

Report of the Task Group on Enhancing NRC Public Meetings

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Table of Contents

Summary.....	2
Background	3
Objectives and Scope.....	3
Evaluation Process.....	4
Challenges and Other Considerations	8
Recommendation 1: Center for Excellence	9
Recommendation 2: Public Meeting Training and Qualification	13
Recommendation 3: Agency-wide Guidance	16
Recommendation 4: External Stakeholder Resources	19
Recommendation 5: Public Meeting Quality Standards	21

Summary

In response to a Chairman tasking memorandum (Agencywide Documents Access & Management System (ADAMS) Accession No. ML14070A070), Executive Director for Operations (EDO) Mark Satorius committed to assemble a task group “...to complete a comprehensive look at our public meeting policies, processes, and guidance, including their implementation, and work toward making what we view as necessary improvements to those aspects of our work.” The task group found that there is wide variability in public meeting/outreach efforts throughout the agency, not just with the ability to plan for and conduct effective meetings, but also in the attitudes towards the value and usefulness of public interaction. Adding to the challenge of conducting effective public engagement is the fact that outreach efforts may be left to technical staff that may not be skilled on the subject. Further, these efforts are sometimes given low priority compared to other safety-significant work unless management places a high priority on outreach efforts.

Staff must be open to stakeholder views and willing to respond, explain, and engage in dialog. There must be a shift towards a more inclusive process and managers must believe in the value of public interaction and convey that belief to staff. Additionally, the proper balance must be found between consistently implementing agency-wide standards and allowing staff flexibility in outreach efforts. Better consistency across the agency will help the public know what to expect from an U.S. Nuclear Regulatory Commission (NRC) meeting, regardless of where the meeting is held and which office or branch is holding the meeting. At the same time, the NRC must seek out and encourage creative ways to engage the public and pull in new stakeholders, as well as effectively interact with active/vocal stakeholders.

The task group is making five recommendations with the expectation that taking action on the recommendations will address the issues noted above and improve the effectiveness of NRC meetings in general:

Recommendation 1: Create a *Center of Excellence (CoE)* for Public Engagement to serve as a centralized resource for information, advice, and support for staff responsible for the planning, execution, and evaluation of NRC public meetings.

Recommendation 2: Create a public meeting qualification program for NRC staff that plan, conduct, and participate in public meetings to ensure acceptable meeting planning, outreach, public speaking, presentation, and facilitation skills.

Recommendation 3: Building upon existing documents, develop and implement a comprehensive set of enhanced agency-wide guidance on conducting public meetings.

Recommendation 4: Develop or update guidance and other resources to help stakeholders, including members of the public and licensees, effectively participate in public meetings.

Recommendation 5: Design and establish more effective ways to measure the success of NRC public meetings.

The report that follows contains information on the task group's processes, as well as additional detail on the task group's recommendations.

Background

The NRC has had a formal policy regarding open meetings since 1978. The policy and related materials have been revised numerous times with the goal of making our interactions with the public more effective. On March 5, 2014, Chairman Macfarlane issued a tasking memorandum (ADAMS Accession No. ML14070A070) to the EDO requesting the NRC staff take certain actions concerning the staff's conduct of public meetings. Specifically, the former Chairman requested a focused effort in three key areas: meeting documentation, strategic use of independent and experienced facilitators, and staff training.

The EDO responded to the Chairman in a May 30, 2014, memorandum (ADAMS Accession No. ML14149A323) reinforcing the NRC's commitment to transparency and openness, increasing public confidence, and establishing and retaining its position as a trusted regulator. Further, in this memorandum, the EDO committed to assemble a task group "...to complete a comprehensive look at our public meeting policies, processes, and guidance, including their implementation, and work toward making what we view as necessary improvements to those aspects of our work." This task group on Enhancing NRC Public Meetings was formed in June 2014, and has worked over the past 6 months to formulate the recommendations discussed below.

Objectives and Scope

As the NRC staff is committed to continuous learning and improvement, the objectives of the task group emphasized identifying and applying best practices and lessons learned.

The objectives of the task group include:

1. Complete a comprehensive look at the NRC's public meeting policies, processes, and guidance with a focus on the extent to which the NRC can improve upon existing practices and adopt methods where all views are exchanged and considered.
2. Define, prioritize, and implement actions the NRC should take to improve public meeting activities, including how to best train NRC staff to accomplish these actions.
3. Report the task group's actions and recommendations to the EDO by January 31, 2015.

The task group met for the first time in June 2014 and developed an action plan. The task group worked with the Communications Council and the NRC's In-House Meeting Facilitator and Advisor Program to accomplish its objectives. Several members of the Communications Council were members of the task group.

The scope of this effort focused on providing NRC staff with the tools needed to conduct successful public meetings. To minimize conflict with related efforts, the task group maintained awareness of parallel efforts involving the three topics from the Chairman's tasking

memorandum, as well as other public meeting and outreach-related initiatives already in motion.

Evaluation Process

The task group's recommendations resulted from three general phases of effort over 6 months:

Research. Task group members identified: 1) differences in the conduct, guidance, attitudes, success criteria, and drivers for public meetings between offices and divisions; 2) NRC best practices; and 3) best practices of other agencies. Task group members also became familiar with existing statutes, NRC policy and guidance, and past NRC staff improvement efforts, and identified gaps and areas of improvement in agency-wide guidance.

