



U.S. Nuclear Regulatory Commission


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NRC's Commitment to Information Quality

NRC's mission is to regulate nuclear facilities and nuclear materials to protect the p and safety, the environment, and the common defense and security. NRC recognize decisions must be objective and clear to the public. Decisions must be based on so information and accurate data. Because of the importance of openness and transpa routinely makes available to the public the majority of its regulatory documents, in about its decision-making processes, and the standards used to analyze informatio to NRC by the regulated community.

Much of the information NRC makes publicly available does not fall within the scope guidelines. However, NRC is committed to quality for all of the information it disse if it is not specifically covered by these guidelines. NRC policies and processes alrea are designed to ensure that NRC information reflects a level of quality commensura nature of the information. This includes information ranging from explanatory infor designed to enhance the general public's understanding of NRC's mission to comple and engineering analyses that forms the technical basis for our rules and regulator

General Approach

NRC's proposed Information Quality (IQ) Guidelines rely on existing agency policies procedures to meet the standards for information quality. In accordance with OMB' NRC uses a graduated approach to ensuring information quality – the more influen information, the more rigorous the quality standards used -- with the most influen financial, and statistical (SFS) data being subject to the most rigorous IQ standards procedures.

OMB defines influential SFS information to encompass information that "the agency reasonably determine that dissemination of the information will have or does have substantial impact on important public policies or important private sector decisions; authorized each agency to define influential SFS in ways appropriate for it, given th the issues for which the agency is responsible.

NRC has defined influential SFS as information that forms the technical basis for a : rulemaking that has substantial impact on an industry. There may also be other ty information that the NRC deems "influential" under its guidelines on a case-by-case

NRC's definition of influential information principally applies to SFS information that basis for rulemaking because rules are legally binding, whereas other agency issued Regulatory Guides, Generic Communications, and others do not mandate industry-wide compliance. Substantive rules are those technical regulations that have a substantial impact on an entire industry. These rules, for example, could include revisions to 10 CFR Part 70 regulations for power reactors, or revisions to 10 CFR Part 70 regulations for major facilities that would have an additional substantial impact on an industry.

Components of Information Quality

OMB's guidelines define three components of information quality: utility, integrity, and objectivity. The following sections describe how NRC's proposed guidelines ensure that information meets the OMB standards for these three components.

How NRC's Draft Guidelines Meet the Standard for Informatic

Utility refers to the usefulness of information to its intended user. The NRC's proposed Information Quality Guidelines are built on existing policies and procedures to meet for information utility.

NRC ensures information utility (1) through existing agency policies that determine information is disseminated and how quickly it is made available; (2) by on-going processes such as feedback forms and user groups to solicit input on the public's interests regarding what and how information is disseminated, (3) by existing processes that routinely solicit public comments on individual documents, and (4) by existing tools and assistance that help the public find the information they are seeking.

NRC's internal policy on the public release of information directs the staff to make public information associated with the agency's regulatory processes and decisions unless restricted because, for example, it contains classified national security information, information, proprietary information, is protected by the Privacy Act, or contains other information withholdable under the Freedom of Information Act. This policy includes timeliness requirements. NRC information is available through the agency's Web site www.nrc.gov and through the Agencywide Document Access and Management System which is accessible from the Electronic Reading Room at NRC's Web site. ADAMS provides public with access to the full text of the record copy for virtually all of NRC's public records. A few records, too large for convenient access in ADAMS, are available on the NRC Public Document Room.

NRC notes that since September 11, 2001, the information made available on the agency's Web site is under review to ensure that homeland security is not compromised. This review balances restrictions related to homeland security with the need for the public to have information about NRC's regulatory activities and the industry NRC regulates. As information is cleared, it is being restored to the site.

