UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-001

October 22, 2010

List of IdeaScale Comments, Responses and Resolutions

1. Comments from the Society of Environmental Journalists
cwhetzel

These suggestions are from the Society of Environmental Journalists, the organization that represents reporters, producers, editors, photographers, and others who cover environmental issues for news media. News media are still the principal channel through which most Americans get their information about energy and the environment issues. Without transparency to the media, there can be no transparency to the public.

NRC generally does a fairly good job of being open and accessible to the media. NRC's public information officers are knowledgeable of decisions and the decision making process, and are willing to arrange interviews with relevant experts, even on deadline. But there is room for improvement.

Specifically we urge the NRC to:

1. End the practice that prevents NRC scientists or employees from talking to reporters without press office permission and a press officer present.

2. Have informed press officers available during extended hours for real-time response to news media questions, including journalists' complete working day on the West coast. Journalists have to do news 24/7, and we need access to authoritative information, position statements, and reactions.

3. Provide weekend updates, especially when information is released or there is breaking news late Thursday or on Friday.

4. When possible, timely dissemination of news/information to make sure it does not miss opportunities to be taken up promptly and fully into the news cycle. When news events or releases can be predicted or planned, this means earlier in the week (not late Friday) and giving advisories as far as possible (days) ahead-of-time to the largest feasible group. When a press officer promises to get back to a reporter with an answer or interview, it should come within hours, not weeks.

5. Make NRC commissioners and Atomic Safety and Licensing board members available to the press.

6. Use less industry jargon in explaining complex technical issues to the media.

7. Develop a less cumbersome, easy to navigate electronic library for technical documents.

8. Replace the color-coded grading system for performance, equipment, and operations with a short, easy-to-understand written synopsis. The color-coded system is so broad it is almost meaningless.

9. Improve press office inclusiveness to include routinely a broader spectrum of media types that make up today's changing news media landscapes. While big national news organizations may get more attention, NRC also needs to communicate well with regional, state, and local media as well as with specialty press, trade press, online media, freelance journalists, minority press, small broadcast outlets and others.

NRC Response:

The NRC has never prevented NRC scientists or employees from talking with reporters. If a media request is made to the Office of Public Affairs, a press officer either answers the question or finds the appropriate expert for the interview, sets up the logistical arrangements and then sits in on the interview. This way OPA can be cognizant of what is discussed and help out the expert and more often help the reporter should he/she need clarification of responses or has a follow-up question.

If the media contacts an employee directly, OPA encourages the employee to contact us so that we can prepare him/her for the interview and provide insights on the issue, news organization, and reporter. This allows the employee to provide an "informed" response to the reporter. If an employee does an interview without notifying OPA first, we encourage the employee to check back with us so that we know what was discussed.

For emergencies and true "after hours" media needs, OPA can be contacted through our Operations Center which is announced on the headquarters' voice mail message at 301-415-8200. Many of our regional press officers identify their cell phone numbers on their office voice mail messages. There is always a way to reach a public affairs staffer by telephone.

If a situation calls for the release of information, we issue a press release or contact reporters by telephone regardless of whether it is on a weekday or weekend. We are very conscientious about being available to answer reporter questions as quickly as possible.

We are cognizant of the need to disseminate press releases and information earlier in the week and earlier in the day. However, sometimes Commission decisions, technical activities or issuances are not completed until late, so we have little control over when those press releases are issued. We try to issue the release as quickly as possible in line with news cycles. By using a ListServe, reporters receive the press release sometimes even before it is posted to NRC's website. Having said that, OPA will continue to encourage early release of its information. We believe our track record for responding to reporters within their deadlines is excellent and that is based on what reporters tell us.

The agency cannot make any of its employees speak to the press. If the ASLB or new commissioners choose to speak to the media, they can. If not, then OPA tries to help reporters out with information from the appropriate experts.

We agree there should be less industry jargon in explaining complex technical issues to the media. OPA continually tries to "translate" technical information so the media and public can understand it. We also coach technical experts who speak with reporters or the public to do the same—less "technospeak" and acronyms. OPA also offers explanations of such jargon to reporters should the need arise--the latter being another reason why it is a good idea to have a press officer present during an interview.

Currently, the NRC is working to upgrade the operating software that supports ADAMS, NRC's Agencywide Documents Access and Management System. This new user interface is scheduled to

be publicly available in late 2010 - early 2011. Since it is currently under development, we are open to user suggestions for improving the software. If you have a recommendation or suggestion for consideration during this process, please submit it to the staff of the Public Document Room (PDR). The PDR staff can be contacted by phone, at 301-415-5737 or 800-397-4209, from 8:00 a.m. to 4:00 p.m. Monday through Friday. You may also submit comments, via E-mail, to PDR.Resource@NRC.GOV.

We assume the "color-coded grading system" is referring to the assessment of nuclear power plant performance. We continuously look for ways to improve our reactor oversight process and how we communicate results. We will consider your comment in the next evaluation.

Over the past few years, OPA has bolstered its outreach program to the public and the media around the country. This includes meetings with reporters, editorial boards, wire service reporters and others that cover NRC. We recognize there are other kinds of reporters cropping up online and we try to keep them informed of NRC activities as well. Recently we participated in the SEJ's conference and established stronger relations with environmental reporters. We have also provided media workshops to educate reporters on the basics of reactor operations and licensing as well as radiation safety. OPA has participated in other gatherings of reporters and plan to continue our outreach efforts to a wide range of media as resources allow.

7. Request for stakeholder input on NRC High-Value Data Sets

NRC Moderator (Office of Public Affairs)

The NRC has created a table of "High-Value Data Sets" that we believe stakeholders would like to see. The NRC is looking for your comments on these data sets. Do they meet your needs? Do you have other suggestions? The table is located here: http://www.nrc.gov/public-involve/open/datasets-catalog.pdf.

Note: Posted by NRC. No response needed.

8. Regulate nuclear safety like the FAA or UL
rgvandewalker

I think the nuclear safety regulatory methods are unduly expensive and confrontational. Nuclear systems are no more hazardous than many large industrial systems, and on the numbers, have a superior safety record to plants using hydroelectricity and fossil fuels, as well as refineries and many chemical plants. In a more traditional regulatory regime, the NRC would designate or license inspectors, inspecting firms or designated engineering representatives. U.S. legislation may not permit it, but this approach is the traditional safety regime in aviation, fire, electrical, electronic and structural design, all areas with substantial continuing needs and regulations for public safety. Similar systems with commercial regulators are used successfully in Europe to license medical devices. Abandoning these traditional regulatory methods damages nuclear innovation in a particularly expensive way that is unwarranted by facts. That is, it is poor allocation of resources to manage nuclear plants and systems in such detail and yet refuse to regulate more hazardous systems, such as hydroelectric, coal or natural gas plants, in similar ways.

NRC Response:

The NRC was created by Congress in 1975 to regulate the various commercial and institutional uses of nuclear energy, including nuclear power plants. The NRC has three principal regulatory functions: establish standards and regulations; issue licenses for nuclear facilities and users of nuclear materials; and inspect facilities and users of nuclear materials to ensure compliance with the requirements.

The nuclear industry is strictly regulated because of the potential hazards involved in using radioactive materials. It is the NRC's responsibility -- until and unless modified by the Congress – to protect people and the environment from these potential hazards. The NRC takes its job seriously and enforces its regulations with a vigor that makes it a regulatory model around the world.

9. Share Ideas to Improve NRC Online Photo Gallery
Ivonne Couret

The NRC Photo Gallery contains a wide range of free, high-quality photos related to the U.S. Nuclear Regulatory Commission and its mission. Share your ideas on how we can improve the NRC Online Public Photo Gallery. Please note that unless otherwise indicated the images are in the public domain and may be reproduced freely.

Note: Idea Posted by NRC. No response necessary.

10. Guidelines and monitoring for reactors
roger.joanne.lind

I urge the NRC to institute stringent guidelines and monitoring for possible leakage of radioactive material from nuclear reactors. As I understand it, at the present there is NO REGULATION, only voluntary monitoring of guidelines.

I urge that this laxness on the part of the NRC be corrected immediately, and that new guidelines for contaminant levels be consistent with or exceeding those of the EPA.

Moderator comment: This comment has been forwarded to the NRC Groundwater Contamination Task Force, which is reviewing past, present and future practices related to radioactive contamination of groundwater wells and soil by nuclear power plants.

Note: IdeaScale is still in a pilot phase and the NRC is using categories established by the White House until the end of pilot.

NRC Response:

In response to incidents involving radioactive contamination of groundwater wells and soil at nuclear power plants, the NRC established a Groundwater Task Force to determine whether past, current and planned actions should be augmented. The Task Force completed its review and issued a report in June (ADAMS accession number ML101740509). The Task Force's overall conclusion was that the NRC is meeting its mission of protecting public health, safety, and the environment; is properly characterizing relevant issues; and is correctly applying requirements.

