MEMORANDUM TO: William D. Travers Executive Director for Operations

FROM: Annette Vietti-Cook, Secretary /s/

SUBJECT: STAFF REQUIREMENTS - SECY-99-070 - IMPLEMENTATION PLAN FOR THE PUBLIC COMMUNICATIONS INITIATIVE (DSI-14)

The Commission has approved the staff's implementation plan for the public communications initiative subject to the comments provided below.

- 1. If not already included in the plans for implementation of ADAMS, there should be a period of overlap concerning utilization of ADAMS and continuing to provide paper copies to the PDR, until six months after we have demonstrated the effectiveness of ADAMS at the point of public interface for access to agency documents.
- 2. The staff should be cautious to the possibility that the resource requirements may be understated. Not only is it important that the initiatives reach all NRC staff and all NRC activities, it is also important that these initiatives not diminish the performance of the tasks that underpin our findings of reasonable assurance of public health and safety, and protection of the environment. If the staff finds that conflicts are developing, it should immediately bring the resource issues to the attention of the Commission.
- 3. With regard to early public involvement in rulemaking (IIA1), the staff should clarify the scope or depth of the intention that "[p]ublic involvement should be considered in developing rulemaking plans." (Emphasis added).
- 4. The staff should consider the proposition that the Agency should "educate" the public, albeit "without being promotional," as might be suggested by the statement of Issue VA. The staff should focus on explaining and discussing agency actions with clarity and accuracy.
- 5. With respect to the "Future of the Plan," the staff should develop adequate, but possibly evolving, performance targets to evaluate how the Agency is proceeding with public communications. The staff must not become complacent and assume that there is one formula that will result in "good communication" at all times or at all sites.
- 6. The staff should review the old courses and modify them as appropriate so that each course will have some, no matter how small, emphasis on constantly improving public communication.

cc: Chairman Dicus Commissioner Diaz Commissioner McGaffigan Commissioner Merrifield OGC CIO CFO OCA OIG OPA Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail) PDR DCS