

## **POLICY ISSUE NOTATION VOTE**

January 23, 2012

SECY-12-0010

FOR: The Commissioners

FROM: R. W. Borchardt  
Executive Director for Operations

SUBJECT: ENGAGEMENT OF STAKEHOLDERS REGARDING THE EVENTS IN  
JAPAN

PURPOSE:

The purpose of this paper is to respond to the staff requirements memorandum (SRM) entitled, "Staff Requirements—COMWDM-11-0001/COMWCO-11-0001—Engagement of Stakeholders Regarding the Events in Japan," dated August 22, 2011 (ML112340693). As requested, the staff is updating the Commission on efforts to: (1) provide the public with the U.S. Nuclear Regulatory Commission's (NRC's) most up-to-date understanding of the chronology of events at the Fukushima Dai-ichi Nuclear Power Plant and with the agency's ongoing understanding of the plant's status, (2) obtain stakeholder input on the recommendations provided in the Near-Term Task Force (NTTF) report and brief the Advisory Committee on Reactor Safeguards (ACRS) on the NTTF recommendations and agency plans going forward, and (3) obtain feedback from public citizens on the readability and understandability of the final NTTF report.

This paper puts the above efforts into context and provides the Commission with recommendations for enhancing the agency's ability to provide comprehensive, transparent, and clear communication with its stakeholders. Following the numbering used in the SRM, these recommendations relate to (4(a)) enhancements that the agency should make to assure ongoing engagement with the public and stakeholders concerning matters related to events at Fukushima Dai-ichi, (4(b)) the potential of convening a one-time group of experts or standing advisory committee to advise the agency on how it might improve the NRC's external communications on significant regulatory issues, and (4(c)) recommendations for engaging other organizations to establish partnerships to advance public communication and education on topics associated with radiological safety.

CONTACT: Lance Rakovan, OEDO  
301-415-2589

SUMMARY:

The purpose of this paper is to respond to the SRM entitled, “Staff Requirements—COMWDM-11-0001/COMWCO-11-0001—Engagement of Stakeholders Regarding the Events in Japan,” dated August 22, 2011 (ML112340693).

The staff is implementing a plan to provide up-to-date information on the events at Fukushima Dai-ichi to both external and internal stakeholders. As additional information becomes known about the accident, staff will communicate its understanding of the chronology of events and plant’s status. The staff continues to receive stakeholder input on the recommendations provided in the NTTF report and the NRC’s subsequent actions and has interacted with the Advisory Committee on Reactor Safeguards (ACRS) as part of the review of lessons learned from the events at Fukushima Dai-ichi. The staff reached out to its Federal partners to obtain feedback on the readability and understandability of the final NTTF report. Although a number of responders thought the report was satisfactory, general feedback on the NTTF report stated that it was written for a technical audience and that the general public would probably not understand it.

The Japan Lessons-Learned Project Directorate (JLD) has assembled a communications team to ensure proper communication with various stakeholders involving follow-up actions associated with the events at Fukushima Dai-ichi. The staff believes that the agency could make a number of enhancements to assure ongoing engagement with the public and stakeholders concerning matters related to Fukushima Dai-ichi, including a number of initiatives detailed by the recent Stakeholder Confidence Working Group (SCWG). The staff has already begun taking action on some of these initiatives. The staff expects to accomplish these activities as part of normal responsibilities. The staff does not see the value in convening a one-time group of experts to advise the agency on how it might improve its external communications on significant regulatory issues in the short term. The staff recommends that the agency leverage existing mechanisms for engaging other organizations. These engagements have been successful and fruitful. The staff also recommends that the agency take full advantage of social media to share informative materials with appropriate stakeholders.

The staff recommends that the agency take no further action other than those already underway or described in this paper.

BACKGROUND:

On Friday, March 11, 2011, a 9.0-magnitude earthquake struck Japan about 372 kilometers (231 miles) northeast of Tokyo off the coast of Honshu Island. The earthquake led to the automatic shutdown of 11 reactors at four sites (Onagawa, Fukushima Dai-ichi, Fukushima Dai-ni, and Tokai) along the northeast coast. Approximately 40 minutes later, a tsunami, estimated to have exceeded 14 meters (45 feet) in height, hit the same coast.