In view of stakeholder concerns about recent groundwater incidents, the Task Force believes that the NRC should consider some changes to its oversight of licensed material outside of its designed confinement. The Task Force developed 16 conclusions on issues associated with oversight of groundwater incidents. The conclusions address the topics of: (1) reassessing the regulatory framework for groundwater protection, (2) maintaining barriers as designed to confine licensed material, (3) creating more reliable NRC response, and (4) strengthening trust. The NRC has established a senior management review group to evaluate the Task Force's report, identify next steps, and make recommendations for the Commission about potential policy or regulatory changes.

The NRC held a public meeting in October to seek feedback on the direction the NRC should take to resolve the issues, including whether to incorporate aspects of the industry's voluntary groundwater initiative into the regulations and how to address monitoring and reporting of groundwater incidents.

11. Tritium and other groundwater contamination at power plants
hope

The voluntary monitoring program for tritium releases, while providing limited data from some plants, is far from sufficient for protection of groundwater as a critical safe future drinking water source. Voluntary monitoring provides no tools for accountability or to drive the investigation, remediation of groundwater quickly to prevent off site migration of contaminants.

Unquestionably, an enforceable GW standard for tritium and other and additional precautionary action levels must be in place close to the plant footprint, and at other locations on-site. There must be mandatory sufficient frequency of monitoring and number of monitoring wells based on local hydrology, positioning of coolant pipes. Coolant pipes must be above ground and in secondary/tertiary containment so that they may be visually inspected frequently for potential failure points.

Moderator Comments

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12. Notify us when NRC refuses to put our submissions on this site

kkrevetski

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Moderator Comments

The NRC will notify writers if their idea is moved to the Off Topic section or not posted.

13. Radiation exposure standards need best science, not politics

kkrevetski

The need to protect the public health from the cancers, genetic defects associated with exposure to ionizing radiation using best science mandates improving current radiation standards. Historically, the EPA's Office of Radiation and Indoor Air (ORIA)in collaboration with the Nuclear Regulatory Commission and the Department of Energy has requested , funded and sponsored the National Academy of Science's (NAS) National Research Council's "BEIR" reports which studies and reports the current state of scientific knowledge on the effects of low-dose ionizing radiation. In 2005, the Academy found that low-dose radiation is about one third more dangerous than assumed by current EPA standards in causing cancer. Similar scientific studies after this latest report confirmed that radiation is considerably more dangerous than currently presumed which suggest upgrading radiation risk estimates in order to strengthen public protection. Best science today tells us we should be tightening protection against radiation. The industry will never volunteer to do that as it will cost them money. The nuclear industry needs mandates. Just like Wall Street.

NRC Response:

The commenter noted a one-third increase in cancer risk per unit dose of radiation as published in the 2006 National Academies report, "Health Risk from Exposure to Low Levels of Ionizing Radiation: BEIR VII Phase 2". The increase in risk was attributable to the committee using a one and a half "dose and dose-rate effectiveness reduction factor" (DDREF) instead of the value of two used by the NRC. The NRC believes the difference between a DDREF of one and a half and two is not significant considering the large range of possible values that could be selected. In support of this conclusion, the more recent 2007 International Commission on Radiological Protection (ICRP) recommendations continue to recommend a DDREF of two.
The NRC staff actively monitors and participates in national and international radiation research and standard setting bodies to ensure our radiation protection regulations are adequately protective of public health and safety. Toward that end, the NRC is currently reviewing the need to revise the agency's radiation protection regulations to achieve greater alignment with the 2007 Recommendations of ICRP Publication 103. Additional information on this process can be found at http://www.nrc.gov/about-nrc/regulatory/rulemaking/potential-rulemaking/opt-revise.html.

14. Ground Water Monitoring at Nuclear Sites

scott_ainslie

From the Savannah River Plant to Hanford, Washington, and under every nuclear power plant in the nation, the NRC has no mandatory program for monitoring radioactive contamination of ground and surface water in place.

This is just more fuel for those who think that the NRC is in bed with the industry it regulates, requiring little, suggesting a bit more, enforcing nothing while granting exceptions to its own safety standards like it was giving out candy on Hallowe'en.

I live five miles from the Entergy Nuclear Vermont Yankee plant, which has lied to us about underground piping, delayed admitting it was contaminating our ground water with Tritium, and attempted to buffalo its way to a license extension that your agency seems perfectly happy to grant, while assisting the state and protecting our environment from long term damage none at all.

We are angry with you. To say we distrust you is merely polite. We consider the agency and its regulators corrupt and its rush to license aging plants that would never be granted a new licensed to operate today criminally negligent.

In this country, we regulate dams more stringently.

What are you going to do about it?

Moderator Comments

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The NRC held a public meeting in October to seek feedback on the direction the NRC should take to resolve the issues, including whether to incorporate aspects of the industry's voluntary groundwater initiative into the regulations and how to address monitoring and reporting of groundwater incidents.

15. Radioactive leaks

annew

This site should have an easily accessible link to public comments on various issues of concern to the public. Currently, my concern is regarding radioactive leaks into our ecosystem.

Tritium can be incorporated into water molecules just like non-radioactive hydrogen atoms, and can't be filtered out. "Tritiated" water acts just like normal, non-radioactive water in the environment and biological systems, even crossing the placental barrier, so it creates a potential health threat if high levels of tritium move off a utility's site to contaminate drinking water wells.

The nuclear industry has responsibilities to monitor and inform the public.
What level of tritium is leaking? When is the ground water tested?
Currently, information on leaks depends on a voluntary industry groundwater monitoring program!

I understand that a task force established by the NRC is considering whether that program should be required in its regulations. Please let me know what is decided. Thank you.

NRC Response:

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16. **Testing groundwater near nuclear power plants**

bobbie

Please provide ongoing support to consistently test groundwater near our nuclear power plants for radionuclide contamination. And non-nuclear as well.

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17. Groundwater monitoring program

gpellett

I would like to urge the NRC to change regulations on groundwater monitoring systems at the nation's nuclear power plants. Currently, information on nuclear power plant radiation leaks into the surrounding groundwater depends on a voluntary industry groundwater monitoring program. It would serve the public interest to make groundwater monitoring mandatory, as well as timely publishing of reports. Recently we have had tritium leaks at NC facilities at Progress Energy's Shearon Harris and Brunswick facilities. It would ease public trust in nuclear power if monitoring and reporting was mandatory. Then problems come to light and we can focus on solutions. Thank-you for all of your great work to regulate the nuclear industry.

NRC Response:

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18. Correct Commissioner's Ostendoroff misstatement?

Mike Mulligan

Could Commissioner Ostendoroff correct his testimony made in the senate hearing on May 5, 2010. He stated "none of the ground water samples at any plant in the USA has exceeded 20,000 picocuries per ml."

At Vermont Yankee ground water contamination was in excess of 3 million picocuries per ml, while at Oyster Creek it was in excess of 1 million.

NRC Response:

Commissioner Ostendorff made the following statement during the NRC oversight hearing before the Senate Committee on Environment and Public Works, Subcommittee on Clear Air and Nuclear Safety:

"So far, to date, none of the water samples taken at any of the plants have had any groundwater contamination in excess of the 20,000 picocuries per liter."

You are correct in pointing out this misstatement. The Commissioner's intention was to say that, to date, no local drinking water samples taken near any NRC-licensed nuclear power plant have had tritium levels in excess of the 20,000 picocuries per liter limit set by the Environmental Protection Agency (EPA). Commissioner Ostendorff intends to correct this matter for the record of the hearing.

19. Opinions about what additional datasets the NRC should publish

NRC Moderator (Office of Public Affairs)

First of all, I think that NRC's implementation of openness with the public is and has been superior. I'm biased in NRC's favor, as a retired employee; but the NRC's openness is one of its key strengths.

Now for the suggestions:
1. Scan and load old NUREGs, docket files, and the like into ADAMS. Index them five ways from Sunday on the website. This issue has been a problem for years. It can only be solved with a lengthy program; but with the large NRC budget and the new reactor imperatives, it's time to correct this shortcoming. These older documents are very useful in forming part of our thinking and actions in the new nuclear age.

2. ADAMS document searches: When I retired in 2001, the ADAMS search feature was largely useless to all but a few ADAMS groupies. It's gotten better, but is still woefully behind the document search features of most other government agencies. Whether ADAMS stays, is greatly modified, or scrapped for something better, it needs vastly more sophisticated search and sort features.

Moderator Comments

Idea submitted through online form "Contact Us About the NRC Approach to Open Government" from author Charles Haughney

Updated Moderator Comment (6/22/2010)
(1) The NRC's records program is regulated by the Codes of Federal Regulations (CFR) part 36, which requires the agency to preserve and ensure the reliability and integrity of all records. NRC maintains its electronic records in the Portable Document Format (PDF) because it provides a consistent image regardless of where the file is being viewed and the record can be locked down to ensure changes to the document cannot be made once it is declared an official record.

(2) As part of ongoing maintenance, the NRC is in the process of upgrading the application software that supports ADAMS to the latest version, IBM FileNet P8. As part of this effort, a new browser-based search engine will be introduced for the public in fall of 2010. NRC also plans to make its public document collection available through the public website's search engine. These new initiatives will greatly improve users' search capabilities and experience with ADAMS.

