

Report of the Public Communications Task Force



Commissioner Jeffrey S. Merrifield
Chairman

Ellis W. Merschoff
Executive Director

Task Force Members

Jennifer L. Albright
Office of Nuclear Reactor Regulation

Francis X. Cameron
Office of the General Counsel

Janet P. Kotra
Office of Nuclear Materials Safety and Safeguards

Mindy S. Landau
Office of the Executive Director for Operations

William H. Ruland
Office of Nuclear Reactor Regulation

Diane Screnci
Office of Public Affairs

Contents

Executive Summary	3
Acronyms	4
1. Introduction	5
2. Background	5
3. Method	6
4. Analysis	6
4.1 NRC Communications with Stakeholders	8
4.1.1 Generally Successful	8
4.1.2 Needs Improvement	8
4.1.3 Generally Poor	9
4.1.4 NRC Staff as Stakeholders	10
4.2 NRC Use of Communication Tools	11
4.2.1 Generally Successful	11
4.2.2 Tools That Need Improvement	12
4.2.2.1 ADAMS	12
4.2.3 Underutilized or Ineffective Tools	12
5. Strategic Recommendations	13
5.1 AGENCY COMMUNICATIONS VISION	13
5.2 THE ROLE OF THE OFFICE OF PUBLIC AFFAIRS	14
5.3 INTEGRATE COMMUNICATIONS INTO DECISIONMAKING	14
5.4 COMMUNITY OUTREACH	15
5.5 MEASUREMENT OF EFFECTIVENESS	16
5.6 WEB	16
5.7 STAFF TOOLS	17
5.8 BUSINESS PROCESSES	18
5.9 PLAIN LANGUAGE	18
5.10 OFFICE OF CONGRESSIONAL AFFAIRS (OCA)	19
6. Conclusions	19
Enclosure 1	21

Executive Summary

In June 2003, NRC Chairman Nils J. Diaz asked Commissioner Jeffrey S. Merrifield to lead a task force to evaluate public communications and to provide strategies for enhancing communications at all levels of the agency. The charter of the eight-member task force was to evaluate current public communication effectiveness at the NRC, determine the needs of the agency, and to develop comprehensive and readily implementable recommendations.

The task force concluded the NRC needs to improve substantially its communications with many stakeholder groups and its use of key communication tools. To accomplish this, the Commission needs to provide the vision and direction for external communications. To implement this vision, an overall agency communications plan, direction, and strategy are essential.

Efforts to enhance public confidence can be achieved through regular involvement of the affected parties. The NRC has an obligation to be factual and communicate its role to all of its stakeholders. This requires a well-trained staff, practiced in good communication skills, and given adequate resources and time to effectively design, prepare for, and carry out communications tasks. In addition, the NRC needs to engage the media and the public more fully to educate them both on NRC's mission, roles, and responsibilities relative to nuclear safety. As NRC moves away from a decide-announce-defend strategy, the agency should consider the communications implications of its regulatory decisions before they are made.

The task force proposes ten strategic-level recommendations for consideration:

- (1) The Commission should provide a clear vision for external communications that supports the agency's strategic goals and should require the development of an agency-wide communications plan responsive to this vision.
- (2) The Office of Public Affairs (OPA) should propose strategies and methods to implement the Commission's vision for external communications.
- (3) The NRC should consider communications issues and their impacts before decisions are made and actions taken.
- (4) The NRC should be more active in its outreach efforts to ensure that local communities have access to balanced and objective information on NRC's responsibilities and that NRC understands the concerns of local communities.
- (5) The NRC should measure the effectiveness of communication efforts.
- (6) The Office of the Chief Information Officer (OCIO) should coordinate enhancement of the NRC Web site.
- (7) The NRC should provide its staff with the tools to communicate effectively with stakeholders.

- (8) NRC should improve its business processes to be more responsive to stakeholder concerns.
- (9) NRC should expand the use of plain language in internal and external communications.
- (10) The Commission should specifically consider improving communications with Congress.

The task force presents these recommendations in detail in the Strategic Recommendations section of this report.

Acronyms

ADAMS	Agency-wide Documents Access and Management System
ANS	American Nuclear Society
CCC	Communications Coordinating Committee
DSI-14	Direction Setting Issue 14
EDO	Executive Director for Operations
FAQs	Frequently Asked Questions
IAEA	International Atomic Energy Agency
NEA	Nuclear Energy Agency
NEI	Nuclear Energy Institute
NRC	Nuclear Regulatory Commission
NUREG	NRC Technical Report Designation
OCA	Office of Congressional Affairs
OCIO	Office of the Chief Information Officer
OIG	Office of the Inspector General
OPA	Office of Public Affairs
PDR	Public Document Room
PTA	Parent Teacher Association
Q&As	Questions and Answers
SECY	Office of the Secretary
SRM	Staff Requirements Memorandum
TWFN	Two White Flint North

1. Introduction

In June 2003, the Chairman asked Commissioner Merrifield to lead a task force to investigate public communications and to provide strategies for enhancing communications at all levels of the agency. Chief Information Officer Ellis W. Merschoff served as executive director of the task force. The task force members have extensive experience in this area from the regions, program offices, and Commission offices. Their task was to review existing agency programs on external communications, determine the communications needs, and develop readily implementable recommendations.

