POLICY ISSUE (NEGATIVE CONSENT)

July 25, 2001

SECY-01-0137

FOR: The Commissioners

FROM: William D. Travers Executive Director for Operations

SUBJECT: ENHANCING PUBLIC PARTICIPATION IN NRC MEETINGS

PURPOSE:

The purpose of this paper is to inform the Commission about staff actions to be taken in response to the Staff Requirements Memorandum (SRM) of January 17, 2001, which directed the staff to examine the agency's policy on public meetings and procedures to determine if revisions are needed. Staff also requests Commission approval, by negative consent, of the actions proposed in this paper.

In the SRM, the staff was asked to consider, as a minimum, issues and resources related to the following:

- 1. Providing all attendees with the opportunity to ask a question or express their views on the topic of the meeting before the meeting adjourns;
- 2. Providing all stakeholders with timely responses to their questions and comments raised during public meetings;
- 3. Providing timely, clear and complete notifications and summaries or transcripts of meetings;
- 4. Providing an opportunity for people to listen and participate by telephone in public meetings, when requested and feasible; and
- 5. Providing access to documents being discussed at the meeting prior to or during the meeting.

This paper also informs the Commission of staff progress related to other suggestions from the public on ways to enhance NRC's methods of providing public interaction and participation in its meetings. For the purpose of this paper, public participation is defined as the opportunity for the public to provide input and comment, ask questions and receive answers to such questions at an NRC staff-sponsored public meeting.

Contact: Mindy Landau, OEDO (301)415-8703

BACKGROUND

Since public confidence was identified as a major performance goal in the Strategic Plan, the agency has embarked on several initiatives to improve its communications with the public, thus providing a pathway to increase public confidence. In addition to the public meeting issues discussed below, other communications initiatives are summarized at the end of this paper to provide overall context for broader communications initiatives in the agency.

The staff held a facilitated meeting on April 4, 2001, to solicit input from interested stakeholders on how the agency could improve its public participation policies and programs. The meeting was held in roundtable format, with telephone access to several groups who could not attend in person. A list of the participants, representing citizens' groups, industry, and government, is attached.

A Communications Task Force, consisting of a representative from each region and program office that interacts with the public, met several times to discuss and develop the proposals put forth in this paper. The paper provides the results of their assessment related to the issues described in the SRM and the concerns expressed at the April meeting.

DISCUSSION

Many of the comments at the April meeting focused on the public's range of expectations of NRC meetings. The participants believed that public involvement in NRC meetings was handled inconsistently throughout the agency. For example, some meetings offered public participation throughout the meeting while a similar type of meeting in a different location or presented by a different office or region would have no opportunities for participation. The public did not have clear expectations, in advance, of the level of participation planned for each meeting.

Participants at the April meeting also remarked that meeting notices sometimes provided insufficient information, lacking agendas or background documents, while other meeting notices did provide agendas, background documents, and links to web pages to help the public prepare for the meeting. Likewise, written summaries were sometimes provided after the meeting and sometimes they were not. In summary, the participants viewed staff practices and actions as inconsistent and unpredictable.

The staff previously examined limited changes to the policy statement on staff meetings open to the public in SECY 00-0154 dated July 13, 2000, entitled, "Recommended Revisions to Section D of Policy Statement on Staff Meetings Open to the Public." After completing that review, the staff determined that the policy statement and accompanying management directive (MD) 3.5, "Public Attendance at Certain Meetings Involving the NRC Staff," should not be changed. It was believed, at that time, that the flexibility which currently exists in these documents to allow for public participation was appropriate.

The current policy describes which public meetings should be open for observation, defines an "outside person," and sets ground rules for staff to decide whether to hold an open or closed public meeting. The policy goes no further in defining the various types of public meetings, nor does it establish expectations for the associated participation levels for the public. The policy also does not identify relevant information that should be provided at those meetings, and is silent on other methods of participation such as teleconferencing and videoconferencing.

