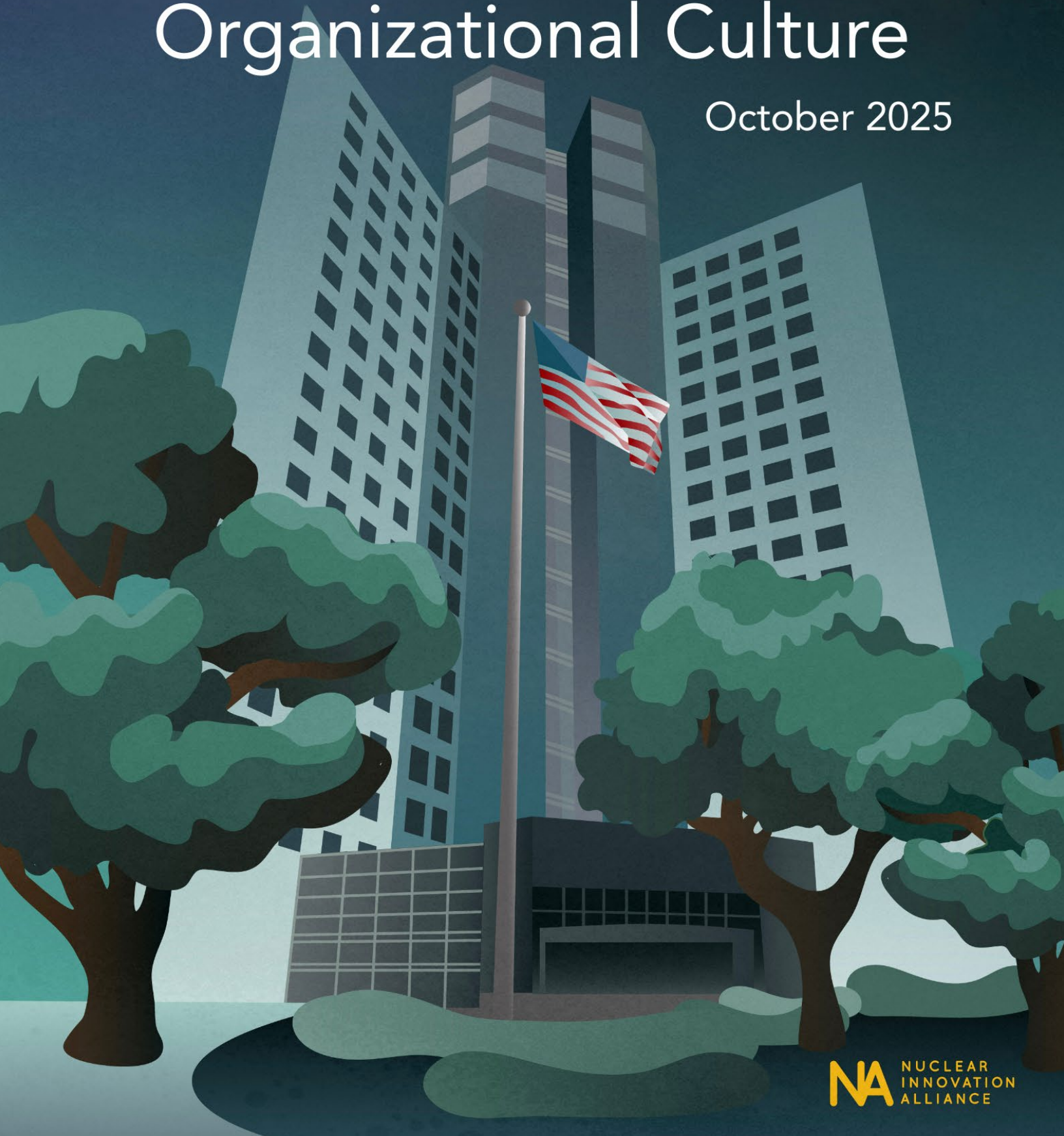


# Improving Nuclear Regulatory Commission Organizational Culture

October 2025



# Improving Nuclear Regulatory Commission Organizational Culture



**Authors:**

Brittany Morgan  
Sarah Cole

October 2025

© 2025 Nuclear Innovation Alliance, All Rights Reserved

This report is available online at:

<https://nuclearinnovationalliance.org/resources>

# Executive Summary

The Nuclear Innovation Alliance (NIA) convened a workshop under Chatham House Rule on Improving Nuclear Regulatory Commission (NRC) Organizational Culture in June 2025. Those unable to attend the workshop met with NIA separately. The participants included former NRC Commissioners, senior leadership, and staff to discuss internal dynamics that affect the agency's organizational workplace culture. The workshop was divided into four sessions: (1) establishing expectations and accountability between management and staff, (2) addressing challenges in recruitment and retention, (3) improving differing professional opinion (DPO), concurrence processes, and interactions with the Office of General Counsel (OGC), and (4) creating strategies for navigating rapid change as NRC implements congressional and executive order direction.

Based on these discussions, the NIA synthesized findings into five pillars, each containing actionable recommendations. These five pillars include:

## *Pillar 1: Accountability, Autonomy and Alignment*

NRC staff must be accountable for performance while having sufficient autonomy to exercise expert judgement. Clear expectations, timely leadership decisions, and alignment between the Commission, Chairman, and EDO are essential to reinforce accountability across the agency.

## *Pillar 2: Leadership Development and Qualifications*

The NRC should strengthen leadership credibility and institutional knowledge by clarifying lines of authority, reducing management layers, and ensuring continuity in key roles. Continued investment in leadership development programs, cross-office collaboration, and early career training and rotation opportunities are essential to build capable leaders.

## *Pillar 3: Differing Professional Opinions, Concurrence Processes, and Interactions with the Office of General Counsel*

Differing views must be heard without consuming disproportionate resources. Scaling responses to safety significance and improving communication will preserve safety culture while resolving disputes efficiently. Clarifying the Office of General Counsel's role in supporting agency staff will likewise increase organizational efficiency.

## *Pillar 4: Employee Retention*

Employee retention depends on fostering a sense of purpose in fulfilling NRC's unique mission, meaningful career pathways, attractive pay and benefits, and recognition of staff contributions. Strengthening these efforts will preserve technical expertise and sustain workforce motivation.

## *Pillar 5: Recruitment*

The NRC should compete for mission-ready talent through targeted pipelines, faster hiring, and more attractive compensation. Promoting the agency's mission and offering practical entry points like regional rotations will help draw in the next generation of experts.

# Workshop Findings

The workshop discussions revealed five key pillars of findings. The following table summarizes the recommendations, which are discussed in detail in the body of the report. Recommendations are organized by discussion, not by priority

*Table 1: Summary of Workshop Recommendations*

| <b>Pillar 1: Accountability, Autonomy and Alignment</b>  |
|--|
| <ul style="list-style-type: none"> <li>• <b>Rec. 1.1:</b> NRC leadership should enable staff to share learning tools on risk-informed licensing, including through use of artificial intelligence.</li> <li>• <b>Rec. 1.2:</b> The NRC should update guidance with lessons learned and eliminate guidance that no longer serves the staff.</li> <li>• <b>Rec. 1.3:</b> The Commission and the Commission Secretary should set realistic voting deadlines and consistently meet them to strengthen accountability in timely decision-making.</li> <li>• <b>Rec. 1.4:</b> The Commission should continue to coordinate voting priorities through their technical advisors and staff.</li> <li>• <b>Rec. 1.5:</b> The Commission, the Chairman, and the Executive Director for Operations should strengthen their alignment on roles and responsibilities to optimize agency operations, establish clear deadlines, and reinforce accountability.</li> <li>• <b>Rec. 1.6:</b> The Commission should direct the Executive Director for Operations to establish a management model that includes systematic oversight mechanisms to assess progress and ensure accountability.</li> </ul>   |
| <b>Pillar 2: Leadership Development &amp; Qualifications</b>   |
| <ul style="list-style-type: none"> <li>• <b>Rec 2.1:</b> The NRC should reconsider its leadership structure to determine which positions require continuity and cannot afford the fungibility typically associated with Senior Executive Service positions.</li> <li>• <b>Rec 2.2:</b> NRC leadership should expand training opportunities for early career development, including the Nuclear Regulator Apprenticeship Network program, and encourage use of appropriately timed rotational programs to increase cross-divisional collaboration.</li> <li>• <b>Rec 2.3:</b> NRC leadership should leverage artificial intelligence and training to better enable staff utilization through the Agency Project Management Initiative.</li> <li>• <b>Rec 2.4:</b> The NRC should address siloing through improving cross-office collaboration and trust-building, ensuring that the technical basis for decisions is clearly shared and understood across the agency.</li> <li>• <b>Rec. 2.5:</b> The NRC should ensure vertical alignment of risk-informed, performance-based approaches from leadership to staff.</li> <li>• <b>Rec. 2.6:</b> The NRC should prioritize leadership development through the Leaders at All Levels and Aspiring Leaders programs within the Leaders Academy.</li> </ul> |