NRC actively seeks public input on its major approaches to information dissemination and ADAMS. During the process of redesigning NRC's public Web site, NRC conducted usability surveys, held focus group meetings with several stakeholder groups, and made a prototype site publicly available for comment. Information obtained through these activities has been incorporated into the redesign of the NRC public Web site. An example of a suggestion from the public that was adopted during the redesign is the Documents for Comment which provides access to all agency documents available for comment from a single location. NRC recently approved a Web site feedback form through which NRC intends to continue of collecting public comments and measuring public satisfaction with its Web site. In addition, the NRC has formed a public user group to obtain public input on ADAMS, the document management system described above. The user group serves as a forum for two-way communications with the agency about making ADAMS more accessible and easier

NRC frequently seeks public comment on particular information products through public meetings, comment forms at its Web site, in Federal Register Notices, and at its on-line rulemaking forum and technical conference Web pages. These opportunities for public interaction are described at the NRC's Web site under *Public Involvement* (<http://www.nrc.gov/public-involve.html>), specifically at the Documents for Comment (<http://www.nrc.gov/public-involve/doc-comment.html>), and also at Contact Us (<http://www.nrc.gov/who-we-are/contactus.html>).

Another important component of utility is the ability of the user to find the information he is seeking. In the recent redesign of NRC's Web site, the agency made a special effort to enhance the public's ability to find information. This included organizing information to public interests, highlighting key topics important to the public, improving and simplifying Web site navigation, improving the site's finding aids (site search, index, and site navigation) and making all contact information available from a single page (Contact Us). In addition, a full-time staff of technical reference librarians in the agency's Public Document Room whose sole mission is to help the public find and obtain the information they seek. The Room may be reached by visiting the PDR, or by phone, fax, mail, e-mail, or a query form on the Web site.

How NRC's Draft Guidelines Meet the Standard for Information Integrity

Integrity refers to the security of information -- its protection from unauthorized access or revision to ensure that the information is not compromised. NRC's proposed Information Integrity Guidelines are built on extensive existing policies and procedures to meet the standard for information integrity.

The agency ensures information integrity by issuing security clearances to employees, contractors, and others commensurate with their access to NRC, physical and electronic controls to information and the equipment used to process it; by the security practices for agency computer systems; by the agency's records management processes; and by management controls and concurrences that are required before information is finally made publicly available.

In addition to requiring clearances for all employees, NRC requires contractors with access to computer systems and associated information to undergo a clearance process. Levels of clearance depend on the sensitivity of the information to which the individual requires access.

Only certain authorized staff or contractors have physical access to the computer facilities to store and process NRC's information and records. Electronic access is password protected and levels of access are graduated, with only a few authorized staff and contractors having powerful systems administration privileges.

The NRC's policies concerning system development and maintenance ensure that computer systems implemented by the NRC are reliable and do not inadvertently alter data. Procedures require that systems, prior to acceptance, be tested to ensure proper performance of the software and the supporting network and telecommunications systems. Computer security controls determine appropriate levels of access to computers, network equipment, and computer systems, as specified in policies on computer and telecommunications security.

NRC's records management program ensures that the agency's official records are maintained and protected. The Agencywide Documents Access and Management System (ADAMS) stores official records in an image format to ensure the fidelity of the record. A document is declared as an official record in ADAMS it cannot be deleted or changed without the approval of authorized records officials with explicit approval by senior management. A complete, independent document repository contains copies of the official records, which are available for view through the NRC Web site. Incoming information which supports agency regulatory decisions is scanned as an image, stored in the same manner, and is thus protected against tampering.

NRC's correspondence policy specifies the agency's management review and approval needed to finalize an internally generated document before it becomes an official record. NRC's policy that no copy of a document is made publicly available unless it is an official record. In addition, NRC's Web policies specify the approvals required for the contextual information pages at our Web site (all information at the Web site other than copies of official records documents).

How NRC's Draft Guidelines Meet the Standard for Information Objectivity

Objectivity, as defined in the OMB guidelines, addresses both presentation and substance of the information must be accurate, clear, complete, and unbiased. NRC's proposed Information Quality Guidelines are built on numerous existing policies and procedures to meet the standard for information objectivity.

