

POLICY ISSUE

(Notation Vote)

July 30, 2014

SECY-14-0078

FOR: The Commissioners

FROM: Mark A. Satorius /RA/
Executive Director for Operations

SUBJECT: ANALYSIS AND RECOMMENDATION ON CONSIDERATION OF NEW
AGENCY POSITION TO DIRECT PUBLIC CONCERNS

PURPOSE:

In the staff requirements memorandum (SRM-) COMAMM-14-0003, "Fiscal Year 2016 High-Level Planning Guidance," dated June 30, 2014, the Commission directed the staff to provide an analysis and recommendation for creating a new position to enhance interactions with the public by directing them to the appropriate avenue to address complaints and concerns within the agency's regulatory responsibility. This paper provides the results of that analysis and a recommendation to the Commission regarding such a position. This paper does not address any new commitments.

SUMMARY:

The staff conducted an analysis regarding creating a new position to help direct public concerns and complaints. The staff reviewed the current avenues and practices for the public to bring issues to the agency's attention, input from offices that routinely interact with the public, and practices used by other Federal agencies. The staff developed three main options: (1) implement enhancements to the current framework; (2) create a new position to direct the public to appropriate processes; and (3) create a new position to direct the public to appropriate processes and conduct followup on those referrals. The strengths and considerations for each of these options were identified and evaluated. For options 2 and 3, staff identified four potential placement locations in the agency and discussed several other factors that would need to be considered, including legal considerations. Based on the results of the staff's analysis,

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which found the agency's current framework for accepting and responding to issues from the public to be generally working effectively and efficiently, the staff recommends proceeding with option 1.

BACKGROUND:

The U.S. Nuclear Regulatory Commission (NRC) considers public involvement in the agency's activities to be a cornerstone of strong, transparent regulation of the nuclear industry. The agency recognizes the public's interest in matters within its regulatory responsibility, and as such provides many avenues for the public to communicate with the agency, including raising concerns and complaints. Being aware of and appropriately addressing issues from the public contributes to the agency's ability to effectively achieve its mission of protecting public health and safety.

In support of this focus, the Commission directed the staff in SRM-COMAMM-14-0003 to provide "an analyses [sic] and recommendation for creating a new position in the agency to enhance interactions with the public. The position would be an employee who acts as a one-stop shop to direct the public to the appropriate offices or processes to address complaints and concerns about matters within our regulatory responsibility..."

DISCUSSION:

The agency currently has a number of avenues, both formal and informal, by which the public can raise concerns and submit complaints, and most offices within the agency interact with the public, in a variety of ways. Staff collected information and input from offices across the agency on such activities and their experiences, and a summary of current practices appears below. Many of these activities are also discussed in NRC's Open Government Plan (<http://www.nrc.gov/public-involve/open.html>).

Current Agency Practices

The NRC has numerous well-established formal and informal processes and programs for public interactions with the agency, including for raising concerns and complaints.¹ To begin with, the NRC's public Web site features two prominent locations on the homepage where the public is advised on how to contact the agency with an issue. First, a highly visible button labeled "Report a Safety Concern" links to instructions for contacting the NRC with either emergency or non-emergency concerns. Second, a "Contact Us" link provides a number of options for members of the public to contact the agency, including through the Allegation Program (for safety or security concerns), the 24-hour Operations Center (for emergencies), the

¹ Input from the public ranges from simple questions and comments to specific concerns and complaints. While this paper seeks to focus on the latter when describing current agency practices, the staff does not routinely separate concerns and complaints from other types of public inquiries unless they are being made as part of a formal complaint process. In addition, this paper does not evaluate the merits of concerns and complaints received by the agency.

hotline of the Office of the Inspector General (OIG) (for waste, fraud, and abuse issues), the Office of Public Affairs (OPA), the Office of the Chief Human Capital Officer, the Public Document Room (PDR), and the main NRC mailing address and phone number, which is answered by the NRC operator staff.

