



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 8, 2015

SECRETARY

COMMISSION VOTING RECORD

DECISION ITEM: SECY-15-0015

TITLE: PROJECT AIM 2020 REPORT AND RECOMMENDATIONS

The Commission acted on the subject paper as recorded in the Staff Requirements Memorandum (SRM) of June 8, 2015.

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

A handwritten signature in black ink, appearing to read "Annette Vietti-Cook".

Annette L. Vietti-Cook
Secretary of the Commission

Enclosures:

1. Voting Summary
2. Commissioner Vote Sheets

cc: Chairman Burns
Commissioner Svinicki
Commissioner Ostendorff
Commissioner Baran
OGC
EDO
PDR

VOTING SUMMARY - SECY-15-0015

RECORDED VOTES

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIP	COMMENTS	DATE
CHRM. BURNS	X	X			X	3/18/15
COMR. SVINICKI	X	X			X	4/7/15
COMR. OSTENDORFF	X				X	2/20/15
COMR. BARAN	X	X			X	3/20/15

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: Chairman Burns
SUBJECT: SECY-15-0015: PROJECT AIM 2020 REPORT AND
RECOMMENDATIONS

Approved Disapproved Abstain

Not Participating

COMMENTS: Below Attached None



SIGNATURE

18 March 2015

DATE

Entered in STARS" Yes No

**Chairman Burns's Comments on
SECY-15-0015, "Project AIM 2020 Report and Recommendations"**

I want to thank the staff, and in particular, the Project AIM Team and senior leadership for its efforts to identify key strategies and recommendations to enhance the NRC's ability to plan and execute its mission while adapting in a timely, proactive and effective manner to a dynamic environment. The Project AIM 2020 report provides the Commission with a reasonable set of recommendations to improve our operational effectiveness and simultaneously ensure that we remain a strong, independent, stable and effective regulator.

The NRC is a high-performing organization and we should not lose sight of that important fact. As I have stated in recent presentations to internal and external audiences, the NRC has an excellent reputation and is a well-respected nuclear regulator. This is due in no small part to the dedicated, talented and knowledgeable NRC staff and their unwavering commitment to the NRC mission.

As with all high-performing organizations, the agency must be well positioned (i.e., organizational structure, programs, processes) to keep pace with its current regulatory responsibilities while pro-actively assessing the potential for and impact of external influences/challenges (e.g., declining interest in new reactor builds, reduced budgets) to its regulatory approach. Equally important is the need to understand internal influences/challenges (e.g., workload, critical skill needs, staffing levels).

The NRC has a long and successful record of continuous improvement and overall, I believe that our performance budget and management framework ensures that the agency is largely focused on the right activities in furtherance of our mission and achievement of our strategic objectives. However, few can dispute the fact that the time has come for the agency to take stock of itself, as pointed out in the Project AIM 2020 report. By undertaking some of the Project AIM 2020 recommendations with strong leadership commitment and oversight, the agency will be better positioned to respond to the challenges of 2020 and even beyond.

I offer several general observations that are relevant to all of the recommendations. Often an organization undergoing change tries to address its organizational challenges by engaging in additional analyses or by creating new processes or tools. However, the solution is many times more straightforward than that: strong, decisive leadership. If, for example, the agency needs to improve the timeliness of licensing actions, it is leadership's responsibility to first ensure that existing processes are being uniformly implemented and can be achieve the desired results before reinventing entirely new processes. To this point, I strongly encourage the NRC's senior leadership to consider its role in ensuring that Project AIM 2020 is successful before it looks to develop new processes. Project AIM 2020 cannot be successful if, in 5 years from now, all the NRC has to show for it is a collection of new studies, reports, and business process tools.

Although the entire leadership of the NRC must take responsibility for the success of this project, a senior leader should be dedicated to oversee the implementation to ensure that Project AIM 2020 is implemented in the most effective manner. I would note, that ensuring more direct leadership attention for any future major change project was a recommendation identified in the Transforming Assets into Business Solutions (TABS) lessons learned report (SECY-15-0008, January 16, 2015). The Executive Director for Operations should designate

the responsible senior leader overseeing Project Aim within one month of the date of the SRM for SECY-15-0015.

The following provides my vote on the individual recommendations for the Project AIM 2020 Report.

I. People

I-1) Ensure the NRC has the right number of people with the right skills at the right time.

- a) Develop a strategic workforce plan that ensures the NRC is positioned to have the right number of people with the right competencies at the right time.**

I approve the development of a Strategic Workforce Plan (SWP) that maps the current workforce to the projected future state of the agency workforce. The SWP should include strategies for managing and minimizing staffing overages and skill gaps. This should be a modest effort, unlike the elaborate SWP tool that was ultimately retired in 2009. We should understand and apply lessons learned from our experiences with the previous SWP tool. Most notably, any SWP tool should set a standard approach that can be easily deployed and managed by first-line supervisors and modified to meet the changing needs of their organization. In addition, the tool should be sophisticated enough (i.e., integration of input) so that it can be used as needed to assess organizational health at the division, office and agency levels. Implementation of this recommendation should begin approximately one month from the issuance of Commission direction on SECY-15-0015, so that the agency is poised to hire, retrain and reposition staff to meet today's work requirements, as well as the work projected for FY 2016 and beyond.

I-2) Enhance employee agility by reducing the time required to shift employees or their work assignments to meet the demands of a changing environment by the following:

- a) Based on agency priorities developed in I-1.a., develop a plan to identify mission critical and/or safety-related positions considered most important for immediate needs analysis (based on criteria such as highest percentage of workforce characterized by the position or role, criticality of the job functions performed, amount of training dollars targeted toward positions, maturity of the qualification program, etc.).**
- b) Based on outcome of I-2.a. determine timeline for developing competency models for other agency occupations and functions.**

I approve these steps, upon completion of I-1a.

I-3) Increase organizational agility and efficiency through focus on "One NRC" and on outcomes.

- a) Develop or adopt an explicit NRC leadership model (or leadership philosophy) that builds on the agency's existing culture (Principles of Good Regulation,**

Organizational Values) and supports agility, to include empowering employees by promoting personal responsibility and accountability along with creative thinking, innovation, and informed risk-taking in all of our activities. Refine the NRC Organizational Values to incorporate those values necessary to support organizational agility or clarify that they are already included under the existing values.

