

DSI-G1

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**From:** Charles Haughney  
**To:** WNP2.SECY  
**Date:** 12/9/96 5:18pm  
**Subject:** Strategic Assessment Comment

I offer the attached comment, not to point to any particular issue paper, but to suggest an aspect of the NRC that should be altered to enhance our existing activities and that would allow the agency to process any future changes more efficiently.

The attached comments are entirely my own, and do not have the concurrence or blessing of my management. My many friends in OGC have not been asked to either endorse my views or legally object to them.

Charley Haughney

**CC:** CJP1,MRK,NKS,CJP1



*enail*  
**Acknowledged by card** 12/31/96 DMS

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## MIXED MESSAGES

The comments that I offer reflect my own opinion, developed during nearly 20 years of work as an NRC staff member and manager. From a broad perspective, I believe that the vision and goals contained in the Strategic Assessment Process are fundamentally important to future NRC success. I congratulate Chairman Jackson for having the insight and courage to embark on such a process. As I will develop in this comment, I feel there is a basic characteristic of the NRC organizational culture, which makes it difficult to change, which diminishes our ability to do our job properly, and which may therefore impede portions of the forthcoming strategic assessment initiatives.

The NRC has many mandates, but the most fundamental is to protect the public health and safety. In my experience as an NRC staffer, we are not always able to stay focussed on that mandate. Many competing forces act to steer our efforts towards other activities that are not directly associated with the protection of the public health and safety. Most of these forces involve unanticipated distractions. Their distractions include: (1) executive correspondence, so-called "*Green Tickets*"; (2) a parade of tasks forces created to solve special problems; (3) protracted discourse with the press or members of the public and; (4) selected staff spending most of their available time dealing with particularly persistent critics. All of these things are part of everyday life in the NRC. The issue centers on how we handle them, how we emphasize them relative to other tasks, and how we balance these activities with a fundamental mandate to perform safety reviews through licensing and inspection. Within the culture of the NRC, all of these activities mentioned in this paragraph take precedence over our ordinary safety activities.

An overriding aspect of the NRC's culture is its strong emphasis on "*The Schedule*". The distractions previously mentioned generally receive particular schedular emphasis. Many of

these items are tracked with great vigor up to the highest levels of the NRC to ensure that measurable accomplishment occurs in very brief, intense periods of time. Supervisors and managers are told that the most important aspect of their performance is their timeliness on answering green tickets, not the technical adequacy of their confirmatory calculations when reviewing safety-related applications. I have been given this particular message dozens of times in my nearly 20 years at the NRC. This organizational behavior is understandable, but not necessarily appropriate. We want to look good in the eyes of others, particularly the Congress, the industry, and the public who scrutinizes our every keystroke. But at what price to safety? These high-visibility activities are imprecisely budgeted, for by their very nature they are unpredictable and vary widely from branch to branch. When I have questioned this organizational behavior, I have been told, with a combination of exasperation and zealotry, that we *must* do these things, we *must* comprehensively answer the Congress in less than 24 hours, we *must* keep the public happy.

"The Schedule", a foundation of NRC's culture, extends to our performance on licensing casework, and inspection reports. There, of course, we are attempting to respond to a licensee's needs to begin an activity or to communicate inspection findings while they are still fresh. Scheduling licensing and inspection activities allows us to plan for the next task and tasks several months hence. Scheduling in this context is a highly useful management tool. The schedules for licensing and inspection become imprecisely woven with the schedules for the distractions. In spite of careful planning, many activities have a tendency to fall behind. The distractions may become intense; and licensing and inspection progress may suffer significantly. As that happens, the criticism multiplies from not only the public and the Congress, but also from the industry. In my experience, at such times pressure on the staff to simply get something done can become extreme. Discussions ensue about mandatory overtime and adjustments in priorities, but discussions are less likely to touch upon preserving the technical content of our safety work. In spite of this turmoil,

we avoid turning out safety evaluation reports or inspection reports that are devoid of technical content. We don't have staff members that have great pangs of conscience when they sign these documents, but many of them have felt that they aren't quite what they should be. We should have asked a few more questions, made another modeling run, or simply done a better technical job. We know that the licensees for the most part have done their job and that the likelihood of a real safety problem arising is small. So we hurry and we rush and we meet the precious schedule.

I have concluded that the culture of the NRC sometimes emphasizes scheduler performance to the detriment of safety. This imbalance is not extreme or catastrophic, and varies drastically from day to day. This emphasis on getting things done and looking good causes us to be somewhat less than thorough when doing our ordinary safety activities. We are forever compromising, usually successfully; but we do not consistently meet the standards of thoroughness that I feel we would demand of all our major licensees. Encumbered with distractions, a staff member who is doing casework will invariably stop doing those extra things that make for a better review. These extras include: re-reviewing applicable standards and standard review plans and making a supplemental list of topics to be covered, researching pertinent technical issues in the library, reviewing similar SERs or inspection reports, reviewing applicable 50.59 reports.

Staff members performing safety functions are forever facing choices, choices about schedule, about thoroughness of the review, about time to prepare, about how much to write. These choices will always be with us and are appropriate to the nature of our matrix organization. But while our agency slogans trumpet our emphasis on safety, our ingrained culture and repetitive actions emphasize schedule as being highly important at the same time. In my view, this culture needs adjustment.

I have five recommendations:

1. Seriously and accurately budget for all the distracting activities I have mentioned above. Don't just include them as some arbitrary fudge factor in labor rates. Attempt to budget this workload on at least a division if not a branch level.
2. Train and assign people who are skilled at handling these external issues, and leave the bulk of the technical staff to concentrate on safety matters, including not just casework, but also supporting work like 50.59 reviews. If necessary, rotate people through the distraction squad so that they may maintain their technical skill and have an equal chance at career growth. Give everyone a chance in both limelights, internal and external.

3. Recalibrate our everyday messages and actions so that they consistently emphasize safety.
4. Don't overpromise to others, whether they be licensees, the Congress or intervenors as to what we can do and by when. Don't cling to "the Schedule" as if it were sacred scrolls.
5. Consistently support the staff on the proper choice between safety and schedule.