

January 22, 1999

The Honorable Shirley Ann Jackson
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Chairman Jackson:

**SUBJECT: ADVISORY COMMITTEE ON NUCLEAR WASTE 1999 ACTION PLAN
 AND PRIORITY ISSUES**

The Advisory Committee on Nuclear Waste (ACNW) has modified its 1998 strategic plan to update the priority issues it will consider in 1999. As part of this update, we refer to the plan as an "action plan" rather than as a "strategic plan" to distinguish it from strategic plans required by the Government Performance and Results Act. A copy of the action plan is enclosed for your consideration.

The action plan is anchored to the 1997-2002 NRC's revised strategic plan and supports NRC's mission, vision, and relevant goals, strategies, and substrategies identified by the agency. The plan is consistent with ACNW's revised charter and the ACNW's 1999 operating plan, which is being updated to reflect the priority issues identified herein.

One purpose of the ACNW action plan is to guide the Committee in carrying out its mission over the next year. The Committee identifies first-tier priority issues it will address this year, and second-tier issues it will address if time and resources permit, unless directed otherwise by the Commission. In addition to the priority issues, the ACNW identifies process and product improvements that we will initiate this year to improve its efficiency and effectiveness.

Two of the second-tier issues in the 1998 plan have been moved up to the first tier, including Radiation Risk Levels for Low-Level Ionizing Radiation (linear no-threshold [LNT] issue), and Yucca Mountain Repository Design. The LNT issue has been given a higher priority because of its importance from a risk-informed context and its potential to cause unnecessary costs to society. Further, it is timely because of the availability of new studies and scientific information. Yucca Mountain Repository Design was moved to the first-tier list to replace the Engineered Barrier System priority in response to the evolution of the high-level waste program. The Viability Assessment and Decontamination and Decommissioning (D&D) priorities have been expanded and remain as first-tier priorities. A priority entitled "Risk Communication" has been added to the first tier because of the mounting evidence world-wide that lack of public confidence may be the biggest impediment to radioactive waste disposal. Priorities on Risk Informed Performance Based (RIPB) and Research have been moved from the first tier to the second-tier priority list. Although the Committee will address RIPB issues such as the proposed 10 CFR Part 63, "Disposal of HLW in a Proposed Geological Repository at Yucca Mountain, Nevada," Issue Resolution Status Reports, and Total System Performance Assessment, it does

not anticipate the need to perform in-depth study this year on these topics. The Research priority has been dropped to the second tier because of the elimination of the requirement for the Advisory Committee on Reactor Safeguards to report to Congress on NRC research. The ACNW will still report to the Commission on ongoing research and technical assistance in its areas of competence. Low-level Waste (LLW) and Interim Storage remain on the second-tier list. LLW is of concern because the ACNW believes that resolution of the LLW disposal problem is required to allow society to continue to benefit from nuclear materials. Transportation has been added to the second-tier list because of strong stakeholder interest and recognizing that the issue will need to be addressed in the near term. Risk Harmonization has also been added to the second-tier list. Finally, several second-tier issues have been dropped, including Department of Energy Oversight and Orphan Sources.

We would appreciate your comments or suggestions on the enclosed plan.

Sincerely,

/s/

B. John Garrick
Chairman

Enclosure: As stated

ACNW 1999 ACTION PLAN AND PRIORITY ISSUES AND ACTIVITIES

This plan provides strategic direction to the ACNW in 1999 and beyond for focusing on issues most important to the NRC in carrying out its mission of protecting public health and safety, promoting the common defense and security, and protecting the environment. It also conveys ACNW's mission, vision, goals, and priority activities and indicates how these goals support the NRC's strategic plan.

