

MEMORANDUM TO: Samuel J. Collins, Director
Office of Nuclear Reactor Regulations

FROM: Bruce A. Boger, Director
Division of Inspection Program Management

SUBJECT: N+1 COMMUNICATION PLAN

As requested by the Commission in a staff requirements memorandum (SRM) dated January 11, 2000, this memorandum forwards the staff's communication plan on the change to the N+1 resident inspector staffing policy (attached).

Attachment: As stated

cc: W. Travers, EDO
L. E. Portner, OCA
P. H. Lohaus, OSP
H. J. Miller, R-I
L. A. Reyes, R-II
J. E. Dyer, R-III
E. W. Merschoff, R-IV
W. M. Beecher, OPA

CONTACT: James A. Isom, NRR/DIPM
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C = COVER

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Attachment

COMMUNICATION PLAN FOR THE CHANGE IN THE N+1 RESIDENT INSPECTOR STAFFING POLICY

I. General Overview:

The Commission has approved a revision to the resident inspector staffing policy to require two resident inspectors at single and dual unit sites and three resident inspectors at triple unit sites. The staff requirements memorandum (SRM), dated January 11, 2000, will permit the agency to make more effective use of its resources by eliminating a staffing requirement adopted in 1988.

The 1988 policy required one more resident inspector at a site (N+1) than the number of reactors at that site. At the time, the N+1 policy placed agency inspection resources where they were needed to address operational events that occurred at nuclear power plants. During the past decade, nuclear industry safety performance has steadily improved. These improvements are among the factors which prompted the Agency to revise its reactor oversight process. The regional administrators (RAs), in consultation with Office of Nuclear Reactor Regulation (NRR), will retain the flexibility to adjust the number of resident inspectors assigned to a site upward if the circumstances warrant.

This communication plan is designed to assist the staff in communicating this change in policy.

II. Objectives:

- Provide accurate and timely information
- Create accurate stakeholder understanding
- Deal with negative perceptions, dispel rumors, and reduce uncertainty

III. Message Development:

- Distribute information about the change to the resident inspector staffing policy to appropriate stakeholders
- Provide consistent messages by various communicators outlined in the communication plan process
- Provide factual, unbiased, and balanced messages
- Distribute the message to internal stakeholders
- Encourage feedback to management by all levels

IV. Key Policy Messages:

Maintain Safety and Increase Public Confidence by ensuring that the stakeholders understand that a change in the N+1 policy will not in and of itself result in a reduction of inspection resources and represents a greater focus on safety by enhancing NRC's ability to allocate resources (increased flexibility) on the basis of licensee performance. It is important to communicate to the stakeholders that any changes in inspection resources will be determined by the Agency's new reactor oversight process and not by the change in the N+1 policy.

Attachment

- **The change in the N+1 staffing policy should not directly result in a diminution in the overall inspection resources or the agency's ability to complete planned inspection program requirements.** First, we need to emphasize that we will not reduce our inspection resources (staff) by the change to the current N+1 policy. During this interim period, when the N+1 vacancies are not re-filled, the resources associated with these vacancies will be retained and remain in the inspection program. These N+1 resources would be transferred to the regional office where they are available to support inspections conducted by the Division of Reactor Projects or Reactor Safety. The resident inspectors may need to receive specialized or refresher training because these inspections may be different than the type of inspections typically performed by the resident inspectors. In the event the resident inspectors transfer out of the region or leave the agency, the vacancies may be filled with individuals new to the agency or new to the resident inspector program. In the latter situation, the individual will require training in order to become a qualified inspector.

Second, it is important to emphasize that the staff will continue to complete planned inspection program requirements at all sites. Therefore, changing the geographical location of the inspectors will not impact the level of inspection required to fully complete the inspection program requirements. The magnitude of inspection effort is determined by the inspection program and the performance of the plant.

There will be some reduction in the total number of hours charged by the resident inspector staff at the vacated N+1 sites. Regional inspectors will continue to supplement resident inspectors in key areas. Since the resources associated with this change in policy will stay in the reactor inspection program, the regions retain the flexibility to apply inspection effort within the region or to provide assistance to other regions.