Disapprove. I do not support the development of a separate NRC leadership model or modifying the NRC Organizational Values. I agree the agency needs to enhance its ability to adjust to the changing environment by being more agile when it comes to supporting higher-priority work that arises. I also agree with Commissioner Ostendorff that effective decision-making can be achieved by focusing attention on the characteristics of the Principles of Good Regulation and the Organizational Values.

I believe that NRC's leadership is fundamentally responsible for ensuring that these existing principles, values and policies are communicated and embraced uniformly by all offices across the agency. When there is an inconsistency between the implementation of an agency practice between offices, this should not be viewed as a failure of the practice; it should be viewed as a management challenge that should be dealt with accordingly. The NRC does not need a rebranding effort or recasting of the agency's Organizational Values to accomplish this.

In the brief time since my return to the NRC, I have observed in the Regions that creative thinking, innovation, and informed risk-taking is promoted, and changes are already being implemented without the need for Commission direction. For instance, in a recent visit to Region II, I was briefed on the "Idea Greenhouse," initiative where employees are given the means to raise new and innovative solutions to a wide range of issues that can be simply implemented and which can result in substantial improvement to processes and resource savings. I understand that other Regions have similar processes that are being used and making a positive difference, and I'm sure that there are offices within Headquarters also doing this. I commend the Regions and those Headquarters offices for taking the initiative to maximize the talents and expertise of their staff to be more effective and efficient in the conduct of their work. Who better to identify opportunities to improve than the individuals performing the actual work, each and every day.

A large part of this is going "back to basics," and in this context it is worth recalling our statutory mandate under the Atomic Energy Act (AEA) of 1954, as amended. Under the AEA's broad authority, the NRC imposes requirements and takes regulatory action to ensure reasonable assurance of adequate protection of the public health and safety and common defense and security. The NRC has continually emphasized over the decades of its existence, its "adequate protection" authority does not require the agency to seek to achieve zero risk in its regulatory activities. I have frequently heard that one challenge the agency faces is a desire to always achieve the "gold standard" which can result in expending more effort than required. The NRC should always seek to achieve the highest standards of performance, but it must do so with a balanced perspective of the significance of the activity in the overall context of our regulatory responsibility and with the overarching objective to be focused on the right things.

The NRC should identify and consider additional opportunities to apply more broadly risk insights to enhance our decision-making beyond traditional technical issues. Decision-making that uses a graded approach should also be applied to determining priorities and the level of resources dedicated to our corporate and infrastructure programs.

Again, this approach does not require a fundamental change in the agency through a new "One NRC" paradigm; it simply requires senior leadership to reinforce this concept uniformly and consistently. It is also imperative that agency employees are thoroughly engaged in this process. The employees of this agency have a significant depth of experience and knowledge in this field. I am confident that when it comes to an understanding of what the NRC does or does not need to be working on, no one is in a better position than the NRC staff. It is also important for the staff to be engaged in this effort because they must embrace and take ownership of the results of Project Aim 2020.

- b) Explore greater reliance on centers of expertise to provide leadership, best practices, research, and support in particular focus areas across the agency. Currently, the NRC is utilizing centers of expertise across certain business lines in areas such as vendor oversight, electrical engineering, allegations, force-on-force inspections, and fire protection licensing reviews. Based on the evaluation, expand reliance by establishing additional centers of expertise.**

I approve the evaluation of the effectiveness of existing NRC Centers of Expertise (COE) to determine whether expansion of this organizational model will lead to greater effectiveness and efficiency in accomplishing the agency's mission. Establishing or using COEs in the science and engineering areas are similar to centralizing the corporate functions recommended by the TABS Task Force Report in 2011, in that they both are designed to consolidate common technical, programmatic and process roles, responsibilities and functions that support the needs of multiple customers with specific needs. Lessons learned from TABS implementation should also be considered and factored into an evaluation of COE expansion. The staff should provide the Commission with an evaluation and recommendation(s). The evaluation of existing COEs is not dependent on other recommendations contained in Project AIM 2020 report, and should proceed on the timeline recommended by the staff.

- c) Develop a transitional plan that describes the approach to conduct a merger of NRO and NRR at the appropriate time, along with any associated organizational changes in Region II. The plan will describe key criteria and factors that need to be considered, interim actions that will be undertaken as key milestones are achieved, and potential future events that could accelerate or decelerate the timing of the merger.**

I approve in part, and disapprove in part. It is premature to determine that a merger of NRO and NRR is the appropriate solution to address the current and projected declining workload in NRO. An organizational "transformation" plan may be more appropriate than a "transitional" plan that considers the optimal organizational construct for performing regulatory oversight of operating and new reactors. The transformation plan should not be limited solely to an examination of NRR and NRO,

but what other organizational structures may be appropriate to be more efficient, effective and agile. For example, the staff's evaluation of COE expansion highlighted above, where the agency's science and engineering expertise is centralized and provides technical support to the statutorily mandated offices (e.g., NRR, RES, and NMSS) and Regions, should be integrated into any transformation plan. If the staff supports the merger of NRO and NRR, the transformation plan should provide the business case for the merger and indicate the optimal size of the organization and the interim steps that are needed to achieve the appropriate size, including staff to management ratios.

- d) **Evaluate further consolidation of the regional materials program to determine whether further consolidation would be more efficient. The Materials Program for Regions I and II was successfully consolidated into Region I in 2006.**

Approve.

- e) **Evaluate the corporate support functions in the regions to ensure they are appropriately resourced and identify if any savings can be reached through standardization or centralization of specific functions. The evaluation should reflect upon the lessons learned from the Transforming Assets into Business Solutions initiative.**

Approve.

II. Planning

II-1) Improve the Planning and Budget Formulation Process

- a) **Benchmark with other agencies and seek external validation from a third party to clearly define and justify overhead as well as identify the variable components of Corporate Support.**

Approve. This effort is currently underway to support the agency's effort to provide greater transparency of the NRC Fee Rule.

- b) **Clarify agency priorities and use office and agency add/shed procedures to ensure effective and efficient use of the staff's time and resources.**

Approve. In my view, it is imperative that the agency enhance its ability to assess new and emergent work by establishing an integrated prioritization scheme that eliminates organizational and budgetary boundaries. Historically, the NRC has been effective at identifying potential regulatory issues and prioritizing them. However, it has sometimes struggled with balancing the resource needs of competing priorities and shedding work. The staff should develop a common prioritization process with a supporting add/shed procedure that integrates all work activities across the agency and includes external mandates. I believe such a process and procedure will ultimately enable the Commission, senior leadership, managers and staff to make more informed and timely decisions. Efforts to improve the common prioritization

process should begin immediately to inform decisions in the FY 2017 budget formulation process, to the maximum extent practical.

