



Graded Approach in Communication and Consultation

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Stakeholders:

- The general public
- National government
- State or provincial government
- Local government
- Licensees
- Nuclear industry
- International counterparts
- Media
- Radiation workers
- Activist groups
- Civic groups

Communication

Communication Tools:

- Press releases
- Social media
- News media (newspapers, television, radio)
- Internet
- Public meetings
- Inspection reports
- Documents for public comment
- Community outreach
- Information seminars or conferences
- Regulator generic communications



Communication

Communicating with Stakeholders on Licensee Performance - Annual local public meetings for all reactor licensees to discuss performance

Step 1: Identify Stakeholder Involvement

- The purpose of these annual meetings is to meet with the public to discuss licensee operating performance during previous year.
- Public
- Licensee
- Media
- Local government officials
- Activists

Step 2: Determine which factors are applicable

- Public interest (historical and current)- primary factor
- Operating performance – if notably declining, interest increases
- Perceived safety significance of any recent events
- Timeliness – confidence in regulator

Communication

Step 3: Integrate the applicable factors into the decision-making process (determine appropriate communications tools, who delivers message, and timing)

- IMC 0305, “Operating Reactors Assessment Program,” describes graded approach for annual perf. meetings.
- Communication activities are dictated by the Action Matrix.

Action Matrix

		Licensee Response Column (Column 1)	Regulatory Response Column (Column 2)	Degraded Performance Column (Column 3)	Multiple/Repetitive Degraded Cornerstone Column (Column 4)	Unacceptable Performance Column (Column 5)	IMC 0350 Process ¹
RESULTS		All assessment inputs (performance indicators and inspection findings) green; Cornerstone objectives fully met	One or Two white inputs in a strategic performance area; Cornerstone objectives met with minimal degradation in safety performance	One degraded cornerstone (3 white inputs or 1 yellow input), or Any 3 white inputs in a strategic performance area; Cornerstone objectives met with moderate degradation in safety performance	Repetitive degraded cornerstone, Multiple degraded cornerstones, Multiple yellow inputs, or One red input; Cornerstone objectives met with longstanding issues or significant degradation in safety performance	Overall unacceptable performance; Plants not permitted to operate within this band; Unacceptable margin to safety	Plants in a shutdown condition with performance problems are placed in the IMC 0350 process
RESPONSE	Regulatory Performance Meeting	None	Branch Chief or Division Director meets with licensee	Regional Administrator or designee meets with senior licensee management	EDO/DEDO or designee meets with senior licensee management	EDO/DEDO or designee meets with senior licensee management	RA/EDO or designee meets with senior licensee management
	Licensee Action	Licensee corrective action	Licensee root cause evaluation and corrective action with NRC oversight	Licensee cumulative root cause evaluation with NRC oversight	Licensee performance improvement plan with NRC oversight		Licensee performance improvement & restart plan with NRC oversight
	NRC Inspection	Risk-informed baseline inspection program	Baseline and supplemental inspection (IP 95001)	Baseline and supplemental inspection (IP 95002)	Baseline and supplemental inspection (IP 95003)		Baseline and supplemental as practicable; Special inspections per restart checklist
	Regulatory Actions ²	None	Supplemental inspection only	Supplemental inspection only; Plant discussed at AARM if conditions met	10 CFR 2.204 DFI; 10 CFR 50.54(f) letter; CAL/Order; Plant Discussed at AARM	Order to modify, suspend, or revoke license; Plant discussed at AARM	CAL/Order requiring NRC approval for restart; Plant discussed at AARM
COMMUNICATION	Assessment Letters	Branch Chief or Division Director reviews and signs assessment letter w/ inspection plan	Division Director reviews/signs assessment letter w/ inspection plan	Regional Administrator reviews/signs assessment letter w/ inspection plan	Regional Administrator reviews/signs assessment letter w/ inspection plan		N/A. RA or 0350 Panel Chairman review/ sign 0350-related correspondence
	Annual Involvement of Public Stakeholders	Various public stakeholder options involving the senior resident inspector or Branch Chief	Various public stakeholder options involving the BC or DD	Regional Administrator or designee discusses performance with senior licensee management	EDO/DEDO or designee discuss performance with senior licensee management		N/A. 0350 Panel Chairman conducts periodic public status meetings
	External Stakeholders ³	None	State Governors	State Governors, DHS, Congress	State Governors, DHS, Congress	State Governors, DHS, Congress	
	Commission Involvement	None	None	Possible Commission meeting if licensee remains for 3 years	Commission meeting with senior licensee management within 6 months. ⁴	Commission meeting with senior licensee management	Commission meetings as requested; Restart approval in some cases.
	INCREASING SAFETY SIGNIFICANCE →						

Tools (type of public meeting)

- Formal public meeting with licensee
- Open house
- Poster board session
- Round-table meeting
- Webinar

Communication

The most appropriate meeting type will be determined by consensus at the annual internal end-of-cycle assessment meeting. The primary consideration will be historical public interest. Where interest is low, the meeting will generally be informal. Where interest is high, a more formal meeting will be held, with possible use of facilitators.

Communication

Second most important factor is licensee performance. Guidance specifies that more formal public meetings should be considered for licensees in Columns 3 or 4 of the Action Matrix.

Who delivers the message:

- Action Matrix dictates level of regulator management involvement. The further to the right in the Matrix (declining performance), the higher level of management is expected to be present.

Timing:

- IMC 0305 provides guidance on timing of annual public meetings.
 - Column 1 or 2 plants – anytime during the year to get greatest public participation
 - Column 3 or 4 plants – meeting should be held within 16 weeks of the end of the assessment period. Higher stakeholder interest expected due to declining performance.



Questions