Last, the agency's adjustment of the N+1 policy is consistent with our past philosophy of directing the inspection resources where they are needed the most. The current inspection program and the revised reactor oversight process provide for making such adjustments of the inspection effort based on plant performance. Under the revised reactor oversight process, the resources required to complete the inspection program will be determined by the agency after the new oversight program has been implemented at all reactor sites for one year.

- **The Regional Administrators (RAs), in consultation with NRR, will retain the flexibility to adjust the number of resident inspectors assigned to a site upward if the circumstances warrant.** The agency will still retain the ability to place extra inspectors at a site. Examples of circumstances which may warrant such staffing would be due to a significant decline in a licensee's safety performance or substantial design differences between units located at a single site. The RA will retain the flexibility to permanently or temporarily supplement inspection resources where they are needed the most.

- **Management should provide heightened oversight of staffing at sites where the number of resident inspectors assigned is N. The number of resident inspectors at any given site will not be reduced to less than two individuals.** Regional management needs to be sensitive to the availability and qualification of onsite staff at multi-unit sites where the number of residents at the site has changed to “N.” Regional management will ensure that temporary situations which result in less than “N” resident inspectors at the site are identified and receive prompt management attention to prevent adverse impact on implementation of the event response and inspection program. The program office (NRR) will monitor implementation of the resident staffing policy and support regional management in achieving desired outcomes.
- **The staff will not direct reassignment of any resident inspector solely to achieve N resident staffing at dual or triple unit sites.** It is premature to reassign resident inspectors until guidance is developed as a result of the broader resource review associated with the revised reactor oversight process. Therefore, the change in N+1 policy only affects those sites where an inspector position becomes vacant until the resource review is completed in June 2001.

Additionally, we should communicate the effect caused by the change to our N+1 policy on the agency’s four cornerstones:

- **Maintenance of Safety.** The change to the N+1 policy will not have an adverse effect on the maintenance of safety because this policy revision will not directly result in a reduction in the inspection resources. Onsite inspection resources will be supplemented if needed.
- **Improving Effectiveness and Efficiency.** The change to the N+1 policy will improve the effectiveness and efficiency of the agency by allowing the RAs the flexibility to appropriately allocate inspection resources where they are needed based on plant performance.
- **Reducing Unnecessary Burden.** This policy will minimize situations where inspections are conducted purely because of staff geographical location rather than based on plant performance.
- **Enhancing Public Confidence.** By effectively communicating with our stakeholders and our staff regarding the proposed resident inspector staffing policy change and its basis, we can address the issue of public confidence. We must make it clear to our stakeholders and staff that the policy revision will not directly result in a reduction of inspection resources, will enhance our ability to allocate resources on the basis of licensee performance, and in no way represents a reduction to our commitment to safety.

V. Stakeholders Identified:

Internal	External
Regional Management (RAs; Division of Reactor Projects (DRP) Directors; Branch Chiefs)	Congress, State Officials
Resident Inspectors; Regional Inspectors	Public, Press, Special Interest Groups, Industry Groups (Nuclear Energy Institute) licensees

VI. Stakeholder Communication Issues:

Internal Stakeholders: To keep NRC employees informed of current program activities, help make the process of change/transition run smoother, seek and respond to comments/ideas of employees to improve the process, to reduce common fears among staff which arise during any period of change.

External Stakeholders: To keep public, industry and interest groups informed of current program activities, enhance their understanding of technical and policy issues, seek and respond to comments/ideas of various groups in order to improve the processes. To address perception that NRC may be reducing its focus on nuclear plant safety.

VII. Communication/Communication Paths:

Role of Regional Management:

It is important to communicate to the resident inspectors the change in the N+1 policy. Senior management in the Regions should communicate personally with the resident inspectors affected by the change in the policy and reassure them that no resident inspector will be reassigned solely to achieve N resident staffing levels. Additionally, background on the basis for this policy change should be explained. Use of the commission paper (SECY 99-227), the Staff Requirements Memo, and the recently issued reactor inspection program newsletter are good references to assist in this endeavor. Emphasis should be placed on maintaining safety through implementation of the inspection program.

First level supervisors are key in supporting a major policy change. They have a direct role in communicating to their staff information about changes which will be taking place within the agency. First level supervisors maintain close contact with employees and are respected by them, hence, it is considered important to have the supervisors actively involved in and supporting the change. The regions should assure first level supervisors are knowledgeable about the policy change and provide them with information which they may pass on to their subordinates.