In my view, there is a close relationship between this effort and the rebaselining effort in Recommendation II-2) (a). It is difficult for me to understand how a rebaselining effort could be effective if it does not also include an effort to clarify agency priorities and undertake an add/shed process. Accordingly, the staff should integrate these efforts.

- c) **Utilize foresight methods and stakeholder engagement to get a more informed estimate of the future to ensure the agency is prepared.**

Disapprove. The agency currently relies on input from licensees and the industry to make projections on both a formal and informal basis to enhance resource decisions in formulating its budget. Devoting resources to institutionalize a formal annual call for workload projections and a detailed forecasting process is not likely to achieve the intended results.

II-2) **Re-Baseline the work of the Agency**

- a) **Conduct a review of the work performed across the agency and confirm the basis for the work (the requirement(s) that the work is intended to fulfill, whether it is required by law (including judicial mandates and regulations), or Commission direction). Work that is not required could be shed to help make the agency more lean and reduce future budgets. With the growth that occurred from FY 2005 through FY 2010, new activities may have been added to the agency's workload and budget that are no longer required or to a lesser degree. This activity would be performed by the staff, with assistance from an outside entity.**

I approve the concept of rebaselining the work of the agency, and integrating this effort with the effort to clarify agency priorities and undertake an add/shed process as noted above. Nonetheless, I have concerns about what the staff may be envisioning for the scope and scale of this effort. I support a one-time assessment that results in the Commission receiving a comprehensive list of activities that can either be shed or performed with a less intense resource commitment. This assessment should be an EDO-led and involve Office Directors, Division level managers and staff examining the business lines activities, making decisions on what work is needed, and how much is required to get back to basics (i.e., focused on what is required and our highest priority). This effort should engage the entirety of the staff in developing recommendations so that there is acceptance and ownership of the final result. Our employees have a significant body of expertise and it would be a failure to not engage that vast body of knowledge. In addition, the production of a major report that takes several months to finalize is not necessary to achieve the intended objective of this recommendation. I believe that the staff can accomplish this task by convening one or a series of meetings to develop the recommendations, as I understand was done to develop the FY 2013 Sequestration Implementation Plan.

Furthermore, this exercise should not resemble the rebaselining effort performed in the mid 1990's that entailed a detailed examination of activities and binning them into one of three categories (i.e., "mandated", "needs", and "should"). This effort could be characterized ultimately as a largely theoretical exercise rather than a rebaselining that changed the scope of the agency's work. As I stated earlier, the NRC is a top-performing agency, we know what we should be doing for safety and security and what mandated work is necessary. It is critical that this effort results in concrete, tangible improvements and not just a collection of reports and analyses.

III. Process

- III-1) Improve the transparency and simplify how the NRC calculates and accounts for fees, and improve the timeliness of when the NRC communicates fee changes. When the NRC published the 2014 Fee Rule, many commenters raised concerns regarding the lack of clarity in the work papers presented to justify fees.**

Approve. This effort is currently underway.

- III-2) Improve licensing by conducting a business process improvement review of the operating reactor licensing process and make associated improvements to enhance the predictability, timeliness, and efficiency of the reviews, while ensuring and measuring the effectiveness and quality of the reviews.**

Approve. The conduct a business process improvement (BPI) review of the operating reactor licensing process should be done on a schedule that does not affect the staff's ability to reduce the backlog of licensing actions. Consequently, I support the staff recommended timeline for initiating the BPI review. Nonetheless, in formulating the FY 2017 budget, the staff should evaluate the existing performance metrics for licensing actions and consider revising them to measure more accurately performance within the staff's direct control. The staff should not be held to a timeliness standard that is frequently impacted by a licensee's ability to provide complete and timely supporting information to finish its review.

- III-3) Improve processes by streamlining, standardizing, and clarifying roles and responsibilities:**

- a) Evaluate and improve the acquisition process to clarify the roles and responsibilities of the Contract Officer Representative (COR), standardize processes, and improve quality and process time.**

Approve.

- b) Improve efficiency of processes by expanding the use of mobile information technology solutions across the agency.**

Approve. I strongly encourage the staff to push the envelope with respect to enhancing the NRC's use of mobile technology, while carefully considering the potential for cyber security issues. The staff should not be overly conservative when assessing the use of new technology, but instead must appropriately balance any

concerns with anticipated benefits of using it. In my short time back at the NRC, many times I have heard that restrictions on technology usage are hampering the staff's ability to get work done. I am also aware that other Federal agencies with sensitive security-related functions have found ways to use advanced technology and still make sure that security concerns are addressed.

I believe modernizing the agency's thinking and approach toward advances in mobile technology can enhance our effectiveness and efficiency, most notably save staff time and effort. In addition, the increased use of laptops, tablets, and smart phones can result in long-term reductions in other overhead costs, such as for paper and toner cartridges.

- c) Eliminate multiple request systems and paper forms by developing and implementing a streamlined "One-Stop-Shop" solution for OIS and ADM requests for services and support. This strategy would identify, evaluate, and define the requirements for such a solution.**

Approve.

- d) Re-examine the processes and practices associated with the NRC's assessment of the risks to its information systems in accordance with the Federal Information Security Management Act (FISMA).**

Approve.

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: COMMISSIONER SVINICKI

SUBJECT: SECY-15-0015: PROJECT AIM 2020 REPORT AND RECOMMENDATIONS

Approved XX In-part Disapproved XX In-part Abstain _____

Not Participating _____

COMMENTS: Below _____ Attached XX None _____



SIGNATURE

04/ 7 /15

DATE

Entered in STARS" Yes No _____

**Commissioner Svinicki's Comments on SECY-15-0015
Project Aim 2020 Report and Recommendations**

The NRC staff has provided the Commission with a quality deliverable and a rich set of recommendations. They have done so within a concise period and while drawing upon a diverse set of employee views and experiences. I thank them for their hard work. I have also had the opportunity to review the feedback report provided by the study team of the National Academy of Public Administration (NAPA) and appreciate the perspectives provided.