- **Evaluate and Implement.** Divided into subgroups, task group members assessed the data gathered during the research phase to identify, develop, and prioritize recommendations. For each recommendation, the members identified the expected impact, advantages, limitations, and potential resources needed.
- **Outcomes.** Task group members created a report to provide a comprehensive and prioritized set of recommendations on enhancing the agency's public outreach processes to the EDO.

The task group considered existing materials involving NRC public meetings, with a focus on best practices and lessons learned. As part of the research phase effort, the task group reviewed numerous past and current documents and guidance in its evaluations, including:

- Report of the Public Communications Task Force, led by then-Commissioner Jeffrey S. Merrifield, dated August 7, 2003 (ADAMS Accession No. ML032730836)
- *Public Communication and Engagement* Report by Jacob I. Zimmerman, March 2013
- A Vantage Human Resource Services, Inc. Report dated May 2, 2014, *Enhancing NRC Public Meetings*
- Ongoing Review of Lessons Learned from the San Onofre Steam Generator Tube Degradation Event¹

The "Report of the Public Communications Task Force" dated August 7, 2003 (ADAMS Accession No. ML032730836), concluded, in part, that:

¹ March 20, 2014, Memorandum from Mark A. Satorius to Marc L. Dapas, Eric J. Leeds, and Glenn M. Tracy (ADAMS Accession No. ML14028A028)

- NRC’s effectiveness in communicating with its stakeholders varies. The Commission needs to provide the vision and direction for external communications. To complement this vision, an overall agency communications plan, direction, and strategy are essential.
- The agency’s efforts to enhance public confidence can be achieved through regular involvement of the affected parties. Customized communications plans need to be developed for each stakeholder and for each situation.
- The agency, as part of its decision-making process, must reach out to affected and interested parties and invite their involvement.
- Public involvement improves the quality of the decision-making process. The agency needs to stop thinking of communications as a chore or an obstacle to its daily activities.
- The NRC has an obligation to be factual and communicate its role to the public. Improving the communication skills of the NRC staff will, no doubt, provide benefits to the agency and its stakeholders. Improving communications must not be viewed as a distraction but as a fundamental means of achieving the agency’s mission and goals. This requires management belief, support, and sustained commitment.

Many of these conclusions are still true today. The task group found that public communication efforts still vary across the agency with several offices and regions making significant progress in outreach efforts. Progress can be attributed to development and implementation of training and qualification programs, as well as management commitment and support. The task group found that improvements are still needed in the areas of: 1) consistent implementation of policy by management; 2) improvement of staff attitudes on public outreach; 3) training; and 4) resources.

The “Public Communication and Engagement” report (the Zimmerman Report) was prepared by Jacob I. Zimmerman in March 2013 at the request of Chairman Allison Macfarlane. He conducted an independent eight-week review of NRC policies, practices, and procedures for communicating and engaging with the public. His methodology included interviews with NRC staff and a review of past NRC assessments of communications policies.

The Zimmerman Report’s recommendations include convening a task group to evaluate the report and make recommendations to improve public communications; creating a CoE for Public Communication and Engagement; and establishing a Policy Statement and Framework that define a more stable, consistent, and predictable public engagement process. While the Enhancing NRC Public Meetings task group was formed at the recommendation of the EDO rather than in response to the Zimmerman Report, the task group came to a similar conclusion: the need for a CoE (see Recommendation 1).

One of the Zimmerman Report’s recommendations states:

Under the current organizational structure, no one NRC office is totally responsible for public communication and engagement activities, but almost all organizations are involved to varying degrees. This decentralized structure may have worked well under increasing budgets, but in today's lean budget environment it is less effective and efficient, and simply not sustainable[.]

In response to Chairman MacFarlane's tasking memorandum, Vantage Human Resource Services assessed models of public engagement. The resulting independent report offers insights and provides the staff many considerations. The primary conclusion of the report is that true public involvement is having an open process where all views are exchanged and considered.

Viewed collectively, the 11 organizations studied by Vantage Human Resource Services offer a generalized model of successful public engagement. The model includes:

- A strong commitment to public engagement/public involvement that goes beyond merely informing the public;
- Identification and analysis of the many and varied stakeholders that may be impacted by a project;
- An established process or processes for public engagement/public involvement that is developed collaboratively and widely distributed among all stakeholders;
- Employment of a wide range of outreach tools and public involvement activities;
- Opportunities for the public to provide direct input;
- A process or method to demonstrate to the public how their input is considered and/or influences decision making;
- Transparent communication about decisions; and
- A values-based commitment to learn and adapt.

The San Onofre Lessons Learned review group was requested by the EDO to consider several items related to communications and external interactions² including:

- Format, focus, timing, location, security, and other logistics associated with the large stakeholder turnout at public meetings;
- Small group meetings set up with stakeholders to provide targeted outreach;
- The use of social media for communication; and
- Coordination of communications with stakeholders considering the significant external correspondence received.

² Page 4 of the March Memorandum

Since the conduct of the San Onofre lessons learned review occurred in parallel with this task force's efforts, insights collected related to San Onofre public meetings were considered and incorporated during this task force's process.

