

BENCHMARKING

Following the Commission briefing on the results of the 2024 Agency Action Review Meeting, including an update on Resident Inspector (RI) program health, the Commission directed the staff to conduct additional benchmarking.¹

Department of State

The U.S. diplomatic corps is a difficult program to benchmark due to its complexity and size in comparison to the NRC's RI program. Whereas the RI program employs 119 inspectors (approximately 4 percent of the NRC staff) in two positions (RI and Senior Resident Inspector) at 57 locations in the United States, foreign service officers include thousands of Federal employees at "270 embassies, consulates and other diplomatic missions" worldwide.² These employees can range in roles from visa processors to Consul General, a very senior position. The State Department has a large infrastructure dedicated to supporting these positions, including housing, school services, and security.

Department of Energy

The Department of Energy (DOE) has 13 field offices employing facility representatives; these offices vary in size from a few staff up to dozens.³ The DOE employs over 15,000,⁴ meaning this program constitutes less than one tenth of a percent of its workforce. The pay, positions, and responsibilities vary from site to site but generally start at GS-13 and move to GS-14; some sites have pay banding, some have various relocation incentives, and some have a 10 percent group retention incentive. The DOE has no objectivity concerns and no tour length restrictions for these positions. Most DOE representatives remain at a facility for their entire career. Some transition to the greater DOE staff, but it is not seen as a normal career path, nor is service as a facility representative considered to increase an individual's promotion potential. Conversations with the DOE reveal that before and after the Coronavirus Disease 2019 pandemic, as it has faced a series of retirements, it has had difficulty staffing the position to full capacity and has had to hire contractors to complete the required work.

Defense Nuclear Facilities Safety Board

The Defense Nuclear Facilities Safety Board (DNFSB) has a Resident Inspector program with two residents per site at five sites. It has 128 employees,⁵ meaning the 10 residents make up 8 percent of its staff. It does not have a formal training program for residents; when an opening occurs, the Board posts it internally for any technical staff member to apply. Previous guidance was 3–5-year tours, but this had not been strictly enforced. In 2022, based on their assessment that objectivity is not a concern when weighed against maintaining positions staffed, the DNFSB

¹ "Staff Requirements—Briefing on Results of the Agency Action Review Meeting," August 2, 2024 (Agencywide Documents Access and Management System Accession No. ML24214A296).

² Foreign Service Officer, U.S. Department of State web page, <https://careers.state.gov/career-paths/foreign-service/officer/>, accessed October 1, 2024.

³ Based on DOE staff interview, September 2024.

⁴ DOE, U.S. Equal Opportunity Commission web page, <https://www.eeoc.gov/federal-sector/department-energy-doe-0>, accessed October 7, 2024.

⁵ DNFSB, "FY 2025 Congressional Budget Justification, FY 2023 Annual Performance Report," March 11, 2024.

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implemented a new policy with no tour of duty limit.⁶ There is some value in the resident experience, but it is not perceived as necessary for promotion within the DNFSB. Relocation expenses are reimbursed but there is normally no relocation incentive; however, in the past, the DNFSB has offered one if it is having difficulty recruiting someone to an open position. There is also no specialized pay scale; residents can negotiate a step increase (or equivalent in their specialized pay scale) to limit their loss in locality pay moving from Washington, DC, to a lower locality pay. The DNFSB has also experienced issues recruiting individuals to sites and has had to repost positions multiple times. Multiple residents in recent years, upon completion of their tours, left the DNFSB for other employment, usually because they did not want to relocate back to the Washington, DC, area.⁷

Department of Agriculture

The U.S. Department of Agriculture (USDA) employs over 6,500 food inspectors at private commercial slaughtering and other plants nationwide.⁸ This comprises the largest category of employees at the USDA, or approximately 6 percent of nearly 100,000 total employees.⁹ Food inspectors range in grade from GS-5 to GS-12, depending on position, education, and seniority. USDA provides a recruitment incentive of \$5,000 for new hires and has considered additional retention efforts. The positions have no tour duration limits; however, most individuals move on to other USDA positions after 4 years.¹⁰

Naval Criminal Investigation Services

Naval Criminal Investigation Services (NCIS) employs about 2,000 people, over half of which are special agents, at 191 locations in 41 countries.¹¹ These offices and billets are broken into three tiers based on staffing difficulties.¹² These tiers have varying tour limits between 2 and 4 years, driven by the needs to staff difficult overseas positions. Some of these tours also allow for multiple 1-year extensions with a maximum cap of between 5 and 8 years, specific to locations and positions based on staffing difficulty, training, and other factors. NCIS employees also benefit from the infrastructure afforded them by the overseas U.S. Department of Defense installations where they are stationed, such as schools, housing and services afforded to military members.

Conclusions and Assessment

No other agencies were concerned with objectivity for their employees. Many have similar difficulties with recruitment and retention and are using similar tools to address them. Relocation is a primary issue with the most similar agency (DNFSB), who has discontinued tour limits.

⁶ DNFSB Instruction I-524.1, "Resident Inspector Program," December 21, 2022.

⁷ Based on DNFSB staff interview, March 2020.

⁸ Food Inspector, USDA Food Safety and Inspection Service webpage, <https://www.fsis.usda.gov/careers/career-profiles/food-inspector>, accessed October 7, 2024.

⁹ About the NCIS USDA web page, <https://www.usda.gov/our-agency/about-usda>, accessed October 7, 2024.

¹⁰ Based on USDA staff interview, February 2020.

¹¹ Locations, Naval Criminal Investigation Services web page, <https://www.ncis.navy.mil/About-NCIS/Locations/>, accessed October 29, 2024.

¹² GenAdmin/10D-0163/25NOV19/SUBJ: GLOBAL PRESENCE—TIERED OFFICE DESIGNATIONS, Naval Criminal Investigation Services message, November 25, 2019.