December 15, 1999

FOR: The Commissioners

FROM: William D. Travers /s/
            Executive Director for Operations

SUBJECT: UPDATE TO THE IMPLEMENTATION PLAN FOR THE PUBLIC COMMUNICATIONS INITIATIVE (DSI-14)

PURPOSE:

This paper provides an update to the Commission for approved tasks in the Public Communications Initiative (DSI-14) Implementation Plan.

BACKGROUND:

- RESPONSE TO THE SRM FOR SECY-99-070:
- IMPLEMENTATION PLAN PROGRESS:
  - Clarity and Timeliness of Communications Tasks
  - The Public Involvement Process Tasks
- STATUS OF DEFERRED TASKS
- NEW PUBLIC COMMUNICATIONS ACTIVITIES

SECY-98-089 contained a plan to implement the Commission's policy guidance in Direction Setting Issue #14, "Public Communications Initiatives." That paper divided the public communications recommendations into five broad categories: (1) clarity and timeliness of communications, (2) the public involvement process, (3) responsiveness to public inquiries, (4) public access to information, and (5) public outreach.

The paper, SECY-98-089, was forwarded to the Commission for approval. A Staff Requirements Memorandum (SRM) dated September 10, 1998, was then sent to the staff. This SRM approved the recommendations, with a few exceptions, and requested a more specific implementation plan. That implementation plan was forwarded to the Commission as SECY-99-070 on March 5, 1999. A SRM on the implementation plan, dated July 8, 1999, was sent to the staff.

In the implementation plan, a commitment was made to review the progress of the tasks and provide a report to the Commission on July 1, 1999. This was to ensure that the implementation plan is meeting the objectives of SECY-98-089 and the associated SRM. The progress report date was postponed, in order to allow time to receive and respond to the SRM for SECY-99-070. This paper provides a response to the SRM for SECY-99-070 and a progress report for the tasks contained in the implementation plan.

RESPONSE TO THE SRM FOR SECY-99-070:

The SRM provided six specific comments on the implementation plan. The staff has reviewed the comments, and has the following response.

In the first comment, the Commission directed that "there should be a period of overlap concerning utilization of ADAMS and continuing to provide paper copies to the PDR, until six months after we have demonstrated the effectiveness of ADAMS at the point of public interface for access to agency documents." In response to this direction, the Office of the Chief Information Officer provided COMSECY-99-031 to the Commission on September 7, 1999, "Additional Information Concerning Staff Requirements - SECY-99-070 - Implementation Plan for the Public Communications Initiative." The OCIO recommended that we discontinue sending paper to the PDR after October 29, 1999. In response, the Commission issued a SRM for COMSECY-99-031, approving a two-month transition period. The Commission also directed that the staff should brief the Commission on its assessment of the operational effectiveness of the ADAMS system from the standpoint of actual PDR users before the end of the two-month period, which started in October, 1999.

In the SRM for COMSECY-99-031, the Commission also directed that the staff discuss the transition period with our stakeholders at a September 17, 1999 meeting on "policies related to the release of information." At the meeting, the staff discussed the transition period, as well as presenting information to the stakeholders about training for ADAMS and how to provide feedback to OCIO staff on their concerns and suggestions about ADAMS.

In addition, the staff held a public meeting on November 17, 1999, to provide status information on ADAMS and to obtain public input on the operation of the system during the transition period. The staff briefed the Commission offices on the results of the public meeting on November 23, 1999, and the Commission, in Supplemental SRM COMSECY-99-03, directed the staff to extend the transition period from November 30 to December 30, 1999. During this period, the staff will continue to send paper copies of publicly available documents to the PDR. The Commission also directed the staff to brief Commission offices again before December 30 on the operational effectiveness of ADAMS from the perspective of PDR users and whether additional measures may need to be taken to facilitate public access to documents after December 30.

In the second comment, the Commission directed that the "staff should be cautious to the possibility 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 staff finds that conflicts are developing, it should immediately bring the resource issues to the attention of the Commission."

The staff is sensitive to the costs associated with the implementation plan tasks, and that those costs will affect how fully the initiatives can be implemented. In fact, some tasks were deferred because the resources required would have overburdened the staff who are already heavily committed

elsewhere. For some other tasks, the offices have considered the funding for other tasks in their budget projections. For example, the Office of Human Resources (HR) had already budgeted funds for development of the public communications workshop in FY99. In another example, the Office of the General Counsel secured funding for a contract to develop the Public Involvement Handbook at mid-year. As the staff works on the tasks in the implementation plan, they will consider the resource implications through the Planning, Budgeting and Performance Management Process.

