

POLICY ISSUE INFORMATION

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FOR: The Commissioners

FROM: Janice Dunn Lee, Director
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SUBJECT: FRAMEWORK FOR AN EXPANDED CADRE OF NUCLEAR
REGULATORY COMMISSION EMPLOYEES WITH
INTERNATIONAL EXPERIENCE

PURPOSE:

In the Staff Requirements Memorandum (SRM M060727A, dated August 7, 2006), the Commission strongly supported broadened opportunities for mid-career staff to consider short- and long-term international assignments. This paper informs the Commission of the Executive Director for Operations, key offices under his purview, and the Office of International Programs's joint development of a framework to more systematically identify and communicate opportunities for management and staff to participate in international activities. No action is requested of the Commission at this time.

SUMMARY:

At the July 2006 annual briefing on the Nuclear Regulatory Commission's (NRC) international programs, the Commission endorsed the Office of International Programs (OIP) suggestion to seek opportunities for staff to gain international experience. Building on discussions in the NRC International Council and its Working Group, this paper provides a framework for identifying current and future activities that can provide staff with focused opportunities to participate in international activities in the interest of expanding the cadre of NRC employees with international experience. Specific ideas that are currently being developed to assist managers and staff in identifying and supporting activities that align with the Commission's commitment to be involved in relevant international activities are also outlined.

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The NRC's staff's ability to achieve the agency's mission is enhanced by increased understanding of the regulatory experience of other countries in the areas of reactor and fuel cycle safety, materials safety, waste management, spent fuel storage, emergency preparedness and incident response, transportation, and safeguards and security. It is also important that NRC provide Federal interagency and international leadership to shape and align U.S. domestic policies with international legal obligations and guidance in the interest of promoting worldwide safety and security. In general, such guidance should be consistent with NRC's domestic regulatory approach. As the nuclear marketplace is increasingly global, regulatory agencies need to position themselves to learn from and reinforce each other to ensure consistent and high levels of safety and security. This paper provides a framework and approaches to identify opportunities in the international area.

DISCUSSION:

A strategic, integrated and systematic approach to expanding the cadre of employees with the capabilities, knowledge, and experience to effectively participate in international activities must be considered within the context of the existing NRC mission and activities. In fact, much of what is necessary is already being effectively implemented within the Office of International Programs and the various Program Offices. Thus, the staff believes that elaborating upon the existing experience and best practices will effectively position the NRC to meet its international obligations and continue to be a leader in the international community.

The elements of a program to facilitate knowledge management and ensure an expanded cadre of employees with international experience includes the following: (a) Commission and Executive Director for Operations communications to senior management and staff to recognize the integral nature of international activities with the domestic safety and security mission, and thus the importance and value of international activities; (b) supervisor and senior management support and encouragement of staff involvement in focused international activities that provide tangible or indirect benefit for NRC, specifically considering opportunities for development and growth when activities are available; (c) identification and communication of the types of international activities that provide opportunities for the desired international outcome; (d) development of procedures and training for assignment of international activities to employees; and (e) resources to support implementation. Many offices can be given credit for having these elements in place; the purpose of this framework is to standardize these elements across the agency, especially in light of the establishment of two new program offices. These program elements are discussed in more detail in the Enclosure.

The framework for developing expanded staff capabilities falls into two categories: knowledge management, and support for NRC's and the U.S. Government's (USG) nuclear safety and security policies.

1. Knowledge Management, Training and Experience

First, in terms of general knowledge and preparation of staff, topical seminars offered by OIP are being developed about key aspects of NRC's international programs. These seminars will be available for new OIP staff, and program office international liaisons will be made aware of the seminars to forward to interested program office managers and staff. OIP also makes presentations at the "NRC: What is It, What it Does" introductory program for new employees, and has made presentations to the Nuclear Safety Professional Development Program to encourage employees to think about how they can professionally support NRC's international programs. Furthermore, training is available at the Foreign Service Institute and the Department of Agriculture that can be used, as appropriate, to provide information and background. This training can translate into practical use through management approval of rotations and full-time positions in OIP, the international liaison positions in the individual program offices, assignments in sister agencies with international responsibilities, staffing of positions within international organizations such as the Nuclear Energy Agency (NEA) or the International Atomic Energy Agency (IAEA), or the NRC's Nuclear Safety Attache position at the U.S. Mission for International Organizations in Vienna, Austria (including the possibility of a rotation to shadow the Attache for on-the-job experience overseas).¹ For example, over the last several years and with program office support, OIP accepted entry-level and mid-career staff into rotational assignments of three months or longer, providing unique opportunities to interact with foreign regulatory agencies and to support Commission travel.