SCOPE OF ACNW ACTIVITIES

The Committee reports to and advises the Commission on nuclear waste management. The bases of ACNW reviews include 10 CFR Parts 60, 61, and other applicable regulations and legislative mandates. The ACNW will undertake studies and activities related to transportation, the storage and disposal of high- and low-level radioactive waste (HLW and LLW, respectively), including the interim storage of spent nuclear fuel, materials safety, decommissioning, application of risk-informed, performance-based regulations, and evaluation of licensing documents, rules, regulatory guidance, and other issues as requested by the Commission. The Committee will interact with representatives of the public, NRC, ACRS, other Federal agencies, State and local agencies, Indian Tribes, and private, international, and other organizations as appropriate to fulfill its responsibilities.

OVERARCHING PHILOSOPHY

In conducting its self-assessment, the Committee realized that it has been the most effective in the areas where it either initiated review of an issue or the Commission requested ACNW's advice on an issue. Examples include letters on the defense-in-depth and multiple barrier concept relative to 10 CFR Part 63; NRC's risk-informed performance-based white paper; the guidance to implement the final rule on radiological criteria; the ACNW's 1998 strategic plan; probabilistic risk assessment methods applied to HLW performance assessment, and HLW performance assessment capability. As a result, the Committee has crafted its 1999 action plan to reflect greater emphasis on self-initiated and Commission-requested topics.

The Committee will strive to take a top-down approach in its review of issues, focusing on the interconnection between issues and their cross-cutting relationships, as opposed to reviewing issues in isolation.

The Committee also believes that it will best serve the Commission by taking a risk-informed, performance-based view in all of its activities. By this statement the Committee means that it will strive to ascertain the inherent risk associated with various issues, to encourage transparency in risk assessments, and to encourage consistency in the approach to risk assessments. The Committee will accomplish these goals by encouraging development of an overall flexible RIPB framework for materials and waste-related regulations. The ACNW believes that adoption of a RIPB framework could advance efforts toward risk harmonization and could alleviate conflicts associated

with dual regulatory authority by providing a systematic and quantitative framework for assessing and comparing risk assessment approaches across and within agencies. Differences in approach now debated at the policy level may prove to lack risk significance, once quantified. An RIPB framework will allow for greater flexibility and transparency and will thus lead to greater confidence in regulatory decisions. In this way, the NRC can develop defensible regulations that have an obvious link to safety and can achieve a greater understanding of relative risks.

Finally, as part of its philosophy, the Committee aspires to factor in international experience whenever possible in examining issues. The ACNW also strives to consider creative ways to involve the public to a greater extent.

ACNW MISSION

The ACNW's mission is to provide independent and timely technical advice on nuclear waste management issues to support the NRC in conducting an efficient regulatory program that enables the Nation to use nuclear materials in a safe manner for civilian purposes.

ACNW VISION, DESIRED OUTCOMES, AND COMMITMENTS

In addition to a clear mission statement describing the ACNW's purpose, the Committee has identified a vision statement and desired outcomes to convey the Committee's direction, as well as commitments that guide the Committee towards these outcomes.

Vision

The ACNW strives to provide advice and recommend solutions that are forward-looking, are based upon best-available science and technology, can be implemented, and reflect the need to balance risk, benefit, and cost to society to enable the safe use of nuclear materials.

Desired Outcomes

The Committee aspires to achieve the following ultimate outcomes:

1. Advice is provided in adequate time to influence Commission decisions,
2. Advice is "forward-looking" in that it alerts the Commission to potential problems that may be averted by taking interim action, or forewarns the Commission of emerging issues that may require action at a later time,
3. Advice reflects state-of-the-art science and technology, yet is sufficiently practicable to allow for incorporation into NRC technical approaches, regulations,

and guidance,

4. Advice for the intended audience is clear and concise,
5. Advice reflects an understanding of inherent risk and reflects consideration of the need to balance risk, cost and benefit in all of NRC's decisions,
6. ACNW assists the Commission in making more transparent the regulatory decisionmaking process by operating in a spirit of openness and focusing on risk,
7. Advice identifies the interplay between HLW, LLW, and D&D programs wherever possible, as well as cross-cutting relationships of issues to the Environmental Protection Agency (EPA) and Department of Energy (DOE) programs,
8. ACNW is respected by the Commission, the NRC staff, EPA, DOE, and the public and perceived as adding value,
9. ACNW is trusted by the public for providing frank, open advice and for offering a forum for public participation in the regulatory process,
10. ACNW assists in resolving conflicts between NRC and DOE, EPA, and other stakeholders by encouraging communication and providing a neutral forum for interaction.