The staff believed that providing for routine public participation, rather than only observation, could impact their ability to conduct business efficiently and effectively with licensees and applicants. It was also recognized that if active participation were allowed, the staff would need to develop criteria for determining which meetings would offer public participation. As stated in a memo to the Commissioners from the EDO, dated October 26, 2000, " the criteria would have to be qualitative, would have to account for the significant variety in the type of meetings and would be subject to multiple interpretations." Staff concluded that current flexibility, rather than imprecise written criteria, would be preferable from the standpoint of our public confidence goals.

In many cases, the staff has enhanced public participation by going beyond what is required in the existing policy. Unfortunately, these variances in practices resulted in inconsistent expectations by stakeholders. After obtaining feedback from the public at the April meeting and at other meetings, we have determined that while providing some measure of flexibility is beneficial, too much flexibility can result in uneven expectations and inconsistent application of the policy. Based on staff evaluation of the items described in the SRM and the comments received at the April meeting, we believe the policy statement on public meetings should be revised to clarify how the public can expect to participate in most types of NRC meetings. The goal remains, as stated in the current policy, that "the NRC should continue its longstanding practice of providing the public with the fullest information practicable on its activities and conduct business in an open manner, while balancing the need for the NRC staff to exercise its regulatory and safety responsibilities without undue administrative burden."

An important first step toward revising our public meeting policy and associated management directive should begin with clear definitions and categorization of the different types of NRC public meetings. This would include an expectation of public participation level, access to documents, and follow-up information. We believe these categorizations and other issues mentioned in the paper address the specific items in the SRM.

<u>SCOPE</u>

The public meeting policy would continue to apply only to NRC staff-sponsored meetings as described in the existing policy on open public meetings. It would not apply to Commission meetings, meetings with states, advisory committee meetings, adjudicatory proceedings conducted by Commission tribunals, or hearings which have their own procedures and requirements.

For discussion purposes, we have grouped other activities summarized in this paper into those we believe can be accomplished in the relatively short term, those activities that may be valuable, but which will require more resources to establish or more time to review or implement, and those activities for which no action is recommended.

Public Participation at Meetings and Related Information Provided

The revised policy would identify three types of meetings and for each type, describe public participation levels, information that should be made available, and appropriate follow-up effort. The level of participation would be noted on public meeting notices and in any press releases issued. The staff used guidance from the International Association for Public Participation, an internationally recognized organization in public information techniques, to help define and assign these categories for NRC meetings.

The extent of public interest in the meeting or activity will be considered by the staff when assessing meetings against these categories, and the objective of the meeting insofar as public involvement is concerned. Various tools have been provided to assist staff in this judgment, some of which are discussed at the conclusion of this paper.

The revised policy would need to provide for special circumstances that may require flexibility in adjusting public participation levels for certain meetings. For instance, meetings that would normally be characterized as Category 1 may be changed to Category 2 because of high public interest. Ample advance notification of this change would have to be communicated to the public.

Three Types of Open NRC meetings

Category 1

Description - Meetings in this category are typically held with one licensee, vendor, applicant or potential applicant or petitioner to discuss particular regulatory issues regarding their specific facility (or facilities), certificate of compliance, license or license application.

Meeting Purpose - The objective for NRC at this type of business meeting is to discuss one particular facility or site with an applicant or licensee regarding, for example, technical issues on an application or inspection results. The intended objective for the public at this type of meeting is to observe NRC's interactions with licensees, and to obtain factual information to assist in their understanding of the applicable regulatory issues.

Examples - Examples of this type of meeting could include: annual public meetings under the reactor oversight process, regulatory conferences, predecisional enforcement conferences, restart meetings, as well as meetings held on licensing actions (or applications), renewals and amendments, new facilities, away-from-reactor storage sites, large or complex fuel cycle facilities, or waste disposal sites. Certain inspection exit meetings such as those for Incident Investigation Teams, Augmented Inspection Teams, or others as appropriate, would also be included in this category.

Level of Public Participation - The public would be invited to observe the meeting consistent with current open meeting policy, and the NRC staff would be available to answer questions from the public after the business portion of the meeting.