The NRC established the NTTF in response to the Commission’s direction to conduct a systematic and methodical review of NRC processes and regulations to determine whether the agency should make additional improvements to its regulatory system and to offer recommendations to the Commission for its policy direction in light of the events at Fukushima Dai-ichi. In examining the events at Fukushima Dai-ichi to gain insights for U.S. reactors, the NTTF addressed actions necessary to protect against accidents resulting from natural

phenomena, mitigate the consequences of such accidents, and ensure emergency preparedness. The NTF issued its report on July 12, 2011.

In SRM SECY-11-0093, "Near-Term Report and Recommendations for Agency Actions Following the Events in Japan," dated August 19, 2011 (ML112310021), the Commission directed the staff to provide a proposed charter for the longer term review of the events at Fukushima Dai-ichi. The staff submitted the proposed charter to the Commission on August 26, 2011, and the Commission approved it in an SRM SECY-11-0117, "Proposed Charter for the Longer-Term Review of Lessons Learned from the March 11, 2011, Japanese Earthquake and Tsunami," dated October 19, 2011 (ML112920034). This charter established a senior level steering committee to lead the agency's longer term response to the accident.

SRM SECY-11-0093 also directed the staff to engage with stakeholders to review and assess the NTF recommendations and provide the Commission with two notation vote papers with the results of that assessment. First, the Commission directed the staff to provide a notation vote paper with recommendations on actions that can and, in the staff's judgment, should be implemented, in whole or in part, without unnecessary delay. The staff issued this paper to the Commission on September 9, 2011 (ML11245A127). Second, the Commission directed the staff to prioritize the NTF recommendations and include implementation challenges, additional recommendations, and a schedule and milestones with recommendations for stakeholder engagement and ACRS involvement. The staff issued this paper to the Commission on October 3, 2011 (ML11269A204). In SRMs dated October 19, 2011, and December 15, 2011, the Commission approved the staff's proposals, subject to specific comments from the Commission.

As of the date of this paper, the staff, under the direction of the steering committee, is engaging with stakeholders, including the public, industry, and State and local governments, to implement lessons learned from the events at Fukushima Dai-ichi consistent with the Commission's direction.

Since the events at Fukushima began to unfold, the NRC has attempted to address the challenging task of appropriately communicating with internal and external stakeholders about the events themselves and about the NRC's and nuclear industry's follow-up actions.

## DISCUSSION:

### *(1) Communication Plan on Chronology of Events*

The "Fukushima-Related After Actions" communications plan related to the events at Fukushima Dai-ichi explains how the NRC will provide up-to-date information on those events to both external and internal stakeholders. For example, external stakeholders can continue to access information through the Japan Nuclear Accident—NRC Actions Web site at <http://www.nrc.gov/japan/japan-info.html> and to receive additional information through the NRC blog and at NRC public meetings. As additional information becomes known about the accident, staff will communicate its understanding of the chronology of events and plant's status. External stakeholders also have access to Freedom of Information Act (FOIA) requests, responses and released records through the *FOIAs Related to Japan's Emergency* website (<http://www.nrc.gov/reading-rm/foia/japan-foia-info.html>). Further, the NRC recently added Twitter to its communications toolbox. The agency can and will use Twitter to reach a broader

audience when important updates concerning Fukushima Dai-ichi are available. The communications plan is located on the NRC Intranet at <http://www.internal.nrc.gov/communications/plans/active/Comm%20Plan%20122211.pdf>.

The NRC staff has additional mechanisms at its disposal to ensure consistent communication. The agency uses the *NRC Reporter* and the *EDO Update*, for example, to communicate the latest news to employees. The agency's communications staff has leveraged these tools since the accident occurred and intends to continue using them to support openness and transparency.

### *(2) Obtaining Stakeholder Input and Holding ACRS Briefings*

The staff continues to receive stakeholder input on the recommendations provided in the NTTF report and the NRC's subsequent actions. The staff held public meetings to discuss the report, including meetings on July 28, 2011, and August 31, 2011, and it continues to hold public meetings on actions involving individual topics. Additionally, for a limited time, the public was able to provide comments through Regulations.gov and as of the writing of this paper the public has the opportunity to provide comments on Tier I Recommendations through the [JLD\\_Public.Resource@nrc.gov](mailto:JLD_Public.Resource@nrc.gov) e-mail address. Specific details on the meetings held and comments obtained appear at <http://www.nrc.gov/japan/japan-meeting-briefing.html>.