Significant staff effort has been expended on this topic since the approval of the "Public Communications Initiative" Direction Setting Issue 14 (DSI-14). Then, in a staff requirements memorandum (SRM) dated March 14, 1997, the Commission directed the Executive Director for Operations (EDO) to create a Communications Coordinating Committee (CCC). Most of the recommendations made by the CCC have been implemented. However, some remain incomplete or have not been used widely or often enough to be effective.

Commissioner Merrifield conducted an analysis of the public affairs function in the summer of 2002 on behalf of former Chairman Meserve. His analysis included interviews with high-level NRC staff and representatives of the media and he recommended specific improvements to NRC public communications procedures. To date, none of these recommendations have been implemented. This task force reflected and built upon previous efforts. The objective of the task force was to investigate public communications at the NRC, to determine the gaps, and to offer practical solutions. This paper forwards the results of the task force efforts.

2. Background

The Commission's imperative to increase public confidence is explicit recognition that nuclear safety and security are the public's business. In carrying out its mission, the Commission must make risk management decisions. The Commission's decisionmaking process could be made more effective by involving the participation of interested and affected parties. It is the role of the decisionmakers, working together with the interested and affected parties, to guide the participants' understanding and to improve their ability to participate effectively in the decisionmaking process.

Communications tools are used inconsistently across the agency and the skill levels of the staff vary. Pockets of excellence exist. The next steps are to institutionalize that excellence across the agency.

In the absence of a clear vision and communications strategy, NRC actions have been criticized in the past for being inconsistent. Stakeholders have expressed concern that the NRC sometimes communicates one message and then appears to take contradictory, regulatory actions. There must be a clear demonstration of the NRC values in everything NRC communicates and does. The NRC's commitment to safety and its values of integrity, excellence, service, respect, cooperation, commitment, and openness must drive agency decisions and actions.

3. Method

The objectives of the task force were to briefly review current public communications, identify gaps or needs, and recommend strategies to close the gaps. The task force divided its work into five steps: (1) review the current procedures and processes, (2) assess current performance, (3) determine the needs, (4) identify the gaps, and (5) develop recommendations to fill the gaps.

The task force compiled a list of external stakeholders and the tools used to communicate with them. For each stakeholder group, the task force evaluated how well NRC meets the groups' information needs using current tools.

The task force rated each pairing of a tool with a stakeholder group by soliciting the views of knowledgeable staff, reviewing current documents and reports on the subject, and referring to previous recommendations. Based on the ratings, the task force grouped effectiveness of NRC's communication with stakeholders and effectiveness of communication tools into three categories. The task force then identified gaps in NRC's effectiveness and considered how to address them.

The result was 10 strategic-level recommendations. The task force evaluated these recommendations against each stakeholder group and tool to ensure each gap had been addressed.

4. Analysis

The task force subdivided stakeholders into sixteen separate groupings for the purposes of this analysis. These stakeholder groupings were: international counterparts, the nuclear industry, radiation workers, professional and trade organizations, licensees, the media, activist groups, State governments, the executive branch (federal), students and teachers, the legislative branch (federal), local governments, civic groups, tribal governments, the general public, and directly affected parties. Directly affected parties include, for example, people living near a site and nuclear medicine patients.

Each of the 16 stakeholder groups was evaluated against each tool. There were two ratings. The first rating reflected the importance of each tool to the stakeholder, and the second rating was based on the effectiveness of how the agency uses the tool to communicate with its stakeholders. The task force recognizes that this approach was subjective. Therefore, the individual ratings are not included in this report. Importance ratings ranged from high importance to low importance. The effectiveness-of-use ratings ranged from *meets needs very well to extremely well* to *doesn't meet needs or meets them poorly*. The rating reflected how well the group assessed the use of each tool. Upon completion of this analysis, the task force grouped stakeholders and tools according to how well NRC communicates with individual stakeholder groups and how well NRC uses the tools. The results of the analysis are shown in Tables 1 and 2.

Table 1: Effectiveness of NRC Communications with Stakeholders

Generally Successful	Needs Improvement	Generally Poor
<ul style="list-style-type: none"> international counterparts nuclear industry radiation workers professional and trade organizations licensees 	<ul style="list-style-type: none"> the media activist groups State governments executive branch (federal) students and teachers legislative branch (federal) 	<ul style="list-style-type: none"> local governments civic groups tribal governments the general public directly affected parties*

Definitions:

Generally successful—NRC meets needs reasonably well

Needs improvement—NRC meets needs adequately, but more needs to be done

Generally poor—NRC does not meet needs adequately or what we currently do is too infrequent to be effective

* Directly affected parties include, for example, local residents living near a site and nuclear medicine patients.