I consider the staff's paper, this Commission vote, and its resulting staff requirements memorandum (SRM) to be the beginning steps in what will ultimately be a multi-year, multi-prong, multi-phase effort. Consequently, I do not begin with an expectation that we must identify all the elements from the start or that we must design and construct each measure with particularity right now. I find myself in strong agreement with the sentiments of Chairman Burns, as expressed in his vote, that in general we know now what we need to do, we have at our command the necessary elements to do so, and that key among these elements is strong, decisive leadership. This principle shapes my view on a number of the individual recommendations. It is why assignment of each implementing action and accountability for its successful achievement must reside with the line organizations, so that a unified chain of command is maintained and so that the organizations responsible for the execution of the NRC's missions can be measured against established metrics and can have "ownership" of the agency processes/solutions they use to achieve that mission. As stated by Chairman Burns, "Who better to identify opportunities to improve than the individuals performing the actual work, each and every day?"

In a similar vein, I disapprove the NAPA suggestion that the NRC may be well-served by a Chief Risk Officer. I do support a greater focus, however, on the use of Enterprise Risk Management techniques. The staff should consider whether the successful management of enterprise risk should be a factor/element in the annual performance evaluation of agency managers.

I disapprove the transfer of security oversight to NSIR from NRR with respect to research and test reactors. Just this month, the Commission received the semi-annual status update on research and test reactor license renewal reviews. Discouragingly, eight out of twelve of the ongoing reviews now clock in at over a decade in duration. I offer no defense of these timeframes. Based on my observation of the prolonged effort to address this backlog, and as echoed in comments received from the National Organization of Test, Research, and Training Reactors, I see no good purpose served in transferring any part of the RTR mission-related activities between the two offices.

Separate and aside from the staff's Project Aim recommendations, and consistent with my testimony before Congress, I formally propose that the Commission revoke the waivers previously granted to the staff in 2006 [see SRM COMNJD-06-0004/COMEXM-06-0006, dated May 31, 2006] related to initiation of agency rulemaking activities. Namely, I propose:

- (1) That the Commission reinstate the requirement that the staff develop and submit to the Commission rulemaking plans prior to embarking on a rulemaking activity;
- (2) That the Commission reinstate the requirement for review by the Committee to Review Generic Requirements (CRGR) at the proposed rule stage; and
- (3) That the Commission reinstate the requirement for review by the Advisory Committee on Reactor Safeguards (ACRS) at the proposed rule stage.

The waivers granted to the staff in 2006 eliminated several important checks and balances occurring prior to the expenditure of significant agency resources on a potential rulemaking effort. It is not clear that the circumstances that gave rise to these waivers are operative now and it is not discernible to what extent the Commission absented itself from the "up front"

decisions to embark upon these activities has contributed to the proliferation of individual rulemakings. These waivers also eliminated an opportunity for these groups - the Commission, the CRGR, and the ACRS – to form a holistic view, across rulemaking activities, of the agency's concurrent efforts and their cumulative impact.

The following provides my vote on the individual recommendations for the Project Aim 2020 Report.

People Strategy

I-1) Ensure the NRC has the right number of people with the right skills at the right time.

- a) Develop a strategic workforce plan that ensures the NRC is positioned to have the right number of people with the right competencies at the right time.

I approve the development of a strategic workforce plan, but agree with my colleagues that this should not be an overly elaborate undertaking. The development of this plan must be informed by the rebaselining initiative but need not await the completion of the rebaselining. Rather, its development should be initiated after the Commission has approved or concurred in the staff's plan for the rebaselining. I further approve the establishment of an FTE ceiling of 3600 FTE onboard strength by September 30, 2016, as a step towards achievement of the agency's eventual rightsizing target for Fiscal Year 2020.

I-2) Enhance employee agility by reducing the time required to shift employees or their work assignments to meet the demands of a changing environment by the following:

- a) Based on agency priorities developed in I-1.a, develop a plan to identify mission critical and/or safety related positions considered most important for immediate needs analysis.
- b) Based on outcome of I-2.a, determine timeline for developing competency models for other agency occupations and functions.

I approve these activities, upon the completion of I-1.a.

I-3) Increase organizational agility and efficiency through focus on "One NRC" and on outcomes.

- a) Develop or adopt an explicit NRC leadership model (or leadership philosophy) that builds on the agency's existing culture and supports agility, to include empowering employees by promoting personal responsibility and accountability along with creative thinking, innovation, and informed risk-taking in all of our activities.

I disapprove this activity at this time. Instead, the staff should return to this concept when the Project Aim recommendations are more substantially underway, re-examine whether this concept is a separate undertaking or is an organizational outgrowth of progress on the other recommendations, and report to the Commission on whether this concept is, in the staff's view, still needed and if so, what form it would take. I share the Chairman's observation that certain cradles of innovation and empowerment already exist at NRC. The staff should encourage greater sharing of best practices in this area. On the topic of informed risk taking, the staff should use formal and informal mentoring to inculcate the understanding that zero risk is neither the goal nor the metric for agency decision-making.

- b) Explore greater reliance on centers of expertise to provide leadership, best practices, research, and support in particular focus areas across the agency.

Expanded decentralization of lines of accountability for the fundamental work of this agency – oversight and licensing – through greater reliance on centers of expertise is a step in the wrong direction. In light of this, I disapprove this recommendation. Again, I second the view of Chairman Burns that “strong, decisive leadership” within the unified chain of command in each program office is vital. I will approve the analysis proposed by Chairman Burns in his vote, however, consisting only of an evaluation of the effectiveness of *existing* NRC Centers of Expertise. To the extent this model is organizationally effective in certain cases, however, the staff should look instead to enhancing its existing Communities of Practice model, within the NRC’s Knowledge Management program.

- c) Develop a transitional plan that describes the approach to conduct a merger of NRO and NRR at the appropriate time, along with any associated organizational changes in Region II.