20. NUDOCS searches

jack.e.rosenthal

Please improve NUDOCS search capability. There are two aspects.
1. make searches easier
2. backfit older documents. start with Comm and SECY. Make NUREG 0737 searchable. Then in order of importance a. add older popular NUREGS, b. add more NUREG/CR, c. add AEOD reports d.add research reports. Every IN,IB,GL should be accesable sincelicensees operational experience programs use these documents.
3. you will need to move legacy files into main part of NUDOCS.

NRC Response:

As part of its Enterprise Content Management (ECM) program, NRC has underway, changes that will result in improved searching for the ADAMS interface used by the public. To date, the NRC has replaced the outdated Citrix search with a new, modern ADAMSPublic search. In addition, NRC is completing development of Web Based ADAMS (WBA) that will replace the current web-based search. WBA offers more functionality, including better access to date-by-date folders, an improved simple search, and a more robust advanced search feature.
Responding specifically to the user's comments, NUREG-0737, "Clarification of TMI Action Plan Requirements," is currently available both via ADAMS http://adamswebsearch.nrc.gov/idmws/ViewDocByAccession.asp?AccessionNumber=ML051400209 and from the NRC Web site http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/. NUREG-0737 is in a portable document format (PDF). When viewing the document in Adobe, a user can use the Adobe search function to search the NUREG. Thus, there is a searchable form of NUREG-0737 on the NRC web site.
Currently, NRC will digitize hardcopy records when they are retrieved from storage or if a mission need is identified. However, it would be cost prohibitive to digitize the approximately 50,000 cubic feet of hardcopy records.

21. Combine static content web pages into downloadable documents

clarence.breskovic

I suggest that the number of web pages could be reduced significantly by combining static information content (i.e. information that changes infrequently) from several web pages into fewer downloadable "reference" documents. These documents would have a table of contents, follow the general style of reference documents, and be available in different formats (PDF, eBook, etc.) They could then be ported by the user to any media device. Updates would be sent to users automatically by allowing them to sign up for updates via RSS or email.

NRC Response:

NRC is redesigning its public website. A usability study has been completed and provides many suggestions for improving the usability of the NRC site. The prototyped design of the new website is currently in development and the redesigned site will be launched late 2011. This recommendation will be considered as NRC moves forward with the redesign.

22. Identification of the most current information

stephen.slack

As the search of publicly available documents is currently implemented by Google, the most frequently used documents are listed first. What the typical user is looking for is the most current information. I think a way to categorize searches by time would be very helpful.

NRC Response:

This is a good idea. As NRC introduces new search capabilities on our public website, various filtering options may be introduced to make searching our website a more positive experience.

23. Docket numbers in datasets for power reactors and test reactors

doug.ellis

The format of the docket numbers entered in the power reactors dataset and test and research reactors dataset is different, and neither format is consistent with the NRC ADAMS search tool which prescribes the format to be used for a search. It would be helpful that the format of the docket numbers be the same in both datasets and ideally, the format of the docket numbers would be in the same format as that required when using the ADAMS search tool. Perhaps each dataset could be modified to identify at the top of the column that identifies the docket number that the format is the same or different from the format requested when using ADAMS.

NRC Response: It would be administratively resource intensive to revise this system and associated records at this point in time. Currently, the NRC does not believe it should be too difficult to find facilities and facility information using the existing system of docket numbers and ADAMS. There is an easily accessible central list of docket numbers on the public web site. In addition, you do not need a docket number to get the vast majority of facility information out of ADAMS.

The NRC does have revisions to ADAMS underway and planned that may assist the author of this idea. This winter with a new web-based ADAMS, we will be providing additional ways to search for public documents that allow searches in more intuitive and other advanced ways. In addition, we will eventually provide a way for public document and web site searches to be conducted in a single interface.

24. general

jl

Is there a way of seeing all comments since a comment may be under a topic that someone else might not choose to look at and therefore not see a comment?

NRC response: IdeaScale is now closed. However, the pilot of IdeaScale was not able to be modified in this manner by the individual federal agencies that used it for a short period of time. The NRC's assessment of IdeaScale can be found on the Open Government page of the website; the assessment discusses what alternative we plan to use to avoid some of the observed shortcomings of this tool.

25. **Reject the relicensing of the Duane Arnold Nuclear Power Plant**

dr_pac-man

To Whom It May Concern:
I tried to send the following email and the NRC refused to accept the email.

This is not open government.

RS

To: Nuclear Regulatory Commission
Re: Reject the relicensing of the Duane Arnold Nuclear Power Plant

I live within 10 miles of DAEC, and therefore am subject to an Emergency Action Plan in case of an accident at DAEC.

I urge the Nuclear Regulatory Commission(NRC) to reject the relicensing of the Duane Arnold Nuclear Power Plant(DAEC) for 20 more years from 2014 to 2034, and instead to decommission the DAEC nuclear power plant.

In connection with the environmental monitoring of DAEC, why is the effect of the nuclear power plant on milk no longer monitored?
(See #2 below)

DAEC has reached the end of it's proposed life span. To extend this license is to endanger the public welfare. Components of the power plant have fixed life spans. Some of the components are subjected to nuclear radiation which shortens the lifespan of the components. Replacing some of these components is not enough to ensure the plant would be safe for another 20 years.

I refer you to http://www.psr.org/nuclear-bailout/health.html.

Please note the following reasons for not renewing the DAEC license:

"1. Health

Studies have found that any increase in radiation exposure leads to an increase in risk for cancer. At various points in the nuclear fuel life cycle, nuclear power poses serious risks to public health."

Question: How can DAEC prove that increases in the radiation exposure in the Cedar Rapids area has

occurred and will continue under the new proposed license?

2. "Uranium Mining

Uranium mining has been shown to create devastating health effects on miners and communities. Miners and their families exposed to radon gas, a highly carcinogenic substance that emanates from uranium mining, have been diagnosed with small cell carcinoma and other forms of cancer.
Uranium mining tends to be concentrated on indigenous lands, where impoverished communities, eager to find work, are uninformed of the environmental and health impacts of the mining. The effects have been so devastating in the United States that the Navajo Nation, upon whose lands sit one of the largest uranium reserves in the world, has outright banned the practice, even as they struggle with crushing poverty.
Elsewhere in the world, serious human rights violations are being perpetuated against other indigenous communities in the name of fuel for nuclear reactors."

Question: How can DAEC assure us that there will be no increase in radiation beyond background levels in the Cedar Rapids area?

3. "Routine Releases from Operating Reactors

Radionuclides routinely released in nuclear reactor operations have been linked to developmental problems, birth defects, reproductive problems, cardiovascular disease, leukemia and other cancers. Pollutants from nuclear power such as tritium, which acts like water in the body, can enter fetuses through the placenta. Tritium leaks into groundwater have been reported all over the United States, from Arizona to New York.
Epidemiological studies of children living near nuclear reactors show a positive association between leukemia and proximity to nuclear reactors."

Question: In connection with the environmental monitoring of DAEC, why is the effect of the nuclear power plant on milk no longer monitored?

4. "Waste: What’s In Your Landfill?

The end of the fuel cycle and waste can also pose potential threats to human health.
‘Low-level’ radioactive waste, so classified based on its source and not its relative safety hazards, kept in shallow landfills can seep into groundwater and expose communities to an array of different

radionuclides, from those with relatively short-half lives like tritium, to long-lived and highly toxic plutonium."

Question: How can the DAEC assure us that there will be no waste contaminating our air, water, land and living space?

CONCLUSION:

DAEC can not stop the flow of radioactivity from it's nuclear plant into the surrounding community, and therefore is a danger to the public health. It's license should not be renewed for another 20 years.

Sincerely,

Robert Schultes M.D.
1000 Prairie Drive NE
Cedar Rapids, Iowa 52402
#319-360-5119

NRC response: The NRC's highest priority is ensuring the health and safety of the public and the environment with regard to nuclear power plants. All 104 reactors, including Duane Arnold, are operating safely based on continuous assessment and inspection. Our 20 years of research into plant aging has identified those safety-related reactor systems, structures, and components where most detrimental aging effects could occur. Research found that many aging phenomena are readily manageable and do not pose technical issues that would prevent reactors from operating safety for more than 40 years. Because aging is a continuous process, many aging effects are dealt with during current plant operations. Based on research and operating experience, NRC has established clear requirements that are needed to assure safety plant operation for extended plant life.

During its license renewal review, the NRC reviews both safety and environmental issues to be sure that the applicant has demonstrated that it will manage and monitor the effects of aging. NRC inspectors verify the renewal application information at the plant that and confirm aging management programs are in place. In addition, the Advisory Committee on Reactor Safeguards conducts an independent safety review of license renewal applications and NRC staff evaluations. The entire license renewal process involves substantial public participation where members of the public may raise questions along the way

26. Use a crowdsourcing tool for the internal NRC suggestion program

Fran Goldberg

I suggest that the NRC consider the use of an on-line brainstorming tool like IdeaScale or other similar tools to replace or augment the current approaches for soliciting employee suggestions. Using the "wisdom of crowds" to refine the suggestions through an on-line discussion would probably result in better ideas and more participation in the program. Pre-set categories aligned with NRC product lines (rulemaking, licensing, inspection, financial management, administration, information technology, etc.) could be used to group the ideas and facilitate moderation. In addition to use for the suggestion program, this approach could also be used for identifying NRC processes that might benefit from a "Lean Six Sigma" process improvement review.