Table 2: Effectiveness of NRC Use of Communication Tools

Generally Successful	Needs Improvement	Underutilized or Ineffective
<ul style="list-style-type: none"> formal briefings reporter contacts NRC-sponsored training external correspondence public meetings staff accessibility 	<ul style="list-style-type: none"> Web regulatory documents ADAMS interviews (print, TV and radio) public comment process press releases 	<ul style="list-style-type: none"> community outreach information seminars informational materials public speeches news programs press conferences meetings with editorial boards letters to the editors human interest pieces

Definitions:

Generally successful—meets needs very well to extremely well, utilization is appropriate

Needs improvement—utilization is appropriate, but could be used to better advantage

Underutilized or ineffective—not meeting the need or the tool is not used frequently enough

A summary of the task force's evaluation of each stakeholder group and tool follows.

4.1 NRC Communications with Stakeholders

4.1.1 Generally Successful

The task force identified several groups of NRC's stakeholders whose communications needs appear to be met reasonably well. These groups include international counterparts, nuclear industry, licensees, professional and trade groups, and radiation workers.

International Counterparts—These stakeholders are served well, particularly by ADAMS, but also by formal briefings, press releases, informational materials, and the Web. The NRC staff is internationally recognized for its expertise and participation in IAEA, NEA, and foreign assignee programs. NRC conferences, such as the Regulatory Information Conference, are widely attended by members of the international community.

Nuclear Industry—The nuclear industry includes interest groups such as NEI, large vendors such as General Electric and Westinghouse, and nuclear power plant owners' groups. Overall, this group is well informed through public meetings, access to the staff, and access to agency documents through ADAMS and the Web. Members of this group are sophisticated in their use of the public comment process and use this method of communication to their advantage.

Licensees—This stakeholder group includes all NRC licensees. They receive needed information through regulatory documents, correspondence, access to NRC staff, ADAMS, and the Web. Informational material, such as NUREG documents and generic communications are also effective means of communicating NRC programs and significant safety-related information. They tend to be involved in emerging issues, and make good use of the public comment process.

Professional and Trade Groups—This stakeholder group includes organizations such as the American Nuclear Society (ANS), the American Society of Mechanical Engineers, and trade unions. Their informational needs are met largely through public meetings and symposia, access to the NRC staff, ADAMS, and the Web. They tend to be involved in emerging issues, and make good use of the public comment process.

Radiation Workers—This stakeholder group includes groups such as nuclear power plant workers, radiographers, and nuclear medicine workers. The informational needs of this group are best served through direct contact with NRC staff, correspondence, and the Web.

4.1.2 Needs Improvement

The task force identified several groups of NRC's stakeholders with whom some communications efforts are successful, but more communications are needed—higher quality, greater frequency, or both—to improve overall effectiveness. These groups are the media, activist groups, State governments, executive branch agencies, students and teachers, and the legislative branch.

Media—The media are generally well served by NRC’s press releases, formal briefings, and access to NRC staff, but little else is done to inform them. The task force found that NRC could make more effective use of interviews, meetings with editorial boards, letters to the editor, appearances on news programs, human interest pieces, and frequent proactive use of press conferences—all techniques of major importance for communicating with and through the media. Training and informational seminars have been received well in the past by the media, but are too infrequent to be effective.

Activist Groups—NRC staff accessibility is generally good for this group, however the effectiveness of communications with activist groups is inconsistent. Community outreach, two-way communications, and NRC’s responses to comments are less than effective. Relative to this group, the NRC has an obligation to correct important factual inaccuracies in the media and often misses these opportunities to act.

State Governments—NRC is most effective in communicating with state governments through direct formal channels. Given the severe budget shortfalls affecting most States, the task force believes the NRC could be making better use of training to help State regulatory programs and to communicate NRC’s message.

Executive Branch (federal)—The most effective ways of communicating with this stakeholder group are formal briefings and direct contacts with the staff. The substance of media reports is important. However, the agency doesn’t engage the media frequently enough. Press conferences and major television news programs are conducted well; however, NRC should increase the frequency of their use. Other tools used adequately are press releases, public meetings, print media and external correspondence.

Students and Teachers—The task force believes NRC’s Web-based materials for students and teachers have improved significantly. However, too little is done to advertise their availability.

Legislative Branch (federal)—Public meetings, the public comment process, and staff accessibility to members of this group are effective on the occasions they occur. The agency places a high value on communications with the Congress as evidenced by the attention given to comments on proposed legislation, proposals submitted by the agency, and testimony given at hearings. Communications with this group are very important and NRC needs to take a more active role to inform and educate Congress about the responsibilities of the NRC. The task force believes additional efforts are needed due to the importance of this stakeholder.

4.1.3 Generally Poor

The task force identified several groups of NRC’s stakeholders with whom some communications efforts are generally poor. These groups are local government, civic groups, tribal governments, the general public, and directly affected parties.