Consistent with Commission direction, the staff has interacted with ACRS as part of the review of lessons learned from the events at Fukushima Dai-ichi. Specifically, the staff briefed ACRS on the agency's response to the accident on April 7, 2011, and June 23, 2011; the NTTF met with ACRS on August 16, 2011, and September 8, 2011, to describe the progress and results of its review; and the staff discussed plans for addressing the NTTF's recommendations at a meeting on October 7, 2011. ACRS also met with representatives from the Institute of Nuclear Power Operations (INPO) on July 12, 2011, and with the Nuclear Energy Institute, INPO, and the U.S. Department of Energy on May 26, 2011.

In letters dated October 13, 2011, and November 8, 2011 (ML11284A136 and ML11311A264) ACRS provided the results of its ongoing review of the agency's response to the accident, including a number of additional recommendations for the agency to consider. The staff has developed a process for evaluating and dispositioning the ACRS recommendations and those provided by other stakeholders. In a letter dated December 8, 2011, the staff provided ACRS with an update on its progress in using this screening process to evaluate the Committee's recommendations. The staff committed to provide further updates to ACRS as it completes the screening process. In addition, the staff will continue to engage with ACRS during the course of the longer term review to obtain the Committee's insights and recommendations.

### *(3) Public Feedback on the NTTF Report*

To obtain feedback in a short timeframe on the readability and understandability of the final NTTF report from public citizens who are not knowledgeable in nuclear/radiological matters, the NRC reached out to its Federal partners. The NRC contacted members of a wide spectrum of groups that are not directly related to nuclear/radiological topics, including the Federal Plain Language Group, environmental conflict resolution facilitators, and Federal librarians, and asked them to provide feedback on the report. Additionally, the staff requested public feedback through a blog on December 1, 2011, entitled "The Near-Term Task Force Report – Readable

for all?" (<http://public-blog.nrc-gateway.gov/2011/12/01/the-near-term-task-force-report-readable-for-all/>). A sampling of the feedback received is included as an enclosure to this paper.

Although a number of responders thought the report was satisfactory, general feedback on the NTTF report stated that it was written for a technical audience and that the general public would probably not understand it.

#### *4(a) Ongoing Engagement Enhancements*

The JLD has assembled a communications team with members from the JLD, the Office of the Executive Director for Operations (OEDO) the Office of Public Affairs (OPA) and the Office of Congressional Affairs (OCA). The purpose of this team is to ensure proper communication with various stakeholders involving follow-up actions associated with the events at Fukushima Dai-ichi.

The NRC published NUREG/CR-7033: "Guidance on Developing Effective Radiological Risk Communication Messages: Effective Message Mapping and Risk Communication with the Public in Nuclear Plant Emergency Planning Zones" in February 2011 (<http://pbadupws.nrc.gov/docs/ML1104/ML110490120.pdf>). The document provides guidance for nuclear power plant licensees and local response organizations on message development for radiological emergencies.

The staff believes that some of the initiatives taken in response to previous events involving groundwater contamination should be applied toward ongoing engagements with the public and other stakeholders concerning significant regulatory issues, such as matters related to Fukushima Dai-ichi. The June 2010 Groundwater Task Force Report (ML101680435) contained a recommendation to develop a strategy on how the agency can strengthen stakeholder confidence in NRC actions related to reported low risk incidents that have high stakeholder interest. In response, the Communications Council (a group established several years ago to address both internal and external communication challenges) created the SCWG to develop a draft strategy for the agency to strengthen confidence in NRC actions. The SCWG provided its report to Martin Virgilio, Deputy Executive Director for Reactor Operations and Preparedness Programs, through a memorandum dated June 28, 2011 (ML11173A129). Although the strategies discussed in the report were created with an eye toward low-risk/high-interest topics, such as groundwater contamination, the NRC believes that agency communications on all topics, including interactions involving the NTTF report, would be improved by taking action on a number of the various strategies discussed in the report. The remainder of this section describes a number of these initiatives and their bearing on communications related to high-profile topics, such as the events at Fukushima Dai-ichi.