In addition to the reports noted above, the task group considered Management Directive (MD) 3.5, *Attendance at NRC Staff-Sponsored Meetings*, the existing 2002 policy on public meetings (67 FR 36920), and existing guidance documents from Agency Offices, including:

- Nuclear Reactor Regulation: Office Instruction COM-202 *Meetings with Applicants, Licensees, Vendors or Other Members of the Public*, Revision 1, July 2005 (ADAMS Accession No. ML051880011)
- Region I:
 - Joint DRP [Division of Reactor Projects] / DRS [Division of Reactor Safety] Policy 27/0530, *Interactions with Members of the Public or State and Local Governments*, April 5, 2010, Memorandum from Larry Scholl, Senior Reactor Inspector, to Darrell J. Roberts, Director DRS, and David C. Lew, Director DRP
 - Regional Instruction 0570.4, Revision 2, *Meetings with External Stakeholders*, November 27, 2012, Memorandum from William M. Dean, Regional Administrator, to all Region I employees
- Region II: Regional Office Instruction (ROI) No. 1972, *Preparation, Conduct, and Documentation of NRC Meetings*, June 18, 2014
- Region III:
 - RP 3.5 *Notification of Meetings*
 - RP 3.6 *Public Meetings after Major Inspections*
 - RP 5.1 *Government to Government Meetings*
- Region IV: Desk Guide – *Planning and Executing Public Meetings*

Other documents considered included

- NRC's Open Government Plan and Addenda
- Environmental Protection Agency (EPA) Superfund Handbook³

The task group interviewed over 100 staff and managers at all levels in several offices and regions with experience conducting all types of public meetings and public outreach. The list of questions used to solicit input on recommendations to improve public outreach and is included as Attachment 1 to this report.

The task group considered holding public meetings to solicit input for this effort. The task group reviewed the past support and information gathered during public meetings held to support the 2003 Public Communications Task Force. The task group found that there was

³ Superfund Community Involvement Handbook, EPA

limited public participation, significant staff resources expended to set up the meetings, and little useful input provided (primarily several comments related to ADAMS document timeliness). Based on these considerations, the decision was made to limit input and interviews to internal stakeholders.

Based upon the information gathered in the efforts above, the task group compiled a list of 23 draft recommendations which were categorized into four subcategories: public meeting preparation and outreach; meeting logistics; staff and stakeholder guidance on public meetings; and public meeting implementation. Many recommendations fell under the category of staff guidance; therefore, they became subtopics under Recommendation 3, Agency-Wide Guidance, rather than being eliminated.

These subcategories were further developed and refined by the task group members in the subgroup phase, including finalizing the language of the recommendations and determining implementation timeframes, expected resources required, and the impact to the goals of the task group.

The task group rated each recommendation in terms of the expected impact on NRC's public meetings: high, medium, or low. The task group also made an effort to estimate the resources required to successfully implement each recommendation using the same labels.

The task group's resulting five recommendations are described below in order of priority.

Challenges and Other Considerations

The task group found that there is wide variability in public meeting/outreach efforts throughout the agency, not just with the ability to plan for and conduct effective meetings, but also in the attitudes towards the value and usefulness of public interaction. Although the first issue can be addressed through training, on-the-job experience, and using the right staff members for public meeting-related tasks, the second requires a cultural shift.

The task group is not intending to say that NRC staff members as a whole do not value public meetings. A great number of NRC staff members understand the value of involvement and openness with public stakeholders and make significant efforts toward public outreach and engagement. Unfortunately, some do not.

Adding to the challenge of effective public engagement is the fact that outreach efforts may be left to technical staff that may not be skilled on the subject. Further, these efforts are sometimes given low priority compared to other safety-significant work unless management places a high priority on outreach efforts. Openness is more than holding a public meeting and allowing public comments. Staff must be open to stakeholder views and willing to respond, explain, and engage in dialog. There must be a shift towards a more inclusive process. If the necessary cultural shift is to happen, managers must first believe in the value of public interaction and convey that belief to staff. The task group believes that actions taken in response to this report will further this 'cultural shift' toward more meaningful public engagement which will result in increased public trust.

Additionally, the proper balance must be found between consistently implementing agency-wide standards and allowing staff flexibility in outreach efforts. The task group notes a lack of consistency across the agency with many public meeting-related topics. Better consistency across the agency will help the public know what to expect from an NRC meeting, regardless of where the meeting is held and which office or branch is holding the meeting. At the same time, the NRC must seek out and encourage creative ways to engage the public and pull in new stakeholders, as well as effectively interact with active/vocal stakeholders. Different offices have different meeting needs, depending on the topic and their targeted audience, and thus require flexibility and innovation in public meeting and engagement.

Recommendation 1: Center for Excellence

Recommendation: CoE for Public Engagement to serve as a centralized resource for information, advice, and support for staff responsible for the planning, execution, and evaluation of NRC public meetings.