Commitments

The Committee will carry out the following commitments in accomplishing its mission and in pursuing its desired outcomes:

1. Be responsive to the Commission's needs,
2. Challenge the status quo, as appropriate, thereby becoming an "engine for change",
3. Remain flexible, be responsive to change, and consider various options and contingencies,
4. Identify in advance those issues that could have an impact on NRC's ability to achieve its mission,
5. Focus on risk by asking "what is the risk, what are the contributors to risk, and what are the uncertainties?",
6. Be mindful of and begin to identify issues that cut across NRC waste and

materials programs, as well as across EPA and DOE waste-related programs,

7. Foster an atmosphere of mutual problem-solving with the NRC staff,
8. Keep abreast of international trends and developments that could influence NRC policies or approaches, and factor international experience into Committee advice,
9. Consider the public as its ultimate customer and seek improved approaches to obtain public involvement,
10. Maintain technical excellence and independence,
11. Abide by the Committee's action plan to ensure efficiency and effectiveness of Committee activities and products.

GOALS AND OBJECTIVES

The ACNW has developed general goals and objectives consistent with its mission and vision. The following five goals serve to provide strategic direction for the ACNW this year and support selected goals identified in NRC's strategic plan. For each goal, we identify objectives to help us better focus on our priority issues.

Goal 1: Assist the NRC in positioning itself to respond to external change and uncertainty in the management of nuclear waste. [This goal supports the NRC mission, vision, and selected strategies and substrategies under NRC Goals 2-7.]

Objective 1: Advise the Commission in a timely fashion on issues of a technical nature that may require changes in the regulations.

Objective 2: Inform the Commission about issues that could cause problems for the NRC or society if not given adequate attention, and recommend solutions.

Goal 2: Strive to ensure that NRC is employing the best science in resolving key safety issues. [This goal supports the NRC mission, vision, and selected strategies and substrategies under NRC Goals 2-7.]

Objective 1: Keep abreast of cutting-edge methods and technologies being developed and utilized world-wide that are applicable for assessing and managing risks associated with cleanup, disposal, and storage of nuclear waste.

Objective 2: Advise the Commission on projected or perceived technical shortcomings in NRC staff capabilities that could adversely impact the agency's ability to address safety issues.

Goal 3: Advise the NRC on how to increase its reliance on risk as a basis for decisionmaking, including using risk assessment methods for waste management, that (1) implement a risk-informed approach, (2) quantify and reveal uncertainties, and (3) are consistent across programs where possible. [This goal supports the NRC mission, vision, and selected strategies and substrategies under NRC Goals 2-7.]

Objective 1: Encourage the NRC staff and propose approaches to gain a better understanding of the inherent risks of licensed activities regarding nuclear waste disposal, cleanup, and materials, as well as the relationship between regulations, cost, and safety.

Objective 2: Encourage the NRC staff to develop an overall flexible RIPB framework for management of nuclear waste disposal, cleanup, and materials that will allow for greater transparency of the underlying assumptions and associated uncertainties of risk assessments, greater consistency across programs, and development of more defensible regulations that are linked to safety.

Goal 4: Support the NRC in improving public involvement in its waste programs and gaining increased public confidence and respect. [This goal supports the NRC mission, vision, and selected strategies and substrategies under NRC Goal 6.]

Objective 1: Provide opportunities through the Federal Advisory Committee Act process for more meaningful public involvement in the regulatory process.