NRC Response:

Generally, we think this is a good idea and are pursuing this suggestion as a part of a larger project to look at innovation in the NRC.

One of the NRC's strategic goals is to reward safety/security-conscious actions and improve communication throughout the organization to support a culture of openness, trust, and innovation. Further, the Commission values proactive service to the public, cooperation in the planning and management of agency work, and excellence and continuous improvement in individual and collective actions. Employee recognition programs aim to reward and/or recognize employees for providing innovative suggestions to help the agency meet its mission and strategic goals.

During the innovation project we will develop an employee innovation program that recognizes and rewards innovation, is unbiased, involves employee participation, and is responsive to employee needs. We will investigate the use of IdeaScale and the Knowledge Management Center as mechanisms by which we involve employees in the development of innovative ideas. We will include the employee who made the original suggestion to use IdeaScale as a subject matter expert on the project. This project has already begun and we expect to have a final recommendation prepared for the agency by December 31, 2010.

27. Summaries and transcripts of past meetings

Jim Lieberman

NRC has an excellent calendar of public meetings. However, once the meetings occur they are no longer listed. NRC should maintain a chronological listing of past meetings along with the meeting notice, agenda, attendees, and meeting summaries or transcripts. This wil be much more useful than searching for them on ADAMS.

NRC Response:

In addition to the list of NRC meetings scheduled to be held on the external Public Meeting Schedule page, NRC does maintain a searchable archive of past meeting postings which are currently accessible from the same page by using the [Search Public Meetings] button. From the Public Meeting Schedule page, you can click on "Welcome and Help," which provides guidance on how to search for both currently scheduled meetings and previously held meetings dating back to October 1, 2003. By using this search, an individual would be able to locate information on past meetings including the notice, agenda, and meeting participants.
Meeting summaries or transcripts are not available through this search. Current NRC procedures only require staff to prepare meeting summaries and enter them into ADAMS. NRC will consider the recommendation of adding meeting summaries to the posted notices of previously held meetings in a future review of these procedures.

28. Paper Savings

jimjpearson

All NRC agency printers should be set to print on both sides of a sheet of paper. Exceptions would be allowed by administraive personnel preparing slides, etc. The could possibly cut paper usage by 35% or more.

NRC Response:

Agency network printers do have a duplex capability and are configured at installation to permit double-sided printing. The agency encourages staff to use two-sided printing (and photocopying) whenever possible. However, we recognize that not all documents are suited to two-sided printing (e.g., timesheets of varying length, INFORMS documents, certain presentations). Thus, unnecessary complications may arise if there was an across-the-board change to two-sided printing. However, if a program office's management and staff would like their printers to default to duplex printing, the Office of Information Systems is willing to implement this change. Several offices have expressed interest in this option and a pilot in one office is under development.

29. Other OpenGov Ideas & Information Resources

sbuckley

Rather than post each of my "OpenGov" Ideas at 27 different websites, I have posted them at the GSA's website (since they are in the forefront of the OpenGov initiative). So, by this notice, the members of the OpenGov Team for this agency have been informed of those ideas. (At least, now, you can't say you were unaware of them.)

http://opengsa.ideascale.com/a/pmd/29640-6960

ALSO -- Those OpenGov Team members, and others tasked or involved in those matters, are also notified that news and information about implementation of the Open Government Directive in the various federal agencies will continue to be available through the following sources (see links below).

Therefore, it is YOUR choice about whether (or not) to be "in the loop" about the Open Government Directive.

Email-group --> http://groups.google.com/group/OpenGovernmentDirective

Wiki --> http://www.OpenGovPlaybook.org

Radio --> http://www.OpenGovRadio.com

Blog --> http://www.UStransparency.com

vr,
Stephen Buckley
moderator, OpenGovernmentDirective google-group

NRC Response:

The NRC Open Government Working Group has reviewed the information.

30. Provide New Cert Designs w/ Effective Reliability Assurance Plan

jkaugust

Responding to Three Mile Island (TMI), NRC developed 10 CFR Part 52, the 'Combined License' (COL) process nearly thirty years ago. The COL's Quality Assurance Program (QAP) requires that certified plant designs have a 'Reliability Assurance Program' (RAP) to assure Probabilistic Risk Assessment (PRA)-assumed reliability.

Unfortunately, Reg Guide 1.206 (NUREG-0800) Standard Review Plan (SRP) Section 17.4 guidance remains incomplete. As written, the existing SRP Design Control Document (DCD) guidance for Section 17.4 provides little reliability assurance for new certified designs.

An effective RAP for new nuclear plant is just a complete scheduled maintenance plan developed from consensus standards. For safety-related equipment, scheduled maintenance & operating monitoring plans can effectively assure equipment reliability.

Providing an effective, consensus standards-based scheduled maintenance program RAP for certified designs would lower new plant construction, startup and operating costs as well as improve nuclear safety.

New plant construction presents a unique opportunity to extend COL certified design standardizations to achieve higher levels of safety and cost performance.

NRC should ask industry to provide an effective RAP by specifying scheduled maintenance & operating monitoring plans to license new plant designs to implement Part 52. NRC should revise SRP Section 17.4 guidance to require an effective RAP as part of the design certification process.

U.S. airframe suppliers have similarly certified scheduled maintenance plans for commercial airframes for the past 42 years -- since the Boeing 747. (ref ML092800071.pdf, NRC letter August 29, 2009)

NRC Response:

The RAP is prescribed by NRC policy contained in the staff requirements memorandum (SRM), dated June 28, 1995 (ADAMS Reference ML003708019), which approved the recommendations contained in SECY-95-132, "Policy and Technical Issues Associated with the Regulatory Treatment of Non-Safety Systems in Passive Plant Designs," dated May 22, 1995 (Reference ML00370800516). The RAP applies to those systems, structures, and components (SSCs), both safety-related and non-safety-related, that are identified as being risk-significant (or significant contributors to plant safety). The purpose of the RAP is to provide reasonable assurance of the following: (1) the reactor will be designed, constructed, and operated in a manner that is consistent with the risk insights and key assumptions for the SSCs within the scope of RAP (i.e., RAP SSCs); (2) the RAP SSCs will not

degrade to an unacceptable level of reliability, availability, or condition during plant operations; (3) the frequency of transients that challenge these SSCs will be minimized; and (4) these SSCs will function reliably when challenged.

Based on the lessons learned and insights gained from the reviews of DC and COL applications, the NRC staff found that the 2007 version of SRP Section 17.4 needed to provide clearer guidance for performing safety reviews of the RAP and more clearly describe the RAP process. Therefore, the staff originated interim staff guidance (ISG) DC/COL-ISG-018, "Interim Staff Guidance on NUREG-0800 Standard Review Plan Section 17.4, 'Reliability Assurance Program'" (Reference ML092290791), which was published for stakeholders and public comment in October 2009 and will soon be published in final form. In addition, the RAP has been discussed in many internal NRC and public meetings. The ISG is designed to improve communication about the RAP among the NRC staff, representatives of the nuclear power industry, and interested members of the public as well as incorporate improved review guidance.

As described in the draft DC/COL-ISG-018, the effectiveness of maintenance is improved by applying risk information and the implementation of other reliability assurance activities during a power plant's design, construction, and operational phases. These reliability assurance activities include several other programs and all are essential to an effective RAP:

- **Processes and controls should ensure the reactor will be designed and constructed in a manner that is consistent with the risk insights and key assumptions for the RAP SSCs. The list of RAP SSCs is appropriately developed, maintained, and communicated to the organizations that will use this information.**
- **The maintenance rule program (Title 10 of the Code of Federal Regulations, Section 50.65, "Requirements for monitoring the effectiveness of maintenance at nuclear power plants") should be implemented in a manner consistent with NRC Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." All RAP SSCs are categorized as having high safety significance. This ensures that performance goals are established for the RAP SSCs and that performance and condition monitoring are performed to provide reasonable assurance that the RAP SSCs do not degrade to an unacceptable level of reliability, availability, or condition during plant operations.**
- **The quality assurance program for safety-related SSCs is established in accordance with 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants."**
- **The quality assurance controls for nonsafety-related RAP SSCs are established in accordance with Part V, "Nonsafety-Related SSC Quality Controls," of SRP Section 17.5, "Quality Assurance Program Description—Design Certification, Early Site Permit and New License Applicants."**
- **Inservice inspection, inservice testing, surveillance testing, and maintenance programs are provided for the RAP SSCs.**

The NRC has established clear requirements for the development and implementation of effective applicant RAPs.

31. Site Suggestions

edd1

A couple of suggestions:
- Display the number of I Agree/I Disagree votes, as well as the average, for example: I Agree(5) and I Disagree(10), total -5. (1)Agree + (1)Disagree = 0 is not very useful.

- Display date and time for each post, to provide more context.

Congratulations on this effort.