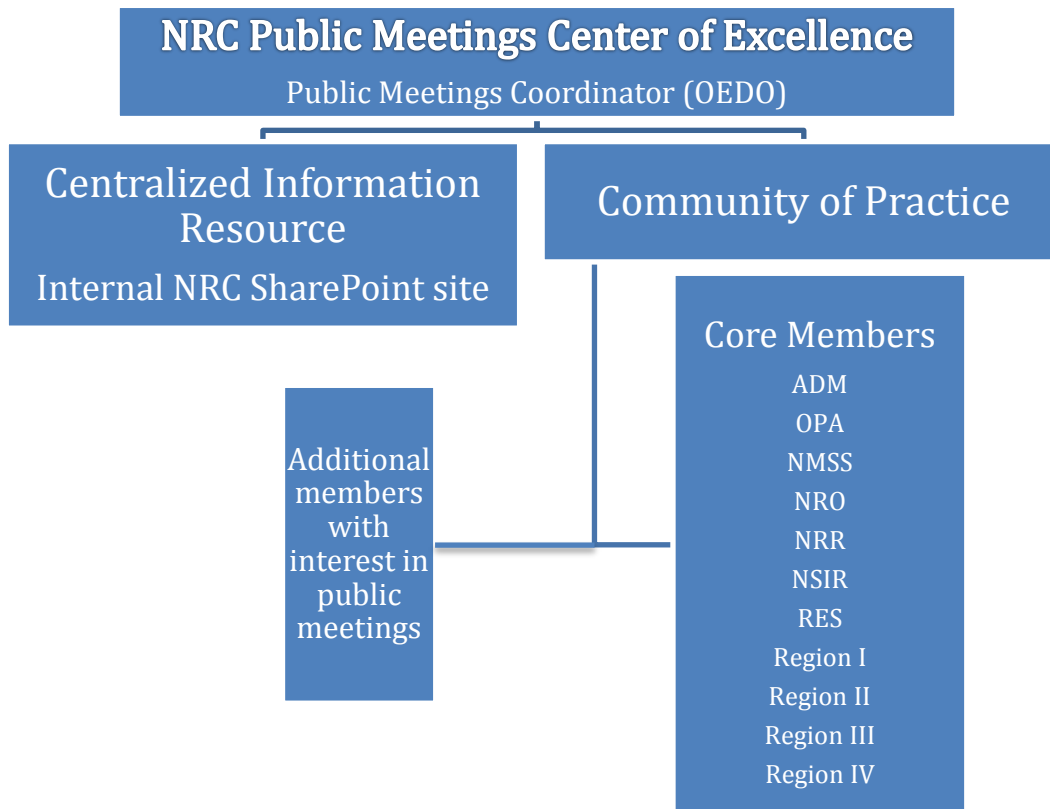
Description: The NRC staff conducts over a thousand public meetings each year. Although agency-wide guidance involving public meetings exists, many offices and regions have their own guidance. Office and Regional best practices are primarily shared internally. There is wide variability in NRC staff skill and experience with public meetings. There are pockets of excellence across the agency on conduct of successful public meetings, but there is little opportunity to share this knowledge across the agency. The CoE concept attempts to close some of these gaps by offering a forum that leverages the skills and experience of NRC staff that have developed public meeting skills. A CoE would provide added coordination and information sharing to assist NRC staff in planning, conducting, and evaluating effective public interactions.

A Public Meetings Coordinator, residing in the Office of the Executive Director of Operations (OEDO), is proposed as the program manager for this activity and would be responsible for overseeing and coordinating the CoE. Establishing a program manager with responsibility for overseeing the success of public meetings is a key component of this recommendation. Currently, there is no central authority responsible for overseeing and evaluating the success of NRC's public meetings or providing leadership to guide this outreach. The intent of the Public Meetings Coordinator would be to support and enhance the ability of the staff in implementing public meetings, but, similar to the CoE in general, not to take the lead in the conduct, execution, or oversight of individual activities or meetings from individual offices or regions. To ensure effective administration, the Public Meetings Coordinator should have some power of accountability to ensure staff are following best practices, performance metrics, and embracing openness values.

The CoE would consist of two primary components: 1) a **Community of Practice** of knowledgeable NRC staff for shared knowledge, support, and discussions of best practices, staff experiences, and lessons learned; and 2) a **Centralized Information Resource** of written materials and guidance.

Community of Practice

This component of the CoE involves a group of knowledgeable staff with hands-on experience who are available to provide assistance and coaching to staff who are preparing for public meetings. This specialist resource is critical for promoting best practices, sharing lessons learned, and providing a consultation service for meeting organizers. The organizational structure recommended by the task group is shown in the diagram below.



There is a wealth of staff knowledge and experience regarding public meeting activities that can and should be harnessed in a Community of Practice to encourage continuous improvement of NRC's efforts in public outreach. The Community of Practice would provide knowledgeable individuals to guide preparations, encourage staff to use best practices for public engagement, and stress the importance of public meetings. The Community of Practice would provide opportunities for more experienced practitioners to mentor new or less experienced staff by sharing knowledge, especially for large-scale meetings involving contentious topics or facilities. Consistent guidance, coaching, and direction will lead to an enhanced public outreach experience for both the staff and the NRC's stakeholders.

For controversial, political, and high-profile public meetings, the resource needs for public outreach increase significantly. The Community of Practice would provide enhanced resources, guidance, and advice to the staff responsible for planning and conducting meetings, but would only provide assistance, not take over the function of organizing or executing these meetings.

The Community of Practice could be patterned after NRC's In-House Meeting Facilitator & Advisor Program, Communications Council, or other similar collateral-duty organization. Offices with involvement in conducting or supporting public meetings should have representation on this council. The core members of this organization would have significant knowledge of at least one specific type of NRC public meeting (e.g., Category 1 public meetings with licensees), a specific aspect of NRC public meetings (e.g., participation technologies), or may be knowledgeable of NRC public meetings in general.