In this regard, NRC needs to more aggressively target and budget for key positions – management and staff-level – at international organizations, focusing on areas where NRC can contribute significantly and where we can learn from others. OIP will continue to include this in future discussions with the offices on prioritization of international activities.

To systematize this process, OIP has initiated outreach, through the Office of Human Resources, to the Nuclear Safety Professional Development Program, the Leadership Potential Program, and the Senior Executive Service Career Development Program to ensure that participants know of rotational opportunities and the processes by which to apply for them. Staff is also working with program offices to align with and incorporate international activities in the Human Capital and Training and Development Strategic Plans and office operating plans. Finally, the International Council Working Group (ICWG) will develop a communications plan for notifying management and staff about international opportunities.

¹ Under Title 5 of the United States Code Parts 3343 and 3581, and Title 5 of the Code of Federal Regulations Part 352, NRC only has authority to detail or transfer staff to organizations listed or approved by the Office of Personnel Management and the Department of State. Detail or transfer to another national regulatory body or a foreign organization of a different country would not qualify under that specific authority. Staff will work with the Office of Human Resources to explore options under these circumstances.

Second, for many staff, the desire may not be to have a career in international activities. Instead, the desire is often to be able to participate in the international aspects of their particular technical disciplines, as another component of their plans to grow professionally. Such knowledge transfer can be gained through “shadowing” another staff member during participation in international travel or other activities. Another example is the staff’s considerable contributions to the cooperative research programs, which is particularly valuable to the NRC and to foreign regulatory agencies. Staff’s personal development is best addressed through the use of Individual Development Plans which recognize the international contributions to overall career development within the program offices’ prioritized needs.

2. Agency Policy Implementation in International Fora

The ongoing development and use of staff in the international components of various NRC programs is parallel to the knowledge management activities described above. In this sense, the international activities are not a separate career, but are integral to the effective and efficient conduct of our safety and security programs. If NRC is to be effective, it needs to have a systematic approach to achieving the “bench strength” of individuals who are comfortable in the scientific and political environment of international interactions, just as they are comfortable in the licensing and inspection environment of the NRC domestic programs. These individuals can knowledgeably apply the information gained through participation in international activities to benefit the U.S. domestic regulatory activities, and likewise apply the knowledge of NRC programs to support the work of our bilateral and multilateral partners.

The key aspects of the framework in this setting involves the identification of appropriate staff, and management making available increasingly responsible assignments that involve international activities, just as is done in the development of staff in the NRC’s domestic responsibilities. Success can be achieved through continuing to involve managers and staff in all stages of a project, and, in particular, identifying when an opportunity exists to observe and learn in an international venue. This will prepare the staff for future situations in which they may take on greater roles and responsibilities.

An additional opportunity exists through ongoing management and staff participation in long-term international initiatives, such as development and review of IAEA documents and associated participation in IAEA consultancies and technical meetings, and participation in assessment missions to ensure U.S. regulatory perspectives are appropriately considered in the international approaches to nuclear safety. These activities, while not directly related to a specific research, regulation development, licensing, or inspection activity within the NRC, provide excellent opportunities for both personal growth and agency influence. For an overview of the types of international activities that provide opportunities for the desired international experience, see Section C in the Attachment.

NRC also needs to continue its leadership in Federal interagency activities, such as the activities of the IAEA Safety Subcommittee, which discusses all safety-related initiatives undertaken by the USG in support of the IAEA's safety mandate (e.g., funding, staffing, development of documents, etc.). NRC is also active in the new U.S. interagency IAEA Security Subcommittee and in the IAEA's specific security activities, and the U.S. interagency initiatives regarding IAEA safeguards. Of particular note is the staff's ongoing efforts to guide the integration of safety with security in IAEA documents and missions, and working with the USG to consider cost-free experts with regulatory experience for positions in the Division of Nuclear Safety and Security.

Examples of the successful leadership and development of NRC staff can be seen in the USG delegations to both the Convention on Nuclear Safety and the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management and presentation of the U.S. National Reports. These activities require dedicated teams to support development of the U.S. report, review the reports of all other Contracting Parties, and to represent the United States in the Review Meetings. The Offices of Nuclear Reactor Regulation and of Nuclear Material Safety and Safeguards effectively utilized a combination of both senior and more junior staff in all phases of this effort, effectively developing relatively new staff for future responsibilities. Staff also notes the multiple-year efforts concerning the interagency negotiation of the text of the U.S. Additional Protocol, in which staff worked closely with the IAEA and with NRC licensees to prepare for its eventual implementation. Other examples include the development and implementation of the Multinational Design Evaluation Program, led by the Offices of New Reactors and International Programs.

