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Secretary,
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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ATTN: Rulemakings and Adjudication Staff

RE: Comments on Proposed Changes to Open Meetings Policy (65 FR 3982)

NRC published in the Federal Register of January 25, 2000, (65 FR 3982) a proposed change to the Commission's open meetings policy. The proposed change would discontinue use of the electronic bulletin board and telephone recording as means of providing notice of open staff meetings. (Posting of paper copies in the public document room and collection of notices in the Weekly Compilation of Press Releases would also be eliminated). In their stead, reliance would be placed on the NRC web site as the official vehicle for public notice of staff meetings. Comments were solicited on these changes.

Licensing Support Services (LSS) is a consulting company providing advice and assistance to NRC licensees. We regularly attend open staff meetings, and rely on the web site for information regarding those meetings. LSS strongly supports the proposal to use the web site as the principal vehicle for noticing open staff meetings. LSS agrees that discontinuing the other means currently used to notice these meetings should result in little or no inconvenience to members of the public.

Our experience with the NRC web site leads us to conclude that improvements can be made in how the web site is used. LSS considers that the change to principal reliance on the web site makes it more important that improvements be implemented. Provided below are specific comments regarding changes/improvements that should be made. It is not necessary that the policy statement include this information. Rather, they represent management practices that should be implemented and documented in internal NRC guidance as appropriate.

1. More detail should be provided regarding the expected content of a meeting. The database supporting the web site currently allows for a limited number of characters in the description of meeting purpose. The result is that some notices say little more than "to discuss licensing issues". The same advances in computer storage capacity that allow eliminating the limitation on posting notices for meetings more than 60 days in advance should also allow this data field to be increased in size. It would be most useful if meeting agendas were included in most notices posted on the web.
2. Meetings should be posted individually. It should be unacceptable to post a single notice for a series of meetings to be held over an extended period (e.g., weekly meetings over a

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period of several months). This is related to comment 1. A notice addressing a series of meetings is very unlikely to be able to provide enough detail about the content of an individual meeting in the series for the public to make a meaningful decision about whether or not to attend.

3. Meetings that are posted with less than 10 days notice should be highlighted in some fashion, such as by use of color within the posted notice. LSS recognizes that there can be times in which a meeting must be held on less than 10 days notice, for reasons such as those described in the Federal Register notice. Those same reasons are likely to make these meetings of more importance for public observers.
4. Notices for meetings that are canceled should be annotated to show the cancellation as quickly as possible. Current practice is to insert the word "canceled", in bold, in the date field. This practice is quite effective, but the annotation is not always timely.

LSS appreciates the opportunity to comment on the proposed change to NRC's meeting notice policy. If there are any questions, please feel free to contact me at 703-671-9738.

Sincerely,

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