Any individual with interest in the NRC's public meetings or seeking assistance with public meeting-related topics would be welcome to participate in the opportunities provided by the Council (e.g., the members of the NRC's In-House Meeting Facilitator & Advisor Program).

Centralized Information Resource

Although the current NRC intranet *Communications*⁴ websites provide guidance and information on the conduct of public meetings, interviews with NRC staff revealed that most offices have developed and use their own internal public meeting web pages. These websites provide valuable information which may be of use throughout the agency. The formation of a professionally designed and executed comprehensive website would be invaluable to NRC staff and would improve efficiency in the planning and execution of, as well as the follow-up to NRC public outreach activities. The Centralized Information Resource is not meant to replace office sites; the intent is that the central site would provide the main source for guidance and information and that office sites would supplement the central site. There may be division- or regional-specific information, such as local facilities or state contacts, which is not practicable to place on the centralized website. However, if the central website is well designed and maintained, it would be the first place staff would go for useful information and guidance. The Centralized Information Resource website would include public meeting information, as well as forums to share experiences and lessons learned. Information provided on the site should include:

- Policies, procedures, and guidance
- Logistics and planning support
- Facilitation
- Communications and public outreach
- Training opportunities
- Links to Office, Division, and Regional websites
- Format options such as webcasts, webinars, teleconferences, and video-teleconferences
- Specialized support and guidance for high visibility or controversial projects
- Staff developed tools, resource contacts, lessons learned, and other documents.
- Frequently asked questions (FAQs)
- Link to the Community of Practice experts

⁴ Website can be found at: <http://www.internal.nrc.gov/communications/policy.html>

- Forum for discussion topics

The Centralized Information Resource would provide staff who infrequently conduct public meetings with guidance, checklists, best practices, and more to assist them in planning for and conducting effective public meetings.

Impact: HIGH

The CoE would provide visibility, focus, and needed resources to help the NRC achieve its openness goals, increase overall public confidence, and reinforce the NRC's image as a trusted regulator by providing a mentoring and coaching resource, as well as centralized information and accountability. The CoE would enhance the staff's ability to provide a more collaborative environment for information sharing and learning between the NRC and members of the public. The CoE provides a consistent starting point for staff engaged in public meeting/outreach efforts thereby facilitating a minimum level of proficiency and a consistent agency message.

Implementation Timeframe: The following short-term and long-term activities would commence upon approval of this recommendation, as well as appropriate staff evaluation of more specific steps going forward.

Short Term Activities – 6 months to 1 year

1. Receive approval for an additional full-time equivalent (FTE) in OEDO.
2. Fill Public Meeting Coordinator position.
3. Public Meeting Coordinator develops an action plan.
4. Identify public meeting liaisons at the appropriate program offices and regions. Because the NRC In-House Facilitator and Advisor Program is in-place and offers some of these services, it can continue to be utilized as a central resource for public meeting advice and support until the CoE is established.

Long Term Activities – 1 year to 3 years

1. Public Meeting Coordinator works with the public meeting liaisons to implement the action plan.
2. Advertise, promote, and train staff on the CoE.
3. Evaluate all sources of public meeting information at the NRC and begin the process of centralizing into one location, likely SharePoint, in addition to improving the public's ability to access information and guidance on public meetings.

Resources Expected: HIGH

Resources (over 2 FTE per year) necessary to effectively implement, operate, and maintain this program include one FTE for the program manager in OEDO. The other FTE would be spread out over the various staff members who support the CoE.

Strengths:

- Enhance overall NRC communications with external stakeholders by: ensuring consistency in communications for highly sensitive projects; providing better community

outreach, engagement, and information sharing; and facilitating more effective NRC public meetings, especially in the case of highly controversial/high-profile issues.

- Provide valuable information for internal stakeholders. It would also provide contacts and staff consultants for meeting organizers. This would be especially useful for organizing unique or high-profile meetings.
- Reduce the number of resources needed to plan a public meeting. Essentially, having a 'one-stop' central resource for NRC staff to use in conducting a public meeting would save time for the meeting planners and would provide the expert guidance and advice needed to produce successful public meetings.
- Ensure more effective sharing of lessons learned to continually improve NRC's public outreach efforts.

Weaknesses:

- Dedicated resources will be required to effectively start-up, operate, and maintain a CoE.
- Some staff may be resistant to new ideas and the increased accountability of adhering to policies and best practices.
- To effectively implement the program, training, promoting, and advertising will be required.

Recommendation 2: Public Meeting Training and Qualification

Recommendation: Create a public meeting qualification program for NRC staff that plan, conduct, and participate in public meetings to ensure acceptable meeting planning, outreach, public speaking, presentation, and facilitation skills.

Description: Currently, staff experience and skill in planning, conducting, and participating in public meetings vary greatly. The staff members who are assigned these responsibilities may have extensive training and experience in these topics, or may have little-to-none. A public meeting qualification program would help ensure that the NRC staff that have public meeting-related responsibilities have the training and experience they need to complete these critical tasks effectively.

Through a qualification program, NRC should be able to assess the ability of staff members to consistently conduct public meetings that accomplish engagement with the public in a manner that helps ensure positive experiences for meeting participants and presentations are delivered in a manner that effectively represents the NRC, while improving public confidence in the NRC. This could be addressed by incorporating specific assessment tools in staff training, as well as developing additional individual study activities and on-the-job-training for those staff that will be interacting with the public.