Local Governments—Although NRC may contact these groups for certain public meetings, there is no coordinated communications strategy to reach them outside of the public meeting context. The NRC staff occasionally arranges a separate briefing for local government officials before a

scheduled public meeting. This is generally well received, but not done routinely. In addition, little is done to maintain communications with these officials outside the context of public meetings. The agency communicates well with these officials, but not often enough.

Tribal Governments—The comments on local government officials above also apply. However, NRC doesn't communicate nearly as well with the tribal governments as with local governments. Notable exceptions were the September 2001 NRC-Tribal Government Workshop in Las Vegas on high-level waste issues, and the cultural training in which NRC participated with the Seneca Nation. However, NRC does not routinely meet with tribal officials nor are meetings held on tribal territory. In addition, there are significant cultural differences that are important for the NRC to understand.

Local Civic Groups—This category includes civic and social groups and organizations, such as the local Chamber of Commerce, Rotary, Kiwanis, the League of Women Voters, and the Parent Teacher Associations (PTA). Although NRC may contact such groups for certain public meetings, there is no coordinated communications strategy to reach them outside of the public meeting context. The agency communicates well with these groups, but not often enough. These groups can be an effective communications pathway to the general public (see below).

General Public—With some notable exceptions, the general public does not turn out in significant numbers for NRC public meetings in communities affected by NRC generic or site-specific activities. The general public may be represented by local government officials, civic groups, and the advocacy groups that do attend. However, the NRC does not have a targeted communications strategy to ensure that the general public at least has the necessary information on NRC activities for purposes of following up if interested. Few, if any, members of the general public attend public meetings at NRC headquarters.

Directly Affected Parties—This category includes people living near a NRC-licensed facility and medical patients who receive diagnostic or therapeutic radioisotopes. The rationale for the "generally poor" performance rating for this group is that, apart from public meetings on specific actions; NRC does not have a robust communications strategy for reaching people living near licensed facilities. The primary reason why NRC communications with patients are "generally poor" is that there are few, if any, targeted communications with them.

4.1.4 NRC Staff as Stakeholders

The task force did not consider the NRC staff along with the above group of stakeholders because there are tools designed for and used exclusively by the NRC staff that do not apply to external stakeholders. These differences made comparison across a common set of tools difficult. Nonetheless, the NRC staff is an important stakeholder group for several reasons.

First, NRC staff's perception of the agency's public image, good or bad, affects employee morale. As indicated in the 2002 OIG Safety Culture Survey, only 43% of NRC employees felt that the NRC is highly regarded by the public. The recent report of the Safety Climate and Culture Task Group found that employee perceptions about how NRC is regarded by the public may be affected by media reports. These tend to focus on safety problems and may be critical of the NRC. Staff perceptions may also be affected by Congressional inquiries, which also may be critical of the

NRC's performance for a variety of reasons. If staff members believe they are perceived as successful safety regulators, they are more likely to invest in their jobs, have confidence in what they do, and become effective spokespersons for the agency who can then inform and educate others about the agency's safety mission.

Second, NRC staff members are themselves members of many of the aforementioned stakeholder groups. As such, they should be valued collectively and individually as potential spokespersons to groups with which NRC needs to communicate more effectively. The task force believes that the staff should be encouraged and supported in assuming a more active role in the public communications process. Much of the staff's hesitation to communicate with the public or the media is due to the potential for being misquoted, having their comments taken out of context, or the use of their comments in a resulting negative news article. Staff members must be well-trained, motivated, and must feel comfortable interacting with the public knowing they have the support of the Commission. When representing the agency in an official capacity, they should be prepared to act as responsible and articulate spokespersons who are trained and well-informed of the views and position of the agency as well as the Commission. As the "face" of the agency, NRC employees are a critical component to improving external communications because they are the foundation for all public interactions, all the time.

4.2 NRC Use of Communication Tools

4.2.1 Generally Successful

NRC is generally successful when it uses certain communication tools. These are formal briefings, reporter contacts, NRC-sponsored training, external correspondence, public meetings, and staff accessibility. Formal briefings (to professional organizations, governments, or other organized groups) are successful because they are targeted to specific groups and well-thought-out. Contacts with reporters are normally initiated directly by OPA, and inquiries by reporters are directed to knowledgeable program office staff. NRC-sponsored training is targeted to specific groups who largely desire such training, with positive results. External correspondence is given a high priority in the agency—due dates are assigned and are generally met. However, business processes could be improved considerably through automation and more effective workflow for concurrence and review. More attention should be devoted to using plain language in all written material (see separate recommendations for business processes and plain language).

Overall, NRC's public meetings are relatively successful. Greater agency effort has been devoted to the quality and consistency of public meetings in recent years. The agency's public meeting policy was revised in response to stakeholder comments so that consistency is now attained by meeting categories, background documents, and meeting summaries. In addition, staff participation in public meetings is encouraged and supported with high quality meeting preparation training offered by the Professional Development Center.