The agency has multiple other established methods for receiving and addressing issues from the public. These include several formal processes that apply to very specific situations; some examples include the petition process under Title 10, “Energy,” of the *Code of Federal Regulations* 2.206, “Requests for Action under This Subpart” (to petition for NRC to take an enforcement action—known as the 2.206 petition process), the procedure for filing complaints about the government contracting process, and the process for raising concerns to the NRC’s Freedom of Information Act (FOIA) Liaison. Other more general avenues include comment opportunities during public review of NRC rulemaking, licensing, regulatory, and other documents. The agency also conducts numerous public meetings, as well as proactive public engagement activities—such as open houses and outreach sessions on specific topics of interest in certain geographical areas—during which the public can share concerns. It is worth noting that the agency recently started an initiative to conduct a comprehensive review of the NRC’s public meeting policies, processes, and guidance, and to make recommendations toward necessary improvements, which could include the aspect of accepting and addressing issues from the public during meetings. A more comprehensive list of examples of programs, processes, and activities for receiving public concerns and complaints is included in Appendix A.

Another way the public can bring issues to the agency’s attention is to directly contact staff. For example, members of the public regularly contact OPA staff in headquarters or regional offices, usually through a telephone call or e-mail. OPA staff receives inquiries from the public that cover a broad spectrum of issues, from technical concerns to Web site or document problems. OPA staff responds directly to any inquiries it can and then refers the remainder to the appropriate office or staff person. An advantage of OPA staff receiving general public inquiries (in addition to its expertise in interacting with the general public) is that it is able to identify when an issue seems to be of broader public interest and can follow-up by issuing widely available public communications, such as a post to the NRC Blog, a fact sheet, or other informational document. Furthermore, if a member of the public identifies a problem with the NRC’s Web site, OPA staff is in a position to promptly initiate a change to address it.

Members of the public also frequently contact staff in other offices based on familiarity with their responsibilities from public meetings or other interactions. Examples include project managers for specific sites in the Office of Nuclear Reactor Regulation or the cognizant branch chief or resident inspector for specific sites in a regional office. Furthermore, the public can contact the NRC in general or specific Commissioner(s), including the Chairman, through written correspondence (e.g., letters or e-mails). The Office of the Secretary manages such correspondence and enters it into a ticketing and tracking process for response by the appropriate staff. Finally, the public can always call the main NRC phone number, which is staffed by the NRC operator from 6:00 a.m. to 9:00 p.m. The NRC Operator transfers callers to their requested contact, or to OPA or the Emergency Operations Centers for general or event-related inquiries, respectively.

The infrastructure and resources used for supporting these methods vary greatly. For more formal processes, such as the Allegation Program and the 2.206 petition process, specific detailed procedures guide their implementation and tracking of issues, and staff members in formal designated positions (e.g., Allegation Coordinators and the 2.206 Agency Coordinator) accept and respond to concerns. Issues raised during comment periods for various agency documents and activities would be reviewed and addressed by the responsible staff as part of completing those tasks. For direct calls or e-mails, the staff receiving them would respond to them to the extent to which they are able as part of their routine work responsibilities, usually in a manner consistent with how they were initially contacted (e.g., e-mail response for e-mail inquiry). For issues that are more significant, staff will inform their management, who would advise and assist with the appropriate handling needed. Issues that turn out not to be within the purview (or sole responsibility) of the NRC recipient are routinely forwarded to the appropriate staff for consultation or action. Given their variety and volume, staff does not track or trend such inquiries that they receive.

Overall, the number of concerns and complaints received vary greatly in number and nature across different agency programs and offices. An example of a program that receives a high volume of issues is the Allegations Program. For the past several years, the agency has received between 500 and 600 allegations annually, and each allegation can include multiple concerns. An example of an office that receives a high level of contact from the general public is Region I. Because of the relatively high level of interest on nuclear power in the Northeast part of the country and around certain nuclear power plants, Region I estimates that it receives directly approximately 400 to 600 public concerns or complaints per year. These items can range from generic issues about nuclear safety to focused technical concerns. Staff responds to these concerns or complaints in the manner described above as promptly as possible. In contrast, several offices reported that they only receive a handful of concerns and complaints directly from the public each year.

It is worth noting that significant external factors, such as the accident at Fukushima or news reports on nuclear safety or similar topics, can lead to spikes in the number of public concerns or complaints that the agency receives. To help address the increase in workload during significant incidents, staff from the Office of Nuclear Security and Incident Response is currently developing plans to initiate a public incident call center. This call center would be designed to process high volumes of calls to the NRC Incident Response Center and help address questions or issues from various agency counterparts, stakeholders, and the general public during NRC response to a nuclear or radiological emergency event.