The task group believes a staff member with sound public interaction skills should be the principal interface with the public during a public meeting, regardless of whether this individual

is the technical lead or program manager of the topic. This would be a change from the current practice which is typically to have the project manager or task lead be the principal interface with the public. Public meeting-qualified staff members, would plan, organize, and facilitate meetings, as well as be the principal interface with the public. In some cases, if the project manager or task lead is not public meeting-qualified, their role may be to provide support to such qualified staffers such as addressing detailed questions at the meeting.

The qualification program could expand upon existing agency-wide training, as well as individual office-level and division-level training efforts. For example, the Office of Nuclear Reactor Regulation's Office Instruction ADM-504, *Qualification Program*, provides public engagement and media training as a general study activity for all appropriate staff, and specific on-the-job public meetings training for Operating Reactor Licensing Project Managers. This qualification program is one that could be used as a baseline for an agency-wide public meeting qualification program in addition to the courses described below. A qualification program could be incorporated into current office qualification programs or be a standalone program such as the *NRC Inspection Manual* Chapters 1245, "Qualification Program for Operating Reactor Programs," or 1252, "Construction Inspector Training and Qualification Program," qualification programs.

When initially implementing the program, consideration should be given to allowing experienced staff members to opt out of certain training per their knowledge and experience level. Regardless of how the qualification program is implemented, mandatory refresher training for staff members that run and participate in public meetings is a necessity to ensure staff members' skills stay up-to-date, as well as to help ensure best and current practices are put into play.

The following three courses are currently being developed to aid in providing the NRC staff with a base of knowledge and hands-on participation and practice:

- Basic presentation course. This 3-day course is designed for personnel with very little or no skills in speaking and presentation skills to build a foundation of basic solid communication skills that also addresses a range of required speaking skills.
- Advanced presentation course. This 2-day course is designed for personnel who have experience and who are familiar with presenting and speaking to further sharpen their skills. This course will and can be used for a refresher course.
- Conducting effective public meetings. This 2-day course is designed to provide personnel with a basic understanding of conducting a public meeting by addressing the guidelines and procedures to conduct a public meeting with an emphasis on a basic understanding of planning, conducting public meetings, and doing mock scenarios to practice the skills they are learning.

These courses have been developed to provide a good knowledge base that will be key in public engagement situations and should be part of the qualification program. They will also help NRC staff develop the communication skills needed to address multiple audiences and deal with highly emotional situations. These courses will be refined to reflect the best practices, lessons learned, and feedback from course participants and will be updated regularly to maintain current practices and procedures.

Impact: HIGH

A public meeting qualification program would help the NRC achieve its openness goals, increase overall public confidence, and reinforce the NRC’s image as a trusted regulator by ensuring NRC staff who interact with the public do so effectively.

Implementation Timeframe:

Short Term Activities – 6 months to 1 year

1. Pilot the Conducting Effective Public Meetings and other presentation courses.
2. Refine the courses, as appropriate.

Long Term Activities – 1 year and beyond

1. Conduct an assessment to determine the training and experience necessary, as well as the best way to implement the qualification plan (incorporate into existing qualification program or a stand-alone program).
2. Create and pilot any additional needed training as revealed by the assessment.
3. Provide a window to pilot the qualification program and for existing NRC staff to become qualified in public meetings.
4. Fully implement the qualification program.

Resources Required: MEDIUM

FTE, funds, and other resources (e.g., contract changes or additions) will be required to complete the action. This would include which NRC office/offices will be responsible for implementing the recommendation.

Strengths:

- Provide more consistency, increased proficiency, and better positive interaction with the public.
- Improve interactions and communication between staff, licensees, and the public. This would provide better agency openness, more productive meetings, more productive interactions with internal and external parties, and increased public relations and confidence.
- Establish new visibility for skills achievement in a process that is vitally important to the NRC’s mission.

Weaknesses:

- Resources would be needed to develop and implement qualification and assessment requirements.
- The qualification and assessment tools would take significant time to research, develop, implement, and evaluate their effectiveness.
- Possible unintended consequence of new aspect of different levels of qualification of staff.

Recommendation 3: Agency-wide Guidance

Recommendation: Building upon existing documents, develop and implement a comprehensive set of enhanced agency-wide guidance on conducting public meetings.

Description: A central theme in the input collected by the task group was the need for improved agency-wide guidance that was appropriately detailed, updated, and comprehensive. Many people said that several offices and regions have developed their own office-level guidance and procedures because the agency-level guidance was not detailed enough, up-to-date, or easy to use. Having staff members in different parts of the agency relying on separate office-level guidance documents leads to the risk of inconsistency, especially over time as policies and documents change. Improved guidance would facilitate the conduct of NRC public meetings that are of higher quality more consistently across various program areas. This should lead to more positive experiences for meeting attendees, helping to improve public confidence and the NRC's image.