The accessibility of the NRC staff is generally good because a high priority is placed on availability and follow through, however the lack of an NRC e-mail directory on the Web site is a shortcoming. Some stakeholders have expressed frustration because they believe industry has disproportionate access to NRC employees.

4.2.2 Tools That Need Improvement

The task force found a number of tools that NRC could use better to reach its stakeholders: the Web, regulatory documents, ADAMS, interviews (print, TV and radio), the public comment process, and press releases. While the Web is already an effective tool, it has the potential to reach a significant portion of our stakeholders. Currently, agency documents are adequate in meeting the needs of NRC's stakeholders. Overall, print, radio, and television interviews are effective, but senior management and the Commission are not interviewed often enough. Most TV and radio interviews take place at regional meetings or when an event or enforcement action has occurred. The public comment process, which opens many of our most important decisions to input from all stakeholders, leaves many wondering how or whether their comments were heard or addressed. Press releases, while well written, are not necessarily targeted to the right groups and often do not always contain the proper level of detail.

4.2.2.1 ADAMS

The task force is not recommending improvements to ADAMS, recognizing that intrinsic ADAMS shortcomings are being addressed by the ADAMS working group. However, it is important to note that certain business practices affecting ADAMS need attention as described in the recommendations section, Business Processes. While external users have learned to use and accept ADAMS, the staff is still resistant in part, because of the difficulties encountered and the manner in which the program was implemented at its inception. Refresher training should be conducted that is respectful of the staff's needs and time pressures. Such training should include coverage of the Web-based search capabilities for the publicly available library and address the staff's specific issues and practical difficulties with this critical information conduit.

4.2.3 Underutilized or Ineffective Tools

Traditionally, the NRC has not invested resources in tools needed to improve its public image. For example, the OPA informational video on the agency is very out of date. The TWFN exhibit area could be used as a museum quality visitor's center that would inform the public and employees of NRC's rich history and safety mission.

Four media-related tools were underutilized for a wide range of stakeholders. Two print media tools—meetings with editorial boards and letters to the editor—are rarely used before a situation has already become controversial and therefore are ineffective in communicating our safety role. The Commission and NRC staff rarely use press conferences to announce a regulatory action or view, possibly missing key opportunities to reach a wide audience. Also, the NRC should try to increase its availability for news program interviews because of the relatively large audience and the opportunity to talk to the public directly. Human interest pieces are used infrequently; however, they can be effective in putting a human face on the NRC.

Community outreach can be tailored to specific communication needs of targeted audiences. Informational seminars can cut through jargon and explain issues in lay terms. Because the seminars are typically educational and attempt to give unbiased information, their use can be

closely aligned with the agency's mission as an objective, unbiased safety agency. Informational materials, normally prepared by the Office of Public Affairs, can also provide non specialist stakeholders important information geared to their level of understanding. The materials have not always been kept up to date or are not available on some key topics. In the absence of relevant current materials, some program offices have resorted to using contractor support in developing tailored materials. Better coordination and information about the subjects and availability of such materials throughout the agency should be encouraged.

NRC's public speeches are typically well received. Unfortunately, they are often given to the same nuclear-related audiences. Audiences of non specialists are not being reached by the speeches, except in rare cases like former Chairman Meserve's speech of January 17, 2002 to the National Press Club.

5. Strategic Recommendations

The task force developed the following strategic recommendations after careful consideration of previous studies and discussions with key members of the staff.

5.1 AGENCY COMMUNICATIONS VISION

The Commission should provide a clear vision for external communications that supports the agency's strategic goals and should require the development of an agency-wide communications plan

For the first time, the Commission has included communications in its agency vision. Consistent with that direction, the Commission needs to develop a corresponding communications vision for public communications that appropriately emphasizes the need to promote nuclear safety and actively engage the media and our stakeholders. This vision should be implemented through an agency-wide plan that integrates the efforts of the Commission and staff offices, is benchmarked against similar agencies or organizations, and has appropriate performance measures.

The vision and plan should incorporate the agency's values, be consistent with the strategic plan, and be reviewed periodically to ensure that satisfactory progress is being made. Each stakeholder group, including the NRC staff, has different needs for communicating effectively. The communications plan should recognize these differences and optimize the approach at the stakeholder group level. The plan needs an organizational owner, such as a Director of Communications, who ensures that the agency-wide communications efforts are aligned and are clearly and accurately articulated by agency spokespersons with a comprehensive understanding of the agency's intended message.

5.2 THE ROLE OF THE OFFICE OF PUBLIC AFFAIRS (OPA)

OPA should propose strategies and methods to implement the Commission's vision for external communications.

To ensure the function of Office of Public Affairs (OPA) fully supports the agency's communications vision, there should be a third-party assessment of OPA's structure, policy, and practices. This assessment will provide an objective view of the office as well as assist in their development of strategies and methods to implement the communications vision. This assessment should address management effectiveness, training and qualification of the staff, prioritization of work, and customer satisfaction. This assessment will lay the foundation and assist OPA in meeting its new objectives.