In summary, taking all the various methods mentioned into consideration, the agency expends substantial efforts accepting and responding to issues from the public. The staff's review found that existing agency practices comprise a reasonably comprehensive range of opportunities for the public to interact with the agency and submit complaints and concerns, which are either initially directed to, or internally redirected to, the appropriate source for review and action. A common theme from the input provided by offices across the agency is that when a member of the public directly contacts the staff member or organization closest to the situation, the agency is generally able to provide more consistent, prompt, and efficient responses to that inquiry.

Practices from Other Organizations

As part of its analysis, staff reached out to several other Federal agencies to gather information on what types of positions exist to assist members of the public with issues. Since agencies' missions and consequently how they interact with the public differ widely, the staff found a variety of practices. Some agencies have highly independent "ombudsman" offices that consist of dozens of full time positions and handle thousands of complaints each year, or "advocate" positions that assist the public in navigating through processes to resolve their complaints. These types of positions tend to have the levels of authority necessary to investigate issues, represent members of the public, or conduct advocacy activities. Agencies that interact directly with the public as part of their primary mission, such as the Internal Revenue Service, or which regulate businesses with a great degree of public interaction, such as the Federal Deposit Insurance Corporation, have more robust organizations and a higher level of dedicated resources out of necessity. Agencies that interact with the general public to a lesser extent have more simple organizations, such as the Department of Justice and the Bureau of Alcohol, Tobacco, Firearms, and Explosives. They might have positions that focus more on supporting the day-to-day operations of the agency, such as a "Community Relations Officer," and some spread public interaction responsibilities out across different groups within their organizations. The staff also noted that some agencies have very detailed and interactive "Contact Us" Web sites, while others have more simple contact listings. In general, there are no standard practices, and agencies create and sustain the level of public interface necessary to handle the number and complexity of complaints and concerns received.

Options for Consideration

Based on analysis of the information described above, the staff developed the following options:

Option 1: Implement enhancements to current framework.

Description: As discussed, the current framework for interacting with the public and accepting and responding to their concerns and complaints appears to be working reasonably effectively and efficiently. This option would further strengthen the current approach by implementing several enhancements:

- a. Web page: Enhance the "Contact Us" Web page on NRC's public Web site to highlight OPA as the main agency point-of-contact for members of the public if they need assistance and are not already aware of appropriate existing agency contacts. In addition, evaluate the "Contact Us" Web page to identify other enhancements to make it more comprehensive and more visible to, informative for, and easy to use by members of the public.
- b. NRC operator: Evaluate the value of providing any additional tools and resources to the NRC operator staff for handling calls from the public who may have concerns or complaints and may not have access to the Web page or otherwise know to contact OPA, and develop those products as needed.

- c. Information sharing: Request that the Communications Council² create opportunities for identifying and sharing good practices and lessons learned across the agency related to accepting and addressing public concerns. Examples of areas that could be shared include relevant training, office-level guidance, and tips and advice for responding to challenging situations.
- d. Collect public views: Over the course of a 6-month period, collect views from the public on the existing opportunities to interact with and to raise concerns and complaints to the agency. This would be done by leveraging planned public meetings and other outreach sessions and solicit input as part of those sessions. The staff would identify the events where there would be diverse participation and opportunity to collect useful input, especially from groups which the agency has not interacted with much in the past. The staff will analyze the results to identify other improvements or changes that could be made to the agency's current approach and practices for accepting and responding to issues from the public.
- e. Leveraging external expertise: Conduct followup with the Environmental Protection Agency (EPA) staff who presented at a Chairman-sponsored internal seminar on July 24, 2014, on the "Superfund Community Involvement Program." Followup activities could include reviewing applicable policies, procedures, tools, and training, and requesting EPA staff to share their experiences, including success stories and lessons learned, for receiving and responding to concerns from the public. Identify useful and relevant resources and insights the NRC can leverage in enhancing its current approach and practices to addressing public inquiries.

Estimated resources needed:

- a. The Office of Information Services (OIS) would be able to make the Web page modification to highlight OPA and conduct the initial Web site evaluation to identify recommended enhancements within the scope of the existing support activities. The level of effort needed to implement additional enhancements would depend on the results of the evaluation and the extent of changes, and OIS would work through normal agency processes to request any additional resources needed.

Additionally, if OPA experiences a significant increase in the number of contacts from the public after the Web page enhancement is made, OPA would evaluate the need to request additional resources to accommodate the increase in workload.