Objective 2: Recommend ways for the NRC to gain more meaningful public involvement in the regulatory process, taking into consideration international experience.

Objective 3: Assist the NRC in making more transparent the agency's decisionmaking process and ensuring agency documentation is thorough, clear, and readily understandable.

Goal 5: Improve the effectiveness and efficiency of ACNW operations.

[This goal supports the NRC mission, vision, and strategies and substrategies under NRC Goal 7.]

Objective 1: Increase the perceived value of ACNW advice to the Commission and staff.

Objective 2: Improve and modify existing operational procedures to accomplish "more with less."

PRIORITY ISSUES AND PROCESS IMPROVEMENTS

In support of its first four goals, the ACNW has identified its highest priority issues for this year, along with other important issues it plans to address this year or next, time and resources permitting. Also identified are the criteria the Committee uses to select its priority issues. In support of its fifth goal, the ACNW has identified process improvements it plans to implement this year to improve its effectiveness.

The highest priority issues of 1999 are identified as first-tier priorities, and other important issues are identified as second-tier priorities. Many of the first-tier priorities are topics for which the Committee will initiate a review and investigation. The Committee plans to conduct in-depth information gathering on most of the first-tier topics, that is, conduct a working group meeting on each topic, whereas it does not plan to carry out a concentrated effort this year on the second-tier issues, unless directed by the Commission or in response to changes in nuclear waste legislation. The Committee may move several of these topics to the first tier in its 2000 action plan. Each priority issue supports one or more of ACNW's goals, as indicated.

For each priority issue addressed, the Committee plans to prepare a task action plan that identifies the nature and scope of the issue and a strategy for addressing it, including planned products and schedule, and performance measures and targets that will enable the Committee to determine whether it has achieved its goals.

CRITERIA FOR SELECTING PRIORITY ISSUES

The following criteria are used to select priority issues:

- issues that are requested by the Commission or the Commissioners for ACNW review,

- the protection of public health, workers, and the environment from adverse effects of the management of nuclear waste, especially in regard to disposal facilities, that is, the risk significance of an issue,
- issues for which the ACNW's review is "self-initiated" rather than "reactive,"
- timeliness based on when an issue is scheduled to come before the Commission and when the advice would be of greatest benefit to influence the Commission's regulatory decisions,
- the relationship of an issue to the NRC's Strategic Plan, including trends and directions in regulatory practice, such as the adoption of a risk-informed, performance-based method of regulation and decisionmaking,
- issues that arise from strategies and activities of licensees and applicants,
- the potential for or likelihood of an issue to pose undue risk or costs to society, and
- issues that arise that are based on the scientific and technical information supporting the safety and performance assessments of nuclear waste disposal facilities, including the quality and level of expertise involved.

FIRST-TIER PRIORITY ISSUES

Viability Assessment, Draft Environmental Impact Statement, and Site Suitability - The DOE submitted its viability assessment (VA) in late December 1998. The NRC staff plans to submit a Commission paper on its review of the final VA in March 1999 and to brief the ACNW in February 1999. In addition, the staff has completed its Revision 1 series of its IRSRs that documents the status of and acceptance criteria for each key technical issue to support its review of the VA and eventual License Application (LA). The staff plans to begin developing a Yucca Mountain Review Plan based on the IRSRs in FY 1999. The staff's review of the VA will be a preliminary review of the eventual LA and is expected to provide valuable insights. The ACNW plans to review DOE's conclusions and the NRC staff's review of the VA, as well as monitor the progress of the IRSRs and the Yucca Mountain Review Plan.

The DOE is also required to submit a draft Environmental Impact Statement (DEIS) in late FY 99. The NRC staff has 90 days to review and comment on the DEIS. The ACNW intends to track DOE's development of the DEIS and comment on NRC staff's review of the document. The DOE is also required to make a site suitability determination in 2001, and the NRC staff must make comments on the sufficiency of DOE's determination. The ACNW will begin to monitor the progress of activities leading toward the site suitability determination. Finally, the ACNW anticipates tracking the

DOE's site characterization program and repository safety strategy. This issue supports ACNW Goals 1 through 3.