Types of Information provided - At a minimum, an agenda or a list of items to be discussed will be entered into an Agency Wide Documents Access and Management System (ADAMS) package. The ADAMS package accession number would be provided in the meeting notice that is posted at our public web site for access to any primary or background documents.

Follow-up - No formal follow-up beyond the normal period for questions. Informal follow-up (telephone or e-mail) may be appropriate for certain questions that cannot be answered at the meeting. Feedback forms would be issued to all public attendees and meeting summaries would be publicly available.

Category 2

Description - Meetings in this category are typically held with a group of industry representatives, licensees, vendors or non-governmental organizations.

Meeting Purpose - The objective for NRC at this type of meeting is to obtain feedback from the regulated community on issues that could potentially affect more than one licensee. The intended objective for the public at this type of meeting is to obtain factual information and to provide the NRC with feedback on the analysis of the issues, alternatives and/or decisions.

Examples - This type of meeting would include task force groups, industry groups (such as the Nuclear Energy Institute or owners groups), or public interest and citizen group discussions that focus on issues that could apply to several facilities, such as plant system aging, license renewal, decommissioning, or spent fuel storage.

Level of Public Participation - The public would be invited to discuss regulatory issues with the agency at designated points identified on the agenda. There would generally be more opportunities provided for questions and comments at a meeting of this type, unlike a Category 1 meeting.

Types of Information - An agenda, names of participants, and background documents will be entered into an ADAMS package, and the accession number would be provided in the meeting notice. A web page with links to other appropriate background information would be optional. The ADAMS package accession number and any link to a web page will be posted to the public web site.

Follow-up - Staff would provide follow-up or answers to questions as appropriate during the meeting. Questions that cannot be addressed/answered at the meeting should be assigned to a designated staff person as an action item. At this level, meeting summaries or any transcripts would be provided in ADAMS and on the web, if a web site is established. Feedback forms would also be provided at this meeting, so that comments can be reviewed and offices can track any planned improvements or resulting actions in their operating plans as appropriate.

Category 3

Description - This type of meeting would be held with representatives of non-government organizations, private citizens or interested parties, or various businesses or industries to fully engage them in a regulatory issue.

Meeting Purpose - The objective of this type of meeting is to work directly with the public throughout the process to ensure that their issues and concerns are understood and considered. The intended objective for the public at this type of meeting is to work with the NRC, and to provide a range of information, views, concerns and suggestions with regard to regulatory issues.

Examples - Examples might include town hall or roundtable discussions, Environmental Impact Statement scoping meetings, workshops, the Regulatory Information Conference, the Nuclear Safety Research Conference, or proposed rulemaking meetings.

Level of Public Participation - This type of meeting would have the widest participation opportunities for the public to comment and ask questions throughout the meeting. More resources should be applied to meetings of this type where public participation is more actively sought.

Types of Information - An agenda, names of participants and background documents will be entered into an ADAMS package, and the ADAMS package accession number would be provided in the meeting notice. In general, more resources would be devoted to background documents with this level meeting. A web page will be created where all relevant documents for the meeting will be posted. The ADAMS package accession number and the link to the required web page will be posted to the public web site.

Follow-up - Similar to Category 2, but meeting summaries or transcripts would be provided in ADAMS and linked to the web site. Feedback forms would also be provided at this level meeting.

Suggestions that can be accomplished in the short-term

A. Public Meeting Web Site

NRC's current public meeting notice system has certain limitations that restrict the amount of information that can be entered into the database, thus limiting the amount of information that can be posted to the external web site. Because of these constraints, OCIO is currently developing a web-based public meeting system which will replace the existing system, and expand the amount of meeting information posted on the external web, including the addition of search capabilities.

There are certain existing capabilities of the public meeting notice system that may not be well known by many staff who plan and present public meetings. Limited information such as an ADAMS accession number or a link to a web page can be provided for posting on the public meeting web site for each category of meeting. Therefore, guidance will be developed to

inform the staff of the best methods to effectively utilize the current public meeting notice system in the interim, until the new web-based site is developed and operational.