NRC Response:

IdeaScale is now closed. However, the pilot of IdeaScale was not able to be modified in this manner by the individual federal agencies that used it for a short period of time. The NRC's assessment of IdeaScale can be found on the Open Government page of the website; the assessment discusses what alternative we plan to use to avoid some of the observed shortcomings of this tool. We hope you will take advantage of the comment feature of the new blog.

32. Nuclear Waste Disposal

michelle072304

Make it clear to the public what is currently being done about nuclear waste, and what the future of nuclear waste disposal is.
Since Yucca Mountain is not open, there are no options beyond illegal overflow storage at individual facilities.
How will future facilities contribute to the waste stream?

Moderator Comments

The spent fuel from the nation's commercial nuclear power reactors continues to be stored safely and securely at the power plant sites. The Department of Energy (DOE) submitted a motion March 3 seeking to withdraw the application it filed with the NRC for a nuclear waste repository at Yucca Mountain, Nevada. DOE also is appointed a Blue Ribbon Panel to recommend new ways for managing spent fuel. Recommendations from the panel are not expected for about two years. As the regulator of nuclear power with no role in energy policy, the NRC is not part of this panel.

In the meantime, the NRC is confident the spent fuel can continue to be stored safely and securely at existing power plants or any new plants that may go into operation. This storage is legal because these facilities, whether spent fuel pools or dry cask storage installations, are licensed and regulated by the NRC.

33. Provide vision into NRC regulatory costs

robert.steinhaus

NRC is primarily funded by fees from current licensing and certification projects. I am interested in obtaining a view into the regulatory process to determine if there are areas where a disproportionate amount of time is spent while producing only a small (or negligible) safety improvements. Is it possible to invent a new tool that would allow decision makers and the public to figure out where the majority of regulator's time is spent when certifying new reactor designs or when reviewing new COL license applications?

Moderator Comments

Moved from Category 4 - Innovation to Category 1 - Transparancy because it asks for more transparency about the NRC's regulatory costs.

NRC Response:

The NRC fee rule is published each year. The NRC believes it is allocating resources appropriately.

34. Making licensing information available online

NRC Moderator (Office of Public Affairs)

[Submitted by a member of the public through Regulations.gov]

We welcome this opportunity to provide comments regarding which data sets the NRC could most usefully place online. I discussed this issue more extensively in a law review article entitled "Spotlight on Safety at Nuclear Power Plants: The View from Oyster Creek," 26 Pace Environmental Law Review 365 (2009), which may be found at:
http ://digitalcommons. pace.edu/envlaw/569/

That article concludes that there are a number of extremely high value data sets related to the safety of nuclear power plants that are not currently available to the public. These include:

i)a compilation of links to documents that would allow the public to determine the Current Licensing Basis("CLB");
ii)a database of issued exemptions, violations (including NCVs), and license amendments, as well as ongoing corrective actions and investigations, with links to the relevant detailed documents;
iii)a log of documents that have been withheld from public release with an explanation of the reason for the lack of disclosure;
iv)licensee documents that the NRC has reviewed to make determinations regarding licensing, license amendments, exemptions, or violations (including NCVs).

We believe that the NRC is already in possession of all of the information that would be required to publish the information relating to. ii) and iii) online. In addition, the agency has, or should have, most of the information to compile i), although we recognize that could take considerable effort to assemble. With regard to iv), we request that the NRC make it a policy to place all reviewed licensee documents online from now on. We are not asking the agency to go back and compile all the documents that it reviewed in the past.

Moderator Comments

Idea submitted through Regulations.gov (FRN Comment-10)

NRC Response:

The NRC appreciates the idea, but does not believe the suggestion is feasible at this time.

35. Decommissioning Fund information

NRC Moderator (Office of Public Affairs)

[Submitted by a member of the public through Regulations.gov]

The NRC should publish information on the current status of all decommissioning funds for operating nuclear power plants. This data set should be kept up-to-date as new information becomes available. Having such information readily accessible is necessary in light of recent revelations that many nuclear power plants across the country do not have sufficient decommissioning funds. A 2009 Biennial Decommissioning Funding Assurance Analysis indicates that at least 26 nuclear reactors had projected trust fund shortfalls.l" This has led to major concerns about how nuclear reactor sites will be properly and timely decommissioned once plant operations cease. ,For example, at Indian Point, acknowledging that the decommissioning fund for Unit 2 was projected to be almost $40 million short, the NRC approved a plan by owner/operator Entergy to delay decommissioning of the reactor for 50 years (to 2063) in order to allow time for the trust fund to accumulate the necessary funds. 12 The merits of allowing nuclear reactor sites to sit in "safe storage" for decades while trust funds increase to legally mandated amounts is highly questionable. Having current information readily available the public will assist in keeping the NRC answerable to the many concerns that arise from the existence of decommissioning fund shortfalls, including excessive delay of proper site remediation.

Moreover, having decommissioning fund information available will allow the public to more easily evaluate whether required trust fund amounts are going to be adequate to cover all actual decommission costs. Indeed, the NRC uses a highly conservative formula to determine the minimum amount of funds required to be in decommissioning accounts. This formula fails to accurately account for all aspects of decommissioning needed to return sites to Greenfield status,such as extensive groundwater contamination plumes like those at Indian Point.13 In fact, plant decommissioning costs estimates have actually demonstrated that projected costs have been far in excess of what NRC would require. 14 Accordingly, having decommissioning fund information accessible to the public will hold the NRC accountable to respond to concerns about insufficient trust fund balances, as measured against NRC's own minimum requirements.

Decommissioning fund information is also "high-value" information as contemplated by OMB, since it will: "improve public knowledge of the agency and it& operations" 15 by allowing thepublic to understand how NRC is handling the decommissioning process and problems therewith; "further the core mission of the agency" 16 by permitting the public to more effectively evaluate NRC's efforts toward ensuring proper protection of people and the environment at the time of decommissioning' 7; and "respond to need and demand as identified through public consultation,"18 since it would respond to public concerns about the ability of nuclear lower plant owners to sufficiently complete decommissioning

activities in a timely manner.

Thus, the NRC should compile and maintain decommissioning fund information for every operating nuclear power plant for public scrutiny. This data set should include current decommissioning trust fund amounts, any information about actual decommissioning costs estimates, details about any current shortfalls along with the number of years it would take the licensee to accumulate the funds at a reasonable rate of return, and proposed or approved plans to deal with any identified shortfalls. This data set should also list all nuclear plants that have been decommissioned thus far, with the original estimate of decommissioning costs, and the final, actual cost listed side by side. Having this information available will undoubtedly foster public participation and inquiry about important environmental concerns associated with decommissioning.

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11"2009 Biennial Decommissioning Funding Assurance Analysis, ADAMS Accession No. ML091940387.

12 See Letter from John P. Boska (Office of Nuclear Reactor Regulations, NRC) to Vice President, Operations, Entergy Nuclear Operations, Inc., Re: Indian Point Nuclear Generating Unit No. 2 - Decommissioning Funding Status Report (TAC NO. ME0528), December 28, 2009, ADAMS Accession No. ML093450778, at 1.

13 For an explanation of flaws in NRC decommissioning cost methodology, see generally, Comments Submitted by
the State of New York Concerning the NRC's Proposed Rulemaking.to Amend 10 C.F.R. Parts 20, 30, 40, 50, 70
and 72 to Require Certain Changes in Decommissioning Planning, NRC Docket No. RAN 31 5-AH45 (May 8, 2008),
ADAMS Accession No. ML081340325.

14 See, e.g., Preliminary Decommissioning Cost Analysis for the Indian Point Energy Center, Unit 2 (October 2008),
ADAMS Accession No. ML092260723 (estimating decommissioning costs for IP2 to be almost a billion dollars,
over double what NRC's regulations would require).

15 NRC Implementation of Open Government Directive, 75 Fed. Reg. at 1419.

17 NRC's website banner touts "Protecting People and the Environment." See http://www.nrc.gov/.

18 NRC Implementation of Open Government Directive, 75 Fed. Reg. at 1419.
19 See, e.g. supra Note 13.

Moderator Comments

Idea submitted through Regulations.gov (FRN Comment 9-3).

A list of the plants with projected decommissioning funds shortfall (current through 2008) is available at the following link: http://www.nrc.gov/about-nrc/regulatory/decommissioning/finan-assur/bi-decom-reports.html. In addition, on February 23, 2010, there was a public Commission meeting on Decommissioning Funding. Slides (and eventually a transcript) are available at the following link: http://www.nrc.gov/reading-rm/doc-collections/commission/tr/2010/.

Updated Moderator Comments (6/22/2010)

Although decommissioning funding status reports and other decommissioning funding related documents are publicly available in ADAMS, the first summary of decommissioning funding shortfall information by plant was published on the NRC public website in March 2009. Based on stakeholder interest generated by this report, it is the NRC's intention to expand the plant specific decommissioning information provided in a summary format on the website. This information could possibly include trust fund balances, shortfall calculations, and NRC decommissioning formula amounts per plant.

Some of the decommissioning data requested would not be possible to provide, since this information is beyond the scope of NRC requirements. Licensees are required to provide updated decommissioning funding status reports on a biennial basis and in some cases annually. Those reports include the amount estimated to be required for decommissioning and the funds available for decommissioning as of the end of the preceding calendar year. Licensees are not required to provide, nor does the NRC staff develop, projections as to the number of years it would take the licensees to accumulate the funds required to decommission the facility. Licensees are not required to report their estimate of a shortfall; however, NRC checks the fund status reports to assure that the amounts meet regulatory requirements.