3. Resource Implications

The critical nexus between international activities and the conduct of the domestic safety and security program is clearly recognized by the Commission. Thus, there is an increasing recognition of the need for a cadre of employees with international experience, not as an objective by itself, but in the context of the overall NRC mission. Much of what is necessary to expand the cadre of employees with international experience is already being effectively implemented within the Office of International Programs and the program offices. These activities include communications about international activities and opportunities; establishment of permanent international liaison positions in the program offices; rotational opportunities; individual meetings between the Office of International Programs' and program offices' management to discuss international activities.

In the shorter term, associated resources have and will come out of existing budgets. Most of the activities necessary for developing competence in the staff for international participation is no different from developing the appropriate competence in other areas.

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Other activities under consideration, such as the major long-term assignments described in Section C of the Attachment (e.g., assignments at sister U.S. Government agencies; positions at foreign counterpart agencies), would have resource implications for the NRC. Resource estimates for these efforts would be developed as the requirements for engaging in these activities are further reviewed and discussed.

CONCLUSION

The Office of International Programs, in coordination with the Executive Director for Operations and the Program Offices, is continuing its process and dialogue to identify opportunities for management and staff to participate in international activities for both knowledge management and training purposes, and to continue support for NRC's international policies and programs. The International Council and its Working Group will communicate with management and staff about the integral importance of international experience in NRC's safety and security mission, and consider more systematic ways to enhance the involvement of staff in international activities. Examples of such involvement include making available training opportunities through participation in meetings or international assignments, and identification of resources for future growth in staff's participation in international activities, such as supporting multiple travelers to overseas meetings for training purposes.

OFFICE COORDINATION:

This paper has been coordinated with the Executive Director for Operations and key offices under his purview. The Office of the General Counsel has no legal objection. The Office of the Chief Financial Officer has reviewed the paper for resource impacts and has no objection.

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Enclosure: As stated

PROGRAM ELEMENTS FOR EXPANDED INTERNATIONAL CADRE

A. Commission and Executive Director for Operations communications to senior management and staff to recognize the integral nature of international activities with the domestic safety and security mission, and thus the importance and value of international activities

The objective is to ensure continuing communications on international activities for all levels of staff and management.

This element is implemented through the variety of Commission-level papers on a range of international activities, notifications from OIP of ongoing international efforts (JDL-grams, OIP weekly), information provided for incoming Commissioners and in NRC's publications such as the Strategic Plan, the Information Digest, and the "Protecting Our Nation" document. These communications reflect the value placed on these activities, and recognize the experience that international activities and knowledge bring to the development of U.S. policy and the regulatory programs of safety and security. These communications may also promote the opportunities and benefits of participating in international activities.

In addition, communications from the EDO have, as appropriate, discussed key international activities and the results of international meetings. Recent internal NRC news articles have highlighted international activities of the commission, management and staff, such as signing agreements at the Regulatory Information Conference, Commissioner travel, and the Chairman's participation in the IAEA General Conference. OIP weekly reports and EDO Daily and Two-Week Look-Ahead reports also demonstrate the implementation of the Commission's policy of active engagement on the international front and give insights into how staff can contribute.

Other components of this element include: quarterly International Council meetings, and twice-monthly meetings of the international liaisons to ensure program-wide knowledge transfer and alignment. Further, there are increasing communications and interactions between the program office management and OIP through the international liaisons to learn how the NRC's priorities relate to those of its counterparts and the role political, economic, social and historical elements play in those countries' activities. An example is OIP management's meetings with individual offices to review possible international activities to help offices in their out-year budget planning process, and posting information on the NRC internal HR website about relevant job opportunities abroad.

The Office of the Executive Director for Operations is considering additional ways to communicate the importance and value of international activities that provide a direct or indirect benefit to the NRC.

B. Supervisor support and encouragement of staff involvement in international activities, specifically considering opportunities for development, expansion, and growth when activities are available

Enclosure

The objective is to have appropriate “bench strength” of individuals who are comfortable in the scientific and political environment of international interactions, just as they are comfortable in licensing, inspection, research, security and other technical environments of the NRC domestic programs.

The ongoing development and use of staff in the international components of various NRC programs is parallel to the development of individual staff interests. The key aspects of the framework in this setting involves the identification of appropriate staff, and the assignment of increasingly responsible assignments that involve international activities, just as is done in the development of staff in the NRC’s domestic responsibilities. Some offices are implementing the following types of activities:

- Supervisory encouragement of staff to consider opportunities for participation in international activities in their Individual Development Plans (IDP).
- Supervisors identify and communicate short-term and long-term international opportunities, including rotations, that can be matched to the staff’s interests and responsibilities.
- Supervisors assigning international activities to staff when employees express interest in IDPs.
- Supervisors assign international activities when the assignment is a logical part of the employee’s work, and/or would enhance the employee’s job performance, or when the experience would enable the employee to serve as backup to staff with more direct international responsibilities.
- Use participation in international activities as an area to be recognized in performance appraisals. Such discussions are often considered under Professional Development and Organizational Effectiveness in Element 4.
- Encourage staff, as appropriate, to utilize mentors in own or other program offices to develop broader understanding of the Commission’s international policies and their implementation.
- Maintain a high-level (e.g., GG-15 or above) international liaison position in each program office and within the Executive Director for Operations.