NRC's existing policies and standards ensure that NRC information meets the standard for objectivity, in both presentation and substance. These policies address correspondence reports, contractor and grantee reports, and public Web site standards. The agency Regulations Handbook and Regulatory Analysis Guidelines also address objectivity.

The NRC recognizes the special requirements for ensuring objectivity for SFS information. It is important that this information be unbiased and transparent. Transparency refers to the practices of describing the data and methods used in developing an information product so that it would be possible for an independent, qualified individual or organization to reproduce the results.

To ensure that such information is unbiased, the NRC has several existing external Committees to provide peer review of agency technical information. These Advisory

- The Advisory Committee on Reactor Safeguards (ACRS)
- The Advisory Committee on Nuclear Waste (ACNW)
- The Advisory Committee on Medical Uses of Isotopes (ACMUI)

The Charters of the ACRS, ACNW, and ACMUI are available at the agency Public Web site: <http://www.nrc.gov/what-we-do/regulatory/advisory.html>

For activities related to the nuclear materials program, the NRC coordinates regulatory responsibilities with the Agreement States. It is NRC's policy to provide an opportunity for Agreement States for early and substantive involvement in the formulation of rules, regulations, directives or guidance. For some of the more significant materials regulatory changes, Agreement States form work teams to develop new regulatory products. For example, the revision to NRC's regulations for the medical community (10 CFR Part 35) involved interaction with the Agreement States. NRC also provides opportunity for active State involvement through the Governor appointed State Liaison Officers Program.

NRC has also established an internal advisory group—the Committee for Review of Regulatory Requirements (CRGR)—that reviews proposed changes to regulatory requirements, correspondence, and regulatory guidance. The CRGR reviews the implications of proposed regulatory changes on NRC licensees to ensure they are justified. The CRGR also reviews the use of risk-informed approaches in NRC's regulatory requirements.

Also, consistent with the traditional means by which scientific and engineering communities ensure the quality of research, the NRC requires that the results of the research it sponsors be subjected to independent peer review to ensure that it is unbiased.

The NRC produces transparent analytic results by requiring that the data and methods used be explained. Results are intended to be reproducible by a qualified third party. NRC's policy and procedures concerning the preparation of staff, contractor, and grantee reports

the Regulatory Analysis Guidelines ensure transparency and reproducibility. Transparency is promoted by including a methodology section in research and investigative reports that describes the methods used and data sources, including any computer codes, for that report. Some of these analytical methods are described in NRC's Regulatory Guidance Review Plans, the NRC Inspection Manual, the NRC Enforcement Manual, and other technical reports. In addition, much of the data from license applications or other industry documents are also made publicly available.

In situations where public access to data and methods will not occur due to other concerns (e.g., classified national security information, safeguards information, proprietary information, or information protected by the Privacy Act), the NRC applies rigorous review processes and documents the checks undertaken.

The NRC believes that public involvement is a key element of the information quality standard and an important element of ensuring unbiased, transparent analyses. This belief is reflected in NRC's use of participatory rulemaking practices and its encouragement of public comment on draft rulemakings and draft guidance documents. These opportunities for public interaction are described at the NRC's Web site under *Public Involvement* (<http://www.nrc.gov/public-involve.html>) and also at *Contact Us* (<http://www.nrc.gov/contactus.html>). Public meetings are announced on our agency's Web site at the Meeting Schedule page. The agency's public meeting practices include live Webcast Commission meetings and the use of facilitators in meetings designed for public input to maximize meeting effectiveness.

Administrative Processes for the Public to Seek Correction of Information

As illustrated in the discussion above, the processes that the NRC uses to generate and disseminate information provide a variety of ways in which the public can seek correction of information throughout the development process of a final information product. As the draft guidelines that follow, the NRC will provide a new process by which the public can seek corrections of information as described in Section 515(a) of Public Law 106-554.

Conclusion

The NRC's existing policy and procedures meet OMB's information quality standard for information quality. As described above, quality is achieved through numerous existing review processes, commensurate with the nature of the information, that occur prior to dissemination. Additionally, the NRC's five-member Commission reviews and approves important policies.