**Pillar 3: Differing Professional Opinions, Concurrence Processes, and Interactions with the Office of General Counsel**

- **Rec. 3.1:** The NRC should create clear lines of accountability and optimize centralized decision-making.
- **Rec. 3.2:** The NRC should continue to improve the timeliness of Differing Professional Opinions and develop off-ramps that allow for resolution without escalation.
- **Rec. 3.3:** The NRC should improve internal communication procedures in the Differing Professional Opinions process.
- **Rec. 3.4:** The NRC technical staff and Office of General Counsel should jointly engage early in the development of concurrence documents where legal expertise is most needed.
- **Rec. 3.5:** The NRC should continue to scale Non-Concurrence and Differing Professional Opinion responses to the safety significance of the issue.
- **Rec. 3.6:** Under the guidance of the Commission, the Office of General Counsel should strive for timely, collaborative support for technical staff by clearly communicating legal risks and offering practical, legally sound options.

**Pillar 4: Retention**

- **Rec. 4.1:** The NRC should expand its technical leadership pathways.
- **Rec. 4.2:** The NRC should adopt the Office of Personnel Management's "special rates" to retain high-quality talent.
- **Rec. 4.3:** The NRC should conduct its performance appraisals with clearer distinction relative to performance of peers, greater specificity, and constructive feedback.
- **Rec. 4.4:** The NRC should strengthen staff enrichment and morale through mentorship, student loan repayment, and industry site visits.
- **Rec. 4.5:** NRC leadership should continue to celebrate and reward exceptional staff achievements.

**Pillar 5: Recruitment**

- **Rec. 5.1:** The NRC should continue utilizing its mission as a highly effective recruitment tool.
- **Rec. 5.2:** The Office of the Chief Human Capital Officer should institute a recruitment program to target talent pools already immersed in specialized work where training and discipline directly translate to technical roles at the NRC.
- **Rec. 5.3:** The NRC should increase early career staff attendance at career fairs.
- **Rec. 5.4:** The NRC should continue its efforts to improve hiring and onboarding timeliness by reducing its average time-to-hire to 80 days, fully leveraging direct hire authority, and issuing interim security clearances.
- **Rec. 5.5:** The NRC should adopt the Office of Personnel Management's "special rates" to attract quality talent.
- **Rec. 5.6:** The NRC should offer a pathway for regional offices to serve as entry points for new hires, providing hands-on experience before transitioning to headquarters roles.

# Table of Contents

|   |    |
|---|----|
| Executive Summary.....  | 3  |
| Workshop Findings .....   | 4  |
| Table of Contents.....  | 6  |
| Introduction .....  | 7  |
| Background .....  | 8  |
| Pillar 1: Accountability, Autonomy and Alignment .....  | 10 |
| Pillar 2: Leadership Development & Qualifications .....   | 15 |
| Pillar 3: Differing Professional Opinions, Concurrence Processes, and Interactions with the Office of General Counsel ..... | 20 |
| Pillar 4: Retention.....  | 23 |
| Pillar 5: Recruitment .....   | 27 |
| Conclusion.....   | 31 |

# Introduction

Deployment of new nuclear energy is imperative to achieve the United States' energy security and climate goals, and licensing new nuclear technologies must become more efficient to meet the moment. In order to accommodate these new technologies, licensing reform is needed on three timescales: 1) the near term, to support first-of-a-kind deployment; 2) the medium term, to support subsequent commercial deployment; and 3) the long term, to support widescale deployment of new nuclear reactors. Much work is being done within the NRC to improve licensing efficiency, but this progress can only be sustained through a high-performing, empowered, and accountable workforce and an organizational culture that values innovation, collaboration, and mission focus.

