to staff and documents; not clear how to request meetings with staff

c. Format - at some meetings the public is allowed to observe only, not participate. Limits should be stated in advance.

d. Even when factually incorrect information is presented, the public cannot speak, and no one else corrects.

e. Public should have a mechanism for suggesting agenda items, i.e. to project manager.

f. Money should be provided to participants to attend meetings; inconsistencies exist.

g. Meeting notice - two weeks is not enough time for major meetings. Airlines,

hotel reservations harder, etc.

h. NRC should use alternate methods for meeting notification and document availability for comments. Use e-mail, snail mail, broadcast fax, bring back list-serves

i. NRC should consider audiotaping meetings. Audiotapes would also enhance the quality of transcripts.

Potential resolution (f): What is our current policy? Examine and assess need for revision.

Action: OGC

Potential resolution (g): Current meeting policy is under revision and this may be an area of focus. Two weeks is a minimum, but at least one month for major meetings is preferable.

Action: OCIO

Potential resolution (h): Assess feasibility of alternate methods, justification for not using certain methods.

Action: OCIO

Potential resolution (i): Should we provide audiotaping to the extent possible? Need to identify costs, duplication issues, how to make them available, etc.

Action: ADM

Potential resolution others: 1) Assign one person as a "notetaker" at meetings to capture all questions for which no answer was given. Assign action at conclusion of meeting. Send a note with follow-up, even if comments will be considered as part of a rule.

2) Categorize open meetings, define participation rights, and inform public of expectations for each, for example:

1. Business meetings (i.e. enforcement, routine management, other examples?)

Purpose is not to hear from the public, but for their observation only
No public participation

2. Business meeting, but topic of some interest to public (i.e. inspection exit, event follow-up, meeting on generic issue, other examples?)

Public can ask questions at the end (or separate meeting held at end) with licensee present

3. Partial participation, NRC informs but also wants comments from the public, (i.e. briefing on transportation, decommissioning or other local/national issue, other examples?)

Public can ask questions during the meeting. NRC presents, but more give and take from the audience.

4. Full participation, purpose is to achieve public comment and advice,

public fully engaged in the process, (i.e. enhanced rulemaking, public roundtable to exchange ideas, town hall, other examples?)
Public fully engaged in dialogue with NRC throughout meeting.

Action: All offices

2. Security

a. There is more security/armed guards at HQ than there are at spent fuel storage facilities. (This may become more contentious as additional questions are raised about the vulnerability of dry casks to potential terrorist attack)

b. Why are packages searched at some meetings and not at others? Inconsistent.

Potential resolution: Need to clarify and assess our current policy. Can we process people at HQ more efficiently? What are security issues in the regions/localities?

Action: ADM

3. Availability and Quality of Information

a. Often, detailed materials to be addressed at meetings are not available early enough so that the public can digest them and prepare knowledgeable questions.

b. NRC should regularly update stakeholders when major documents become available or when major actions occur (via postcard, e-mail, other means)

c. Re-open at least some public document rooms.

d. Daily reports don't describe any follow-up actions to PNs. Should be something earlier than the 3-4 weeks it takes for an inspection report.

Potential resolution: 1) Staff needs to maintain stakeholder lists/database. Consider use of postcards, e-mail list serve, etc. to notify them of meetings, actions, availability of docs. Establish web pages for major issues to post documents in a timely manner. Planned web-based public meeting site may create links to documents, agendas, meeting summaries, etc. 2) Briefly explain policy for closing LPDRs; acknowledge practice of housing documents in local libraries for major activities 3) What is the timing for PN resolution? Current policy?

Action: ADM (?); All offices

4. Risk Communication

a. NRC changes its definition of what constitutes risk. Should explain "safety margins." What would lead to a core melt? Don't use risk numbers. We say there is no documentation for minor violations, yet we refer to certain "minor" violations in our inspection reports.

b. NRC needs to identify several people with skill in communicating and use

them whenever there's an event. The public likes consistency and honesty. Commissioners need to go "on the road" to talk to the public.

Potential resolution: 1) Risk communication training - are these issues addressed? Perhaps need to assess our wording for "minor" violations. What is current policy? 2) NRC has a cadre of senior level crisis "communicators" trained to be used in emergencies.

5. Public "point of contact"

a. NRC needs a point of contact for the public when it's needs are not being met, or when responses are not received.

b. This contact could parcel out such needs to the right people at NRC

Potential resolution: Consider appointing such a person at HQ

Action: All offices

Actions which are substantive technical issues; may be neither cost-effective nor within our purview

1. Pervasive effort on the part of NRC to remove rights of interveners by eliminating the right of discovery, cross-examination, etc.

Potential resolution: Cannot change policy, but perhaps a fact sheet outlining hearing process and legal participatory rights can be developed

Action: OGC, OPA

2. We provide more security to our employees than to spent fuel casks.

Potential resolution: Can we supplement our fact sheet w/ security information? What is our policy with respect to security of dry casks?

**Communications Task Force
Meeting Agenda
May 30, 2001**

-- Welcome and Introductions

- purpose of the task force
- note taker

- Background; 1/17/01 SRM and 4/4/01 public participation workshop

-- Goals of this meeting

Main purpose is to respond to SRM, must decide:

- actions that make sense right away because they are valuable and fairly easy to implement with few resources
- actions that make sense, but cannot implement right away (suggest target dates)
- actions that are not cost effective, or not within our purview

---General discussion of the issues

- identify/agree on short-term actions that can be committed to in SRM
- identify/agree on mid- or longer term actions - will likely require another meeting

-- Office tasking review, summary of input needed, agree on target dates

-- Need for follow-up meeting(s)