

Communication Plan

General Overview

The NRC and States are in the process of developing options for a National Materials Program which will potentially offer opportunities for NRC, Agreement and non-Agreement States to work together in a more collaborative manner to achieve efficiencies in implementing our individual and joint responsibilities for regulating the use of radioactive materials and radiation sources. A Working Group has been formed, at the direction of the NRC Commission, to develop various options for implementing such a program. The Working Group has identified a need to provide information to various stakeholders on development of options that will be presented to the Commission and to seek feedback from its stakeholders during product development and once a draft product is completed. This communication plan provides an approach for meeting this need.

Objectives

- g Provide information to stakeholders in a timely manner, as the product is developed*
- g Create positive stakeholder perception*
- g Engage negative perceptions, dispel rumors, and reduce uncertainty*
- g Actively engage stakeholders at all levels by soliciting feedback and maintaining positive relationships*
- g Identify issues involving a cultural transition of NRC, State and other stakeholders and seek feedback on how these issues can be addressed*
- g Consider stakeholder comments in developing Working Group products*

Stakeholders

- g NRC Staff: HQ, Various Program Offices, Regions*
- g Agreement and non-Agreement State Staff*
- g Other Regulatory Agencies: EPA, OSHA, DOT, FDA, DOE, DOL, MSHA, DOI*
- g Licensees*
- g Industry Representatives: Manufacturers, Consultants, Professional Organizations (SNM, AMA, HPS, ASNT, SMA, AMA (mining), NEI)*
- g Standards Organizations: NIST, ASME, ASNT, ANSI, ICRP, NCRP, IAEA*
- g The Public*
- g OMB*
- g Congress and State legislatures*
- g Citizen and Environmental Groups*

Communication Tools and Opportunities

- g NRC Web Site and Written Communications: OSTP/NMPWG site, NMSS Newsletter, Regional Web Sites or Newsletters, NR&C*
- g State Web Sites and Written Communications: Radrap, CRCPD Newsletter*
- g Federal Register*
- g Industry/Professional Written Communications: HPS Newsletter, ASNT Newsletter, Journal of Nuclear Medicine, etc.*
- g Industry and Professional Meetings: HPS, ASNT, SNM, etc.*
- g State/NRC Interface: CRCPD meeting/poster session, OAS meetings and conference calls, NERHC, NRC Counterpart Meetings*
- g Public Affairs Interface*
- g Pilot Projects: OAS tabletop exercise*
- g Senior Management Interface: EDO, Commissioner Technical Assistants, Senior Management Meeting, IMNS Director's Conference Calls, Commission Briefing*

Message Development and Objectives

- g Provide information on draft product, while in progress, to stakeholders and obtain feedback*
- g Distribute message directly to all levels of stakeholders and encourage individual participation*
- g Consider stakeholder comments in developing Working Group products and provide feedback to stakeholders regarding resolution or outcome*
- g Provide consistent messages by various communicators*
- g Provide a planned/structured communication approach corresponding to the various stages of product development; the communication plan should account for the challenges associated with the scope and complexity of the project at various stages in development*
- g Account for the different perspectives of and needs for communication with external stakeholders*

Key Messages

- 1. Maintain safety by establishing a regulatory oversight framework that ensures that materials licensees continue to conduct activities involving use of radioactive materials and radiation sources in a safe manner. The States and NRC have done an excellent job in regulating materials users; however, due to the continued shift in regulatory oversight responsibilities and authorities from NRC to Agreement States, a more collaborative approach is needed. This approach should seek to balance use of resources among the States and NRC and distribute the resource burden more equitably among Agreement State and NRC licensees. Maintaining regulatory programs that are*

adequate to protect public health and safety is a priority in evaluating potential changes.

2. *Enhance public confidence by 1) increasing consistency and predictability in regulatory approach, while recognizing the need for flexibility among State and Federal regulatory programs, and 2) improving efficiency in implementing our regulatory oversight responsibilities.*
3. *Improve the effectiveness and efficiency of regulatory programs nation-wide by enhancing collaboration, through exchange of information and resources, promoting consensus among regulatory agencies and optimizing use of resources on a national level.*
4. *Reduce unnecessary regulatory burden by promoting a consistent regulatory approach nation-wide which will offer efficiencies for licensees and greater predictability for stakeholders.*

Stakeholder Communication Issues

NRC Stakeholders:

- g*** *Keeping NRC employees informed of current Working Group activities*
- g*** *Enhance stakeholder understanding of the draft product being developed and the process used by the Working Group*
- g*** *Minimize concerns regarding potential changes in their roles as a regulator and potential transition in organization or activities*
- g*** *Seek and respond to comments and feedback of stakeholders*

State Regulatory Stakeholders:

- g*** *Keeping State radiation control program staffs informed of current Working Group activities*
- g*** *Enhance stakeholder understanding of the draft product being developed and the process used by the Working Group*
- g*** *Minimize concerns regarding potential changes in their roles as a regulator and potential transition in organization or activities*
- g*** *Seek and respond to comments and feedback of stakeholders*

Other Regulatory Stakeholders (EPA, OSHA, DOT, FDA and others):

- g*** *Informing other potentially affected regulatory stakeholders of current Working Group activities*

- g Enhance stakeholder understanding of the draft product and its potential impact on any shared responsibilities or areas of interest*
- g Seek feedback on potential impacts on other regulated activities or relationships between regulatory agencies (State and Federal)*

Industry and Licensee Stakeholders:

- g Keeping regulated stakeholders informed of Working Group activities*
- g Enhance stakeholder understanding of potential impacts of the draft product on stakeholder licensed activities*
- g Seek input on areas where regulatory burden can be decreased and efficiency enhanced*
- g Seek feedback and respond to stakeholders*

The Public:

- g Inform public stakeholders of the issues and Working Group activities*
- g Seek feedback on whether proposed options meet strategic goals (e.g., maintain public health and safety, increase efficiency and effectiveness, etc.)*
- g Seek feedback and respond to stakeholders*

Citizen and Environmental Groups:

- g Inform public stakeholders of the issues and Working Group activities*
- g Seek feedback on whether proposed options meet strategic goals (e.g., maintain public health and safety, increase efficiency and effectiveness, etc.)*
- g Seek feedback and respond to stakeholders*

Working with Regulatory Stakeholders

The Working Group recognizes that options developed for the National Materials Program and adopted by the Commission may change relationships between the Regions, NMSS, OSTP and the States. Since these changes will affect the how administrative and technical staffs for NRC and States perform their work, it is important that the Working Group provide these groups with information on the screening process and options and solicit their comments and input during the process of developing recommendations. Although dissemination of information will primarily be done using electronic and written communications, the Working Group considers it important to meet with stakeholders and make presentations at NRC and Agreement State offices and regional and national meetings to transmit key messages, provide updates on current activities and solicit input from staff, supervisors and management.

The Working Group plans to visit each of the NRC regional offices and headquarters during the development phase of the project and when the draft Commission Paper is prepared to make a presentation to NRC regulatory stakeholders to solicit their input. Outreach targeted at State

regulatory stakeholders will include a poster presentation at the CRCPD annual meeting, a table top exercise at the annual OAS meeting, and a presentation and poster at the annual NERHC meeting. The Working Group has also scheduled its meetings at NRC and State offices to provide ready access for regulatory stakeholders.

Working with Non-Regulatory Stakeholders

The Working Group recognizes that non-regulatory stakeholders' activities may also be impacted by options developed for the National Materials Program and adopted by the Commission. NRC and Agreement State licensees may be affected by changes in regulatory programs at the State and Federal level; therefore, it is important that licensees be made aware of the Working Group's efforts and provided opportunities to give their input during the development of options and recommendations. The Working Group is seeking opportunities to receive input from licensees, particularly regarding issues relating to improving efficiencies and identifying areas where changes in the materials regulatory program could lead to reduction in regulatory burden while maintaining the current safety goals.

Consistent with the common goal of enhancing public confidence in our regulatory programs, the Working Group also recognizes that it is desirable to seek input from public stakeholders regarding any proposed changes to the materials regulatory program. Thus, the Working Group will examine methods by which we can actively engage public stakeholders by both providing information and seeking their input.

Although dissemination of information will primarily be done using electronic and written communications, the Working Group will seek opportunities to meet with non-regulatory stakeholders during the development phase of the project. This will include opening Working Group meetings to attendance by the public and presentations during industry and licensee workshops and meetings.

Pilot Projects

The Working Group plans to conduct a pilot project in conjunction with the annual OAS meeting. The pilot project will consist of an exercise involving representatives of the Agreement States and NRC in which the representatives will attempt reach a consensus decision on regulatory priorities based on each agency's rulemaking and guidance development agendas. This pilot will provide the Working Group the opportunity to "field test" a key component of a national materials program. It will also provide the regulatory stakeholders the opportunity to compare individual agency agendas with their own and provide the Working Group feedback on the viability of sharing regulatory priorities and reaching a common agenda.

CRCPD G-34 Committee proposed a process for establishing a certification committee comprised of OAS, CRCPD and NRC members. The committee would act as certifying entity to review and approve certification regulations submitted by other agencies or groups.