Risk Communication - The Committee believes that risk communication may be the most essential, yet most neglected, aspect of risk-informed, performance-based regulation. Mounting evidence suggests that public involvement and public confidence are the biggest impediments to solving the issue of radioactive waste management world-wide. Until the scientific community accepts and embraces the public as the ultimate decisionmaker in waste management, final solutions for radioactive waste management are likely to remain out of reach. Another critical element of public participation and risk communication is bringing RIPB to the forefront and addressing the risks of nuclear waste disposal in a broader context. The ACNW will focus on how NRC can improve its relationship with the public. ACNW will first explore ways to improve its own involvement and relationship with the public by holding a working group meeting in partnership with the public to address their questions and hear their views directly. The working group meeting may also focus on lessons learned from other countries and other waste programs in the U.S. to learn ways to involve the public more meaningfully in NRC regulatory programs. One option may be to encourage the public to participate formally in the performance assessment process. This issue supports ACNW Goals 1, 3, and 4.

Repository Design, Thermal Effects, Coupled Processes - On the basis of the results of its June 1998 working group on the engineered barrier system, two factors appear critical to the longevity of the waste package: thermal effects and the amount of water contacting the waste package. The Committee will begin to focus on the HLW repository design, emphasizing the results of thermal testing and modeling and how moisture contacts and affects the waste package. As part of its effort, the Committee may examine the significance of coupled effects on the performance of the proposed repository and the aspects of waste retrievability, repository ventilation, rock fall, and water dripping into drifts. Also of potential interest is the exploration of what additional design features may be necessary if a 300-year operational period is decided upon. The Committee may also explore the issue of which data must be collected before the LA is submitted, which data may be collected during the performance confirmation period, and the basis for these decisions. In lieu of a Working Group meeting on this topic this year, one of the Committee members plans to develop a white paper on this topic. This issue supports ACNW Goals 1 through 3.

Decommissioning - The ACNW continues to have a strong interest in waste disposal issues related to decommissioning. Last year, the ACNW reviewed the supporting guidance for implementing the final Rule on Radiological Criteria for License Termination, including guidance on dose assessment modeling and parameter selection criteria for decommissioning assessments. In recent years, the ACNW has advised the Commission on aspects of the proposed and final rule on license termination and on streamlining the Site Decommissioning Management Program (SDMP), including encouraging the staff to apply the LLW Performance Assessment

Methodology to SDMP sites. This year, the ACNW plans to review the Standard Review Plan (SRP) on conducting D&D assessments, to follow progress of the guidance on the final rule as it undergoes testing, and to review the status of the multi-agency-sponsored decision support system (DSS) to support decommissioning decisions. An issue also related to this first-tier priority is review of the forthcoming rulemaking on clearance levels. Other activities may include implications of the final license termination rule and implementing guidance for reactor decommissioning, tracking staff efforts to assess inherent risks of decommissioning and activities to simplify the decommissioning process, and assisting the Commission in contingency planning for a possible rapid increase in nuclear power plant decommissioning as a result of deregulation. This issue supports ACNW Goals 1 through 3.