Other staff initiatives already underway include the following relevant examples:

- Using Plain Language. The staff is working on several Plain Writing initiatives, including (1) issuing a task to all offices, informing them about the Plain Writing Act of 2010, indicating which documents are covered, and encouraging the staff to take appropriate actions, (2) devoting a section of the public Web site to plain writing (<http://www.nrc.gov/public-involve/open/plain-writing.html>), (3) sponsoring a plain writing contest in the *NRC Reporter* and publishing several follow-up articles on the importance

of plain writing, (4) encouraging the staff to take plain language training, and (5) briefing segments of the staff on the Plain Writing Act of 2010. All of these initiatives will collectively improve agency communications about topics such as the events at Fukushima Dai-ichi.

A new 2-day, instructor led course entitled, "Writing in Plain English," is now available to the staff, in addition to the 1-hour online course entitled, "How To Write Clearly and Concisely." The Office of Human Resources recently launched several new or revamped courses in the communications area, including a course entitled, "Effective Risk Communication and Public Outreach." These courses are oriented toward communicating information on risk perspectives and enhancing stakeholder confidence. The NRC must ensure that staff members who interact with the public on complex and sensitive topics of high stakeholder interest have the communication skills and talent necessary to build confidence in the agency's regulatory activities. The agency should incorporate such training into existing qualification and developmental programs and possibly into elements and standards. The NRC should monitor these courses to determine whether they are successful in adequately preparing the staff to communicate with the public in a manner that improves stakeholder confidence.

The agency will produce a plain language executive summary or a high-level plain language version of high-interest NRC materials to provide the public with a better, clearer understanding of the events that have occurred. Although the NRC certainly does not need to take such actions for all topics, highly visible issues require that the staff take additional steps to include some summary or version of communications in plain language. The OEDO will consult with OPA, and OCA to accomplish this in the future.

In addition, the Plain Writing section of our public website provides access to a *Contact Us* page (<http://www.nrc.gov/public-involve/open/plain-writing/contactus.html>), through which we invite site visitors to offer comments or questions about the use of plain writing in our documents, public Web site, and public meetings. Feedback provided using this form is directed to [PlainWriting.Resource@nrc.gov](mailto:PlainWriting.Resource@nrc.gov), and the form includes a drop-down menu that enables site visitors to select the specific type of communication addressed in the comment or question, using the following options:

- Plain Writing Action Plan
- Public Web Site Information
- Public Meeting
- Inspection Report
- License/Amendment
- Performance Assessment
- Regulatory Guide/Guidance Document
- Significant Enforcement Action
- Other

Our public website also provides an online form (<http://www.nrc.gov/public-involve/doc-comment/form.html>) to enable site visitors to contact us about publications we've issued

for public comment, or provide feedback regarding information collection requirements. Another online form (<http://www.nrc.gov/public-involve/info-quality/contactus.html>) enables site visitors to contact us to seek correction of NRC information, in accordance with our Information Quality Guidelines. In addition, we've invited public feedback in a blog posting, entitled "Are We Writing in Plain English?", dated February 15, 2011 (<http://public-blog.nrc-gateway.gov/2011/02/15/are-we-writing-in-plain-english/>).

- Ensuring Proper Use of Web Pages. Although the agency uses the public website to communicate the current status of events, the SCWG noted that it is difficult to keep Web pages for high profile issues current. In many cases, the site does not list the sponsor of the Web page for these issues. Moreover, NRC key documents used to communicate with the public are text heavy; are presented at a high reading level; and the lack graphics, charts, and tables for ready comparison and quick communication. These attributes are particularly notable in an age of text messages, tweets of less than 140 characters, and 2-minute YouTube videos.

All NRC public website pages involving high-profile, ongoing topics, such as the events in Japan, and the agency's responses to those events will have an active sponsor. The sponsor will be expected to review Web pages quarterly and update them, as necessary, to ensure accuracy at the time the review was conducted. Pages without sponsors will be removed from the Web site. The agency will target sponsors of Web pages that involve high-profile topics and will work with them to provide language and graphics that are improved and easier to understand. The agency will place greater emphasis on the widespread use of graphics, charts, and tables and on short, easily understandable narratives, for perspective and ease of comparison.