Current agency-wide guidance on public meetings (e.g., 2002 Policy Statement on “Enhancing Public Participation in NRC Meetings;” MD 3.5, “Attendance at NRC Staff-Sponsored Meetings,” NUREG/BR-0297, “NRC Public Meetings,” and other available agency-wide supporting documents) should be reviewed to ensure the guidance is appropriate, consistent, current, and at an appropriate level of detail. Office-specific guidance on public meetings should be identified and incorporated into agency-wide guidance, as appropriate. Outdated guidance should be updated or eliminated. One example noted by the task group was refining MD 3.5 to remove logistical direction that is too prescriptive for agency-wide guidance. For example, consideration should be given to whether the guidance provided in Handbook Section IV. “ADDITIONAL MEETING PROCEDURES” should be removed and placed in a lower-level guidance document to allow for greater ease in revising the guidance and flexibility between different venues. The enhanced guidance should be clear, concise, and allow for flexibility for addressing different circumstances, as well as allow for creative approaches to public interactions. Based on the input received from internal stakeholders, the following topics should be considered for new or enhanced agency-wide guidance. Direction and information on these topics should be incorporated into the appropriate level of guidance, such as an MD, an OEDO

procedure⁵, or more informal guidance⁶. The task group believes that the specific topics below should be considered in the process of creating the enhanced guidance. This is not meant to be a comprehensive list.

- Public meeting categories: current guidance does not recognize non-traditional meeting types, such as stand-alone open houses and poster sessions. Staff would benefit from agency-wide guidance towards ways to adopt a more flexible approach in using alternative formats to traditional meetings (e.g., alternatives to traditional Category 1 end-of-cycle meetings at sites where public attendance has been historically low and the plants are performing well).
- Public meeting purpose: the agency staff should find additional ways to clearly identify the purpose of a public meeting via public meeting notices, press releases, and the public meeting schedule on the agency's internet page, as well as other vehicles.
- Highly controversial meetings: agency-wide guidance is needed addressing highly charged, emotional, and disruptive participants at NRC public meetings. Staff have expressed interest in the use of security personnel, managing public question and answer (Q&A) sessions, NRC staff participation, and when and how to dispel tension or even terminate a meeting, if necessary.
- Meeting participants' unanswered questions: agency-wide guidance is needed for handling questions asked but not answered at NRC public meetings.
- Closed meetings: agency-wide guidance is needed for conducting closed meetings, specifically, the public restrictions, handling of sensitive information, and types of participation.
- Logistic best practices: agency-wide guidance is needed on logistic details, including security planning (especially for offsite meetings), use of audio/visual equipment, and use of remote participation technology (e.g., Webcast, Webinars).
- Meeting locations: agency-wide guidance is needed on external venues for public meetings, including funding requisition, contracts, and use of potentially controversial locations such as upscale resorts, religious facilities, etc.
- Sign-in sheets: agency-wide guidance is needed to eliminate the confusion and inconsistency among NRC staff involving the use of sign-in sheets at public meetings.

⁵ See <http://fusion.nrc.gov/edo/team/Lists/OEDO%20Procedures/Type%20View.aspx>

⁶ For example, the guidance on Communication Tools and Plans at http://www.internal.nrc.gov/communications/comm_tools/guidance.html

- The role of the licensee: agency-wide guidance is needed to clarify the responsibilities of licensees at NRC public meetings.
- Recording public meetings: agency-wide guidance is needed on factors to consider in determining if meetings should be videotaped, recorded, or transcribed.
- Public recording of public meetings: agency-wide guidance is needed on how to handle situations where members of the public wish to record public meetings.

All guidance documents need to align with the current Strategic Plan vision statement focusing on use of public meetings to convey competence to stakeholders and to promote trust in the agency. The guidance must also address and encourage more flexible approaches to public meetings, such as an open house or webinar, to achieve more meaningful public engagement.

Impact: HIGH

Improved guidance is essential to improving the quality of the agency's public meetings.

Implementation Timeframe:

Short Term Activities – 6 months to 1 year

1. Assess office and division-level guidance for incorporation into agency-wide guidance.
2. Create plan for providing agency-wide guidance at the appropriate level.
3. Begin initial implementation of the plan by addressing the guidance that could be created or refined quickly while starting to work on longer-term activities.

Long Term Activities – 1 year and beyond

1. Finish implementation of the plan.
2. Revise and update guidance, as necessary.

Resources Required: MEDIUM

OEDO would lead the efforts, with extensive input and support from offices that conduct or support public meetings as well as the Office of Public Affairs (OPA). Once the updated guidance is completed, it would need to be communicated to staff agency wide, and appropriate methods for providing training on the new content would need to be considered. Existing courses that cover public meeting planning and conduct would need to be updated.

Strengths:

- Provides management tools and information to sustain improvements.
- Provides more consistency across the agency in how public meetings are planned and held, which can lead to higher-quality meetings.
- Helps reduce the amount of effort staff expends to set up and conduct meetings, and make the planning process more efficient.

- Supports the agency’s knowledge management efforts, especially when there are new staff and/or turnover in staff.

Weaknesses:

- This will likely be a very resource-intensive action, not only for the offices that contribute to creating and revising guidance, but also in implementing changes and updating agency training.
- It will be difficult to create a document that provides a level of detail that is beneficial, but not too prescriptive as to preclude use by all office and regional staff.
- If too narrowly interpreted, guidance could stifle creativity and flexibility.

Recommendation 4: External Stakeholder Resources

Recommendation: Develop or update guidance and other resources to help stakeholders, including members of the public and licensees, effectively participate in public meetings.

Description: A principal reason stakeholders are dissatisfied with NRC’s public meetings is due to their misunderstanding of factors such as the purpose of a meeting, the roles of participants, including NRC representatives, etc. For example, the agency needs to clearly identify whether it is seeking public input as the basis for a regulatory decision at a meeting, or whether a meeting is informational. Additionally, the public often refers to NRC public meetings as ‘hearings’ which also reveals significant misconceptions.