B. Training

Some of the issues raised at the April meeting focused on the attitude of NRC staff, lack of plain language use in slides, statements made by staff that do not represent NRC policy, choice of local moderators, seating of participants and presenters, balancing types of invited participant groups, and timing and location of meetings. All of these issues are covered in NRC's current training courses on communicating with the public, public outreach, and technical writing for supervisors and their staff. We have directed HR to request that the instructors specifically emphasize these issues in upcoming courses. This training is currently voluntary, but will become mandatory for all employees who are involved in planning or conducting public meetings.

C. Telephone Access to Meetings

Several participants welcomed the advantages of having telephone access to meetings such as the one held in April, where the public can participate without the expense and inconvenience of traveling. Although the meeting itself was teleconferenced, the roundtable format of the meeting did not lend itself well to teleconferencing. Individuals on the telephone had to struggle to be heard and to "weigh in" at appropriate points during the discussion. It was also difficult for those on the telephone to identify speakers at the meeting.

Nonetheless, the NRC has a telephone bridge at its headquarters complex that will allow interested members of the public to participate in meetings. The bridge can be accessed via a toll-free telephone number and can reasonably accommodate up to 30 lines for persons wishing to listen or participate in a meeting (technical capabilities provide for more than 30 lines, but for practical purposes these may need to be used for other functions). Direct costs are limited to providing toll-free telephone access, which is approximately 5 cents per minute per connection. The system is now available and service can be provided for meetings either at or away from NRC headquarters. Reservations for the bridge are made by the NRC staff on a first-come, first-serve basis so meeting coordinators must arrange for its use in advance.

Telephone access could be considered when travel to a meeting site is considered difficult for interested citizens, or when the meeting is held in a remote location.

The staff believes that teleconferencing can be successful, but that capabilities for each category of meetings should be further explored. Resources would have to be considered and budgeted for, and technical capabilities outside NRC locations are sometimes inadequate. If teleconferencing is offered, the meeting notice would have to announce this capability, and the public would need to contact the meeting coordinator to make arrangements. Press releases would also indicate teleconference availability.

We believe increased use of teleconferencing can enhance public participation in meetings.

D. Security

At the April meeting, concerns were raised about the inconsistent levels of security provided for certain meetings. For instance, it sometimes takes longer for visitors to be processed at Headquarters than at meetings held in the Regions. Also, at some meetings packages are searched or metal detectors are used, while at others no visible security measures are taken.

Security measures are intended to ensure the safety of attendees and participants and to guard against disruptive behavior. Security procedures for NRC public meetings have been published in the Federal Register and cover the introduction of signs, banners or posters, actions taken for disruptive behavior, and information on screening or inspecting attendees and their possessions.

Security measures are established for remotely held meetings based on an overall assessment by the Physical Security Branch, ADM, of the potential security concerns at each particular meeting. Security measures at similar facilities nationwide may be different based on factors that are not readily apparent. Consideration is given to the "comfort" level of NRC staff hosting a meeting, the degree of contentiousness of the issue, and any specific intelligence regarding a potential threat. Other security measures such as package screening may be employed. Some meetings may have no security coverage. Thus, security coverage may differ because of staff assessment of the potential threat for each individual meeting, or due to security measures instituted by local authorities.

Security coverage of our meetings from both the public and the staff has generally been favorably received, however, we will review our processes for further potential efficiencies.

E. Availability and Quality of Information

Many at the meeting felt that all relevant information about one particular meeting should be linked together on the web site, and that ADAMS accession numbers for meetings should be provided and meeting summaries posted. We believe the categorization system described in the beginning of this paper will allow the public to obtain complete and timely information related to particular meetings from ADAMS until the new web-based system is in place.

Other comments focused on the need for more material on the organization of the agency, certain fact sheets, and particular information on agreement states and a supplement to the reactor oversight handbook. The staff is currently reviewing these suggestions and will develop the appropriate fact sheets or brochures if needed. We also believe that the re-designed web site and associated program area web sites will address many of these problems by describing NRC programs and activities in a clear, logical and understandable manner, and provide updated, relevant background information.