In the third comment, the Commission directed that with "regard to early public involvement in rulemaking (IIA1), the staff should clarify the scope or depth of the intention that "[p]ublic involvement should be considered in developing rulemaking plans." (Emphasis added)." With hindsight, the staff recognizes that its statement in SECY-98-089 was ambiguous. It could be interpreted to mean that the public will be involved in the process of developing rulemaking plans. It was not the intent of the staff to have the public involved at that point in the process. The intent was that the staff should consider and anticipate the public participation in the actual rulemaking process, namely, in the way that the rulemaking plan is carried out. The staff believes this intent is consistent with the comment in the SRM.

In the fourth comment, the Commission directed that the "staff should consider the proposition that the Agency should "educate" the public, albeit "without being promotional," as might be suggested by the statement of Issue VA. The staff should focus on explaining and discussing agency actions with clarity and accuracy." The staff has recommended "increasing public confidence" as one of the performance measures in the draft strategic plan. These Commission comments will serve as guidance as we develop our communication strategies. Along with the reminders and guidance changes that are part of the implementation plan, we are trying to improve communications with the public through the Plain Language Initiative, improving the external web site, and becoming more consistent and responsive in releasing information to the public.

In the fifth comment, the Commission directed that "the staff should develop adequate, but possibly evolving, performance targets to evaluate how the Agency is proceeding with public communications. 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." These performance targets are being developed as a part of the FY2000 - 2005 strategic plan development, under the performance goal of increasing public confidence. Improving public communications is an integral part of the agency strategy for increasing public confidence.

In the sixth comment, the Commission directed that the "staff should review the old courses and modify them as appropriate so that each course will have some, no matter how small, emphasis on constantly improving public communication." As a result of the SRM, the Associate Director for Training and Development, Office of Human Resources, identified courses for which this information would be appropriate. He sent this information to the cognizant staff, and asked that they incorporate the ideas found in the Public Communications Initiative the next time that they provide the courses that were listed. He also asked that they continue to seek ways in which they can assist the agency in improving the clarity, timeliness, and responsiveness of public communications. He also suggested that this staff incorporate these ideas into additional courses or new courses under development where appropriate.

IMPLEMENTATION PLAN PROGRESS:

The staff has made significant progress on the tasks listed in the implementation plan. Progress on tasks that contained a milestone date on or before 10/99 is provided in this section. The tasks are listed by the categories described in SECY-98-089, (1) clarity and timeliness of communications, (2) the public involvement process, (3) responsiveness to public inquiries, (4) public access to information, and (5) public outreach. A task update table summarizing the information in this section is provided in an Appendix.

CLARITY AND TIMELINESS OF COMMUNICATIONS TASKS

- The staff was sent a reminder on 3/25/99 about the glossary of nuclear expressions posted on external NRC website. This glossary will be updated annually. (Task IB2)

- Standard wording was prepared for guidance (Management Directives 3.5, 3.7, others as appropriate) on conveying findings in a balanced way. Guidance revision is in process with other revisions to the same guidance. (Task IB3)

- The Director of the Office of Public Affairs (OPA) issued a reminder on 3/8/99 to OPA staff, with copies to the technical staff senior management, on coordinating with and assisting technical staff on messages to the public. (Task IB4)

- A performance appraisal sub-element for public communications was revised by 6/99 and made available for Senior Executive Service (SES) performance plans. (Task IC1)

- Office of State Programs reviewed procedures for notification of local governments in each region. They distributed the review with all the regions on 4/23/99, to share good practices and to ensure good communications continue. (Task IE2)

THE PUBLIC INVOLVEMENT PROCESS TASKS

- The Executive Director for Operations and the Director of OPA have provided direction to the staff during the weekly EDO staff meetings to explore actions or events which may necessitate additional public involvement. (Task IIA3)

- The Director of OPA collected regional best practices for public communications from the regional Public Affairs Officers, and distributed a list of these ideas on 3/22/99 to the Regional Administrators and Public Affairs Officers in each region. Best practices will continue to be shared among the regions as they arise, rather than in a quarterly list. (Task IIB4)

Responsiveness to Public Inquiries Tasks

The EDO sent a reminder to staff, dated 3/31/99, on agency policy and guidance on notifying the public of delays in correspondence. (Task IIIA2)

- A working group was formed to establish procedures for handling e-mails in 3/99. The working group will make recommendations for procedural and guidance changes by 12/99. (Tasks IIIB1 - IIIB5)

Public Outreach Tasks

- As resources allow, OPA is collecting and developing standard presentations and informational publications as a resource to the staff and public. (Tasks VA1, VA3, and VA7)

- A central audiovisual library is currently being developed. The first phase of the project, a repository of photographs available to the staff, was originally scheduled for 5/99. The photographs have been scanned in by the contractor, but technical issues surrounding web access to the photographs by the staff need to be resolved. The new target date is November 30, 1999. (Task VA2)

