

July 8, 1999

COMMISSION VOTING RECORD

DECISION ITEM: SECY-99-070

TITLE: IMPLEMENTATION PLAN FOR THE PUBLIC COMMUNICATIONS INITIATIVE (DSI-14)

The Commission (with all Commissioners agreeing) approved the subject paper as recorded in the Staff Requirements Memorandum (SRM) of July 8, 1999.

This Record contains a summary of voting on this matter together with the individual vote sheets, views and comments of the Commission, and the SRM of July 8, 1999.

/s/

Annette Vietti-Cook  
Secretary of the Commission

Attachments: 1. Voting Summary  
2. Commissioner Vote Sheets  
3. Final SRM

cc: Chairman Dicus  
Commissioner Diaz  
Commissioner McGaffigan  
Commissioner Merrifield  
OGC  
EDO  
PDR  
DCS

---

VOTING SUMMARY - SECY-99-070

RECORDED VOTES

|                  | APRVD | DISAPRVD | ABSTAIN | NOT PARTICIP | COMMENTS | DATE    |
|------------------|-------|----------|---------|--------------|----------|---------|
| COMR. DICUS      | X     |          |         |              | X        | 4/6/99  |
| COMR. DIAZ       | X     |          |         |              | X        | 3/31/99 |
| COMR. McGAFFIGAN | X     |          |         |              | X        | 4/30/99 |
| COMR. MERRIFIELD | X     |          |         |              | X        | 3/30/99 |

COMMENT RESOLUTION

In their vote sheets, all Commissioners approved the staff's recommendation and provided some additional comments. Subsequently, the comments of the Commission were incorporated into the guidance to staff as reflected in the SRM issued on July 8, 1999.

---

Commissioner Comments on SECY-99-070

**Chairman Dicus**

I add my commendation to that of Commissioner Merrifield for the high quality Implementation Plan that the staff has presented in this paper. I do have one suggestion concerning the plan. On page 24 it is suggested that paper copies will no longer be distributed to the PDR concurrent with the implementation of ADAMS. While the staff will have the benefit of several days of training and daily use of the new ADAMS system, that will not

necessarily be the case for the public. If not already included in the plans for implementation of ADAMS, there should be a period of overlap concerning utilization of ADAMS and continuing to provide paper copies to the PDR, until we have demonstrated the effectiveness of ADAMS at the point of public interface for access to agency documents.

#### **Commissioner Diaz**

As I have long stated, the clarity and accuracy of NRC communication are important aspects of our responsibility to the American people. Thus, I am pleased to see the broad array of tasks and steps toward implementation that are outlined in SECY-99-070. I agree that these actions should help achieve that goal. I do have, however, some cautionary comments.

First, I continue to believe that "increasing public confidence" is a result of effective utilization of the first three criteria that the staff has begun to employ for measuring outcomes: "(1) maintaining safety, (2) reducing unnecessary regulatory burden, [and] (3) increasing efficiency and effectiveness." Actions that achieve and/or contribute to maintaining safety, reducing unnecessary regulatory burden, and increasing efficiency and effectiveness, are primary indicators of how the NRC is satisfying agency objectives; by themselves, and by establishing effective communications with the public, they should increase public confidence and serve our national interest.

In this regard, although we properly focus on the logistics of excelling in our communication with the public, I am concerned that the resource requirements may be understated. Not only is it important that the initiatives reach all NRC staff and all NRC activities, it is also important that these initiatives not diminish the performance of the tasks that underpin our findings of reasonable assurance of public health and safety, and protection of the environment. If the EDO finds that such conflicts are developing, he should immediately bring such resource issues to the attention of the Commission.

Secondly, before I could fully endorse the plan for early public involvement in rulemaking (IIA1), I would need more details. Although I agree that early public involvement is beneficial, I am not clear as to the scope or depth of the intention that "[p]ublic involvement should be considered in developing rulemaking plans." (Emphasis added).

Lastly, I would recommend that consideration be given to the proposition that the agency should "educate" the public, albeit "without being promotional," as might be suggested by the statement of Issue VA. I have no objection to the specified tasks, but I believe the focus should be on explaining and discussing our actions with clarity and accuracy.

#### **Commissioner McGaffigan**

I concur in Commissioner Dicus' comment with regard to preserving paper copies of documents in the PDR during the initial implementation of ADAMS.

#### **Commissioner Merrifield**

First, I want to recognize the staff for assembling a commendable product on an important but often ambiguous topic, public communications. At first glance, the intuitive thought is that adequate public communication should be almost an automatic function; after all, society has been "communicating" for literally thousands of years. But in reality, inadequate communication often lies at the heart of many problems found in society today. It is proper that the NRC contributes its part in improving communications. I have two things that I want to both support your current plans but also caution you to be conscientious in long term follow-up actions.

First, under "Future of the Plan", you properly state that the implementation of the plan itself is not the ultimate goal. I most heartily agree that the "ultimate goal" is the institutionalization of a good public communication process. However, I caution you to develop adequate, but possibly evolving, performance targets to evaluate how the Agency is proceeding with public communications. It will be too easy after two years to say the implementation plan is done, the process is "institutionalized", now let's go back to business as usual. Many bureaucratic procedures started out as a good product for the particular circumstances under which they were developed. But people kept using the same "approved" words, even though the circumstances changed, until the words no longer made sense. The same thing can happen with this current initiative. What is good communication at one site may not be good communication at another site or even the same site at a different time. The staff must not become complacent and assume that there is one formula that will result in "good communication" at all times or at all sites.

Second, under the resources section of the paper, you discussed the need to develop two new training courses due to the fact that no single existing courses would fully satisfy the objectives of SECY-98-089. I can support the development of the new courses, but the paper could be read to say that the staff saw no need for revising the old courses. I am going to assume that all of the old courses will be reviewed and modified as appropriate so that each course will have some, no matter how small, emphasis on constantly improving public communication.