OPA should be more effective in developing and implementing communications policy and practices. Recognizing OPA provides an important service to the staff as well as the Commission, it should work more closely with the EDO and NRC program offices to reach out to stakeholders. The Office should clarify the requirements and expectations relative to press conferences and briefings, meetings with editorial boards, and participation in news programs. The Office should provide the information tools necessary for the staff to accomplish the Commission's communications objectives. The agency should consider embedding the headquarters OPA staff in the major program offices, where they will be closer to the emerging issues, serve as advocates for public communications in the earliest stages of an issue, and assist the program offices in addressing the public's information needs. OPA should consider integrating the agency's approach on public speeches to ensure that the right topics are covered in the right places at the right time. Consideration should also be given to more aggressively correcting misinformation in the media. The media training workshop should be held in conjunction with an exercise either in headquarters or the regions to improve the media representatives' training experience.

5.3 INTEGRATE COMMUNICATIONS INTO DECISIONMAKING

The NRC should consider communications issues and their impacts before decisions are made and actions taken.

The task force believes that communications issues and their impacts must be considered and addressed up front, so that better decisions can be made and better actions taken. This is important for two reasons. First, this method will enable NRC to be more effective in explaining its actions. Second, it is important for the NRC to be aware of public concerns in making its regulatory decisions. Although some of these concerns may not reflect technical aspects of Commission decisions, they are necessary to understand fully the impact of these decisions. The agency

should move away from a decide, announce, defend strategy and embrace practices that support a proactive, open, and responsive decisionmaking process consistent with our policies. The task force recommends that the communications implications be explicitly considered before regulatory decisions are made. This recommendation applies at every level throughout the organization. To achieve this goal, the task force believes that it would be useful to better integrate public affairs officers and/or communication specialists within the program offices. The public affairs staff also could serve as communications resources for the specific programs.

5.4 COMMUNITY OUTREACH

The NRC should be more active in its outreach efforts to ensure that local communities have access to balanced and objective information on NRC's responsibilities and that NRC understands the concerns of local communities.

Although NRC public meetings have provided a mechanism to reach local community leaders and the general public in the communities where licensed facilities are located, a broader and continuing community outreach program could bring added benefits to the NRC in terms of establishing trust and credibility. These types of outreach efforts are a very effective way to reach the general public because they focus attention on the people closest to a licensed facility. They can be an effective way of informing local residents of NRC's responsibilities and can demonstrate the technical expertise and competence of the NRC staff on a personal level. This is an effective way to build relationships of trust and maintain continuity. Community outreach provides an effective way to listen to community concerns. In addition, residents of the community may have a unique knowledge of local conditions that may assist the NRC in its decisionmaking.

The tools that could be used in a community outreach program include our traditional public meetings in the community on specific NRC actions. However, more use can be made of briefings to local government officials and speeches to local civic groups (Chamber of Commerce, Rotary, League of Women Voters, the PTA). Particular emphasis should be placed on briefing tribal officials and elders on tribal territory. On certain issues, the Commission itself could consider convening a meeting in the local community rather than at NRC headquarters. In addition, more emphasis could be placed on the use of media tools such as local press conferences and participation in local news programs or public interest broadcasts on the local cable channel. Informational materials tailored to the community, including newsletters and local mailings, could also be effective. An NRC speaker's bureau, and the use of staff members as effective spokespersons would also facilitate community outreach efforts. Effective NRC staff followup on questions and requests for information must be a vital part of any community outreach effort. Followup efforts by individual Commissioners to the community's congressional delegation after visits to NRC-licensed facilities or with local constituencies would also be effective.

5.5 MEASUREMENT OF EFFECTIVENESS

The NRC should measure the effectiveness of communication efforts.

The task force believes that the NRC should measure the extent to which the public views the agency as an independent, competent and a credible regulator; the extent to which the public understands the NRC mission; and the extent to which the public has opportunities to express its views effectively. Without such measurements, the staff must rely solely on anecdotal evidence of improvement. A survey or other measurement of relevant stakeholder groups (e.g., tribal governments, local residents) should be used to establish a baseline for the effectiveness of NRC's communication efforts. NRC should compare its measurement methods to other federal regulatory agencies, and to our international counterparts. Because of the complexity of identifying the types of questions and participants that would provide meaningful data, NRC will need the support of contractors with experience in developing appropriate measurement techniques. Through the analysis of survey or focus group results, the staff could gain a better understanding of how well the agency is communicating.

NRC could also measure success by tracking Web and Public Document Room (PDR) use, attendance at public meetings, public ADAMS visits, periodic dialogues with stakeholders, and news coverage. Although the task force recognizes that tracking news coverage is by no means the only method of gauging the public impact of our actions, some insights may be gained from monitoring general positive or negative trends in press coverage.

The staff formally recommended a baseline survey in SECY-00-0035, dated February 11, 2000. The Commission disapproved the staff's recommendation in (SRM dated March 27, 2000) and directed the staff to enhance the process for obtaining feedback from attendees at public meetings. However, the Commission noted in the SRM that "The staff should not interpret the Commission's disapproval of [Option 2] as indicating that a public confidence survey may not be appropriate in the future." The task force believes it is time for the Commission to reconsider the decision in the March 27, 2000 SRM.