- b. With support from communications experts from other offices, OIS, which implements the NRC operator function, would conduct the evaluation within its existing resources. The level of effort needed to develop any products would depend on results of the evaluation, and OIS would work through normal agency processes to request any additional resources needed.

² The Communications Council is an agencywide group whose purpose is to plan, coordinate, research, and recommend actions toward improving NRC communications.

- c. The information-sharing activity would be conducted as part of the Communications Council's routine business activities and fall within that group's existing scope of responsibilities. If the Communications Council identifies additional resources needed for enhancing any of the agency's current practices, the Council chair would engage the appropriate agency management to evaluate and respond to the need through normal agency processes.
- d. & e. An estimated 0.5 full-time equivalent (FTE) in fiscal year (FY) 2015 would be needed to conduct: (1) the effort to collect public views; (2) the followup with EPA; and (3) overall project management of all these activities under option 1. The Office of the Executive Director for Operations (OEDO) would lead and coordinate with participating offices on these efforts. Any additional resources needed would be determined after completion of the initial evaluations and the effort to collect public views and be evaluated at that point.

Advantages:

- This option would further enhance the current framework for accepting and responding to public concerns and complaints. The enhanced Web site would more clearly highlight OPA as the main point-of-contact for individuals who may not know where to go to raise an issue. This option would leverage existing resources and activities from OPA, OIS, and the Communications Council. The resources needed for the effort to collect public views can be minimized by leveraging existing planned activities.
- The information-sharing activity dovetails with one of the objectives of the Communications Council: to provide a forum for sharing communications-related best practices and lessons learned that add value across the agency. Offices would be able to learn from each other's experiences and potentially share resources.
- The effort to collect public views would allow the agency to gain insights directly from members of the public to inform any further improvements. The followup activity with EPA would allow the agency to learn from the experiences and resources of an organization with extensive experience in conducting public engagement on how they receive and handle concerns and complaints from the public.

Considerations:

- This option does not designate a single point-of-contact to whom the public could turn when raising issues (OPA would, however, continue to serve as a resource for individuals who may not know whom to contact).
- Additional resources would be needed to provide overall project management of the activities and to conduct the effort to collect public views.

Option 2: Create a new position to direct the public to appropriate processes.

Description: The position would serve as an agency point of contact for the general public and public non-governmental organizations for raising complaints and concerns. Once the nature of the topic is understood through initial communications, the staff person in this position would direct individuals to the appropriate processes and person(s) and ensure contact is made. The staff in this position would not conduct followup or track resolution of issues. It is important to emphasize that this position would not replace any of the avenues the public currently uses to communicate with the NRC staff which were discussed previously. Adding another step if individuals already know where to go could create inefficiencies and might be viewed as making the agency less responsive or more bureaucratic to the public than the current approach. This position would serve as a resource for individuals who are uncertain on how to pursue raising their issue.

Estimated resources needed: 0.75 FTE in the first year to establish the position and develop applicable procedures and tools. 0.25 to 0.5 FTE in following years, depending on number of issues received.

Advantages:

- This option would provide a resource to assist members of the public who are unaware of or unable to navigate to the appropriate avenue under the agency's current framework for raising concerns or complaints.
- A new full-time position would not be required; the activities could be performed as collateral duty for existing staff, with appropriate adjustments in priorities and workload.

Considerations:

- Based on input collected from offices as discussed, it is not clear the extent to which an additional position to direct public complaints and concerns would help improve public interactions.
- If the position is not placed in OPA, overlaps with OPA's current role in public interactions would need to be resolved. There could be some confusion, both within the agency and among members of the public, about contacting the person in this position versus contacting other NRC staff directly, which would need to be clarified. If the position is placed in OPA, then OPA would need to clarify roles and responsibilities between the new position and existing staff functions.
- Some users could be unsatisfied with the limited function of the position (i.e., because the person in the position would not perform followup actions or track issues).
- The person in this position would not be able to provide systematic feedback on resolution of issues or indications of public satisfaction with the use of processes.

Option 3: Create a new position to direct the public to appropriate processes and conduct followup.