One means of institutionalizing these actions is to use office web sites, most of which have international pages, to post and update information relating to these opportunities and general advice on how to become aware of and involved in international activities.

C. Identification and communication of the types of international activities that provide opportunities for the desired international outcome

The objective is to maintain awareness of the wide range of opportunities available related to international activities.

The types of activities that may be appropriate for assignment to staff to gain international experience can be categorized and listed on the basis of potential resource commitments, e.g., incidental activities, those with small impact, with significant impact, and major long-term assignments. A notional list of these activities include the following:

Incidental Activities

- Participation in preparations for NRC or USG meetings with international participants.
- Working closely with (perhaps mentoring) foreign assignees at NRC.
- Seminars, “brown bag” talks and other methods by which staff who have completed international rotations or other foreign travel can share their experiences with colleagues and managers. These may provide opportunities to share information about the experience, benefits, and guidance of participating in international activities, e.g., perhaps as part of the knowledge management initiative.
- Representing NRC organizational units at interagency meetings.
- Participation in preparations to support Commissioner travel or interactions on international topics.
- Participation or observation of International Council and International Council Working Group meetings and activities.

Small Impact

- Attendance, presentations at and taking training with foreign visitors at NRC’s Technical Training Center and/or the U.S. National Laboratories and/or institutions such as the World Nuclear University.
- Attending bilateral exchange meetings as a participant (or as an observer) at the NRC.
- Review of international (IAEA, NEA, or other country) documents for which agency approval or comments are requested.
- Participate in international meetings or facility visits that directly support the staff member’s regulatory responsibilities (e.g., licensing, inspection, and regulatory development).

Significant Impact

- Participation in IAEA, NEA, or other international organization meetings, either to provide support to the lead participant, gain experience, and make contacts or representing NRC in specific areas of technical expertise.

- Short (rotational) or longer-term assignments as Program Office or Division international coordinator; or serve as backup to the Program Office or Division international coordinator.
- Participation in international cooperative research programs.
- Rotational assignments in OIP, including consideration given to establishing a position dedicated to rotations from program offices.
- Rotational assignments to the Executive Director for Operations office to support EDO coordination of staff international activities.
- Short-term support assignments (e.g., one month or less) at sister U.S. Government agencies, or at international organizations (e.g., IAEA and NEA).
- Rotational assignment shadowing the NRC Nuclear Safety Attache in Vienna, Austria.

Major Long-Term Assignments

- Longer-term assignments, e.g., 3-6 months or longer at sister U.S. Government agencies, or standard 2-5 year assignments at the IAEA or NEA.
- Targeting of key senior and mid-level leadership positions at IAEA and NEA where NRC through NRC and Federal interagency support, where an NRC staff person can contribute significantly and also where we can learn from others.
- Promote and support NRC staff involvement as U.S. cost-free experts at the IAEA.
- Promote and support NRC staff for positions at counterpart regulatory bodies – e.g. Germany and France. Despite many offers from foreign counterparts, NRC has not reciprocated its foreign assignee program by sending staff abroad.

D. Development of procedures for assignment of international activities to employees

The objective is a robust and continuing process through which NRC staff and management can be aware of opportunities for international activities.

There is a need to review and improve established mechanisms, and to create new mechanisms for communicating specific opportunities that might be of interest and of value to a broad range of NRC employees. These opportunities may be identified to staff by means of:

- Enhancing the visibility of information on OIP's internal web page about international opportunities, including opportunities for rotations in OIP, Program Offices, in other agencies or countries, and in international organizations, and relevant frequently asked questions.

- Consideration of additional web page content for OIP and program office international liaison activities, such as links to the OIP web site for the OIP weekly information summary.
- Broader availability of information on NRC's international activities through the agency knowledge management web site(s).
- Revise and update, as appropriate, of NRC Management Directives (MD) 10.2 to clarify that time, privileges, etc. continues during detail to other organizations or countries; clarify applicability of NRC pay travel and per diem; resolve the issues associated with return rights; and provide for identification, insofar as possible, or positions to which the individual will return before the assignment takes place.
- Revision, as appropriate, of other Management Directives (14.1, 3.9, 5.13) that impact participation in international activities, and establish links to these MDs from program office international web pages.
- Use of the international travel database to coordinate staff travel.
- As appropriate, inclusion of international employment activities on the Human Resources web site.