Radiation Risk Levels for Low-Level Ionizing Radiation - The ACNW will revisit the issue of radiation risk levels for low levels of ionizing radiation. The ACNW may consider the question of what research, if any, the NRC should sponsor regarding the linear no-threshold (LNT) hypothesis and the appropriate regulatory approach, given the uncertainty about the LNT hypothesis. The ACNW will provide an update on the status of LNT research and will advise the Commission on a range of options for addressing the LNT issue. The NRC indicates in its strategic plan that it will incrementally move toward an RIPB regulatory framework for nuclear materials and waste. A major element of RIPB regulation is making transparent the assumptions and uncertainties associated with risk estimates, particularly those uncertainties that are most significant to risk results. The LNT hypothesis may be one of the most pervasive and significant assumptions used in NRC dose and risk assessments. For this reason, testing the validity of the LNT hypothesis is critical to ensure the reliability of risk estimates and the defensibility of NRC regulatory requirements. The agency has come under scrutiny regarding its understanding of the relationship between regulations, cost, and safety. The clear message is that the NRC is accountable not only for protecting public health and safety but for doing it in a manner that is cost-effective and not unnecessarily burdensome to society. This issue supports ACNW Goals 1 through 3.

SECOND-TIER PRIORITIES

Risk-Informed, Performance-Based Regulatory Framework - The ACNW will continue to support the agency's effort to implement a risk-informed and incrementally performance-based regulatory framework. The Committee anticipates continuing to encourage the NRC to adopt regulatory approaches that are transparent, to enhance public understanding of the key safety issues, and to encourage the NRC to use risk as a basis for setting priorities. In particular, the Committee will continue to stress the need for RIPB risk assessments to quantify the contributions of individual barriers for waste isolation and for staff to develop guidance that clarifies what is intended regarding quantification of barriers. Issues to be addressed may include the RIPB interoffice task force report, public comments on draft 10 CFR Part 63, NRC's

comments on the proposed EPA HLW standard (40 CFR Part 197), and peer review of NRC's TPA code and sensitivity analysis. The Committee's major focus this year under RIPB will be on risk communication, which is listed as a first-tier priority. This issue supports ACNW Goals 1 through 4.

LLW and Agreement States Program - The ACNW believes that, from a risk perspective, the national LLW program is of growing concern because of the failure of the Low Level Waste Policy and Amendments Act (LLWPAA) of 1986 process to bring about new LLW sites. The ACNW will consider the role of the NRC in LLW disposal from the perspective that lack of progress of the national LLW program could interfere with society's benefitting from the use of nuclear material, hence NRC's ability to carrying out its mission. The ACNW will advise the NRC on alternatives to the current national LLW disposal program. The ACNW also may examine interactions between NRC and Agreement and non-Agreement States, and whether communications can be improved. Other topics under this priority may include review of the final LLW Branch Technical Position (BTP) on PA, and issues associated with the Envirocare LLW site. This issue supports ACNW Goals 1 through 3.

Research - The ACNW will examine again this year the waste-related research and technical assistance programs in the NRC. In 1998, the Committee provided input to an ACRS report to Congress and a report to the Commission. This year, the ACRS is not required to provide a research report to Congress as a result of the Reports Elimination Act but will provide a report to the Commission. The ACNW has moved this priority to the second tier because it plans to invest a lower level of effort to conducting its review of the waste-related research program. However, the ACNW will continue to monitor the NRC's research program to ensure that it is changing in response to the agency's shifting emphasis to risk-informed, performance-based regulation. This effort will include ensuring that research is focused on helping to assess the relationship between regulations and safety and on understanding the inherent risks of licensed activities. This issue supports ACNW Goals 1 through 3.

Risk Harmonization - The current perception is that all progress on addressing problems associated with dual regulation between NRC and EPA has been brought to a standstill over the debate of a 4-mrem groundwater pathway standard versus a 25-mrem all pathways standard. Little is being done on risk harmonization efforts between the agencies. The Committee shares the concern of the Nuclear Energy Institute (NEI) that dual regulation between NRC and EPA could undermine the NRC's efforts to move toward an RIPB framework, especially in the D&D program, in that EPA can undermine the finality of NRC's RIPB decisions. However, the ACNW believes that adoption of an RIPB framework could advance efforts on risk harmonization and could alleviate conflicts associated with dual regulatory authority by providing a systematic and quantitative framework for assessing and comparing risk assessment approaches across and within agencies.

