



DSI-14 (24)

Conference of Radiation Control Program Directors, Inc.

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November 27, 1996

Mr. John C. Hoyle
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTN: Chief of Docketing and Services Branch

Dear Mr. Hoyle:

Enclosed are the comments from the Conference of Radiation Control Program Directors, Inc. (CRCPD) Board of Directors on the U.S. Nuclear Regulatory Commission's (NRC) Strategic Assessment and Rebaselining issues papers. The CRCPD is a national organization dedicated to radiation protection and whose membership is made up of personnel from state, territorial, and local radiation control programs throughout the country.

The activities of the NRC, especially in the radioactive materials area, have a significant impact on state and local radiation control programs. We have concentrated our comments on those issues papers that most directly impact the future of the programs represented in CRCPD. Comments are enclosed on the following Direction Setting Issues Papers:

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| DSI 2 | Oversight of the Department of Energy |
| DSI 4 | NRC's Relationship with Agreement States |
| DSI 5 | Low Level Waste |
| DSI 6 | High Level Radioactive Waste |
| DSI 7 | Materials/Medical Oversight |
| DSI 9 | Decommissioning - Non-Reactor |
| DSI 12 | Risk-Informed, Performance-Based Regulation |
| DSI 13 | Role of Industry |
| DSI 14 | Public Communication Initiatives |
| DSI 21 | Fees |
| DSI 22 | Research |
| DSI 23 | Enhancing Regulatory Excellence |
| DSI 24 | Power Reactor Decommissioning |

We appreciate the opportunity to comment on these issues and your consideration of our concerns.

Sincerely,

William P. Dornsife

William P. Dornsife
Chairman, CRCPD

Enclosures



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**CRCPD Board of Directors
Comments on**

DIRECTION SETTING ISSUES PAPER 14

PUBLIC COMMUNICATION INITIATIVES

Many of the options in the other DSIs have a public communication component. This issue could have been subsumed in the discussion on other options, but it is noteworthy that it was considered important enough to be dealt with individually. This is an area ripe for a self-assessment. What are the goals of a public communication effort? Are they to obtain agreement for a course of action that the NRC has already defined? Or are they to really identify additional issues for consideration? If NRC has not always been "right" in the past, can a program of public interaction help to improve regulatory excellence? Can public discussion of risk help to provide a sound foundation to make resource decisions? Can better understanding of the trade-offs involved in regulation help NRC regain public confidence? Is the public affairs program only to assist the public in making informed judgements regarding NRC activities, or is it to influence the NRC's activities?

If NRC is to regain public credibility, it needs to find grass roots support for its mission. It is not enough to provide information to those who ask for it, or those who take the time to go to a public document room and search for it. You have to first capture the interest of a largely disinterested public. The most effective public communication strategy for regaining credibility is visibility. This could be as simple as providing informational materials at local community sponsored events to educate state, county, and local officials as well as the general public. Forming a partnership with local concerned citizens could lead to a better strategy for cleaning up a contaminated site, for instance. It is important not to just identify public concerns and address them, but to allow public input to help to shape the final outcome of a project. Option 3 (Place a Priority on Expanding General Public Outreach) is the only option that actually begins to engage the public.

The NRC has relied on conducting open meetings to discuss various issues. The traditional public meeting format may be intimidating. People will be put off enough by the technical terminology and the endless acronyms. If they are expected to speak into a microphone and have their comments recorded by a stenographer, they could be even further alienated. There are other options for public meetings. These should be explored.

To begin to overcome the scepticism and mistrust of the NRC by the media and the public, there needs to be better public understanding of the NRC's role, philosophy, and regulatory programs. Utilizing retired NRC employees to give educational seminars at various venues would be an inexpensive and advantageous educational method of overcoming mistrust. Some likely audiences might be League of Municipality conferences, League of Mayor conferences, universities, community colleges, etc. It is important that the NRC

ensure the presenters are aware of their audiences. This means not using technical jargon or speaking over the heads of those listening. People tend to lose interest. Simplifying the presentation, empathetically listening to what people have to say, and thoughtfully responding are all important skills for the presenters.

The NRC would be missing the opportunity to effectively implement the programs in the other DSIs if they only concentrate on Option 2 (Early Identification of Public Concerns). Even if public concerns could be anticipated, as a situation evolves, concerns can also evolve. A skeptical public will keep finding "concerns" rather than moving on to action unless they can learn to trust a public agency. It is the long term, general public communication and education that will pay off in the future. The NRC should be providing the leadership in education of the public about radiation protection in a general sense, and then showing how they are applying it in a specific instance. Anything less will only increase mistrust.