While the NRC strives to embrace risk-informed, performance-based, and technology-inclusive philosophy for nuclear energy regulation, recent years have shown an unfortunate decline in workforce satisfaction. In 2023, NRC's ranking among medium-sized federal agencies plummeted to number 23 out of 26,<sup>1</sup> whereas in previous years, it had consistently ranked among the "best places to work," including first place between 2007 and 2010.<sup>2</sup> This declining trend must be reversed to achieve the mission of the agency—because even the most well-designed regulatory frameworks cannot succeed without a capable, motivated, and mission-driven workforce.

A recent marker of the tide turning is the May 2025 release of NRC's Mission Statement Implementation Guidance, which explains key concepts needed to successfully implement each of the four elements of the mission.<sup>3</sup> The guidance describes how to apply important concepts such as risk-informed decision making, timeliness, and organizational cohesion, among others. It offers clarity in how the mission should be incorporated into daily work to better align staff with leadership priorities.

To advance the conversation for improving organizational culture at the NRC, NIA sought out former NRC employees to learn from their decades' worth of experience and identify best practices in organizational culture at NRC and elsewhere. This effort builds on NIA's previous work in the regulatory space, including [\*The Urgency of NRC Reform, Key Recommendations for Reforming U.S. Nuclear Energy Regulation\*](#),

---

<sup>1</sup> [Best Places to Work in the Federal Government | Nuclear Regulatory Commission](#)

<sup>2</sup> This study was based on data from the Office of Personnel Management (OPM) Federal Employment Viewpoint Survey (FEVS) employee engagement index.

<sup>3</sup> [Nuclear Regulatory Commission | Mission Statement Implementation Guidance | ML25106A353](#)

[Nuclear Innovation Alliance Licensing Efficiency Workshop Summary Report](#), and [Promoting Efficient NRC Advanced Reactor Licensing Reviews to Enable Rapid Decarbonization](#). Unlike these previous reports, this report analyzes workforce dynamics and organizational culture rather than execution of technical activities. NIA's findings herein are provided to empower all levels of NRC staff to efficiently work together in order to meet the current moment.

## Background

In June 2025, NIA convened former NRC Commissioners, executives, managers, and staff for a closed-door workshop focused on improving NRC's organizational culture. Individuals unable to attend the workshop but wishing to contribute met with NIA in one-on-one sessions. All discussions were conducted under Chatham House Rule to ensure that participants could speak freely without individual attribution. The NRC roles formerly held by participants and interviewees are provided below, followed by descriptions of the moderated workshop sessions.

*Table 2: Former NRC Positions of Workshop Participants and Interviewees*

|                                      |   |
|--------------------------------------|---|
| Commissioner (5)                     | Risk Analyst (2)                          |
| Executive Director of Operations (4) | Technical Assistant to a Commissioner (1) |
| Office Director (3)                  | Deputy Office Director (1)                |
| Regional Administrator (3)           | Technical Assistant (1)                   |
| Branch Chief (2)                     | Project Manager (1)                       |
| Division Director (2)                | Engineer (1)                              |

### **Session 1: Establishing expectations and accountability between management and staff**

*How does the NRC establish clear expectations about risk-informed decision-making between management and staff? To what extent does the agency hold employees accountable to its mission through project management initiatives and leadership training?*

This discussion focused on the current challenges with establishing clear expectations and accountability between management and staff. The participants highlighted the over-reliance on guidance and under-reliance on engineering judgement, questionable presumption of manager fungibility, and insufficient cross-office collaboration. Additionally, the attendees shared examples of existing learning tools for shaping clear expectations among staff, including best practices memos and exemplary regulatory documents. The discussion emphasized the importance of the Commission being a role model of accountability, for example, by balancing collegiality with timely voting, potentially through greater transparency and the revision of, and strict adherence to, the Commission's procedural timelines.