- The student corner of the NRC website, at http://www.nrc.gov/reading-rm/basic-ref/students.html, was expanded and the graphics were improved. The updated version of the webpage, made available on 4/1/99, includes lesson plans and classroom activities for teachers, and numerous study aids for students. (Task VA4)

- HR reviewed the past attendance of "NRC: What It Is and What It Does" courses. To encourage increased attendance, they decided to contact all new employees and inform them of the next date that this class will be offered. They will continue to contact these employees a couple of months before each session. (Task VB1)

- OCIO sent a network announcement to the staff on 9/14/99 announcing the availability of the 1998 NRC Annual Report, which was released on July 30, 1999. The date for the reminder was delayed from the originally scheduled date, to be consistent with the availability of the 1998 version of the report. Likewise, a reminder to the staff to read the Information Digest will be coordinated with the update of the digest. (Task VB1)

STATUS OF DEFERRED TASKS

As described in the DSI-14 implementation plan, the Office of Human Resources budgeted funds to design and develop a half-day seminar and one-day workshop on improved communication techniques with the help of a contractor. However, offering this training to the staff was deferred until February 2001 due to multiple competing training priorities.

Two tasks were listed in the implementation plan for reconsideration in 7/99. One task was compiling specialized lists of stakeholder contacts categorized by types of interests and types of regulatory actions, listed as Task IIB3. The Executive Council recommended that each organization continue to maintain and refine their own lists in the course of implementing existing programs and activities. Based on Office of Nuclear Regulatory Regulation and Office of Nuclear Material Safety and Safeguards input, allowing each organization to maintain and refine their own lists is the method preferred. No additional action is recommended at this time.

The second task is establishing a speaker's bureau, Task VA5. Due to the number of changes underway in the agency, the staff did not believe that there were enough resources available at this time to successfully initiate this activity. The task will be reconsidered by OPA as resources allow.

NEW PUBLIC COMMUNICATIONS ACTIVITIES

The staff has been engaged in ongoing activities to improve public access to information that have been initiated since the implementation plan was provided to the Commission. In response to criticism from our stakeholders on how we disseminate public documents, we have held two public meetings to gather feedback from our stakeholders. The first meeting, held on July 9, 1999, was a listening session for the staff where the stakeholders were invited to share their concerns, criticisms and suggestions for improving our processes for releasing information to the public. The staff summarized the comments from the public, and formed a working group to address the issues raised by the stakeholders. A second meeting was held on September 17, 1999, to present plans by the staff to modify the processes for releasing information with the goal of providing information in a timely and consistent fashion to all interested members of the public.

The staff has also looked at ways that public outreach could be improved. The Office of Nuclear Regulatory Research sponsored sessions on risk communication by a noted expert in the field for all of the staff on September 29, 1999. These sessions were well-attended, and feedback from the staff who attended was very positive. From the comments that were received, the staff found the speaker's recommendations to be quite useful in planning interactions with the public.

The staff has also been working to improve the external NRC Web site through a three-step process. In the first step, the offices have committed to a schedule to review their content on the external web for accuracy and currency, with a completion target date in January 2000. The offices will examine and correct content for currency and accuracy, date pages and collections, establish e-mail links at each content area for user feedback, and verify that all links work properly. The second step will be to consider an interim redesign of the external Web site, to improve navigation, accommodate the ADAMS Electronic Reading Room, and incorporate feedback from stakeholders. This activity is targeted for the second quarter of calendar year 2000. The third step will be to develop a strategic Web site plan, analyzing the information presented on the external site to ensure consistency with agency strategic goals. This activity is targeted for the third quarter of calendar year 2000.

The staff is preparing to broadcast public Commission meetings on the Internet. The public will be able to view the meetings from their own personal computers. All public meetings will be broadcast live and will also be archived on the Internet for public viewing for one year. Other key meetings, such as stakeholder meetings or workshops, may also be 'webcast' as appropriate. This capability received very positive press in the November 22, 1999,

issue of Inside NRC.

COORDINATION:

This paper has been coordinated with the Office of Public Affairs. The Office of the Chief Financial Officer and the Office of the Chief Information Officer have no objections. The Office of the General Counsel has no legal objection to this paper.