For convenience, hard copies of all primary documents should also be available at the meeting.

F. The public needs a "point of contact" at the agency for public participation suggestions and concerns who could then direct their concerns or questions to appropriate staff within the agency.

The primary contact in the agency for general public participation policy issues will be the Assistant for Communications, Deputy Executive Director for Management Services, OEDO.

The Office of Public Affairs is also available to receive such suggestions. There is also an opportunity for comment on our public participation policies, or on any of our programs, through a link on the public involvement page of the redesigned web site. The revised policy will note these opportunities for public involvement.

Suggestions that require further review or for which no action is recommended

A. The public should have a mechanism to recommend agenda items and to request a meeting.

The staff currently provides for public input on agenda items for certain meetings. For facilitated Category 3 meetings, affected interested individuals and groups are routinely contacted for input and suggestions. The staff is reviewing possible methods that could facilitate this action at other meetings. One possible solution is a link on the public involvement page of the redesigned web site. Another is a link on the web site for that particular activity, if one exists. We are also reviewing the possibility of an automated sign-up to be provided on a web page for Category 3 meetings for subject-specific e-mail lists, requests for agenda items, meetings and feedback. These features could be incorporated into Phase II of the web redesign effort, however, currently there is no funding provided for this project.

B. The staff should consider alternate methods (in addition to the web) for notifying the public of meeting information and document availability.

Last year, the NRC announced that it would provide public meeting notice primarily through the web site, and discontinue announcing public meetings through its electronic bulletin board, telephone recording, the mailed Weekly Compilation of Press Releases and posting in the NRC's Public Document Room. Since NRC began posting meeting notices on its web site, use of other automated means declined substantially. The agency sought public comment on this action and received four comment letters, all of which supported the revisions.

Although use of regular postage service was not explored in this initiative, mailing meeting notices would impose a significant resource burden on the staff and would likely be slower and less reliable than the web site notification. It should also be noted that many staff go beyond what is minimally required and notify the public of meetings through press releases, paid advertisements and/or letters to interested local citizens and public officials. Typically, these methods are used for highly visible or controversial topics that are of high public interest, and would likely be used for Category 2 or 3 meetings. The staff will review other methods for notifying the public such as enhanced web page feedback for particular program areas, re-institution of list serves and broadcast fax, and assess the costs for these activities. We recognize some members of the public do not have access to computers, and are currently reviewing other methods the public may use to obtain information and communicate effectively with the NRC.

C. Videostreaming, Videoconferencing and Audiotaping of Meetings

Some at the meeting suggested that, for those who cannot participate or attend, videostreaming and/or audiotaping of meetings would be helpful and would help supplement any written transcripts. Videostreaming has been adopted by the agency for Commission meetings only. Because of the equipment cost, inconsistent quality of recordings, privacy issues, and logistical problems with duplicates, storage, and access to audiotapes and videolinks, videostreaming and audiotaping of public meetings is not recommended for routine use at this time. Improved access to meeting summaries (or transcripts, when available) for all meetings should adequately substitute for an audio or video recording.

The public is provided with an opportunity to observe certain public meetings via videoconference and the procedures are described in M.D. 3.5. The revised policy would include opportunities for videoconference participation in these meetings in accordance with existing guidance. Meeting notices and press releases would also announce videoconference availability.

D. Money should be provided for participants to attend meetings.

For approximately nine years, the staff has provided invitational travel to selected participants at NRC workshops using a set of informal guidelines to assure that the travel was necessary and appropriate. The objective of the invitational travel is to obtain perspective on a regulatory issue that otherwise would not be available without travel assistance. In summary, invitational travel is appropriate:

- for roundtable discussions with invited participants rather than general audience participation;
- for generic regulatory issues;
- when it would be difficult for a representative with desired perspective on the issues to attend without travel assistance;
- budget resources permitting.

