

SAMPLING OF FEEDBACK ON THE NEAR-TERM TASK FORCE (NTTF) REPORT

To obtain feedback on the public readability and understandability of the final NTTF report from public citizens who are not knowledgeable in nuclear/radiological matters, the U.S. Nuclear Regulatory Commission (NRC) reached out to its Federal partners (thus avoiding complications involving Office of Management and Budget clearances). The agency contacted members of a wide spectrum of groups, including the Federal Plain Language Group, environmental conflict resolution facilitators, and Federal librarians, and asked them to provide feedback. Additionally, the agency posted a blog on December 1, 2011, requesting feedback.

A sampling of the comments received on the report appears below.

First off, it is obvious that the authors made a real effort to make a complex topic easier for a lay audience to digest, and they did a great job. In particular, I noted the use of short sentences and simple language throughout the report. This is in line with the recommendations of the Plain Language Action and Information Network (PLAIN). I also appreciated the inclusion of the two summaries (of the overarching and detailed recommendations). I think that these could be repurposed as very useful stand-alone documents, with one small change (see below).

I would recommend two changes to improve readability. First, the report is written almost entirely in the passive tense. I would recommend that the authors use the active tense instead, though I understand that this is a pretty major change. Second, I got tripped up by the number of acronyms and found myself flipping back sometimes pages to find out what an acronym meant. I think lay readers would appreciate it if the authors spelled out more terms, even if this increases the length of the document. In particular I would try to eliminate all of the acronyms from the recommendation summaries.

Overall, I found the report to be simple and very well written.

My impression is that it is well written, but not surprisingly, fairly technical. I would say it is going to be most understandable for an audience of at least advanced high-school level through college and especially graduate-level educated readers. Part of what makes it less accessible for a true lay reader is the necessary use of regulatory and technical terms of art throughout the document.

I do have two specific suggestions. First, a glossary of abbreviations and acronyms, and certain selected terms of art, would have been very helpful.

Second, an "executive summary" or similar short version, targeted to more of a lay audience, could be helpful. As examples to consider, I'd point to the one pagers GAO pre-pends to their reports, and especially, what ATSDR does for their "toxicity profiles" of chemicals. The tox profiles tend to be highly technical, but ATSDR opens the reports with a "public health statement" that does a nice job of explaining the key content in plain language.

The Plain Language initiative sounds like a great idea. It does become a problem when team members refer to the same thing in much different terms.

Lots of plain language issues in this report. Let's take just a few examples. We can start with the very first sentence of the Executive Summary. It's 62 words long. Significantly longer than our recommended maximum sentence length of 40 words. It has a verb in passive voice (was established). It has several hidden verbs—for example, “conduct a review” (use “review”), “make improvements” (use “improve”), and “make recommendations” (use “recommend”). It has wordy phrases (in light of, among others). There are many words they could have eliminated to create a more powerful and concise sentence. For one sentence, that's a lot of style faults! I'd love to say it's a record, but considering all the terrible government writing I've seen over the years, unfortunately it isn't.

Issues other than the writing—

The first sentence of the report proper is 67 words long. It goes on and on. Most readers will lose track of the subject by the time they get to the end. You can't tell for sure what some of the phrases refer to. For example, who is to “make recommendations” (there's one of those nasty hidden verbs again) to the Commission? Is it the agency, or the senior-level agency task force? This is the peril of long complex sentences. If you tried to diagram it, you couldn't figure out what actor went with what action.

I then cut 12 pages from the report and combined them into one document. I avoided obviously difficult sections such as discussions of regulations and lists of references. I then ran the selection through Stylewriter software. The section got 111 (bad) on overall style. It got 26.6 (bad) on sentence length. On passive voice, it did better, earning a 37 (good).

Overall, this report is poorly written. It certainly isn't plain language. The writing style makes the report far less effective than it might be had it been written more clearly. Its length is also an issue—good plain language writing would have brought the length down considerably, and as a result it would be read more.

I love science but I am not a scientist so being able to follow your developments in easier to follow language will be very helpful.

- Suggest you apply additional elements that would be useful to the reader:
 - List of Figures
 - List of Tables
 - List of Abbreviations and Symbols

- Dr. Charles Miller could be an MD, PhD, JD, Reverend. Suggest you honor his actual accomplishment and state whatever that Dr. means.

- Dedication: “inflicted” (2nd graf, 1st sentence) implies intention rather than the randomness of a natural disaster. Yes, the term may be stretched (such as the third or fourth definition) to include such “acts of God”, however I suggest using “caused”
- Acknowledgement: Somewhere, it would be useful to identify the target audience for this work. If the full NRC Commission, then say so. Perhaps in the Intro would be good, as well as in the Exec Summary
- Executive Summary:
 - (first sentence) This is backwards and awkward. While I appreciate your wish to put the Task Force up front, actually it’s the NRC that comes first as they’re the ones that posed the task. Further, a 62-word sentence, especially an introductory sentence, is just too much. Plain Language seeks sentences UNDER 20 words, in general.
 - (throughout) When you write “the Commission” I can’t tell if you mean the panel of Commissioners or the agency itself. This confusion should be fixed. On your web site “The Commission” leads to the panel itself. If you mean the agency, then say the agency or NRC, consistently throughout.
 - It might be useful to define clearly “defense-in-depth philosophy” as it underpins much of your approach, findings, and recommendations.
 - (ninth graf, beginning “Many of the elements of such...”) technical jargon needs to be translated, even if only parenthetically after it is in text to appease both [those] who speak the lingo and those who don’t. This lingo is “anticipated transient without scram.” What the heck? Also, “alternative treatment”; is there only one?
- Page 7–10—It is not clear whether this document meets Section 508 accessibility requirements (<http://www.section508.gov/>). Maybe it does to some extent, however, alt text does not pop up on screen when I mouse over any of the Figures.
- Page 16—pls define “scram” (again, as it is hopefully defined in the Executive Summary)
- Page 73—Seems a Concluding Statement that wraps this report up would be appropriate.

English is not my native language and still the pages that I read are very understandable.