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Attachment: Task Update Table

CCC Task #	Topic	Lead/Support Office	Product	Person(s)	Milestone(s)	Update
IA1/IA2	Training - Improved Communications Techniques	OPA/HR	Review of existing training activities/training courses	Beecher/ Mason	Review: 1/99 Design/develop training: 9/99	Training developed; due to competing priorities for training, will not be offered until February 2000
IB2	Publicize glossary	OPA/ CIO	Establish glossary on NRC web page	Hayden	Posted 9/97 reminder 3/99	**Completed** - Network announcement sent to staff as a reminder; issued 3/25/99
IB3	Conveying findings in a balanced way	EDO	Review and revision of training and guidance documents for writing reports and preparation for public meetings	Lund	6/99	Standard wording prepared; revision of MD 3.5, 3.7 in process with target date January 2000.
IB4	OPA/Staff Coordination on public communications	OPA	Issue affirmative statements from EDO, OPA Director, and RAs reminding staff to coordinate public communications	Beecher	3/99	**Completed** - Message sent to OPA staff and senior managers in other offices on 3/8/99
IC1	Performance appraisal sub-element for public communications	HR	Review SES and non-SES sub-elements and provide suggested modifications	Mason	6/99	**Completed** - Performance sub-element was revised by 6/99, and made available for SES performance plans 7/99. Optional performance sub-element for non-SES was provided for use 10/99.
IE2	Communications with local governments	RAs/ OSP	Review procedures for notification of local governments to ensure good communications continue	Droggitis	Review: 4/99	**Completed** - Review completed and shared with regions: issued 4/23/99
IIA3	Public involvement exploration at weekly EDO staff meetings	EDO/ OPA	Direction to explore actions or events which may necessitate additional public involvement	Cameron	3/99	**Completed** - Guidance given in EDO staff meeting, and Public Involvement Handbook will continue to reinforce.
IIB3	Specialized lists of stakeholder contacts	DEDE	Each organization to continue to maintain and refine their own lists in the course of implementing existing programs and	Lund	Revisit in 7/99	Task was revisited in 7/99. Based on NRR and NMSS input, allowing each organization to maintain and refine their

			projects; DEDE will make determination if additional action is necessary			own lists is the method preferred. No action is recommended.
IIB4	Regional best practices for public communications	OPA	Regional PAO's should compose best practices and OPA should distribute a consolidated list of ideas	Beecher, regional PAOs	Quarterly, beginning 3rd quarter FY99	**Completed** - OPA collected best practices from the regional PAOs, and distributed a list of these ideas to the RAs and PAOs in each region; issued 3/22/99; **schedule change**: best practices will continue to be shared among regions as they arise, rather than following a quarterly schedule
IIIA2	Notification of delays in correspondence	EDO, SECY/ CIO	Guidance for responsiveness already exists in MD 3.57; will provide reminder to staff from DEDE of this requirement	Lund	3/99	**Completed** - Reminder to staff from EDO on 3/31/99
IIIB1	Screening process for e-mails	EDO	Establish working group to establish procedures	Lund (chair working group)	Start 3/99	Working group established in 3/99; first meeting 4/99; recommendations for procedures - target 12/99
IIIB2	Responsiveness to e-mails	NRR/ NMSS, Regions	Establish working group to establish procedures	See IIIB1	See IIIB1	See IIIB1
IIIB3	Inform appropriate NRC offices of e-mail	ALL	Establish working group to establish procedures	See IIIB1	See IIIB1	See IIIB1
IIIB4	Handling general information e-mail requests	ALL	Establish working group to establish procedures	See IIIB1	See IIIB1	See IIIB1
IIIB5	Policy and procedural guidance for e-mails	CIO	Establish working group to establish procedures	See IIIB1	See IIIB1	See IIIB1
VA1	Standard presentations and informational publications	OPA	Development of presentations and publications (as resources allow)	Landau	8/99	Developed and maintained as resources allow
VA2	Central audiovisual library	OPA	Develop and maintain audiovisual library (as resources allow)	Landau	5/99	Milestone revised due to change in contractor support in ADM and resolving technical issues with web access to photographs; new target: 11/30/99
VA3	Update and expand standardized publications and presentations	OPA	Update and expand current efforts, and make public aware of availability via website (as resources allow)	Landau	see VA1	see VA1
VA4	Student corner of the NRC website	OPA	Expand the student corner (as resources allow)	Landau	5/99	**Completed** - Web site updated 4/1/99
VA5	Speaker's bureau	OPA	Establish a speaker's bureau (as resources allow - no current activity, but will be reconsidered as resources allow)	Landau	Effort will be reconsidered 7/99	Effort reconsidered by OPA in 7/99; resources not available to initiate this activity
VA7	Use of audio-visual materials	OPA	To be implemented on an ad hoc basis as resources allow	Landau	see VA2	see VA2

| VB1 | Initial and refresher training on "NRC: What It Is and What It Does" and encouragement of the staff to read NRC Annual Report and Information Digest | HR | HR to review past attendance and recommend attendance strategies | Mason | 6/99 | **Completed** - HR reviewed past attendance, and decided to contact all new employees and inform them of the next date that this class will be given. HR will continue to do this a couple of months before each session. **Partially completed** - Reminder to the staff to read the NRC Annual Report given 9/14/99. Reminder about Information Digest will be given as soon as the new digest is available. |