- Using Social Media. The NRC continues to take great strides in the use of social media. Appropriately, the NRC blog focused on the events in Japan and the agency's actions in response for months following the event. The NRC has also begun using YouTube and Twitter as ways to communicate about high-profile issues, such as the agency's continued follow-up to the events in Japan. Such videos can also be shared with selected stakeholders for their use.
- Updating Communications Guidance. Although still relevant, the NRC's internal communications guidance provided through the agency's main Intranet communications page (<http://www.internal.nrc.gov/communications/>) is outdated and unknown to many staff members who could benefit from its use. Communications specialists will review the pages for updates and improvements, work with the Web Content Services Group to incorporate those updates and improvements, and publicize the page using various agency communication vehicles (e.g., the *NRC Reporter* and the internal blog). The staff completing this task will specifically focus on (1) taking greater advantage of existing communications guidance both within the agency and from outside sources and (2) using new social media techniques, as appropriate.

The staff believes that these initiatives will strengthen the agency's ability to communicate with its stakeholders and that they are the appropriate actions to take at this time.

*4(b) Convening a Group of Experts*

The staff continually receives input from external stakeholders on improving the NRC's external communications on regulatory issues. The agency provides NRC Form 659, "Public Meeting Feedback Form," (<http://portal.nrc.gov/nrcformsportal/Shared%20Documents/NRC%20659.pdf>) at all public meetings to allow members of the public a simple way to provide input on how the NRC is communicating about a particular issue. The staff is currently revising the form and streamlining the feedback process.

SRM – COMWDM-11-0001/COMWCO-11-0001 directed the staff to use the insights gained from stakeholder and public input to provide to the Commission a notation vote paper considering, among other things, the potential of convening a one-time group of experts to advise the agency on how it might improve NRC's external communications on significant regulatory issues. Such a group could be operated in a manner similar to a public workshop held with external stakeholders on October 4, 2010 (ML102861795). As mentioned above, this workshop was held to solicit input on the Groundwater Task Force's findings. One of the four sessions focused specifically on strengthening trust in the NRC. The discussions during this session addressed the following question: "How can the NRC increase confidence in its actions and communications related to groundwater protection?" At the workshop, each panelist provided his or her individual input/ideas on actions NRC should take (see page 5 of the SECY paper). This would be an efficient and resource-effective way to obtain the individual views of members of a group of experts providing advice to the NRC on how to improve the agency's external communications on significant regulatory issues. In lieu of a charter, details on such a meeting are enclosed. The Commission could be provided with the individual views expressed by the group members, without having to follow the procedures required by a group that is subject to the Federal Advisory Committee Act (FACA).

SRM – COMWDM-11-0001/COMWCO-11-0001 also directed that the expert group mentioned above should be invited to "opine" regarding potential actions the NRC might take in the long term to improve stakeholder involvement, such as the establishment of a "standing advisory committee" for that purpose. Presumably, this means that the new group that could be established might be a permanent NRC advisory committee subject to the FACA. That would likely be a more resource intensive undertaking than the type of committee that would be modeled on the example of the panelists at the workshop held to solicit input on the potential policy changes being considered as part of the Groundwater Task Force's findings mentioned above. This is because of the necessity to comply with FACA procedures. Important FACA advisory committees usually have one or more support staff assigned to them.

Advisory committees subject to the FACA require the following, among other things:

- Charters must (1) be filed with the standing committees of the Senate and House of Representatives; (2) be reviewed by GSA's Committee Management Secretariat; and (3) contain the estimated annual operating costs of the committee;<sup>1</sup>

---

<sup>1</sup> A meeting, whether it is a public meeting, workshop, group, or briefing is generally not subject to the Federal Advisory Committee Act (FACA) if all the participants do is to provide their individual views on the subjects that are the focus of their meeting together. If, in addition to providing their individual views, the participants deliberate together or negotiate over what should be their recommendations or advice to the agency that created the meeting, workshop, group, or briefing opportunity, FACA may be implicated.

- The head of an agency must make a determination, as a matter of formal record, that the establishment of an agency advisory committee is in the public interest in connection with the performance of duties imposed on the agency by law;
- Meetings must be open to the public, unless a Sunshine Act exemption applies;
- Documents made available to or prepared for or by an advisory committee must be available for public inspection and copying, unless a FOIA exemption applies;
- Detailed minutes must be kept of each meeting, and their accuracy must be certified by the chairman of the committee;
- A designated officer or employee of the Federal Government must chair or attend each meeting, and such individual has authority to adjourn a meeting of the committee;
- A meeting may not be held by a committee unless the agenda for the meeting has been approved by a designated officer or employee of the Federal Government;
- The committee's agency must keep records to fully disclose the disposition of any funds that may be at the disposal of the advisory committee and the nature and extent of their activities;
- Each agency is responsible for providing support services for its advisory committees, unless it provides otherwise.