Description: In addition to the function described in option 2 above, this position would conduct followup tracking on the resolution of complaints and concerns and collect feedback from users. This would help ensure that the individual's issue was properly handled. This would also allow the agency to gain information on views from the public on the effectiveness of various processes in resolving their issues, as well as monitor trends in the types of issues received. In addition, if an individual is not satisfied with the resolution of an issue, the staff in this position could assist in identifying additional processes or alternatives that might be available. As discussed for option 2 above, it is important to emphasize that this position would not replace any of the avenues the public currently uses to communicate with the NRC staff which were discussed previously. This position would serve as a resource for individuals who are uncertain how to pursue raising their issue.

Estimated resources needed: 1.5 FTE in the first year to establish the position and develop applicable procedures and tools. 1+ FTE in following years, depending on number of issues received.

Advantages:

- This option would provide a resource to assist members of the public who are unaware of or unable to navigate to the appropriate avenue under the agency's current framework for raising concerns or complaints.
- This approach would help ensure that complaints and concerns from the public are received and addressed, which could potentially provide a more satisfactory user experience than the other options. Information from tracking and trending the resolution of public complaints and concerns could be used in identifying opportunities for improvements and to inform the proactive development of external communications on emerging topics of interest.
- The agency could consider sharing the tracking/trending data externally to demonstrate its commitment to public engagement and transparency.

Considerations:

- The agency would need to create a new position, as well as new processes for the tracking and trending. This option would add to the workload of staff from other offices in having to provide resolution status and information to the position. Therefore, there could be inefficiencies and indirect burdens created by the addition of more processes and required actions.
- The data collected by the staff in this position would be limited only to those issues that he/she directly receives and refers and not those directly received by other avenues available to the public. Therefore, the information would not be comprehensive.

- This would be the most resource-intensive option. Whether the benefits that could be gained from tracking and trending public concerns and complaints would be worth the additional resources is not clear.

For options 2 and 3, the staff identified 4 potential placement locations in the agency:

Organizational Placement A: OPA

Advantages:

- OPA staff currently serves as the main point-of-contact for the general public, so this placement allows the agency to leverage existing expertise and resources for public interactions. It would also allow close coordination with OPA's other activities aimed at public outreach.
- Many members of the public and the agency staff are already very familiar with OPA's role in public interactions.

Considerations:

- For options 2 and 3, unless additional FTE is provided, OPA will not be able to perform all the functions of the new position with current staff.

Organizational Placement B: OEDO

Advantages:

- The position might be viewed as having greater authority if it is part of the OEDO organization.
- This placement would leverage existing agency expertise and resources in the Communications and Performance Management group.

Considerations:

- Under option 2, for OEDO to perform the functions with existing FTE resources, priorities and workload would need to be reevaluated and adjusted. Some existing activities would need to be shed. For option 3, additional FTE would be needed.

Organizational Placement C: Office of Enforcement (OE)

Advantages:

- This option would leverage existing agency knowledge and resources OE has for responding to public concerns through the Allegation Program.

Considerations:

- Under option 2, for OE to perform the functions with existing FTE resources, priorities and workload would need to be reevaluated and adjusted. Some existing activities would need to be shed. For option 3, additional FTE would be needed.

Organizational Placement D: OIS

Advantages:

- This option would leverage existing agency knowledge and resources OIS has for responding to information requests from the public (e.g., PDR, FOIA staff).

Considerations:

- Under option 2, for OIS to perform the functions with existing FTE resources, priorities and workload would need to be reevaluated and adjusted. Some existing activities would need to be shed. For option 3, additional FTE would be needed.
- OIS staff might not have the same depth of knowledge on some technical and regulatory topics as staff from offices in the other options, which might lead to its needing additional time in making referrals to the appropriate avenues.

Other Considerations

Under options 2 and 3, if a new position is to be created, the Commission direction requested several other factors be considered. These include:

- Title: The title should clearly convey the purpose of the position. As discussed in the earlier section on practices at other agencies, terms such as “ombudsman” and “advocate” have certain connotations regarding their scope of responsibility. Since the role of this new position, under both options 2 and 3, would be limited to directing concerns and not performing investigations or resolution of concerns, the title should be accurate in conveying this more narrow scope. Suggested titles include “Public Concerns Contact” and “Public Concerns Coordinator.”