Role of Program Branch

Inspection Program Branch (IIPB) will ensure that consistent messages are sent to both internal and external stakeholders through this communication plan. IIPB plans to raise this policy change with the Agency Labor-Management Partnership Committee (ALMPC) to enhance the communication with all NRC staff. IIPB will monitor the implementation of the revised resident inspector staffing policy by the Regional Offices. The program office will also obtain regional feedback on the change to the policy during routine conference calls with the Regions. IIPB has issued an article concerning the staff's proposal to the Commissioners on the change to the N+1 policy in the December 1999 issue (99-02) of the Reactor Inspection Program Newsletter and will consider future articles as appropriate.

Internal Stakeholder Meetings:

Each Region holds several inspector "counterpart" meetings during the year. IIPB management will provide assistance to the Regions, if requested, to explain the basis for the policy change. During visits to regional offices IIPB will assist regional management in transmitting key messages, update staff on current N+1 vacancies, and solicit input from field inspectors and Regional staff.

Working with External Stakeholders:

Our stakeholders in Congress will be informed of this policy change via routine monthly correspondence. This activity will be conducted through the Office of Congressional Affairs (OCA). OCA will reemphasize the fact that the change in the N+1 policy will not directly result in the reduction of the overall inspection resources or the agency's ability to complete planned inspection program requirements. Further, OCA will inform our Congressional stakeholders that a recommendation on inspection staffing will be provided to the Commission in June 2001 as part of the report on full implementation of the revised reactor oversight program. The report will include recommendations on how those resources will best be allocated among headquarters, the regions, and the sites. The program office will interface with OCA to ensure this message is communicated.

Office of State Programs (OSP) also will work closely with the state representatives to ensure that they communicate this message to our stakeholders in the various states. Office of Public Affairs (OPA) will not issue a press release until OSP has communicated with the states.

As a result of the process utilized in revising the reactor oversight process, the agency has developed positive and long term relationships with external stakeholder groups. Among these are NEI, and various public interest groups. IIPB will discuss the change in the N+1 policy during periodic public meetings with these external stakeholders.

Electronic Communication:

We will place the press release, the SRM and the SECY on the WEB to provide information to both internal and external stakeholders.

The following contains a schedule of planned activities.

SEQUENCE OF EVENTS FOR N+1 COMMUNICATION PLAN

S E Q U E N C E	DATE:	PROPOSED ACTIONS:
1	1/20	Conduct video conference with RAs Responsible Organization/Person <i>DEDR/ F. Miraglia</i>
2	1/20-27	RAs contact RIs to discuss change in N+1 policy Responsible Organization/Person <i>Regions I-IV - Senior Regional Management</i>
3	1/28	Chairman Meserve approve Press Release Responsible Organization/Person <i>OPA/ V. Dricks</i>
4	1/27	Complete Communication Plan and provide copy to the Commission Responsible Organization/Person <i>NRR - J. Johnson / OEDO - D. Lange</i>
5	1/28 9:00- 11:00 am	OCA contact appropriate members of Congress and provide "advance copy" of the press release and additional information if Congressional Office is interested. Responsible Organization/Person <i>OCA - L. Portner</i>

		<p>OSP contact state organizations for those states where the change in policy will impact the number of onsite inspectors</p> <p>Responsible Organization/Person <i>OSP - P. Lohaus and Regional State Liaison Representatives</i></p>
	1/28 12:00 pm	<p>Issue Press Release/ contact SECY to make SRM/Comm paper public/post on the web.</p> <p>Responsible Organization/Person <i>OPA - V. Dricks /OEDO - D. Lange</i></p>
6	1/31	Regional notification of licensees
7	1/31	<p>Include discussion on N+1 policy in the cover letter of the next Congressional report</p> <p>Responsible Organization/Person NRR- W. Dean/OEDO - M. Satorius</p>

February - May 2000

- IIPB/NRR representatives discuss change in N+1 policy at upcoming resident inspector counterpart meetings as necessary.
- Monthly report to Congressional oversight including policy change message.
- Discuss with external stakeholders at pertinent interface meetings.