A list of permanently shutdown reactors is updated annually in Appendix B to NUREG-1350. The list includes the status of each permanently shutdown plant, and whether the decommissioning is complete. NUREG-1350 is available on the NRC's public website. The NRC does not require licensees to report the actual cost of decommissioning. The cost of decommissioning may be available from State Public Utility Commissions. However, costs reported to the States may include substantial amounts for activities that are not included in the NRC definition of decommissioning, such as spent fuel management and site restoration. NRC handles funding for spent fuel separately from decommissioning costs. Site restoration falls outside the NRC's authority. Consequently, costs reported to the States are not directly comparable to NRC requirements.

The staff proposes to update summary level decommissioning funding status information on a quarterly basis, as updated information is received and reviewed. All other decommissioning funding related documents would remain publicly available in ADAMs.

36. Nuclear power plants' current licensing basis

NRC Moderator (Office of Public Affairs)

[Submitted by a member of the public through Regulations.gov]

One "high-value data set" that NRC should publish is the current licensing basis ("CLB") for all currently operating nuclear plants in the United States. NRC defines the "current licensing basis" as

--the set of NRC requirements applicable to a specific plant and a licensee's written commitments for ensuring compliance with and operation within applicable NRC requirements and the plantspecific design basis (including all modifications and additions tosuch commitments over the life of the license) that are docketedand in effect. 5

When confronted directly, the NRC has had noted difficulty defining what constitutes the CLB for particular nuclear power plants. This has become evident in license renewal proceedings, where NRC staff have not been always been able to adequately define current licensee commitments. Accordingly, there is a growing concern that many of the safety requirements that nuclear power plants must meet are vaguely defined and poorly understood by the NRC.6

With an increasing number of nuclear power plants applying for license extensions, this is very problematic, since issues pertaining to the CLB are considered outside the scope of license renewal review, However, the underlying assumption that nuclear power plants are in compliance with the CLB is wholly undermined by the inability of NRC staff to even identify what the CLB is?

A comprehensive understanding of what requirements are governing individual nuclear power plants is necessary to ensure proper oversight by the NRC. The efficacy of publishing the CLB for every operating nuclear power plant is, thus, quite apparent. This is precisely the kind of information "that can be used to increase agency accountability and responsiveness," that OMB
was contemplating as "high-value data" in the Open Government Directive. Indeed, publishing individual plant CLB's would hold the NRC directly responsible for knowing what regulations are applicable to each nuclear power plant, and assist the NRC in being able respond when problems with compliance arise.

Public availability of this information would also "improve public knowledge of the agency and its operations," 8 by allowing the public to develop an understanding of what requirements nuclear plants must obey and by helping to restore public confidence that the NRC understands its regulations and how to safely govern the operation of nuclear plants across the country.

Publication of individual plant CLB's would certainly "further the core mission of the agency," 9 which is

ostensibly to ensure the safe operation of nuclear plants. Lastly, publishing the CLB would indeed "respond to need and demand as identified through public consultation," '0 since members of the public have raised concerns over the NRC's lack of understanding of the CLB.
Accordingly, Riverkeeper urges the NRC to publish individual nuclear plant CLB's as one of NRC's "high-value data sets," to comply with OMB's Open overnment Directive.

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5 10 C.F.R. § 54.3(a); see also NRC Generic Letter 92-03, Compilation of the Current Licensing Basis: Request for
Voluntary Participation in Pilot Program (March 19, 1992) ("A definition of CLB was set forth in Section 54.3.
Although set out in Part 54 [the plant license renewal Part], that definition represents the staff s understanding of the
scope of the CLB and should be applicable to all reactor licensees.").

6 See, e.g., Letter from Richard Webster (Eastern Environmental Law Center) to Joseph A. McMillan (Assistant
Inspector General for Investigations, U.S. NRC Office of the Inspector General), Re: NRC Staff Comments
Regarding License Commitments (June 1, 2009), attached hereto as Exhibit A.
7 NRC Implementation of Open Government Directive, 75 Fed. Reg. at 1419.

8 Id
9 Id.
10 Id.

Moderator Comments

Idea submitted through Regulations.gov (Comment 9-2).

Portions of the information the NRC uses to make its licensing determination, such as the licensees' Safety Analysis Reports and NRC's Safety Evaluation Reports are made available to the public through Agencywide Documents Access and Management System (ADAMS) at http://www.nrc.gov/reading-rm/adams.html . Other material, such as security-related information and proprietary information is not available to the public.

37. Stakeholder process workshop

NRC Moderator (Office of Public Affairs)

[Submitted by a member of the public through Regulations.gov]

There should be a stakeholder process conducted annually that includes not just the usual beltway crowd, but critics of the NRC from around the U.S., who provide areview of how well the agency is doing in its alleged quest to become "transparent." Transparency is easy when there is nothing to see because the important material cannot be located and viewed or is withheld from public view. Becoming publicly transparent and actually making information and processes both visible and available to participate in, that is another matter entirely--and one that the NRC has a long, long way to go in achieving.

Moderator Comments

Idea submitted through Regulations.gov (FRN Comment 8-4).

NRC Response:

The NRC is at the forefront of federal agencies when it comes to making its documents available to the public. We have tens of thousands of pages on our website and thousands of documents available in our online records management system, ADAMS, which can be accessed through our website. The significant opportunities for public participation is outlined at: http://www.nrc.gov/reading-rm/doc-collections/nuregs/brochures/br0215/ .With regard to surveying the public on NRC transparency, we will take your suggestion under consideration to determine whether to pursue that suggestion.

38. Make information easily accessible to public

NRC Moderator (Office of Public Affairs)

[Submitted by a member of the public through Regulations.gov]

All baseline data, past and current licensing basis data, licensing amendment, violations, corrective actions, exemption determinations, and any determinations not to make such data, documents, reports and materials available to the public should be available on-line at a single mouse click in a location that is accessible and easily navigated by a 6th grader.

Moderator Comments

Idea submitted through Regulations.gov (FRN Comment 8-3).

Updated Moderator Comment (6/22/2010)

All of the data the requestor suggests that is able to be posted in the public domain is available in the public portion of ADAMS. There are some elements requested that the NRC does not have access to, such as “corrective actions.” The requestor is asking for access to the data in each of the licensee’s corrective action program. The NRC does not maintain a database of corrective actions from the licensees data bases.

With respect to the ease of access and the request that all data be available with “one click,” the staff does not see this as an actionable request. The public data is relatively easily accessible in the current structure and it is not feasible to meet the intent of the request.

39. Unavailability of certain document

NRC Moderator (Office of Public Affairs)

[Submitted by a member of the public through Regulations.gov]

The agency needs to review all past determinations concerning which documents should be public and get them on-line and available. I have complained numerous times to persons working at the highest levels of the NRC and the IG concerning the unavailability of certain document that should not have been classified "non public" -- e.g., a transcript of a telephone conference in the Yankee Rowe license termination case, annual reports of the Homestake Mining company and dozens of related documents (which were not released to the public until several years later when the licensee's own attorney's FOIAed them so they would not have to undergo the expense of copying them when providing them in a due diligence process). This kind of shoddy classification of documents is untenable and will not be eliminated until there is a top to bottom review of the classification process AND a complete review of all documents currently classified as "non-public".

Moderator Comments

Idea submitted through Regulations.gov (FRN Comment 8-2)
Updated Moderator Comment (6/22/2010)

NRC has in place a process for reviewing all documents received by and generated within the NRC for public availability. Management Directive 3.4, “Release of Information to the Public,” requires the Director, Office of Information Services to conduct annual assessments of the accuracy with which NRC staff are applying the agency’s criteria for designating records as public or non-public. Documents that are made non-public are reviewed on a regular basis according to NRC policy to determine if they should be made public.

40. ADAMS access

NRC Moderator (Office of Public Affairs)

[Submitted by a member of the public through Regulations.gov]

The U.S. NRC needs to go a very long way to comply with the White House initiative on open government. ADAMS access is abysmal. Even if documents are there, unless one is working at NRC Head Quarters, documents cannot be easily accessed with an adequate indexing system to make locating desired documents feasible. I was lucky enough to get a consultant at NRC to configure my MAC to have access. That lasted about two weeks. Then it stopped and the expert told me that there were problems and the entire system was going to be changed. Fat lot of good that does for anyone trying to meaningfully participate in an NRC proceeding or to intervene. Without access from outside to a decent, indexed system for document location and retrieval, anything else the agency does is just window-dressing.

Moderator Comments

Idea submitted through Regulations.gov (FRN Comment 8-1)
Updated Moderator Comment (6/22/2010)

ADAMS is an information system that, since 1999, serves as the central repository for all regulatory and technical information created by NRC staff, NRC contractors, and NRC licensees. The application software that supports ADAMS (FileNet Panagon) is reaching the end of its product life. As part of ongoing maintenance of ADAMS, NRC has begun to migrate to the latest version of the application software, IBM FileNet P8. This migration is to ensure we can maintain ADAMS on a supported application platform until a long term Enterprise Content Management solution is identified.