Recipients of travel assistance have included representatives of Agreement States, Native American tribal organizations, and non-governmental organizations. This practice is limited to circumstances in which invitational travel is permitted by government regulations. We do not plan to change our guidance for the purposes of the proposed policy.

E. Freedom of Information Act (FOIA)

Questions were raised at the April meeting about the fairness of fees charged for FOIA requests and the policy on fee waivers. Some attendees thought licensees should be charged these fees as a cost of doing business, and that procedures for FOIA requests were too cumbersome and intrusive.

The Freedom of Information Reform Act of 1986 amended the FOIA by establishing new provisions relating to assessment of charges and waiving of fees for records requested. The amendments directed the Office of Management and Budget to publish a fee schedule and

implementation guidance. The OMB guidance encourages agencies to charge for all allowable direct costs. NRC adheres to this fee structure and charges requesters direct costs involved in processing requests. The fees collected are then sent directly to the U.S. Treasury. Our duplication charge of 20 cents per page has not changed since 1987. A recent survey of 20 other federal agencies, determined that charges range from 5 cents to 25 cents per page, with the average at 16 cents per page.

The comment that FOIA requests are too cumbersome and intrusive pertains to the questions NRC asks to determine whether to grant a waiver of fees. Certain questions must be answered to aid us in making a determination whether to grant a fee waiver. The Reform Act provides for fees to be waived if disclosure of the information is in the public interest because it is likely to contribute significantly to the public's understanding of government activities and is not primarily in the commercial interest of the requester. NRC fee waiver regulations adhere to the Department of Justice guidance resulting from the Reform Act, and we do not recommend changes at this time.

F. NRC has removed the public's rights to cross examination and discovery.

Another substantive issue was raised at the April meeting and in other correspondence from the public regarding the Commission's proposed rule on changes to the hearing process. Commenters raised concerns that the NRC was removing rights to cross examination and discovery. The staff believes this matter should be considered in connection with the Commission's future actions on the proposed rule regarding the hearing process.

Other Communications Initiatives

Communication Plans

In May, 2000, the staff began developing and implementing communication plans which describe how they will interact with stakeholders (both internal and external) for highly visible program areas. Among other things, these plans identify the goals of the program, the stakeholders, points at which the stakeholders can become involved, the tools for communicating key messages, and methods of evaluating progress. They can also contain timelines for specific events, and questions and answers that are anticipated by stakeholders on the activity.

More importantly, the communication plans have encouraged the staff to focus on opportunities for public involvement, prepared them for anticipating related issues which may arise, and have heightened their awareness and sensitivity to public involvement and communication issues. Currently, the staff has produced approximately 20 communication plans, with others in process. Additional communication plans will be developed as the need arises.

Training

Training programs have been developed to assist the staff in planning, developing and conducting public meetings. The training incorporates videotaping of "dry runs," including critiques by an "audience," effective communication skills, quality of slides and handouts, general conduct of the meeting, and logistical details that should be considered in preparing for a meeting. The training programs have been very successful, and many staff have directly attributed positive meeting outcomes to the training they received in this regard.

Web Page

The staff is near the end of the first phase in the redesign of the agency web page, an 18month project that included input from representatives of all affected offices and regions. The OCIO provided a prototype for groups of public "evaluators" to test its effectiveness. The new site is a major improvement, richer in content with more graphics, consistency, and navigability, and includes more information about the agency's mission, goals, performance and activities. The re-designed site is intended to provide information that should significantly enhance the ability of stakeholders to participate in our regulatory process.

Feedback Forms

In response to Commission direction, since last October the staff has been engaged in a pilot program using feedback forms to evaluate the effectiveness of public meetings. The forms have given us insights into the public's perception of individual meetings and the usefulness of those meetings. At the end of the pilot program later this year, we will evaluate and analyze the composite set of comments received on the meetings, as well as the design of the feedback form, and factor them into some long-term decisions and actions. Many of the issues described in this paper mirror those that have been raised in the feedback forms.