5.6 WEB

The Office of the Chief Information Officer (OCIO) should coordinate enhancement of the NRC Web site.

The Web is an increasingly vital tool for reaching NRC stakeholders. The task force recognizes that not everyone has access to the Web or the skills to use it effectively, however, more people will be using the Web in the future. Although there is a wealth of information on the NRC's site, a number of enhancements will make it more user-friendly and informative. Better use of advanced

Web management tools would make it easier to keep the site up to date. Likewise, making the Web site easier to navigate would make it easier for a broader audience to use. For example, NRC could add a *Reporter's Tools* and *For the Record* sections. Under *Reporter's Tools*, the media would find links to contact names and email addresses, fact sheets, diagrams, and ideas for human interest stories like "A Day in the Life of a Resident Inspector." *The Reporters Tools* and *For the Record* sections would need to be updated frequently to remain current and topical. Currently other Federal agencies (the National Oceanic and Atmospheric Administration and the National Science Foundation) and private organizations (the American Automobile Association) offer story tips on their Web sites. The *For the Record* section would include letters to the editor, corrections to media stories, and letters to members of the public or Congress. In addition, a consolidated frequently asked questions (FAQs) page should be established. NRC videos should be added to the Web site so that members of the public can view them, and teachers can show them in their classrooms. Fact sheets or brochures should be written on topics such as epidemiological studies.

The evolving role of the Web in people's lives requires that the agency continuously seek new and innovative ways to incorporate the Web into its daily business. The agency should hold Web town meetings or open houses. This would allow members of the public to ask questions and receive answers in real-time, via the Web. Finally, a section devoted to tribal government interactions and interests may result in more use of the NRC's Web site by the tribal governments.

5.7 STAFF TOOLS

The NRC should provide its staff with the tools to communicate effectively with stakeholders.

Improving external communications will require the efforts of the entire staff. Since the staff is a direct link to the public, it must be equipped with the right tools to interact effectively. NRC needs to commit resources that would enhance these tools and demonstrate to the public that the agency is serious about communicating its safety role. For example, the OPA informational video should be kept up to date. The TWFN exhibit area could be used as a professional-quality visitors' center that would showcase NRC's rich history and safety mission.

Additional effort should focus on a few key areas such as staff training, improving and updating informational materials, and updating technology. The staff should receive training in developing and using communications plans, and additional training on responding to public inquiries and interactions with the media and public. Communications lessons learned should be shared agency-wide. Proper training will allow the staff to be comfortable in their communications.

A reliable, user-friendly, up-to-date database of questions and answers would enable the staff to provide consistent and accurate information. The staff also needs better graphics and pictures to assist in communicating complex technical topics or explain radiation principles, defense-in-depth, etc. in a manner more easily understood by a general audience.

The staff needs access to sophisticated technological communication devices and other display items: video-streaming, color brochures, CDs, current videos, list servers, diagrams, and models of reactors. Finally, additional facilitators for public meetings and workshops need to be identified, trained, and supported. Whether agency employees or external contractors, they must function as neutral parties.

5.8 BUSINESS PROCESSES

NRC should improve its business processes to be more responsive to stakeholder concerns.

NRC's business processes should fully support responsiveness to the agency's stakeholders. As a mature agency, the NRC can afford to investigate areas for improvement to its processes. Business processes in need of attention are the external correspondence and public comment processes. The external correspondence process must be improved to provide more timely responses, consistent due dates, and to ensure that the originator receives a copy of the final version. For example, a letter written by a member of the public addressed to the public affairs officer will receive a response within 7-10 business days for routine issues. The same letter addressed to a member of management or forwarded by a member of Congress can take several months due to concurrences, management review, and repeated editing. To be truly effective, this system should be revised to minimize intermediate handling and allow the staff to respond directly to certain public inquiries. Automating the receipt and assignment of external correspondence will improve response times and allow staff resources to be better utilized.

Agency processes should be regularly evaluated to keep them current as NRC changes, the environment changes, and new technologies become available.

Central to the notion of responsiveness is that the NRC must not only listen and consider the comments—both formal and informal—of its stakeholders, but to demonstrate how the agency evaluated those comments in its decisionmaking process. The staff should provide followup responses to questions that were asked at public meetings but not fully answered. Doing a better job of documenting how the agency resolves public comments would enhance its communication efforts.

The Office of the Secretary (SECY) should maintain an updated style guide that reflects current Commission preferences. This guide should greatly improve the timeliness of responses by enabling the staff to get it right the first time.

5.9 PLAIN LANGUAGE

NRC should expand the use of plain language in internal and external communications.