Electronic Communications

The use of electronic communications is a key mechanism for providing stakeholders information and soliciting input and feedback from regulatory and non-regulatory stakeholders. The Working Group has established a web page, located with the OSTP web page, which is accessible to both regulatory and non-regulatory stakeholders. The web page includes the group's charter, membership, screening criteria, evaluation of program elements, meeting summaries and schedule of meetings, among other products. The web page is maintained with up-to-date information and provides contact information to solicit feedback on the group's products. The Working Group plans to add links to other regulatory and non-regulatory stakeholder web pages.

The Working Group has also utilized a joint State and NRC list server (Radrap) as a forum to communicate with regulatory stakeholders and plans to continue to use this resource to solicit input from regulatory stakeholders.

Written Communications

In addition to the web page, the Working Group plans to prepare articles for CRCPD and HPS newsletters which will include an overview of events and policies leading up to the creation of the Working Group and the development of options and the screening processes used. The articles will also provide information on how stakeholders can provide input to this project.

Meetings

All working meetings of the Working Group are open to the public and are posted on NRC's web page. A list of planned meetings and presentations are attached.

Interface with Commission Staff

In order to keep the Commission staff informed, the Working Group will invite the Commissioners' technical assistants to Working Group meetings held in NRC headquarters. The Working Group will brief the technical assistants on the current status of the Working Group's products and solicit their input.

Commission Briefing

The Commission will be briefed on the recommendations of the Working Group at the conclusion of the project, which is projected for May 2001.

Attachments:

- 1) List of Acronyms*
- 2) Meeting Schedule*

Attachment 1

List of Acronyms

<i>AMA</i>	<i>American Medical Association</i>
<i>AMA</i>	<i>American Mining Association</i>
<i>ANSI</i>	<i>American National Standards Insitiute</i>
<i>ASME</i>	<i>American Society of Mechanical Engineering</i>
<i>ANSI</i>	<i>American National Standards Insitiute</i>
<i>ASNT</i>	<i>American Society of Non-Destructive Testing</i>
<i>CRCPD</i>	<i>Conference of Radiation Control Program Directors</i>
<i>DOE</i>	<i>U.S. Department of Energy</i>
<i>DOI</i>	<i>U.S. Department of Interior</i>
<i>DOL</i>	<i>U.S. Department of Labor</i>
<i>DOT</i>	<i>U.S. Department of Transportation</i>
<i>EDO</i>	<i>NRC Executive Director of Operations</i>
<i>EPA</i>	<i>U.S. Environmental Protection Agency</i>
<i>FDA</i>	<i>U.S. Food and Drug Administration</i>
<i>HPS</i>	<i>Health Physics Society</i>
<i>HQ</i>	<i>NRC Headquarters</i>
<i>IAEA</i>	<i>International Atomic Energy Agency</i>
<i>IMNS</i>	<i>NRC Division of Industrial and Medical Nuclear Safety</i>
<i>ICRP</i>	<i>International Council on Radiation Protection</i>
<i>MSHA</i>	<i>U.S. Mine Safety and Health Administration</i>
<i>NCRP</i>	<i>National Council on Radiation Protection</i>
<i>NEI</i>	<i>Nuclear Energy Institute</i>
<i>NERHC</i>	<i>New England Radiological Health Compact</i>
<i>NIST</i>	<i>National Institute of Standards and Testing</i>
<i>NMPWG</i>	<i>National Materials Program Working Group</i>
<i>NMSS</i>	<i>NRC Office of Nuclear Materials Safety and Safeguards</i>
<i>OAS</i>	<i>Organization of Agreement States</i>
<i>OMB</i>	<i>Office of Management and Budget</i>
<i>OSHA</i>	<i>U.S. Occupational Safety and Health Administration</i>
<i>OSTP</i>	<i>NRC Office of State and Tribal Programs</i>
<i>SNM</i>	<i>Society of Nuclear Medicine</i>

Attachment 2

Meeting Schedule

<i>March 6-8, 2000, NRC HQ</i>	<i>Working Group</i>
<i>April 10-12, 2000, NRC RIV</i>	<i>Working Group</i>
<i>May 15-17, 2000, CRCPD</i>	<i>Poster Session & State Interface</i>
<i>June 5-7, 2000, Denver, CO</i>	<i>Working Group</i>
<i>June 14, 2000, NRC HQ</i>	<i>Steering Committee Briefing</i>
<i>August 22-24, 2000, NRC HQ</i>	<i>Working Group</i>
<i>September 11-13, 2000, NRC RIII</i>	<i>Working Group</i>
<i>October 4-5, 2000, OAS</i>	<i>Table-top Exercise with States & NRC, Working Group Meeting following OAS</i>
<i>November 2000</i>	<i>Working Group (Tentative)</i>
<i>March 2001, Georgia</i>	<i>Working Group</i>
<i>April 2001</i>	<i>Working Group - Steering Committee</i>