

DSI-23

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**From:** Roxanne Summers  
**To:** TWP5.SECY  
**Date:** 11/13/96 5:32pm  
**Subject:** Comments on Direction-Setting Issue Papers

Thank you for providing an opportunity to comment on the Direction-Setting Issue Papers. The attached file contains comments on Direction-Setting Issue Paper #23: Enhancing Regulatory Excellence. These comments are provided by the Subcommittee on Managing Diversity, one of the three subcommittees established by the Equal Employment Opportunity Advisory Committees, with the participation of the Office of Personnel and the Office of Small Business and Civil Rights. Please contact Roxanne Summers (RGS1) or Peter Bloch (PBB) if there is a need for further information concerning these comments.

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COMMENTS ON DSI 23  
SUBCOMMITTEE ON MANAGING DIVERSITY

The Subcommittee on Managing Diversity is one of the three Subcommittees created by all the Equal Employment Opportunity Advisory Committees, with the participation of the Office of Personnel and the Office of Small Business and Civil Rights. The members of the Subcommittee wish to make the following comments on Direction-Setting Issue 23:

Background

The Strategic Assessment and Rebaselining initiative asks stakeholders to identify what, if any, important considerations may have been omitted from the issue papers, and to comment on the accuracy of the assumptions on which the issue papers are based.

Direction-Setting Issue (DSI) 23 is entitled "Enhancing Regulatory Excellence." It mentions the need to develop "an NRC organizational culture insisting on excellence in staff activities affecting regulatory oversight." Option 2 states that, if adopted, it is "expected to instill, down through NRC's organizational levels, a culture that strives for enhancing regulatory excellence and management and support function excellence, even as ongoing initiatives aimed at organizational streamlining, improving efficiency, and reducing regulatory burden are implemented." It further states that if Option 2 were adopted, "A culture that pursues regulatory excellence would be promoted and instilled at all NRC organizational levels..."

Comments and Recommendations

1. In the above description, the possible need for change in the organizational culture is mentioned several times. While there is extensive discussion of the technical areas where regulatory excellence could be improved, however, there is no discussion of specific areas where the current organizational culture could be changed, nor is there a recommendation to study the current culture.
2. The Commission's Preliminary Views state that strategies designed to improve the way the NRC does its job should include "measures to engage the work force at the grassroots level and to stimulate management and employee communications in problem solving." The Subcommittee agrees and believes changes to the organizational culture are warranted. However, it does not have the resources to review the organizational culture of the agency in depth and recommend improvements. Nor would this be effective, as such changes can only be brought about through total commitment from the highest levels of management.
3. We recommend, therefore, that the agency undertake a thorough, top-down review of its organizational culture, with the intent of defining the prevailing culture and recommending changes, given the effects of streamlining, etc. mentioned above, and the increasingly diverse nature of the NRC workforce. The commitment to understanding the current culture and making whatever changes are necessary should be clearly stated in the Commission's recommendations to the staff in DSI 23, so that it becomes a basic tenet of the strategic planning exercise.
4. The Subcommittee will continue its research in these areas in order to assist the agency to achieve the goals described in DSI 23.