### **Session 2: Addressing recruitment and retention**

*What strategies can the agency employ to improve its recruitment and retention efforts? How does the agency combat talent attrition and "brain drain"? Is there value in bringing in more outsiders? Can employee salary grade and structure be improved to support retention? Do current professional development initiatives effectively motivate employee retention? How has the composition of the agency changed? Are there experience or knowledge gaps, and what can be done to fill them?*

This session highlighted opportunities that had a positive impact on some early career NRC staff, including rotational programs, technical training, development initiatives, and mentorship. Participants expressed concern about a perceived sense of "brain drain" and loss of high-quality talent, citing barriers to recruitment and retention, such as inflexible pay scale, lengthy time-to-hire, and limited technical leadership pathways.

### **Session 3: Improving concurrence and differing professional opinion processes and interactions with the Office of General Counsel**

*How can the NRC preserve the safety merit of differing professional opinions (DPO) and concurrence processes while omitting redundancy and non-safety significant activities? How can the Office of General Counsel (OGC) effectively help staff find solutions to internal issues?*

The workshop participants discussed the critical role of the DPO and concurrence processes in upholding the agency's safety culture and ensuring that all employees have a voice. They illustrated constructive communication strategies and highlighted the importance of improving timeliness of decision-making and developing off-ramp/non-escalation routes to reduce inefficiencies in the DPO process.

The role of the OGC in supporting NRC staff was also addressed. Participants considered the value of involving legal counsel early alongside technical reviews, as well as additional ways for OGC to more transparently and proactively help resolve legal issues.

#### **Session 4: Strategies for navigating rapid change**

*What should be the agency's top reform priorities, given its constrained resources? If you were in NRC leadership at this moment, how would you navigate the current challenging circumstances?*

The participants discussed the agency's response to the ADVANCE Act and Executive Orders, including the need for an independent NRC and for both regulatory flexibility and stability. They also discussed the importance of internal and external transparency in all NRC actions. They examined the path forward for adopting some of the reforms, including the implementation of 18-month licensing timelines, agency reorganization, and reconsidering prescriptive guidance.

## **Pillar 1: Accountability, Autonomy and Alignment**

The NRC staff must be both accountable for performance and provided sufficient autonomy to exercise their expert judgement. Realizing these objectives requires navigating several challenges. As one workshop participant explained, to be risk-informed means that "insights from probabilistic risk assessment are considered [along] with other engineering insights," yet this concept is often misunderstood and applied inconsistently across NRC offices and divisions. At the same time, the volume and complexity of staff tools and resources are not structured to support practical use, and Commission policy decisions are not consistently communicated by managers, leaving staff without the clarity to act with confidence.

Leadership actions set the tone for accountability. Commission voting timeliness and the degree of alignment between the Commission, the Chairman, and the Executive Director for Operations (EDO) are critical to accountability and the agency's ability to respond effectively to new technologies. When leaders act in concert and model timeliness and efficiency, staff are motivated and empowered to meet expectations and carry out the mission effectively.

These internal workforce dynamics determine how the NRC implements its safety culture, defined in NRC's 2011 Final Safety Culture Policy Statement as "the core values and behaviors resulting from a collective commitment by leaders and

individuals to emphasize safety over competing goals to ensure protection of people and the environment.”<sup>4</sup> The NRC’s emphasis on safety over other goals is woven into many areas of its organizational framework, shaping everything from risk philosophy to guidance development. It is important to note that the 2011 Policy Statement said that a positive safety culture should be commensurate with the safety and security significance of their activities. Furthermore, the agency’s Principles of Good Regulation make it clear that safety should be achieved through independence, openness, efficiency, clarity, and reliability.<sup>5</sup> The NRC needs to re-emphasize that focusing on the most important risks, adhering to appropriate timelines, and ensuring efficiency of agency and licensing activities do not compete with safety excellence, but rather enable it.