NRC staff initiatives are already underway to ensure that communications about topics such as the events at Fukushima will be improved. These initiatives include (1) ensuring proper use of web pages; (2) using social media, and (3) updating NRC's internal communications guidance provided through the agency's main intranet Communications page (see page 7 of the SECY paper). It is important this work is not duplicated by any new group efforts that may be under consideration.

#### *4(c) Recommendations for Engaging Other Organizations*

The NRC currently partners with many other organizations, including Federal agencies, State and local governments, nonprofits, educational institutions, and other entities, to advance public communication and education on topics associated with radiological safety.

The NRC staff met with State organizations over the past year in various forums, such as teleconferences, workshops, and annual meetings, to address the lack of federal coordination and communication early on during the Fukushima Dai-ichi event. State views and recommendations were noted in NRC's overall after action report and also provided to the White House national security staff. Organizations NRC staff met with include the Governor-appointed State Liaison Officers, the Conference of Radiation Control Program Directors, the Organization of Agreement States, and the National Governors Association. NRC staff continues to keep States informed about NTF activities and related meetings, as well as opportunities to participate and comment on those activities.

One new organization with which NRC recently developed a relationship is the National Alliance for Radiation Readiness (NARR). NARR is a relatively new coalition of representatives from State and local public health preparedness, State public health laboratories, State and territorial epidemiologists, State and local radiation control programs, disaster medicine, and emergency preparedness organizations. NRC, like other federal representatives, participates in NARR as an ex officio member. NARR seeks to address the problems associated with radiation

emergency preparedness, including (1) identifying gaps and barriers at the state, local and federal levels, (2) sharing best practices, lessons learned, and practical applications to enhance the planning for, response to, and recovery from radiation emergencies, (3) creating a professional network of public health professionals and other stakeholders invested in advancing the field of radiation emergency preparedness, and (4) developing tools, improving communication, and raising awareness of radiological issues. NRC's working relationship and collaboration with NARR, as with other State contacts and organizations, will help facilitate radiological preparedness, incident, and response communications. NRC staff also believes collaboration with these organizations can help the public better understand and put into perspective radiation health effects.

The NRC is part of a Federal Government working group, headed by the Federal Emergency Management Agency, to update the public affairs annex to the National Response Framework (<http://www.nrc.gov/reading-rm/basic-ref/glossary/national-response-framework-nrf.html>) to ensure that the Federal Government has a coordinated communication strategy for events that do not trigger the framework (i.e., an event that is not covered under the Robert T. Stafford Disaster Relief and Emergency Assistance Act).

The NRC should consider enhancing partnerships with other organizations through various forms of social media. A YouTube video that explains specific topics can be shared with multiple audiences easily, quickly, and inexpensively. The staff should be encouraged to more fully use social media technologies to communicate nuclear/radiological issues of importance.

The staff should consider bringing other organizations or individuals "into the conversation" when attempting to communicate about high-profile topics. The NRC could invite organizations such as the Health Physics Society and individuals such as local medical professionals to provide their input and perspective on specific topics on a case-by-case basis. The staff expects that the public will be receptive to these additional perspectives, especially if they come from trusted sources not directly affiliated with the NRC or the industry involved with the respective topic.

## RECOMMENDATIONS:

### *Ongoing Engagement Enhancements*

The staff believes that the agency could make a number of enhancements to assure ongoing engagement with the public and stakeholders concerning matters related to Fukushima Dai-ichi, including a number of initiatives detailed by the SCWG. Many of these initiatives are discussed above, and the staff has already begun taking action in some cases. The staff expects to accomplish these activities as part of normal responsibilities. For example, the Japan Lessons-Learned Project Directorate's communications team continues to enhance outreach involving the NRC's progress on the NTF's recommendations. The staff recommends continuing to take appropriate steps to improve communications and outreach.

### *Group of Experts*

The staff does not see the value in convening a one-time group of experts to advise the agency on how it might improve its external communications on significant regulatory issues in the short term. As noted in the discussion above, the SCWG analyzed the input received at the groundwater workshop on October 4, 2010, and provided a series of initiatives that the agency

is considering to improve its ongoing engagement with the public and others concerning significant regulatory issues. In addition, the NRC has obtained feedback from the public during public meetings on issues that specifically involve the agency's response and intended actions involving Fukushima Dai-ichi, and it expects that it will continue to do so.

