

July 27, 2005

MEMORANDUM TO: Chairman Diaz
Commissioner McGaffigan
Commissioner Jaczko
Commissioner Lyons

FROM: Jeffrey S. Merrifield /RA/

SUBJECT: STAFF FORMAL MEMBERSHIP IN COMMITTEES
AND OUTSIDE GROUPS

The staff is involved as official or informal NRC representatives in a large number of professional societies and committees on both a national and international level. I recognize that official membership in many of these organizations is vital in achieving the Agency mission. In addition to being professionally rewarding for members of the staff who participate in these activities, it provides an opportunity for the Agency to influence the products produced by these organizations. Official or informal membership in these various organizations, however, can have significant resource implications. Staff time and effort is expended in preparing for the meetings and there is also the associated travel costs, which in some cases can be significant.

I have no objections to staff serving in an official or informal capacity with appropriate organizations. However, I have several concerns. First there is no centralized listing of all the various organizations to which the staff belongs in an official or informal capacity. When asked, staff can readily identify individuals who serve on specific committees but there is no centralized listing of all the organizational memberships, or for that matter, of the organizations themselves. Second, there does not appear to be a systematic written process for (a) determining which organizations for which there should be an official or informal NRC staff designee, (b) determining the appropriate management level for authorizing the membership, (c) ensuring that the NRC representative communicates the official position of the Agency or clearly indicates when they are providing personal opinions, (d) evaluation of the need to continue the official membership in a organization, (e) periodically evaluating the need to become a member of another organization, or (f) ensuring that the positions taken by that organization are in concert with the policies of the Agency.

My concern with a lack of a centralized listing and a lack of written directives is that it may be indicative of a lack of proper management oversight and control. To correct this situation, staff should be directed to do the following actions:

1. Develop a centralized listing of all organizations, both internationally and domestic, for which there is a formal or informal NRC representative assigned. This list should be maintained up-to-date and be readily available for senior management.
2. Develop a written procedure, possibly a Management Directive, which at a minimum achieves the following objectives:

- a. Provides criteria for determining which organizations should be considered for an official or informal NRC representative to be assigned.
 - b. Designates an appropriate level of management approval for official or informal NRC membership in a specific organization. The level of management approval will vary depending on the specific organization involved. This management approval process includes the level of staff involvement (i.e., general membership, official responsibility within the organization such as secretary or committee chair, amount of NRC resources spent in supporting the specific organization, etc.).
 - c. Provides clear guidance to the designated NRC representative to advocate and defend the official NRC position. If for any reason the individual deviates from the official NRC position, they should clearly indicate that the position they are communicating is a personal position and not the agency official position. The guidance should recognize that in a few rare instances, particularly for some international organizations, the requested representative is for the individual's technical expertise and not as an NRC representative. If the Commission decides to support staff membership in such a committee, the NRC representative will need to clearly indicate that they are representing personal opinions and not necessarily NRC positions.
 - d. Establishes a procedure for replacing the official or informal NRC representative, when appropriate.
 - e. Established procedures and responsibilities for maintaining the master list of organizations up-to-date.
 - f. Establishes procedures and a periodicity for reviewing the master list to determine if continued NRC official membership in a specific organization is appropriate, if the level of effort to support a specific organization is appropriate, adequate, and appropriately budgeted, and are there other organizations for which official NRC representation should be considered. Decisions on continued involvement in a specific activity may be limited by the total number of organizations with official NRC membership. Senior NRC management should have final approval authority over this periodic review.
 - g. Provides criteria to determine whether continued NRC participation in the organization is warranted.
3. The EDO shall report on this effort 180 calendar days after the SRM is finalized.
 4. The EDO shall prepare a yearly report to the Commission listing each organization, the total number of NRC participants supporting each organization, the level of NRC

resources in both FTE and dollars (including travel funding and money provided directly to the organization) to support each organization and an overall total of NRC resources (in both FTE and dollars) expended to support the entire effort.

SECY please track.

cc: L. Reyes, EDO
A. Vietti-Cook, SECY
K. Cyr, OGC