The Commission should actively promote the use of plain language wherever possible, both with internal and external stakeholders, and should track staff progress in this area. The task force recognizes that NRC's technical staff members are knowledgeable and experienced with presenting to and writing for technically trained audiences. They are accustomed to interacting with other specialists who insist on precise and complex explanations of technical and policy issues. Although training is helpful and should be continued and expanded, the agency should continue to make every effort to ensure the staff feel comfortable in communicating with the public. Technical staff members often use too many acronyms and technical terms in public documents and presentations. To communicate effectively as public servants, the NRC and its staff must explain its mission and actions in terms the public can understand. Most NRC documents would benefit from a plain-language abstract or an executive summary. Technical editing and graphics should be more widely used.

5.10 OFFICE OF CONGRESSIONAL AFFAIRS (OCA)

The Commission should specifically consider improving communications with Congress.

The task force noted a number of similarities between the challenges faced by the Office of Public Affairs and the Office of Congressional Affairs. Although outside the specific charter of this task force, some of the recommendations for enhancing public communications also apply to OCA. Other means of enhancing the effectiveness of communications with Congress are available and should also be explored.

6. Conclusions

NRC's effectiveness in communicating with its stakeholders varies. In many cases, the agency is communicating reasonably well with its stakeholders. However, there is room for significant improvement. The Commission needs to provide the vision and direction for external communications. To complement this vision, an overall agency communications plan, direction, and strategy are essential. The NRC needs to engage the media and the public more fully in order to educate them both on NRC's mission, roles, and responsibilities relative to nuclear safety. If the agency fails to do so, others will frame the issues and the agency's image will suffer. The agency's efforts to enhance public confidence can be achieved through regular involvement of the affected parties. Stakeholders differ in their agendas, information needs, access to information, and technological skills. Therefore, customized communications plans need to be developed for each stakeholder and for each situation.

The Office of Public Affairs should play a vital role in the successful implementation of this vision. OPA should champion effective communications and serve not only the Commission but the staff as well in achieving these goals. The staff should be able to rely on OPA's expertise to make better use of communications tools and activities. The agency, as part of its decisionmaking process, must reach out to affected and interested parties and invite their involvement. Communications issues and their impacts must be considered and addressed up front, so that better decisions can

be made and better actions taken. Public involvement improves the quality of the decisionmaking process. The agency needs to stop thinking of communications as a chore or an obstacle to its daily activities. Communications are a fundamental part of our work. Words, ideas, and decisions are some of NRC's most important products, and plain language is the basic tool for enhancing the quality of those products and influencing public debate on nuclear safety issues.

The NRC has an obligation to be factual and communicate its role to the public. Improving the communication skills of the NRC staff will, no doubt, provide benefits to the agency and its stakeholders. This will require continued positive reinforcement and staff training, which has the dual benefit of increasing the skill level as well as the morale of the staff. Adequate resources must be devoted to implement this effort well and correctly. This requires a well-trained staff, practiced in good communication skills. The NRC staff must be given adequate resources and time to effectively design, prepare for, and carry out communications tasks, and the Commission must provide a continued commitment to improving communications across the board. Improving communications must not be viewed as a distraction but as a fundamental means of achieving the agency's mission and goals. This requires management belief, support, and sustained commitment.

Enclosure 1

June 4, 2003

MEMORANDUM TO: William Travers
Executive Director for Operations

Karen Cyr
General Counsel

FROM: Nils J. Diaz /**RA**/

SUBJECT: TASK FORCE ON PUBLIC COMMUNICATIONS

In an effort to enhance communications at all levels of the agency, and after discussion with my fellow Commissioners, I am creating a task force to develop strategies for comprehensive and effective public communications with external stakeholders. Given his extensive interest, I have asked Commissioner Merrifield to lead this effort. Commissioner Merrifield has graciously accepted. Please give him your full cooperation and support. OPA is to serve as a resource to the task force.

Attached is the charter for the task force. I have asked Commissioner Merrifield to provide me his draft report by July 26, 2003. This is an important undertaking to support our goal of effective communications.

cc: Commissioner Dicus
Commissioner McGaffigan
Commissioner Merrifield

Distribution: W. Beecher
D. Rathbun
A. Vietti-Cook

Attachment:
As stated

Charter: Development of an Effective Public Communications Program for the Nuclear Regulatory Commission

Goal: Develop strategies for comprehensive and effective public communications with external stakeholders by the NRC.

Purpose: Provide recommendations for enhanced communication with external stakeholders, including the media, the public, Congress, federal, State, and local governments.

Project Overview:

- a) Review existing agency information programs on the public affairs, outreach, and communication of activities
2. Determine the communication needs of the agency and identify any gaps or obstacles that may exist.
- (3) Develop recommendations to address identified needs and close any gaps or obstacles found.

Completion date for draft report: July 16, 2003

Potential list of task force participants:

Commissioner Merrifield - Task Force Chairman

Ellis Merschoff - CIO, Executive Director

Team:

Chip Cameron, OGC
Diane Screnci, Region I
Mindy Landau, EDO
Bill Ruland, NRR
Janet Kotra, NMSS