#### *Engaging Other Organizations*

The staff recommends that the agency leverage existing mechanisms for engaging other organizations. These engagements have been successful and fruitful. The staff also recommends that the agency take full advantage of social media to share informative materials with appropriate stakeholders.

The staff recommends that the agency take no further action other than those already underway or described above.

#### RESOURCES:

The staff does not require any additional resources to complete the recommended actions. These actions are functions that the staff should routinely perform in conducting meaningful stakeholder engagement on regulatory issues of significance.

#### COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection. OIS has reviewed the paper for Paperwork Reduction Act implications and concurs in it. The Office of the Chief Financial Officer declined to review and concur on the paper as it has no resource implications.

***/RA Darren Ash for/***

R. W. Borchardt  
Executive Director  
for Operations

#### Enclosures:

1. [Sampling of Feedback on the NTTF Report](#)
2. [Details on External Communications Group](#)

## **SAMPLING OF FEEDBACK ON THE NEAR-TERM TASK FORCE (NTTF) REPORT**

To obtain feedback on the public readability and understandability of the final NTTF report from public citizens who are not knowledgeable in nuclear/radiological matters, the U.S. Nuclear Regulatory Commission (NRC) reached out to its Federal partners (thus avoiding complications involving Office of Management and Budget clearances). The agency contacted members of a wide spectrum of groups, including the Federal Plain Language Group, environmental conflict resolution facilitators, and Federal librarians, and asked them to provide feedback. Additionally, the agency posted a blog on December 1, 2011, requesting feedback.

A sampling of the comments received on the report appears below.

---

First off, it is obvious that the authors made a real effort to make a complex topic easier for a lay audience to digest, and they did a great job. In particular, I noted the use of short sentences and simple language throughout the report. This is in line with the recommendations of the Plain Language Action and Information Network (PLAIN). I also appreciated the inclusion of the two summaries (of the overarching and detailed recommendations). I think that these could be repurposed as very useful stand-alone documents, with one small change (see below).

I would recommend two changes to improve readability. First, the report is written almost entirely in the passive tense. I would recommend that the authors use the active tense instead, though I understand that this is a pretty major change. Second, I got tripped up by the number of acronyms and found myself flipping back sometimes pages to find out what an acronym meant. I think lay readers would appreciate it if the authors spelled out more terms, even if this increases the length of the document. In particular I would try to eliminate all of the acronyms from the recommendation summaries.

Overall, I found the report to be simple and very well written.

---

My impression is that it is well written, but not surprisingly, fairly technical. I would say it is going to be most understandable for an audience of at least advanced high-school level through college and especially graduate-level educated readers. Part of what makes it less accessible for a true lay reader is the necessary use of regulatory and technical terms of art throughout the document.

I do have two specific suggestions. First, a glossary of abbreviations and acronyms, and certain selected terms of art, would have been very helpful.

Second, an "executive summary" or similar short version, targeted to more of a lay audience, could be helpful. As examples to consider, I'd point to the one pagers GAO pre-pends to their reports, and especially, what ATSDR does for their "toxicity profiles" of chemicals. The tox profiles tend to be highly technical, but ATSDR opens the reports with a "public health statement" that does a nice job of explaining the key content in plain language.

---

The Plain Language initiative sounds like a great idea. It does become a problem when team members refer to the same thing in much different terms.

---

Lots of plain language issues in this report. Let's take just a few examples. We can start with the very first sentence of the Executive Summary. It's 62 words long. Significantly longer than our recommended maximum sentence length of 40 words. It has a verb in passive voice (was established). It has several hidden verbs—for example, “conduct a review” (use “review”), “make improvements” (use “improve”), and “make recommendations” (use “recommend”). It has wordy phrases (in light of, among others). There are many words they could have eliminated to create a more powerful and concise sentence. For one sentence, that's a lot of style faults! I'd love to say it's a record, but considering all the terrible government writing I've seen over the years, unfortunately it isn't.

