

RESPONSE SHEET

TO: Brooke P. Clark, Secretary
FROM: Commissioner Crowell
SUBJECT: COMAXC-23-0001: Enabling the Mission – A Measured Approach to the Future of Work

Approved X Disapproved Abstain Not Participating

COMMENTS: Below Attached X None

Bradley R. Crowell Digitally signed by
Bradley R. Crowell
Date: 2023.06.07
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Yes X

No

Signature

Voted May 19, 2023

**Commissioner Crowell's Comments on COMAXC-23-0001
"Enabling the Mission – A Measured Approach to the Future of Work"**

The NRC is simultaneously facing two major and interrelated inflection points that will define the future of the agency. The first inflection point relates to the agency's processes and organization for achieving its fundamental mission. The second, interrelated point, is focused on how the agency will structure its work environment to enable successful execution of its mission in adherence with the guiding principles of the federal government's coordinated effort to responsibly transition executive branch agencies to a contemporary work model that benefits both employees and the public stakeholders whom we serve.

From a mission execution perspective, the NRC is facing some of both its greatest challenges and opportunities since the founding of the agency in 1974. We must build the workforce of the future while simultaneously adopting more flexible, efficient regulatory processes that facilitates timely, fact-based decisions. In doing so, we must continue to uphold the agency's foundational responsibility to protect public health and safety while enhancing our commitment to transparency, public trust, and meaningful engagement with all stakeholders. This is no small task.

To be successful, we must institute a modern work environment with clear and actionable nexus to our mission execution goals. This will require new and revised policies and procedures to both retain our existing expert workforce while also recruiting a significant number of new, qualified employees in an increasingly constrained and competitive labor market. With 24% of the NRC workforce currently retirement eligible, attrition is inevitable. This reality further emphasizes the NRC's need to incentivize employee retention and attract the next generation of the NRC workforce. This will necessarily include fostering an innovative work environment, enhancing knowledge transfer, and looking beyond the walls of the NRC for best practices.

Through the pandemic we found new ways to effectively communicate and learned that many traditional office functions and responsibilities can be performed remotely. Likewise, we were also reminded that many activities can only be performed in-person, or are more effectively performed, through meaningful in-person engagement. A few notable examples of such activities include key leadership functions, relationship and team-building, security functions, select trainings, on-boarding, as well as brainstorming and critical decision making, just to name a few. That said, there is no "one size fits all" approach to striking this balance. Every employee, regardless of job duties, benefits from a degree of in-person engagement. However, in today's dynamic work environment, we must also maintain appropriate flexibility for needed in-person engagement that may ebb and flow based on the natural evolution of job duties and responsibilities over time and as unexpected events may warrant. This is particularly true in an agency like the NRC that values frequent and widespread rotational opportunities with unique job responsibilities.

Based on these basic principles and lessons learned, I support the EDO's fundamental concept of instituting "Presence with a Purpose." However, at present, I find the concept lacking sufficient detail and appropriate guardrails to provide the Commission the necessary confidence that "Presence with a Purpose" will be successful. I share many of the concerns expressed by Commissioner Caputo that the current approach proposed by the EDO "is not consistent and actionable and that the current draft guidance lacks evidence and a data-driven process with the

necessary specificity to measure progress and performance.” Additionally, I am also concerned that the current proposal does not properly reflect the overall goals articulated by the Administration for federal agencies to substantially increase meaningful in-person work, including specific guidance from OMB and the President’s Management Council Work Environment Working Group that a sound planning principle for agencies could mean that, as a whole, physical presence at the worksite is at least equal to the time spent at alternative work locations. While this overarching guidance does not preclude individual agency’s from instituting a different balance, I believe any deviations should be based on a clear rationale, reflective of the agency’s mission, and supported by objective data and analysis. I do not believe the EDO’s current proposal meets this threshold.

Therefore, the staff should provide to the Commission no later than 10 business days before NRC is expected to reach a final agency decision on its Work Environment Plan, an information paper discussing: (1) the staff’s proposed decision; (2) anticipated guidance for implementing Presence with Purpose norms and behaviors; (3) key performance indicators for monitoring accomplishment of our mission, organizational health, and public confidence; (4) expected changes to policies, management directives, collective bargaining agreement, and other governing documents; (5) data relied upon to reach its proposed decision, and (6) an internal strategic communication plan. The information paper should include a summary of all formal and informal feedback received from OMB and discuss how the staff responded to feedback, including highlighting any feedback that was not incorporated into the NRC plan. The information paper should also include a narrative and relevant data on how NRC’s plan for the work environment compares to other agencies of similar size and function. As NRC staff continues to meet with OMB and the President’s Management Council, the EDO should regularly update the Commission.