The upgrade will take place in two stages. The first stage involves the migration and catalog synchronization of the current ADAMS with the new P8 ADAMS, including nearly 2.0 million ADAMS files. It also includes the migration of NRC users. The second stage involves the migration of NRC applications, such as the Electronic Information Exchange or Electronic E-Mail Capture, that rely on ADAMS. The current schedule, contingent upon available budget, is to complete both phases in 2012 and decommission the old ADAMS operating system in early 2013.

41. Make all office instructions public

NRC Moderator (Office of Public Affairs)

[Submitted by a member of the public through Regulations.gov]

Currently, some of NRR's Office Instruction's (0I's) are publicly available. However, some are non-publicly available. Since the OI's describe activities involving NRR's stakeholders, including the public, all of them should be made publicly available.

Note, some of the OI's that are currently non-publicly available, were previously publicly available. A decision was made in recent years to change the availability, however, it's not clear why that decision was made.

Moderator Comments

Idea submitted through Regulations.gov (FRN Comment 7)

NRC Response:

The NRC appreciates the idea, but does not believe the suggestion is feasible at this time.

42. Database of environmental data results for nuclear power plant

NRC Moderator (Office of Public Affairs)

[Submitted by a member of the public through Regulations.gov]

Would it be possible for the NRC to share the database of all the environmental data results collected each year surrounding nuclear reactor sites? The database might include sample results from nuclear utilities, state oversight programs and the NRC. This would also address the openness concern raised some years ago in Illinois concerning the tritium releases from Exelon plants.

Moderator Comments

Idea submitted through Regulations.gov (FRN Comment 5).

Each commercial nuclear power plant is required to submit two annual reports that detail (1) the radioactive effluents discharged from the site, and (2) the effects (if any) on the environment. These Reports are available at the following link:
http://www.nrc.gov/reactors/operating/ops-experience/tritium/plant-info.html.

43. Sealed Source and Device Registry

NRC Moderator (Office of Public Affairs)

[Submitted by a member of the public through Regulations.gov]

I suggest the NRC provide access to the Sealed Source & Device Registry, if not to the public at large, at least to current licensees. I don't feel there is anything particulary sensitive to security contained in these certificates, and they are of invaluble use to licensees and others working with the manufacture, distribution, service, and purchase of these devices.

Moderator Comments

Idea submitted through Regulations.gov (FRN Comment 4).

The Sealed Source and Device Registry (SSDR) does contain sensitive security-related information. For example, it contains detailed descriptions and drawings of sources and devices, and information on the radionuclides and quantities of radioactive material contained in sources. This information, if publicly available, could be useful to a terrorist in planning an attack, and could increase the risk of a malevolent radiological incident.

The online SSDR is password-protected. Passwords and complete access are granted primarily to NRC staff, Agreement State staff, and other government agencies that have a need to know.

Licensees and others are provided limited information on individual sources and devices on a case-by-case basis. Usually, people needing information obtain it from the manufacturer as customers or potential customers. NRC will also release limited information. For example, if a licensee or applicant possesses a device or is applying for a license to possess a device, NRC will release specific information on that device upon request on an individual basis.

The NRC has restricted access to the SSDR for several years, and has not identified any significant problems on the part of stakeholders regarding the restrictions.

44. Daily Event Notifications in a map format

NRC Moderator (Office of Public Affairs)

[Submitted by a member of the public through Regulations.gov]

I would like to see the NRC publish the Daily Event Notifications in a map format, similar to the Google Maps mash-up employed by EPA (http://www.epa.gov/compliance/resources/reports/endofyear/eoy2009/2009-mapallactions.html). This form of viewing events would be particularly beneficial to a concerned public and would hopefully facilitate better understanding and tracking of events by the affected public. For example, if a citizen is concerned about a local nuclear plant, the current NRC website does not provide an intuitive or reliable method for summarizing events in a locale (or a facility).

It is my suggestion that the Daily Event Notifications y in a map format that allows aggregation of events over a selected time period (a user could see all events for last week, month, year, etc) and could sort by event types. A model for this type of data visualization is CrimeReports.com (http://www.crimereports.com/map?search= 1347+Maryland +Ave+NE%2C+washington+DC) Thank you for your consideration of this idea.

Moderator Comments

Idea submitted through Regulations.gov (FRN Comment 3).

NRC Response:

While the NRC is currently not planning to make this change, maps of all licensed facilities by region, state, and facility name are available on the public website at the following links: http://www.nrc.gov/info-finder/reactor/ and http://www.nrc.gov/info-finder/region-state/index.html .

45. Metrics for Non-part 50

NRC Moderator (Office of Public Affairs)

[Submitted by a member of the public through Regulations.gov]

The NRC is without a doubt one of the most transparent organizations in the country. Relative to operating commerical nuclear power plants, the NRC already provides public access to the most comprehensive performance metrics for each licensee possible. I would not recommend a dramatic change in NRC transparency relative to power reactors or DOE facilities due to the sensitive nature of infomation that deeper transparency could reveal. The NRC web site and commission briefings are extremely forthcoming and reveal discussions on seemingly every detail of oversight associated with the commission.

If there were an area for improvement, I would state that there seem to be no metrics established for non-part 50 special nuclear material holders that the public can easily view. There seem to be a high number of medical, radiographic and geologic instrumentation incidents that recur. I believe the NRC could improve oversight structure and publish metrics for this area of regulatory service.

Moderator Comments

Idea submitted through Regulations.gov (FRN Comment 1).

In fact, this information is already publicly available for the nuclear reactor, nuclear materials, and waste management program areas. NUREG-1100, Volume 25, “NRC Performance Budget, Fiscal Year 2010," which was published in May 2009, contains a series of outcome (i.e. incident) metrics, similar to the ones you describe, and outputs (e.g., number of licensing actions and inspections that NRC completed) for each program area including nuclear materials. In addition, the NRC public Web site provides access to the Annual Nuclear Materials Events report, which provides a more detailed analysis of incidents that took place for NRC and Agreement State nuclear materials licensees across the country.

The links to NUREG-1100 and to the Annual Materials Events are:
http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1100/v25/ and http://nmed.inl.gov .

46. Make public meetings more accessible by putting them online live

tommendip

It's good to see that NRC Commission meetings are available on the website. I wish that I could also watch live online video from public meetings in other locations where it's not convenient to attend.

Moderator Comments

Updated Moderator Comments (6/22/2010)

As part of the NRC's strategic objective of openness, the NRC strives to make available to the public full and complete information on NRC’s activities and programs to strengthen public trust in us as the nation’s nuclear regulator.

NRC staff is currently undertaking an expansion of its Webstreaming Program to include non-Commission public meetings held in Rockville, Maryland, of “significant public interest.” The definition of public meetings that are of significant public interest is contained in a May 7, 2009, memoranda from the Deputy Executive Director, Corporate Management to the Commission (ML091210102). In addition to the capability of Webstreaming 50 public Commission meetings, the expansion allows up to 50 additional Webstreamed public meetings to support NRC headquarters offices in their efforts to reach a wider public audience. NRC staff will use lessons learned from expanding the headquarters Webstreaming capability and the Atomic Safety and Licensing Board Panel’s pilot program to Webstream hearings from remote locations, and make recommendations to the Commission on how best to implement a Webstreaming program for NRC regional offices.

47. OpenNRC v2.0: A next gen opensource/opensocial portal

megan.eskey

A pilot project to build a next-gen Nuclear Regulatory Commission portal for the Federal Community Cloud. The idea is to build a suite of opensocial portals, one at each Federal Agency, based on The Open Stack that will enable communication with all opensocial partners.

Useful Links:
http://tinyurl.com/yks78pg
http://bit.ly/cUrTv8

Moderator Comments

Updated Moderator Comment (6/22/2010)

Contingent upon available funding, the NRC plans to expand its current Web Site Management services to embrace modern Web technologies. The NRC web site contains the Open Government pages and information required by Office of Management Budget guidance. NRC is looking to make the public Web a tool for users to broaden their ability to engage in the NRC's regulatory processes and programs. In addition, funding would support activities related to Web 2.0, (making the NRC web site more interactive and providing the capability of users to personalize it and receive updates on changes made to pages of interest) such as social media tools Facebook, Twitter, and YouTube.

48. NRC should live webcast all meetings

jaorangemen

NRC should live webcast all meetings for proposed rule making and regulations where the public comment should take place. They should make these meetings available for on demand viewing and have the ability to have that content be indexed for video search. By doing this the public and stakeholders will be able to see the inner workings of the rule making process and make the content and proceedings transparent to the public. It will also use effectively use internet video technologies for transparency and government efficiencies.

Moderator Comments

NRC has recently expanded its capacity to webcast 100 public meeting per year.
Updated Moderator Comment (6/22/2010)

Webcasting is a one-way method of communication. If increasing NRC's dialogue with stakeholders is the goal, Webcasting is not a tool that can expand the agency's outreach. However, NRC has in place other mechanisms in the rulemaking process to solicit public comments.

