

UNION OF
CONCERNED
SCIENTISTS

January 14, 2000

Chairman Richard Meserve
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: NRC EVALUATION TOOL

Dear Chairman Meserve:

During my fourteen years working as a consultant in the nuclear industry prior to joining UCS, I had assignments at top-ranked nuclear utilities and also at utilities with plants on the NRC's Watch List. This experience leads me to conclude that the difference between a top-performing plant and a troubled plant is not its people, its vendor, or even its age – the difference is primarily a reflection of management effectiveness.

In NRC Stakeholder meetings before you became Chairman and in testimony before the US Senate, I expressed my opinion that the NRC's management effectiveness reminded me more of a troubled plant than of a superior plant. In private meetings with Commissioners McGaffigan and Merrifield, I elaborated on my views.

At this week's NRC workshop on the revised reactor oversight process, I was reminded of an evaluation tool used by Mr. Bruce Kenyon when he was brought in by Northeast Utilities for the Millstone recovery effort. Mr. Kenyon instituted a management evaluation process he had used successfully at South Carolina Electric and Gas for the Summer nuclear plant.

This process, as described beginning on page 36 of the transcript of the January 30, 1997, Commission briefing on Millstone, featured employees rating their immediate supervisors in 26 or 28 areas. Mr. Kenyon explained that NU used the results of these surveys to make decisions about supervisors, including those needing training in weak areas and those needing reassignment. This process also clearly communicated management expectations regarding key performance attributes to supervisors.

The UCS uses a comparable process. For example, I report to Alan Noguee, UCS's Director – Energy Programs. Each year, I am contacted by Alan's boss and asked questions about his leadership abilities. Alan's other direct reports are also polled. In addition to using this process to help individual supervisors improve weak areas, we have also identified common leadership problem areas that we addressed by consultant training during staff retreats.

The NRC Office of the Inspector General conducted a survey about 18 months ago of the NRC culture. The survey suggested a gap between NRC management and staff regarding the agency's ability to reach identified objectives.

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The supervisor assessment process described by Mr. Kenyon might be useful at the NRC. In addition to the benefits realized by NBU at Millstone and by UCS using a similar process, the NRC's use of this process might facilitate the ongoing changes associated with reorganization, downsizing, and program revisions.

I am providing this information on the supervisor assessment process for your consideration. This process has helped UCS and nuclear utilities and may contain comparable benefits for the NRC. I am told that the NRC does not currently have such a process.

Sincerely,

A handwritten signature in black ink that reads "David A. Lochbaum". The signature is written in a cursive, flowing style.

David A. Lochbaum
Nuclear Safety Engineer
Union of Concerned Scientists