I approve this recommendation and applaud the staff in NRO and NRR for modeling strong, decisive leadership in putting this recommendation forward. The Commission should join them, by approving it. I know some of my Commission colleagues were unconvinced on this recommendation. As someone who has been observing and taking part in the NRC’s activities in response to the planned “nuclear renaissance” for a number of years (but not, certainly, as long as the NRC staff), I respect the staff’s (perhaps reluctant) admission that now is the time to begin planning for the alignment of these two offices to reflect external reality. Large organizations do not wait to begin planning for the future of offices until their activities have wound down. To do so would be a singular disservice to the employees of NRO whose skills are now and will continue to be vital to the agency’s success, and who moreover deserve, based on their commitment and contributions, to be provided with a vision of how and where their skills will be housed organizationally going forward. The staff should provide a transition plan within six months of the issuance of the SRM for this paper, which will accomplish the transition within a time certain. The leadership of both organizations has already been contemplating this merger, so it is time to eliminate staff uncertainty and give our employees greater clarity about their own futures.

- d) Evaluate further consolidation of the regional materials program to determine whether further consolidation would be more efficient.

I do not have sufficient information to know whether further consolidation is a good idea but I approve further evaluation of the idea.

- e) Evaluate the corporate support functions in the regions to ensure they are appropriately resourced and identify if any savings can be reached through standardization or centralization of specific functions.

I approve further evaluation of this area but it is essential, as noted in the recommendation, that the evaluation reflect upon the lessons learned from the Transforming Assets into Business Solutions initiative, which did not proceed smoothly in many aspects and therefore provides important organizational lessons for any similar undertakings (such as this one) in the future.

Planning Strategy

II-1) Improve the Planning and Budget Formulation Process

- a) Benchmark with other agencies and seek external validation from a third party to clearly define and justify overhead as well as identify the variable components of Corporate Support.

This effort is ongoing and I approve its continuance.

- b) Clarify agency priorities and use office and agency add/shed procedures to ensure effective and efficient use of the staff's time and resources.

Under law, agency priorities are established through the Commission's deliberation and vote on the Chairman's budget proposal and subsequent enactment of agency appropriations by the Congress. Any priority setting or add/shed process must not violate these principles. The Commission is the first level of determining priorities or clarifying them. I agreed with (then) Commissioner Jaczko when he once remarked, in a Commission meeting, to the effect that the Commission voted on a budget and argued about individual elements at the \$500,000 level (or lower) and then it seemed that the agency staff went off and executed whatever budget it wanted within Congressional reprogramming limits. Consequently, I do not hold up the NRC's budget formulation process as a model of perfection but I acknowledge that many of its quirks arise from our governing structure – that of a Commission and not a unitary executive. The staff must hold this aspect of our operations harmless in any proposed changes.

- c) Utilize foresight methods and stakeholder engagement to get a more informed estimate of the future to ensure the agency is prepared.

In light of the adequacy of the existing process (i.e., letters of intent and other licensee forecasting), and in acknowledgement of Commissioner Baran's observation (with which I agree) that predictions will always be wrong to some degree, I disapprove initiating any effort on this recommendation at the present time.

II-2) Re-baseline the Work of the Agency

- a) Conduct a review of the work performed across the agency and confirm the basis for the work.

I approve this recommendation but believe there is great peril in creating too elaborate of a process. I share Chairman Burns' cautions about the tendency of large organizations to spin such efforts into something of an all-consuming, resource intensive scope and scale. Consequently, the staff should submit its plan for conducting the re-baselining to the Commission. This should take the form of an information paper. If the staff has understood the Commission's expectations for the rebaselining, the staff will have kept us informed. If the plan contained in the information paper is not in alignment with the Commission's expectations, a member of the Commission can convert it into a voting matter. Either way, time and effort will not be squandered on something which fails to align with expectations.

Process Strategy

III-1) Improve the transparency and simplify how the NRC calculates and accounts for fees, and improve the timeliness of when the NRC communicates fee changes.

This effort is already underway. I commend the Chief Financial Officer and the staff of her office for these efforts and approve their continuation.

III-2) Improve licensing by conducting a business process improvement review of the operating reactor licensing process and make associated improvements to enhance the predictability, timeliness, and efficiency of the reviews, while ensuring and measuring the effectiveness and quality of the reviews.

I approve this activity in the abstract but would delegate decision-making about this activity – its timing, its scope, and the application of its results to the Director of NRR. For Project Aim (the recommendations before us now and all their progeny over the coming years) to be implemented successfully and incorporated in a cycle of continuous organizational learning and process improvement, agency organizations at every level will need to have ownership of the improvement activities within their span of control. The successes in innovation and improvement in the regions, remarked upon by Chairman Burns in his vote and observed by many of us, have their roots in employee engagement and empowerment. This recommendation should be approved but its design and execution should be delegated to the Director of NRR in its entirety.

III-3 a. – d.) Improve processes by streamlining, standardizing, and clarifying roles and responsibilities.

Although generally described in ways that sound meritorious, I agree with Commissioner Baran that these recommendations lack sufficient detail to be approved or disapproved. Consistent with my view that employee engagement and empowerment is key to the achievement of our Project Aim objectives, the staff should develop and implement process improvements that are within the staff's authority, as appropriate. If something is crosscutting or has a pervasive agency-wide impact, the staff should seek the Commission's review and approval in those cases. In all cases, the staff should keep the Commission informed of planned improvements, of successes, and of challenges encountered along the way.

Again, I thank all of the staff who contributed to this impressive set of recommendations. I do not support instruction to the EDO to assign a senior leader to own this process because, as I said at the Regulatory Information Conference, I think this process should and does belong to every single NRC employee. You will create the NRC you want to be working at in the year 2020 and you will work with and be supported by your management at every level in establishing the metrics to get there, while holding each other accountable along the way. The EDO should develop and submit, however, a high level plan for initiating all of the activities approved in the Commission's SRM, including how they will be sequenced and assigned.


Kristine L. Svinicki 04/7/15

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: COMMISSIONER OSTENDORFF
SUBJECT: SECY-15-0015: PROJECT AIM 2020 REPORT AND
RECOMMENDATIONS

Approved X Disapproved _____ Abstain _____

Not Participating _____

COMMENTS: Below _____ Attached X None _____

W. Ostendorff
SIGNATURE

2/20/15
DATE

Entered in STARS" Yes X No _____

**Commissioner Ostendorff's Comments on,
"Project AIM 2020 Report and Recommendations"**

I want to thank the Project AIM team and NRC staff for thoroughly assessing future states and identifying recommendations to move the agency forward constructively. The Project AIM Team's work, in collaboration with the Guiding Coalition, has presented the Commission a thoughtful product to structure decisions associated with the NRC's future organization, size, work practices, and human capital strategy.