In this regard, the Committee is especially interested in reviewing the status of the

EPA/NRC-sponsored DSS funded by the Office of Nuclear Regulatory Research (see decommissioning priority). The DSS is intended to support greater consistency and transparency in risk-based decisionmaking in the D&D and LLW programs, as well as EPA hazardous waste-management and cleanup programs. The Committee is aware that EPA is considering no longer funding the project because of the policy disagreement between the two agencies related to groundwater protection. It is unclear whether NRC can continue to fund the project alone. The tool would be valuable for conducting and comparing risk assessment approaches within and across NRC programs, as well as across agencies. It is possible that different approaches and assumptions used in interagency risk assessments lead to variances that far outweigh the difference between 4 mrem and 25 mrem. Quantification of risk using a tool such as DSS could possibly provide important insights that could open new discussions on risk harmonization. The Committee plans to consider the issue of risk harmonization as time permits this year, including the Interagency Steering Committee on Radiation Standards efforts and intends to pay it greater attention in the year 2000. This issue supports ACNW Goals 1 through 4.

Interim Storage Facilities for Spent Fuel - The ACNW will begin to identify issues that the NRC may need to consider and prepare for in the event that proposed legislation is enacted to create a central, interim HLW storage facility. This issue supports ACNW Goals 1 through 3.

Transportation - To date, the Committee has not focused much attention on the issue of transportation of HLW and spent fuel. This topic is likely to become more significant as the Yucca Mountain project moves closer to the suitability and licensing stage, or if central interim storage is mandated. The DOE's Yucca Mountain DEIS will also focus on alternative modes of transportation and associated impacts. The ACNW will address this issue in its review of the DEIS, and will begin positioning itself to address this issue in more detail in 2000, if not sooner. This issue supports ACNW Goals 1 through 3.

PRIORITY OPERATIONAL ACTIVITIES

Operational processes or activities that the ACNW plans to implement this year in support of ACNW Goal 5, "Enhance the effectiveness and efficiency of ACNW operations," follow.

Strategic Planning - On an annual basis, the ACNW will conduct top-down planning to identify primary goals and priority issues and activities for the coming year, followed later in the year by a self-assessment of the Committee's performance against these goals. The ACNW has established performance goals and indicators to measure effectiveness and will use customer surveys to solicit feedback from the public on the Committee's effectiveness.

Changes in Operational Procedures - To improve its efficiency and effectiveness, the

ACNW will try to modify some of its processes and products, including the letter-writing process, the depth and consistency of advice, the scope and duration of meetings, interactions with Commissioners, communication between members and ACNW staff, and use of ACNW consultants. The Committee plans to implement the following:

- Hold more informal meetings on technical topics between individual ACNW members and members of the NRC staff,
- Allocate more time for Committee discussion of the content of letters before preparing a first draft. Circulate draft letters before the next Committee meeting so as to increase letter-writing efficiency with the bounds of the FACA,
- Acquire software to allow for easier circulation of draft letters electronically,
- Develop shorter letters and provide greater detail in an attachment. This format is especially suitable for letters that are based on working group meetings,
- Limit letters to three or four pages, place recommendations up front, and indicate which of the recommendations the ACNW would like a formal response from the NRC staff. If possible, the ACNW will suggest the time frame within which the staff should carry out the recommendation,
- For each priority topic, the Committee will identify whether a consultant is needed and develop a list of possible consultants,
- Spend the same amount of time on Committee deliberation as is spent on the technical briefings,
- Consider reserving a full day of every meeting for letter-writing, EDO response review, and discussing the Committee's future agenda,
- Conduct more meetings one-on-one with individual Commissioners and have more public interactions with the Commission.

UPDATING THIS PLAN

The ACNW will conduct a planning meeting at least once a year to update this action plan as necessary. Revisions to the plan may be based on input from the Commission, changes to the NRC strategic plan or performance plan, results from customer surveys and self-assessments, external events and factors, and available resources.