



# Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

## COMMUNICATING THE PROPER SAFETY PERSPECTIVE

I began preparing for this presentation by compiling complaints about the NRC's safety communications over the past year. As one page turned to two, then three and more, I went back and pulled out the worst examples. It was a strong lineup that would have supported some really good whining that would have fulfilled my role as obligatory counter-point for this panel. But it would have done neither you nor me much good.

So I filed the complaints in a couple of three-ring binders and turned instead to outlining where I'd like to see this issue one year from now. This new direction was more difficult than I'd expected. I struggled with how to judge whether communications were "effective" or "adequate" or "consistent" or any number of equally subjective measures. I almost threw in the towel and returned to those complaint binders.

But the binders stayed on the shelf. Rather than evaluating whether safety communications were proper focused, I opted for the simpler task of proposing a process through which proper safety communications can be achieved. If NRC can implement this process this year, then next year's session might examine process refinements and metrics to verify consistent implementation. If not, we can all stage another in the long series of "not filling, works great" debates.

I don't feel that it's unrealistic to expect this process could be in place next year, for the model that I selected is one that this industry developed many years ago and successfully uses. It is the two-way communication method currently used in every nuclear power plant control room and in every Technical Support Center across the country. You know the drill: Person A makes a statement and Person B repeats it to confirm the intended message was received. Sometimes, Person A even verbally acknowledges that Person B's re-statement was accurate. This process was developed to eliminate problems caused by miscommunication between individuals.

Why not apply this tried and true method for communicating the proper safety perspective? I'll admit there's more to it than a cut-and-paste job. At the plants, the task is simplified by having the individuals face-to-face or at least linked real-time by telephone or radio. Two-way communication is complicated when the speaker and audience are separated by both distance and time. But the concept still has value and may still be a viable template for the NRC to use.

When the NRC communicates to any audience about safety, the agency should not simply assume its audience received the intended message. One-way communication is vulnerable to the audience not hearing the message, or misunderstanding the message, or misinterpreting the message, or putting the intended message in the wrong context, or any number of other obstacles. In fact, it was communication problems between persons acting in good faith that prompted the industry to adopt two-way communications. It worked then, and it can work now.

The challenge before the NRC is how to emulate two-way communication, particularly when the outgoing message is a document placed in ADAMS, a posting on the website, or a news release. There are measures that NRC can take before and after the message goes out. For an example of a pre-release measure, UCS often has a person from another program area review a draft document before it goes out. This reviewer is asked to state the key messages from the document. If the wrong messages are identified,

we try again. Not with another reviewer, but with a revised version of the document. I know that NRC takes great care in the preparation of its outgoing documents. That preparation could be enhanced by a review for message to ensure that the desired message is readily understood.

Once communications have gone out, the NRC must rely on feedback to gauge whether audiences received the intended messages. The NRC currently has a number of commendable vehicles for obtaining feedback. Those measures are largely aimed at soliciting feedback on the timely and convenient access to outgoing communications, not on whether the audience got the message. Where applicable, those methods could be adjusted, supplemented, or expanded to include verifying that the audience received the intended message. For those of you with nuclear navy experience, the analogy might be to use active sonar in addition to the passive sonar devices. Don't merely wait for audiences to say they didn't get the message, ask audiences what message they heard. When it is determined that the message received was not the one intended, there's an opportunity for improvement in future communications and, depending on the depth of the misunderstanding, issuing a clarification.

There's another important difference between the two-way communication methods employed at nuclear plants and the method I'm proposing for NRC's use. At the plants, agreement is almost always an objective of the communications. This is not true when NRC uses two-way communications about safety to its audiences. Agreement on the message is not a success criterion. Common understanding of the message is the success criterion the NRC should apply. Agreement to the message would be nice and should be encouraged, but understanding the message is the primary criterion.

When common understanding of a successfully transmitted message is not achieved, the NRC must not jump to the conclusion that the reason is lack of awareness on the part of the audience. For example, two years ago then NRC Chairman Richard Meserve told me about his personal frustration in communicating with Congresswoman Sue Kelly of New York. "Short of making her a nuclear engineer, what can I do to assure her that Indian Point is safe?" Chairman Meserve asked me, perhaps rhetorically. I told the Chairman that I was a nuclear engineer and I wasn't buying his message, so he should seek some other remedy. I believe the Chairman was confusing disagreement with the message with not understanding it.

When the NRC provides a safety message to an audience and that audience successfully receives the intended message, an entirely possible outcome is for the audience to disagree with it. That's acceptable. It sure would be nice if all audiences always agreed with NRC's messages, but that's an unrealistic expectation. But if the NRC's audiences actually do receive the intended messages, at least any ensuing debate will involve an area of genuine dispute rather than a "fantasy" debate.

I believe the two-way communications model could enhance the NRC's ability to communicate safety messages. The NRC is familiar with this tool and already uses it in a limited way for some communications. The NRC could significantly broaden the use and application of two-way communications in the next year. If so, there may still be a need for a session like this one at the next RIC. But we might be able to progress to the next phase of figuring out better ways to reach agreement or tolerate disagreements. I, for one, am ready for that next phase. We all have been stuck in this phase so long it's beginning to feel a lot like the movie, *Groundhog Day*. Let's move on to the next feature, please.

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