Any serious look at assessing these organizational/staffing issues requires a reference baseline from which to begin the dialog. In the case of Project AIM, I see re-baselining (identified in recommendation II-2.a) as the starting point for many of the other recommendations. While I appreciate staff identifying a target FTE and budget number for 2020, I see the outcome of the re-baselining effort and other consolidation efforts providing the foundational basis for any realistic target for 2020. Hence, I neither approve nor disapprove the 3400 FTE number contained in the report. Rather, I think the agency needs an interim FTE planning number with final staffing decisions to await the re-baselining efforts and other ancillary initiatives in Project AIM. Consistent with my vote on the NRC Fiscal Year 2016 budget, the staff should plan for an FTE ceiling of 3600 by the end of Fiscal Year 2016 so that the agency can begin the transition to the eventual target for 2020.

I note that in the coming months, the staff is expecting to receive a review of recommendations on the "Achieving Exemplary Nuclear Regulation in the 21st Century," by the National Academy of Public Administration. Should this report provide additional insights that should inform Commission action, I reserve the option of providing additional direction on Project AIM.

As an aside, I also note that moving forward, the Project AIM effort is a journey, and there will be future engagement with the Commission.

My votes on individual recommendations from the Project AIM report are provided below.

I. People

I-1.a. Develop a strategic workforce plan that ensures the NRC is positioned to have the right number of people with the right competencies at the right time.

While I approve this step, staff should defer commencing work on this recommendation until II-2.a (re-baselining) is completed and approved by the Commission. Furthermore, staff should include in its plan the additional need to have staff in the right place, for example filling resident inspector and regional SES positions.

I-2.a. Based on agency priorities developed in I-1.a., develop a plan to identify mission critical and/or safety-related positions considered most important for immediate needs analysis.

While I approve this step, staff should defer commencing work on this recommendation until II-2.a (re-baselining) is completed and approved by the Commission.

I-2.b. Based on outcome of I-2.a., determine timeline for developing competency models for other agency occupations and functions.

While I approve this step, staff should defer commencing work on this recommendation until II-2.a (re-baselining) is completed and approved by the Commission.

I-3.a. Develop or adopt an explicit NRC leadership model (or leadership philosophy) that builds on the agency's existing culture and supports agility, to include empowering employees by promoting personal responsibility and accountability along with creative thinking, innovation, and informed risk-taking in all of our activities.

I do not support the development of a separate NRC leadership model. This step is not needed and would likely confuse the staff. Rather, the staff should emphasize the existing Principles of Good Regulation, Organizational Values, and behavior matters campaign to support effective and efficient decision-making. As we move the agency forward, the staff should focus attention on those characteristics of the Principles of Good Regulation and Organizational Values that support empowerment and feeling a sense of personal responsibility and accountability through creative thinking, innovation, and informed risk-taking in all of our activities.

I-3.b. Explore greater reliance on centers of expertise to provide leadership, best practices, research, and support in particular focus areas across the agency. Based on the evaluation, expand reliance by establishing additional centers of expertise.

While I approve this step, staff should defer commencing work on this recommendation until II-2.a (re-baselining) is completed and approved by the Commission. The staff should provide the Commission with its recommendation for which centers of expertise should be initiated; the recommended host organization (i.e., program office, regional office, RES, NSIR); the recommended geographic location; the appropriate balance between staff, contractors, and Department of Energy laboratories as well as other outside laboratory or academic institutions and what efficiencies should be expected from the establishment of these centers of expertise. The staff should use lessons learned from TABS including NTEU observations, the NMSS/FSME merger, and existing centers of expertise in its evaluation. Given the significant human capital expertise in the Office of Research, the Office of Research needs to be listed as a lead office for this initiative under the Resources breakout for recommendation I-3.b

I-3.c. Develop a transitional plan that describes the approach to conduct a merger of NRO and NRR at the appropriate time, along with any associated organizational changes in Region II.

Approved. The staff should use lessons learned from TABS including NTEU observations, the NMSS/FSME merger, and the OIS reorganization. Examples of focus areas to address before any consolidation is initiated are transparency in reassignment decision-making and adequately resourcing, planning, and managing the change. Additionally, staff should not limit its consolidation efforts to those areas identified in I-3.c, d, and e, but should look at the agency broadly as an outcome of the re-baselining to ensure that the right work is being done in the most efficient and effective manner.

I-3.d. Evaluate further consolidation of the regional materials program to determine whether further consolidation would be more efficient. The Materials Program for Regions I and II was successfully consolidated into Region I in 2006.

Approved.

I-3.e. Evaluate the corporate support functions in the regions to ensure they are appropriately resourced and identify if any savings can be reached through standardization or centralization of specific functions. The evaluation should reflect upon the lessons learned from the Transforming Assets into Business Solutions initiative.

Approved.

II. Planning Strategy

II-1.a. Benchmark with other agencies and seek external validation from a third party to clearly define and justify overhead as well as identify the variable components of Corporate Support.

I acknowledge that efforts had already begun in this area prior to it being considered as a Project AIM 2020 recommendation and approve these efforts continuing.

II-1.b. Clarify agency priorities and use office and agency add/shed procedures to ensure effective and efficient use of the staff's time and resources.

I approve addressing the agency priorities and use of the office and agency add/shed procedures. The Secretary to the Commission should provide the Commission a one-time listing of outstanding Commission directed actions. This list should include staff recommendations as to which selected actions should be terminated. The Commission will review the actions to reassess whether each action is still required. Separately, the staff should provide annual rulemaking plans for Commission review and approval. These rulemaking plans should include, where appropriate, staff recommendations for suspending or terminating rulemaking due to changed or changing circumstances.

II-1.c. Utilize foresight methods and stakeholder engagement to get a more informed estimate of the future to ensure the agency is prepared.

I disapprove development of a separate annual report with scenarios and extensive stakeholder outreach. I approve application of lessons learned from the development of the Project AIM 2020 report regarding assessment of the external environment into the current strategic planning and budget processes.

II-2.a. Conduct a review of the work performed across the agency and confirm the basis for the work (the requirement(s) that the work is intended to fulfill, whether it is required by law (including judicial mandates and regulations), or Commission direction). This activity would be performed by the staff, with assistance from an outside entity.