Currently, each rulemaking program office has established procedures for conducting public meetings to enhance interaction with the public throughout the rulemaking process, particularly early in the process at the regulatory or technical basis stage, and when the rule is controversial or affects many different types of stakeholders. The purpose of these meetings is: (1) to ensure that the NRC and external stakeholders have a complete understanding of the issue; (2) determine whether the proposed approach for addressing the issue is effective, feasible, and practical; and (3) identify whether there are better regulatory tools for addressing the issue.

49. Provide the public access to an NRC FINDING search forum

mark.king

The NRC should give the public access to an NRC FINDING SEARCH FORUM/ a finding search engine.

This would have the benefit of the public being able to quickly search plants in their area or plants of interest with regards to NRC inspection findings. It would also allow groups such as the Union of Concerned Scientist (UCS) and Institute of Nuclear Power Operations (INPO) and individual licensees to do these searches thereby improving openness and hopefully industry response to NRC findings to help prevent recurrence. There is no reason why this information in this format - using a seach forum/ seach engine should not be made available to the public. These findings are publicly available information already, and this valuable tool should be made available to the public (exceptions for security related NRC findings would be allowed, of course, since these are not publicly available normally).

NOTE: The current internal NRC search engine for findings is available for NRC users only at: http://nrr10.nrc.gov/ope-info-gateway/insp-findings-index.html

Moderator Comments

Updated Moderator Comment (6/22/2010)

Currently NRC users can search the database that contains both public and non-public information. A search engine similar to what is available to NRC users is technically possible, but changes would need to be made to the internal search engine so that it would not allow non-public inspection reports to be returned. Examples that should be excluded from a publicly available search are security related inspection findings, or findings that contain personally identifiable information (PII). At this time, developing and implementing an inspection finding search engine for the public that meets the applicable IT security requirements is not an agency priority.

50. Publicly available documents in ADAMS searchable by Google, etc

mark.king

The NRC should make all publicly available ADAMS documents searchable by outside search engines (suchs as Google...and other search engines).

Also all Generic Communications (GCs) should be made searchable by the NRC public web page for GC's - after about 2007 the agency stopped posting the pdf file versions to our webpage generally, instead they startedlinking the GC's by ML number into ADAMS. This had the unintended consequence of making the GC's less searchable - only the titles are now being searched for items posted after 2007 (not the whole GC document). This should be corrected until, all Publicly Available ADAMS documents are made visible to external search engines.

See this web page where the search problem exits now:
http://www.nrc.gov/reading-rm/doc-collections/gen-comm/index.html

Moderator Comments

Updated Moderator Comment (6/22/2010)
As part of ongoing maintenance, the NRC is in the process of upgrading the application software that supports ADAMS to the latest version, IBM FileNet P8. As part of this effort, a new browser-based search engine will be introduced for the public in fall of 2010. NRC also plans to make its public document collection available through the public website's search engine. These new initiatives will greatly improve users' search capabilities and experience with ADAMS.

51. 10 CFR 2.206 public participation

Mike Mulligan

Assign a senior NRC official to a petitioner. His job would be to help negotiate around the NRC bureaucracy and be a technical advisor to a petitioner. He'd be like NRC assigned lawyer or a NRC assigned public defender. His job would be to wholly serve the petitioner, then the community. The NRC bureaucracy and nuclear issues are technically too complex for the average person...let alone for the professionals.

So the petitioner needs a NRC professional advocator and he needs horsepower!

NRC Response:

The NRC appreciates the idea, but does not believe the suggestion is feasible at this time.

52. Searching for NRC documents

Mike Mulligan

The old Adam citric was a abomination. When this system (old adam) first came on the line years ago it was revolutionary...microfiche was the pits. The internet Adams search engine and the new public Adams are too frustrating to use and inefficient today. In public Adams, I have lost faith I can find documents that I know are in the NRC data base.

There is a huge frustration quotient with searching NRC documents. Public participation would be greatly enhance if the agency vastly increased the efficiency of searching NRC document.

What I see as a general statement...there is no direct NRC ownership over the public searching and participation capabilities.

Moderator Comments

Moved from Category 2 - Participation to Category 1-Transparency because the ability to find informaton is an element of transparency.

Updated Moderator Comments (6/22/2010)
ADAMS is an information system that, since 1999, serves as the central repository for all regulatory and technical information created by NRC staff, NRC contractors, and NRC licensees. The application software that supports ADAMS (FileNet Panagon) is reaching the end of its product life. As part of ongoing maintenance of ADAMS, NRC has begun to migrate to the latest version of the application software, IBM FileNet P8. This migration is to ensure we can maintain ADAMS on a supported application platform until a long term Enterprise Content Management solution is identified.

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53. Public participation on writing up inspection reports

Mike Mulligan

Revamp the ROP and the inspection report process. Make real time public participation the watch word with the NRC. With inspection reports, LERs, any other NRC special investigations...write up the report as a day by day process to and on the internet. Allow public internet questions and inputs as the report is written.

So the final report would include public participation?

Moderator Comments

Duplicate of idea submitted through Regulations.gov (Comment 2-2)

NRC Response:

The NRC appreciates the idea, but does not believe the suggestion is feasible at this time.

54. Plant blog or message board...NRC participation

Mike Mulligan

How about a internet blog or message board for every plant. A member of the community and a NRC official could moderate the site...preferably a on site inspector. I suggest everyone has to be identified...no anonymous additions. On a case by case situation you might allow anonymous sources. There would have to be a respectful decorum. So members of the public and community could ask questions to the board and the NRC. NRC officials would be required to reply and within a certain time frame.

I would volunteer as moderator...how about we make VY a prototype or test plant?

Moderator Comments

Duplicate of idea submitted through Regulations.gov(Comment 2-1)

NRC response: The NRC has a working group that is developing guidelines for the NRC's use of various social media tools as a way to better communicate to the public. At this time, the guidelines are still in process and no social media tools are being implemented. However, the NRC will unveil an NRC blog in January 2011, which will feature posts from employees throughout the agency – including resident inspectors at nuclear power plants– and which allow moderated public comments. We encourage you to take advantage of this new tool when it is initiated.

55. Public 2.206 petition

Mike Mulligan

Make the 2.206 pre hearing internal deliberation public. Video record and place on the internet these deliberations. It would make board members more accountable to the community...not accountable to themselves in a private meeting. The prehearing is a black box and nobody knows how these deliberation work. If future users had true knowledge of the petition board member deliberation they might become more successful. I hope quality assurance people were watching these prehearings.

Really, you need to revamp the whole 10 CFR 2.206 Petitions process. I believe the last time was in 1999.

There is a too high evidence hurdle to participate in the petition process. It is too legalistic...the community and the NRC would be better served if you let people into system and everyone is continuously tested.

The NRC would be thought more of as a more transparent and credible regulator. The community would have greater assurance of safety if they knew people were banging around in the system and testing everyone?

The community and the industry would be better served if adversaries gained troubling inside information...to take out in the community and used it in any way they wanted (media). It would evolve the NRC and industry at a faster pace...we all would be better if outside people kept everyone on their toes.

NRC Response:

The NRC appreciates the idea, but does not believe the suggestion is feasible at this time.

56. Trial period

warrenpmurphy

I applaude your efforts, however, I think your trial period is too short.

Moderator Comments

This idea has been moved to category 5 - Help us improve this dialog site - because it pertains to how the NRC could improve our use of the IdeaScale site rather than a specific idea on improving participation.

NRC Response:

IdeaScale was piloted for several months at the NRC. The NRC's assessment of IdeaScale can be found on the Open Government page of the website; the assessment discusses what alternative we plan to use to avoid some of the observed shortcomings of this tool.

57. What is safety?

Mike Mulligan

What is safety?

NRC philosophy of reactor safety.

Should be a additional item under ideas... such as innovation, collaboration?

As a example, you could crater local and national credibility of the NRC and industry before you crossed safety barrier? What if you cratered two local areas and then a TMI or Besse level event occcured? And it is based on not being safety related.

Should the NRC's highest priority be nuclear safety or nuclear industry existence? I know you think it is nuclear safety? But does the exclusive priority of the agency with nuclear safety serve your highest interest?

NRC Response:

The NRC is responsible for regulating the safe and secure use of nuclear power. The Department of Energy and others, including the White House, set energy policy for this country. The NRC's mission statement is: License and regulate the Nation's civilian use of byproduct, source, and special nuclear materials to ensure adequate protection of public health and safety, promote the common defense and security, and protect the environment. The NRC's Strategic Plan goes into detail about the NRC's plan for regulation through 2013. It can be found here: http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1614/v4/sr1614v4.pdf .

58. Document Analysis

moonstalker87

While the Public document room posts all NRC generated documents, it does so in the Adobe Acrobat file format. NRC generates charts, tables and spreadsheets that contain valuable data. While this data is presented in the Adobe Acrobat file, the ability to manipulate/analyze the data (charts, spreadsheets) to sort differently, rank, trend, etc. is not available. Please consider also making the source file for these charts, etc. available.

NRC Response:

The NRC has put some of its public information in www.data.gov in formats that allow manipulation of data. We will review expansion of this idea to see if it's feasible to implement.