Public Participation Primer

NRC enlisted the help of a contractor to develop a primer for the staff to assist their public participation decisions and processes. Although the primer does not represent agency policy, and is not required to be implemented, it is intended to provide the staff with some information on best practices for general public participation. The primer includes public involvement and communication techniques that have been recommended by the International Association for Public Participation. The primer contains planning worksheets to determine levels of public interest in a particular issue, suggests methods for obtaining feedback, and identifies various tools appropriate for specific public interactions. The primer will be distributed to office directors who will ensure the appropriate staff receive copies and become familiar with the document.

RESOURCES

Many of the activities described in this paper are already being implemented by the staff but these resources are not specifically tracked. It is unclear how many additional resources will be needed to implement the actions described in the categorization portion of this paper. Therefore,

the staff recommends we proceed with a one year pilot program of the categorization method to track the actual associated resources. While the program is piloted, resources may have to be re-programmed from other activities.

CONCLUSION

The staff is committed to improving communication and increasing public confidence and recognizes that building positive relationships with the public and being responsive to their concerns is critical to achieving our goal. Similarly, practicalities regarding resources and level of effort should be considered in balancing this goal with the agency's mandate of protecting public health and safety.

RECOMMENDATION

The staff intends to prepare a proposed revision to the public meeting policy, including the categorization of meetings and the public participation components, which will be sent to the Commission for approval. Action on this portion of the paper will not be taken until the SRM is received. Staff requests action within 10 days. The staff will begin to implement other short-term actions described in this paper that arose from the April meeting. We consider this to be within the delegated authority of the EDO.

COORDINATION

This paper has been coordinated with the Office of Public Affairs, the Office of the Secretary, the Advisory Committees on Reactor Safety and Nuclear Waste, and the Atomic Safety and Licensing Board Panel. The Office of the Chief Financial Officer has reviewed this paper for resource implications and has no objection. The Office of the General Counsel has no legal objection to this paper.

/**RA**/

William D. Travers Executive Director for Operations

Attachment: List of Participants at 4/4 meeting the staff recommends we proceed with a one year pilot program of the categorization method to track the actual associated resources. While the program is piloted, resources may have to be re-programmed from other activities.

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/**RA**/ William D. Travers Executive Director for Operations

Attachment: List of Participants at 4/4 meeting

ADAMS ACCESSION #ML012070084

*SEE PREVIOUS CONCURRENCE

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ATTACHMENT

ROUNDTABLE PARTICIPANTS - APRIL 4, 2001, PUBLIC PARTICIPATION ISSUES WORKSHOP

David Lochbaum Union of Concerned Scientists

Neill Howey Illinois Department of Nuclear Safety

Roger Houston Licensing Support Services

Jim Riccio Public Citizen

Mike Shoppman Nuclear Energy Institute

Ray Shadis Friends of the Coast New England Coalition on Nuclear Pollution

Paul Blanch Consultant

Robert Holden National Congress of American Indians

Paul Gunter Nuclear Information and Resource Service

Ellen Ginsberg Nuclear Energy Institute

Michael Cavanaugh Manager, Communications Connecticut Yankee Atomic Power Company

Terry Concannon (by phone) Nuclear Energy Advisory Committee State of Connecticut

Debbie Katz (by phone) Citizens Awareness Network

Don Moniak (by phone) Blue Ridge Environmental Defense League Glenn Carroll (by phone) Georgians Against Nuclear Energy

Dr. Judith Johnsrud (by phone) Environmental Coalition on Nuclear Power

Jackie Cabasso (by phone) Western States Legal Foundation

Bill Sinclair (by phone) Director Utah Radiation Control Program

Owen Berio (by phone) DawnWatch

NRC:

Patricia Norry Executive Director for Management Services

Sam Collins Director Office of Nuclear Reactor Regulation

Margaret Federline Deputy Director Office of Nuclear Materials Safety and Safeguards

William Beecher Director Office of Public Affairs

Roy Zimmerman Deputy Director Office of Nuclear Regulatory Research

Luis Reyes Regional Administrator NRC Region II