I strongly approve re-baselining the work of the agency and, as stated at the beginning of my vote, believe it is the starting point for many of the other recommendations.

In support of this recommendation, I believe it helpful to provide some historical context. The last re-baselining effort occurred in the 1990's. After the attacks of 9/11, the agency significantly increased staffing in the area of security. While appropriate at the time, now is an opportunity to take a fresh look at the work/staffing of NSIR. I will note that while NRO (which experienced a rapid expansion in workforce following the 2005 Energy Policy Act), NMSS/FSME, and OIS have all undergone significant organizational staffing changes, the agency has not taken a recent look at NSIR's work.

Additionally, for almost the past four years, the agency has been addressing regulatory enhancements post-Fukushima. That work will draw to a close in the near future. Again, the timing is right for a re-baselining effort.

While it may go without saying, this re-baselining should also ensure that we perform those work activities necessary to fulfill our regulatory mission. The Executive Director for Operations (EDO) should actively oversee the re-baselining and provide clear guidance to ensure a consistent and effective review using top-down high-level principles. The EDO's guidance shall be submitted to the Commission for review and approval prior to being implemented. The re-baselining effort should furthermore provide clear justification for any work to be continued. As I indicated in my vote on recommendation II-1.b., I believe the Commission needs to also assess the work it has directed the staff to do to determine if it continues to provide appropriate value compared to the resources expended. The results of the re-baselining should be provided to the Commission for approval.

III. Process

III-1. Improve the transparency and simplify how the NRC calculates and accounts for fees, and improve the timeliness of when the NRC communicates fee changes. Also, assess alternative methods of allocating fees.

I acknowledge that efforts had already begun in this area prior to it being considered as a Project AIM 2020 recommendation and approve these efforts continuing.

III-2. Improve licensing by conducting a business process improvement review of the operating reactor licensing process and make associated.

I approve conducting the business process review. I do not approve deferring the activity until the completion of existing initiatives and backlog reduction, as a broader review of the process may negate the need to perform planned changes and could improve our ability to reduce the backlog. Implementation of this recommendation should be accelerated to begin in FY16 by reprogramming resources as necessary. If this effort prevents staff from making progress on reducing the backlog, the staff should inform the Commission.

III-3.a-d. Improve processes by streamlining, standardizing, and clarifying roles and responsibilities.

I do not object to implementing these recommendations as long as it does not impact implementation of the recommendations I have explicitly approved. The staff should develop clear success criteria for these recommendations so that involved stakeholders can effectively support implementation and the agency can adequately measure whether the recommendation achieved its desired outcome.

Again, I want to thank the staff for their professionalism in developing and providing this product.

NOTATION VOTE


RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: Commissioner Baran
SUBJECT: SECY-15-0015: PROJECT AIM 2020 REPORT AND
RECOMMENDATIONS

Approved Disapproved Abstain _____

Not Participating _____

COMMENTS: Below _____ Attached None _____



SIGNATURE

3/20/15

DATE

Entered in "STARS" Yes No _____

Commissioner Baran's Comments on SECY-15-0015 Project AIM 2020 Report and Recommendations

I want to express my appreciation to the Project AIM team, the Guiding Coalition, and every staff member who participated in any of the outreach efforts related to Project AIM 2020 for their hard work and contributions to this report. I also want to thank the National Treasury Employees Union for their insights on the report and willingness to remain engaged on these issues going forward.

The completion of the Project AIM 2020 Report is an important first step in the ongoing process of preparing NRC for the future. Now is the right time for the Commission to take a close look at the agency as a whole and the ways we can improve our performance while preserving the many positive aspects of the agency. With that goal in mind, I support a number of the principles and recommendations presented in the Project AIM Report, including better matching the agency's resources to its expected workload, increasing agility and efficiency, strengthening talent management, and sharpening our focus on the overall NRC mission. My thoughts on the individual Project AIM recommendations are described below.

I. People

Recommendation I-1(a): *Develop a strategic workforce plan that ensures the NRC is positioned to have the right number of people with the right competencies at the right time.*

I approve this recommendation. In my view, the development of a strategic workforce plan should begin immediately, in parallel with the implementation of other recommendations. The strategic workforce plan should not be overly burdensome and will necessarily be dynamic, requiring updates as related items, such as the re-baselining, are completed. However, the staff can begin assessing the agency's current workforce competencies and identifying any current or anticipated gaps now. Hiring managers should also work with OCHCO to thoughtfully assess whether to fill vacancies as they are created by attrition. I agree with Commissioner Ostendorff that it is appropriate to establish, for planning purposes, an interim FTE ceiling of 3,600 for the end of Fiscal Year 2016.

Recommendation I-2: *Enhance employee agility by reducing the time required to shift employees or their work assignments to meet the demands of a changing environment...*

I approve this recommendation, which should be implemented upon completion of recommendation I-1(a). The recent experience of shifting employees from NRO to NRR should provide lessons learned that could inform this activity.

Recommendation I-3(a): *Develop or adopt an explicit NRC leadership model (or leadership philosophy) that builds on the agency's existing culture (Principles of Good Regulation, Organizational Values) and supports agility, to include empowering employees by promoting personal responsibility and accountability along with creative thinking, innovation, and informed risk-taking in all of our activities. Refine the Organizational Values to incorporate those values necessary to support organizational agility or clarify that they are already included under the existing values.*

I disapprove proceeding with the broad scope of this recommendation at this time. However, I agree with the Project AIM team that it is important for the agency's leaders at all levels to focus on agency priorities instead of office-wide or other more narrow priorities. To

assist in this effort, I approve proceeding with Recommendation (a)(viii) to incorporate candidates' modeling of these leadership attributes into selection decisions for positional leaders.

Recommendation (a)(ix), which is to assess the NRC's organizational structure to determine whether staff-to-supervisor ratios can be increased and whether layers of the hierarchy can be eliminated, is a valuable activity but does not appear to fit naturally within this recommendation. My understanding is that this ratio has been an agency-wide focus for some time. The staff should continue to analyze the staff-to-management ratios and whether levels of management can be decreased when implementing each approved recommendation that contemplates the overall structure of a program or organization, including the development of a strategic workforce plan.

After the agency completes implementation of the approved recommendations from the Project AIM Report, the staff should notify the Commission if it continues to think that the remaining portions of this recommendation are necessary or would be beneficial.