- Appointment authority: Appointing authority would rest with the director of the office in which the position is placed, except if the position is in OPA, in which case the Chairman would be the appointing authority. If the position is in OEDO, either the EDO or a Deputy EDO could be the appointing authority. The position can be managed at a lower level in the organization, as long as it maintains close communications with senior managers when needed, so they can quickly engage when warranted.
- Degree of authority: This position should be afforded the authority to interact directly with the public in receiving the concern or complaint and directing them to the appropriate avenue, as well as the ability to interact directly with senior management of other offices when needed (see next section). In addition, under option 3, this position should be provided the authority to directly request information for tracking of and followup on issues from other offices. Under either option, this position does not need to be independent from the line organization, because the position would not have an oversight or processing function.
- Access to and interface with senior management: This position would have access to the appropriate program/office contact or to senior management as needed to assist with referring a concern or complaint. In addition, under option 3, this position would provide periodic reports or briefings to senior managers on trends in issues being received.
- Interface with other offices: This position would need to work closely with contacts and organizations throughout the agency that have responsibility for resolving concerns and complaints, including the OIG if appropriate. As discussed in the position descriptions, this position would refer concerns and complaints received to the appropriate avenues in the agency for addressing them, and therefore would need to maintain close contact and coordination with other offices. Under option 3, this position would also track issues referred to other offices and would need to request information on resolution of issues from them. As described, this position would not replace any existing communications channels with the public or external groups that offices throughout the agency currently maintain, including those specifically mentioned in the SRM tasking (e.g., the OIG, the Office of the General Counsel (OGC), OPA, the Office of Congressional Affairs, the Office of International Programs, and the Atomic Safety and Licensing Board).
- Legal considerations: Particularly with regard to option 3, the incumbent in this new position would need to ensure that he or she does not hamper or interfere with the timely administration of processes that have time limits prescribed by statute or regulation, such as 2.206 petitions, requests made under FOIA or the Privacy Act, claims under the Federal Tort Claims Act, and certain programs under the jurisdiction of the Office of

Small Business and Civil Rights. A position that directs members of the public to the appropriate staff or organization (as contemplated in option 2) would be unlikely to have any adverse impact on such processes; however, the more involved the position is with handling and followup, the greater the concern that such a function may slow down well-established processes. This is of particular concern with FOIA requests, which have very tight deadlines. In addition, creation of the position or articulation of its duties must not create the impression that the position will interfere in any way with the authority of the OIG to receive and investigate complaints about matters within its jurisdiction. With regard to organizational placement, none of the options presented are legally objectionable and the OGC agrees with the staff's assessment of the relative advantages of each proposal.

- Comments from OIG: The staff contacted the OIG for its views on the options presented in this paper. The OIG is concerned that options 2 and 3 could have a chilling effect on matters within its purview, particularly whistleblower complaints, or be viewed as interfering with communications intended for OIG.

RECOMMENDATION:

Based on its analysis, the staff recommends option 1. As discussed, the current framework for accepting and responding to concerns and complaints from the public is working reasonably, effectively, and efficiently. Proceeding with option 1 would provide for enhancements to the agency's current approach while leveraging several existing resources. In addition, the legal considerations and OIG's concerns that would need to be addressed for options 2 and 3 would not apply to option 1. If approved by the Commission, the staff can provide an update to the Commission through a Commissioner Assistants' note once the initial evaluation activities and the effort to collect public views are completed, and next steps have been determined.

RESOURCES:

If the Commission approves the staff's recommendation, 0.5 FTE will be provided to OEDO in the Policy Support Product Line by reallocating resources in the FY 2015 Current Estimate. Other activities will be accomplished using resources included in the FY 2015 budget request. If additional resources are needed in FY 2016 or beyond, the staff will address those needs through the Planning, Budgeting, and Performance Management Process.

COORDINATION:

OGC has reviewed this paper and has no legal objection. The Office of the Chief Financial Officer has reviewed this paper for resource implications and has no objection.

/RA/

Mark A. Satorius
Executive Director
for Operations

Enclosure:
Appendix A, Avenues for Receiving Public
Concerns and Complaints at NRC

COORDINATION:

OGC has reviewed this paper and has no legal objection. The Office of the Chief Financial Officer has reviewed this paper for resource implications and has no objection.

/RA/

Mark A. Satorius
Executive Director
for Operations

Enclosure:

Appendix A, Avenues for Receiving Public
Concerns and Complaints at NRC

SRM-CMAMM-14-003-3

ADAMS Accession No.: ML14209A190

*concurrence by e-mail

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