



Organization of Agreement States

Robert Quillin, Chair
Richard A. Ratliff, P.E., Past Chair

Roland Fletcher, Chair-Elect
Thomas Hill, Secretary

October 21, 1996

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sirs:

As you know, there are currently 29 states that have entered agreements with the NRC under Section 274 of the Atomic Energy Act of 1954. The agreement state program is an excellent example of the ability of states to conduct regulatory programs in an effective and efficient manner. The Organization of Agreement States (OAS) provides a vehicle for Agreement States to interact on common issues that affect individual states or all 29 Agreement States.

The OAS has received comments from individual Agreement States on the Direction Setting Issue Papers issued as part of the NRC's Strategic Assessment of Regulatory Activities. These comments have been summarized for each of the Direction Setting Issue Papers and are attached for consideration in this matter. Many of the individual Agreement States will provide state specific comments as well.

If you have any questions, please contact me.

Sincerely,

Robert Quillin, Chair
Organization of Agreement States
Radiation Control Division
Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Organization of Agreement States

Comments on

U.S. NRC Strategic Assessment and Rebaselining Initiative

Direction Setting Issue Paper #14 "Public Communication Initiatives"

What approach should the NRC take to optimize its communication with the public?

Direction Setting Issue Paper #14, "Public Communications Initiatives," (DSI #14) addresses solid concerns regarding the need to communicate with the public in an effective and timely manner. I cannot, however, agree with the Commission's Preliminary Views that Option 2 alone is the best approach in dealing with public communications.

The approach that would best optimize NRC's communication with the public would be a combination of Options 2 and 3.

Option 2 is directed towards helping NRC make informed decisions that are accepted by the public, whereas Option 3 increases efforts to inform the general public and media about NRC. By combining both, there is flexibility to identify and address public concerns, offer diverse public outreach activities and publications that the general public and media need to know, and offer the facilitated meetings, electronic conferences and video conferences necessary to provide the information that licensees and the Agreement States demand and the public and media are interested in.

The content of any information disseminated by NRC should be beneficial to all parties. Combining Option 2 and 3 -- to anticipate, involve and conduct general public outreach -- NRC will have an interactive approach that helps participants understand each other's views and helps NRC progress towards informed decisions; and at the same time will provide information to the public that helps them understand the regulatory process and NRC decisions.

NRC will have to work out who will plan and manage the program and be responsible for dissemination of information, but overall, this could also be a combination of different areas, depending on what medium is used.

A variety of performance measurement tools could be used, based on the type of information that is disseminated and the overall goals of the program.

There are valuable positive aspects to each option and combining the strong points in each would create an overall program that would supply timely information, help NRC make informed decisions, aide in changing the public's perception of NRC, offer different media that address a wide spectrum of resources, and address the needs of their licensees, the Agreement States, the general public and the media.

DIRECTION SETTING ISSUE 14

"PUBLIC COMMUNICATION INITIATIVES"

Issue

What approach should NRC take to optimize its communication with the public?

Preferred Option(s)

Option 2 -- Public concerns must be identified and addressed as early in the process as possible. Agreement states have repeatedly asked the NRC for the opportunity to provide early and substantive input into rules and policies being developed by the NRC that have impacts on Agreement States. This option, giving priority to early identification of public concerns, appears to address some of the concerns raised by the Agreement States. Agreement States, representing regulatory authorities equivalent to the NRC, can use their experience and expertise to contribute toward identification and resolution of issues and help identify otherwise unforeseen impacts. The NRC's recent expansion of documents available electronically on various NRC home pages has been most welcome. Continued electronic access to correspondence, rule proposals, and sealed source and device evaluations has eliminated some routine calls to NRC to obtain information and copies of documents. We agree with the suggestion to consider other interactive technologies such as video conferences and electronic meetings; however, the NRC must keep in mind that not all affected and/or interested people will have access to these technologies and continue to consider alternative methods of participation.

Option 3 -- The public feels that "government" has failed to provide true and accurate information regarding nuclear power, radiation, radioactive materials, and both high and low level wastes. Therefore many in the public do not believe, trust, or respect government regulators, including those in the NRC. The NRC needs to get out there and be proactive in the "education" arena. NRC cannot leave it to the industry and professional groups to get the message out to the public. This outreach needs to be directed to traditional arenas such as schools, community meetings, and legislative hearings as well as the "newer electronic methods".



DSI-14 (3)

NRC STRATEGIC ASSESSMENT AND REBASELINING INITIATIVE

DIRECTION SETTING ISSUE COMMENT FORM

NAME Richard Ratliff

PHONE NO. (512) 834-6688

AFFILIATION Org. of Agreement States

PLEASE CHECK ONLY ONE:

- ☐ DSI 2 - Oversight of the Department of Energy
- ☐ DSI 4 - NRC's Relationship with Agreement States
- ☐ DSI 5 - Low-Level Waste
- ☐ DSI 6 - High-Level Waste
- ☐ DSI 7 - Materials/Medical Oversight
- ☐ DSI 9 - Decommissioning - Non Reactor Facilities
- ☐ DSI 10 - Reactor Licensing for Future Applicants
- ☐ DSI 11 - Operating Reactor Program Oversight
- ☐ DSI 12 - Risk-Informed, Performance-Based Regulation

- ☒ DSI 13 - Role of Industry
- ☐ DSI 14 - Public Communication Initiatives
- ☐ DSI 20 - International Activities
- ☐ DSI 21 - Fees
- ☐ DSI 22 - Research
- ☐ DSI 23 - Enhancing Regulatory Excellence
- ☐ DSI 24 - Power Reactor Decommissioning
- ☐ General

COMMENT:

Attached

300030



DSI 13