



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

OFFICE OF THE  
GENERAL COUNSEL

*Honor Law  
Grads*

MEMORANDUM TO: Chairman Meserve  
THRU: Paul E. Bird, Director  
Office of Human Resources  
FROM: Karen D. Cyr  
General Counsel  
SUBJECT: REQUEST TO USE RECRUITMENT BONUS INCENTIVES FOR  
NEW ENTRY-LEVEL HIRES IN THE HONOR LAW GRADUATE  
PROGRAM

I The Office of the General Counsel requests approval to use recruitment bonuses as an incentive for new entry-level hires in the Honor Law Graduate Program. These positions are being filled through competition. As defined in NRC Management Directive 10.48, this applies only to newly-appointed Federal employees. I would like to offer 10% recruitment bonuses based on the entry-level salary for an Honor Law Graduate (Occupational Series 904/905; pay grade GG-11/9) salary of a Legal Intern. The bonuses would be paid out after employees begin with the NRC and would be subject to the specific service requirements.

I have reviewed the criteria outlined in the handbook and have attached a narrative justification that addresses both the criteria to be met in making an initial determination to use pay authority and the criteria for determining the amount of payment.

11/7/02  
Date

Karen D. Cyr  
Karen D. Cyr, General Counsel

II I have reviewed the request for the use of the above-indicated pay authority, and have determined that it  does \_\_\_ does not meet the criteria specified in the handbook. I  do \_\_\_ do not concur with this recommendation. An explanation is attached for any nonconcurrency.

11/22/02  
Date

Paul E. Bird  
Paul E. Bird, Director, Office of Human Resources

*C/B*

III There  are  are not sufficient funds to pay for this request.

11/27/02  
Date

Paul E. Bird  
Paul E. Bird, Director  
Office of Human Resources

IV We have reviewed the request for use of the above pay authority. We  do  do not agree with the amount recommended. We recommend an alternate payment amount of \_\_\_\_\_ based on the attached evaluation. We recommend that this request be  approved  disapproved with any change noted. Justification for this recommendation is attached.

11-27-02  
Date

Patricia M. King  
Chair, Federal Employees Pay Comparability Act (FEPCA) Senior Management Review Panel

V I have reviewed the request for the use of the above authority and  approve  disapprove the request  for the amount initially requested, or for the amount of \_\_\_\_\_.

Nov. 27, 2002  
Date

Robert Johnson  
Chairman

Forward to the Director, HR, for implementation.

### OGC JUSTIFICATION FOR RECRUITMENT BONUSES

OGC is seeking approval of recruitment bonuses as an incentive to attract well-qualified applicants offered positions with the Office of General Counsel through the Honor Law Graduate (HLG) Program. OGC currently seeks to do all of its hiring through an entry level program, unless there is a need for a specific specialty that cannot be met by on the job training (e.g., government contracts). In order to recruit highly qualified third year law students to report in late summer (after law school graduation taking the Bar Exam required for law practice), offers must be made in the previous November-December time frame to compete with other hiring organizations, both private and governmental, for top students. Successful recruitment through the HLG program is critical to OGC's ability to refresh legal talent and to support the agency's goal for 25% entry-level recruitment for professional positions.

The current environment for legal employment poses a number of challenges to the NRC's successful retention of entry-level attorneys. According to the National Association for Law Placement (NALP), the national median base salary as of April 2002 for first year associates in law firms was \$90,000, compared to \$58,857 (GG-11/9 with D.C. area locality pay) for law graduates who join NRC as HLG's. The median starting salary in law firms in Washington, D.C., was \$120,000 in 2000 and rose to \$125,000 in 2001. While women now constitute over half of all law students, minority enrollment in law schools has not substantially grown as a percentage over the last 20 years. Unlike other graduate students, law students do not typically participate in university programs that effectively lead to the award of cost-free advanced degrees by teaching fellowships or other special incentives.

The current environment is having an impact on OGC's recruitment and retention of new lawyers. Although features of our program (particularly the structured rotational assignments) attract well-qualified applicants, the NRC must compete with other agency honors programs, including some more well-known or prestigious programs such the Department of Justice Honors Program. A number of agencies, particularly in the defense or financial regulatory sector, have already built in financial incentives into their recruitment or retention programs which give them an advantage over NRC. The offering of a recruitment or "signing" bonus would enhance our competitiveness and help meet the need by many entry-level applicants for "start-up" money to enable them to transition from lives as students to professional careers.

Based on recent attrition and anticipated increases in resource needs to adequately staff the review and litigation of the proposed Yucca Mountain repository and ongoing license renewal and new reactor licensing work, we expect to hire at least 4-6 Honor Law Graduates out of each law school graduating class to stay close to our FTE needs.