Issues other than the writing—

The first sentence of the report proper is 67 words long. It goes on and on. Most readers will lose track of the subject by the time they get to the end. You can't tell for sure what some of the phrases refer to. For example, who is to “make recommendations” (there's one of those nasty hidden verbs again) to the Commission? Is it the agency, or the senior-level agency task force? This is the peril of long complex sentences. If you tried to diagram it, you couldn't figure out what actor went with what action.

I then cut 12 pages from the report and combined them into one document. I avoided obviously difficult sections such as discussions of regulations and lists of references. I then ran the selection through Stylewriter software. The section got 111 (bad) on overall style. It got 26.6 (bad) on sentence length. On passive voice, it did better, earning a 37 (good).

Overall, this report is poorly written. It certainly isn't plain language. The writing style makes the report far less effective than it might be had it been written more clearly. Its length is also an issue—good plain language writing would have brought the length down considerably, and as a result it would be read more.

---

I love science but I am not a scientist so being able to follow your developments in easier to follow language will be very helpful.

---

- Suggest you apply additional elements that would be useful to the reader:
  - List of Figures
  - List of Tables
  - List of Abbreviations and Symbols
  
- Dr. Charles Miller could be an MD, PhD, JD, Reverend. Suggest you honor his actual accomplishment and state whatever that Dr. means.

- Dedication: “inflicted” (2<sup>nd</sup> graf, 1<sup>st</sup> sentence) implies intention rather than the randomness of a natural disaster. Yes, the term may be stretched (such as the third or fourth definition) to include such “acts of God”, however I suggest using “caused”
- Acknowledgement: Somewhere, it would be useful to identify the target audience for this work. If the full NRC Commission, then say so. Perhaps in the Intro would be good, as well as in the Exec Summary
- Executive Summary:
  - (first sentence) This is backwards and awkward. While I appreciate your wish to put the Task Force up front, actually it’s the NRC that comes first as they’re the ones that posed the task. Further, a 62-word sentence, especially an introductory sentence, is just too much. Plain Language seeks sentences UNDER 20 words, in general.
  - (throughout) When you write “the Commission” I can’t tell if you mean the panel of Commissioners or the agency itself. This confusion should be fixed. On your web site “The Commission” leads to the panel itself. If you mean the agency, then say the agency or NRC, consistently throughout.
  - It might be useful to define clearly “defense-in-depth philosophy” as it underpins much of your approach, findings, and recommendations.
  - (ninth graf, beginning “Many of the elements of such...”) technical jargon needs to be translated, even if only parenthetically after it is in text to appease both [those] who speak the lingo and those who don’t. This lingo is “anticipated transient without scram.” What the heck? Also, “alternative treatment”; is there only one?
- Page 7–10—It is not clear whether this document meets Section 508 accessibility requirements (<http://www.section508.gov/>). Maybe it does to some extent, however, alt text does not pop up on screen when I mouse over any of the Figures.
- Page 16—pls define “scram” (again, as it is hopefully defined in the Executive Summary)
- Page 73—Seems a Concluding Statement that wraps this report up would be appropriate.

---

English is not my native language and still the pages that I read are very understandable.

---

**DETAILS ON EXTERNAL COMMUNICATIONS GROUP TO ADVISE  
THE AGENCY ON POTENTIAL IMPROVEMENTS IN THE COMMUNICATION OF  
SIGNIFICANT REGULATORY ISSUES**

1. **Potential Discussion Topics.** Among other potential topics, the group is invited to:
  - opine regarding potential actions the NRC might take in the long term to improve stakeholder involvement, such as the establishment of a “standing advisory committee” for that purpose;
  - discuss ways NRC could engage other organizations to establish partnerships to advance public communication and education on topics associated with radiological safety; and
  - provide input on non-traditional places the NRC could communicate their message.
  
2. **Duration.** One-time group for one a four-hour meeting.
  
3. **Meeting Structure.** Each panelist is expected to provide his or her individual input/ideas on actions NRC should take toward improving the NRC’s external communications and stakeholder involvement on significant regulatory issues. Each panelist will be provided an opportunity to provide an opening statement for each agenda topic, followed by open discussion.
  
4. **Meeting Type.** This will be a Category 2 public meeting by NRC’s definition. Primary discussions are expected to take place between the NRC and invited panelists. The public will be invited to participate at specific points on the agenda.
  
5. **Potential Participants.** Membership should include representatives from the following:
  - Other Federal agencies
  - State government
  - Local government
  - Nongovernment organization
  - Communications expert from academia
  - Media expert