Recommendation I-3(b): *Explore greater reliance on centers of expertise to provide leadership, best practices, research, and support in particular focus areas across the agency.*

I approve the staff presenting the Commission with a plan and recommendations related to establishing additional centers of expertise. The plan should evaluate the effectiveness of existing NRC centers of expertise and provide more details regarding what additional specific centers of expertise the staff recommends and what office would house each center. The plan also should address (1) how these centers can avoid the "stove-piping" that the report identifies as a concern with the existing office structure and (2) how the agency can avoid organizational complexity and confusion with the creation of additional centers of expertise. I agree with Commissioner Ostendorff that the Office of Research should be added as a lead office for this effort.

Recommendation I-3(c): *Develop a transition plan that describes the approach to conduct a merger of NRO and NRR at the appropriate time...*

I disapprove this recommendation at this time. Before the staff conducts an in-depth examination of how to merge these offices, there should first be an assessment of the pros and cons of this potential merger and a recommendation to the Commission regarding whether an NRR-NRO merger is beneficial for the agency. In the absence of this threshold decision about whether to merge the two offices, I believe it would be premature to expend resources examining how to execute such a merger.

The staff should provide the Commission with a SECY paper assessing the pros and cons of merging NRR and NRO and providing recommendations to the Commission on whether and when to proceed with a merger. In determining whether to merge the two offices, the staff should consider the lessons learned from the NMSS-FSME merger and the process used to make the determination to merge NMSS and FSME. The staff also should consider how an NRR-NRO merger would relate to the formation of any additional centers of expertise.

Recommendation 1-3(d): *Evaluate further consolidation of the regional materials program to determine whether further consolidation would be more efficient.*

I approve this recommendation to perform an evaluation of the best way to structure the regional materials program. The staff should submit to the Commission a SECY paper with a specific consolidation plan prior to implementation.

Recommendation 1-3(e): *Evaluate the corporate support function in the regions to ensure they are appropriately resourced and identify if any savings can be reached through standardization or centralization of specific functions. The evaluation should reflect upon the lessons learned from the Transforming Assets into Business Solutions Initiative.*

I approve this recommendation, particularly with regard to taking a close look at whether “standardization” or “centralization” makes sense for corporate support functions in the regions. As stated in the recommendation, this activity should incorporate the lessons-learned from the Turning Assets into Business Solutions (TABS) initiative, including the comments of the National Treasury Employees Union on that initiative. Additionally, this effort should be coordinated with implementation of any other corporate support efforts recommended by the Project AIM team and approved by the Commission.

II. Planning

Recommendation II-1(a): *Benchmark with other agencies and seek external validation from a third party to clearly define and justify overhead as well as identify the variable components of Corporate Support.*

I approve this recommendation. Carrying out this activity should involve both properly defining “corporate support” and actually reducing the amount of agency overhead, however the term is ultimately defined.

Recommendation II-1(b): *Clarify agency priorities and use office and agency add/shed procedures to ensure effective and efficient use of the staff's time and resources.*

I approve this recommendation. I agree with Chairman Burns that the staff should develop a common prioritization process with a supporting add/shed procedure that integrates all work activities across the agency and includes external mandates.

Recommendation II-1(c): *Utilize foresight methods and stakeholder engagement to get a more informed estimate of the future to ensure the agency is prepared.*

I encourage the staff to continue engaging stakeholders about expected future workload. However, I do not believe it is necessary to develop a separate report on this topic. Ultimately, the agency should focus its efforts on improving its agility rather than on trying to develop ever more precise predictions of future workload. Predictions of this kind will inevitably be imprecise so it is important for the agency to be prepared to respond to unanticipated changes in workload. Therefore, I disapprove this recommendation.

Recommendation II-2(a): Re-Baseline the work of the agency.

I approve this recommendation. In my view, this effort should begin as soon as practical. However, I do not believe that re-baselining needs to be completed before other approved recommendations are implemented.

I agree with Chairman Burns that it is important to have a common understanding of the scope and scale of this effort. It should be a one-time assessment that results in the Commission receiving a comprehensive list of activities that can be shed, de-prioritized, or performed with a reduced resource commitment. However, for the effort to be valuable, the inquiry should not narrowly focus on whether there is a specific statutory requirement or Commission direction to perform a given task. The process should also consider what work is most critical to the safety and security mission of the agency and how the relevant NRC staff subject matter experts would prioritize their work. If, through this process, the staff finds that the agency expends resources on tasks that may no longer be necessary but which the staff was previously directed to perform, the staff should propose changes for Commission consideration along with a discussion of why the task was originally required and why it is no longer needed. The staff should be authorized to seek assistance from an outside entity in performing this re-baselining activity, if it determines that such assistance is necessary.

III. Processes

Recommendation III-1: Improve the transparency and simplify how the NRC calculates and accounts for fees, and improve the timeliness of when the NRC communicates fee changes.

I note that this activity is already ongoing and approve continuing efforts to make the fee rule clearer to licensees, other stakeholders, and the public.

Recommendation III-2: Improve licensing by conducting a business process improvement review of the operating reactor licensing process and make associated improvements to enhance the predictability, timeliness, and efficiency of the reviews, while ensuring and measuring the effectiveness and quality of the reviews.

I approve this recommendation. As noted in the estimated start time for this recommendation, implementation of this recommendation should not begin until after the staff works through the current backlog of licensing actions. However, any lessons learned about how this backlog originated and how it was resolved should be incorporated into the review.

Recommendation III-3: Improve processes by streamlining, standardizing, and clarifying roles and responsibilities.

I defer making a decision on the specific actions proposed in this recommendation. The staff should provide the Commission with greater detail on these proposed process improvements in a SECY paper if, during the course of implementing other approved actions, it determines that the proposed process improvements would be beneficial.

Conclusion

Given the breadth and volume of the recommendations proposed in this report, sequencing and synchronizing implementation will be critical. OEDO should submit an overall implementation plan to the Commission for the approved recommendations. This plan should

focus on implementation timeframes and metrics and ensure that it is feasible for the lead office(s) to execute each approved recommendation within the established schedule. With OCHCO tasked as the lead office for several of the proposed actions, it should be fully engaged in the development of this plan.

I agree with Chairman Burns that a senior leader should be dedicated to overseeing the implementation of approved recommendations. The Executive Director for Operations should designate the responsible senior leader within one month of the date of the SRM for SECY-15-0015.