The NRC can greatly aid stakeholders by providing them up-to-date information, guidance, and other resources that could help them better prepare for and participate in its public meetings. The goals of providing this information are to improve the exchange of information during meetings and improve the overall meeting experience by helping stakeholders better understand the public meeting process and manage their expectations. Information could be communicated through vehicles such as the public website, via NUREG, brochures, and/or through generic communications to licensees. Different methods may be needed to communicate with different targeted audiences (e.g., licensees versus the general public).

A user-friendly interface for NRC’s stakeholders on its public website is a necessity to help ensure the information is easy to find and access. All products must be written in plain language, and consideration should be given to translating products into other languages, as appropriate.

The guidance should address such issues as:

- Purpose of public meetings
- Public meeting process, including types of meetings
- Roles of the NRC, licensee, and public
- Expectations regarding interactions between NRC, the public, and licensees
- Post-meeting expectations

Additionally, the NRC has a number of NUREGs involving public meetings such as NUREG/BR-0215, Rev. 2, “Public Involvement in the Nuclear Regulatory Process,” dated October 2004 and NUREG/BR-0010, Rev. 4. “Citizen’s Guide to U.S. Nuclear Regulatory Commission Information,” dated August 2003. Unfortunately, these documents are out-of-date and not well-known to the staff, much less the public. Thus, they provide little assistance to the NRC’s stakeholders towards preparing for and participating in its public meetings. These documents should either be updated or eliminated.

Impact: MEDIUM

While this action could enhance the agency’s public meeting/outreach efforts, such guidance may not be necessary to enhance the effectiveness of all public meetings. The impact on individual meetings would be dependent on the nature of the meeting and on stakeholder’s familiarity/acceptance of the guidance.

Implementation Timeframe:

Short Term Activities – 6 months to 1 year

1. Assess current information and guidance involving public meetings available to NRC’s stakeholders.
2. Create plan for creating, updating, or eliminating guidance, as well as the right ways to provide information to NRC’s stakeholders.
3. Begin initial implementation of the plan by addressing the guidance that could be created or refined quickly while starting to work on longer-term activities.

Long Term Activities – 1 year and beyond

1. Finish implementation of the plan.
2. Revise and update guidance, as necessary.

Resources Required: LOW

The amount of time and resources required to implement the recommendation are, in part, a function of the type(s) of communication(s) developed and whether a contractor is engaged to develop professional-level resources.

Strengths:

- Less misunderstanding between the agency and stakeholders at public meetings
- Improved interactions between agency staff and stakeholders, which may lead to more productive exchanges and engagement.
- Increased public confidence in agency decisions
- Improved communications to members of the public (i.e., via updated NUREG/BR-0297) about NRC’s approach to public meetings and how they can participate.

Weaknesses:

- Significant resources may be necessary to develop communication products.
- Challenge of developing guidance applicable to all types of public meetings and across the diverse range of agency licensees.
- Guidance that is too general may not be useful for some NRC public meetings.
- Some public meeting attendees may not use the resources and thereby potentially diminish enhancements.

Recommendation 5: Public Meeting Quality Standards

Recommendation: Design and establish more effective ways to measure the success of NRC public meetings.

Description: The only formal way the NRC currently collects feedback involving the success of its public meetings is through the NRC’s Public Meeting Feedback Form. Staff is expected to provide hard copies of the form at all public meetings. Members of the public have three ways to use the form to provide feedback: providing a filled-out hard copy form to NRC staff, providing feedback electronically using a computer, and providing feedback electronically through a smartphone through the quick response (QR) code provided on the form. Currently, the form consists of eight questions and a place for members of the public to provide written comments. Not only are response rates for the form very low, but there is also no way to know if the individuals who fill out the form provide a true representative sampling of the public participating in the meeting. There are no controls in place to ensure a proper sampling of stakeholders’ viewpoints.

If the NRC is serious about improving its public meetings, steps must be taken to better measure and monitor what aspects of NRC’s public meetings are working well and what aspects are not, especially from the public’s perspective. The NRC could attempt to take this action in-house, or could secure the services of a contractor to determine ways it can measure the success of its public meetings. Once these methods are implemented and feedback received, processes to assess the information gained from the feedback should be created.

Impact: MEDIUM

The task group feels this action would make some positive impact towards enhancing our public meetings

Implementation Timeframe:

Short Term Activities – 6 months to 1 year

1. Develop contract for services and secure a contractor.

Long Term Activities – 1 year and beyond

1. Allow time for the contractor to perform their work and provide results and recommendations.

2. Once the contractor provides their recommendations, NRC would need to decide which recommendations to implement and how to implement them.

Resources Required: LOW

Contractor funding and FTE to create and implement changes would be needed

Strengths:

- Receiving more accurate and actionable information on what is and is not working with our public meetings would greatly assist the NRC staff with improving the public meeting experience for attendees.
- NRC could expand knowledge and utilization of technology-based solutions in the area.
- If measures are shared publicly, it would provide more transparency on how the agency is doing in conducting public outreach.

Weaknesses:

- This could become a resource-intensive action if done periodically.
- It may be very challenging to develop effective and meaningful performance measures.