*The NIA recognizes that accountability issues do not characterize the NRC as a whole and that organizational change in any agency is inherently gradual. As one workshop participant explained, “Any time there is a shift, there will be early adopters, begrudging people, and wait-and-see people.” He postulated the agency may be near its “tipping point,” where the hesitant staff members begin to align and progress accelerates, driven by recent bipartisan support and an influx of license applications.*

### **Recommendation 1.1: NRC leadership should enable staff to share learning tools on risk-informed licensing, including through use of artificial intelligence.**

In 2007, the NRC initiated the Risk-Informed, Performance-Based Plan, designed to modernize its regulatory philosophy by integrating risk insights and performance-based principles. The evolution of the agency’s risk doctrine over time has created a spectrum of competing interpretations of risk qualifiers resulting in ambiguity around the meaning of being risk-informed. In certain cases, long-serving NRC staff have experienced multiple distinct regulatory paradigms over the course of their career. As a result, some employees are unclear about, or skeptical of, the agency’s approach to risk-informed decision-making and instead default to less flexible but more straightforward deterministic approaches. While this response to ambiguity makes sense, risk-informed decision-making remains a sound regulatory philosophy when applied correctly and consistently; it should be reinforced as a positive framework for consistency and improvement.

There are numerous resources available to staff, but they lack the organization and

---

<sup>4</sup> [Nuclear Regulatory Commission | Final Safety Culture Policy Statement](#)

<sup>5</sup> [Nuclear Regulatory Commission | Values | Principles of Good Regulation](#)

accessibility that make them usable. Moreover, staff lack the bandwidth to sift through helpful materials when they must remain focused on mission-related activities. To address this issue, NRC leadership should utilize artificial intelligence (AI), peer-to-peer learning, and other tools to enable the accessibility of quality resources to staff. This would improve the staff's ability to exercise autonomy, avoid unnecessary regulatory burden,<sup>6</sup> and strengthen reviews of new technology as the complexity and volume of applications increase.

#### *Precedent Documents and Memos*

An AI tool should be leveraged to organize, and increase accessibility of, the existing database of high-quality examples that demonstrate effective risk-informed regulatory approaches. The NRC should also circulate an agency-wide prompt, such as, "What are the best examples of applying risk-informed principles to licensing engagements your office, division, or branch?" and submit them to a central collection point to be circulated agency-wide. These concepts should be applied to precedent documents and internal memos, using AI to flag the most valuable examples to update the database.

#### *Procedures and Templates*

While exemplary precedent documents and memos can provide regulatory clarity, it is important that their intent translates to consistent implementation. Thus, when applicable, managers should additionally use AI to ensure that procedures and templates are updated to reflect the intent of such documents. Over time, proper utilization of quality resources and adjustment to procedures and templates will shape staff intuition and strengthen regulatory alignment across the organization.

### **Recommendation 1.2: The NRC should update guidance with lessons learned and eliminate guidance that no longer serves the staff.**

The NRC should update its guidance to incorporate lessons learned from risk-informed practices. Currently, guidance is perceived as burdensome: it constrains staff, discouraging the use of engineering judgement, and has led to "regulatory ratcheting" and excessive focus on minutiae. As one workshop participant put it, the NRC "went too far and now there is rigidity." The agency should prioritize guidance based on safety significance, retire outdated material, and clearly distinguish between binding requirements and supporting information. This would preserve procedural continuity where essential while allowing staff to apply engineering judgment where flexibility is appropriate. The staff and senior leadership should

---

<sup>6</sup> [Nuclear Regulatory Commission | Unnecessary regulatory burden](#)

ensure that guidance is in alignment with the reasonable assurance of adequate protection standard. If the guidance is not aligned with that standard, it should be modified or dropped.

**Recommendation 1.3: The Commission and the Commission Secretary should set realistic voting deadlines and consistently meet them to strengthen accountability in timely decision-making.**

The Commission plays an essential role in policy and regulatory decisions. Having a bipartisan deliberative body makes it more likely that policies and rules will be reasonable and lasting. As should be the case throughout all of NRC, sound decision-making must also be efficient. Timely Commission voting sets the tone for efficient NRC operations, reinforcing a culture of accountability. Unexplained delays in Commission voting frustrate NRC staff and stakeholders awaiting policy clarity. As stated by one participant, delays can mean that by the time the Commission considers a draft rule, “The world has changed around the document.” On the other hand, sometimes delays reflect shifting priorities or circumstances.

The Commission plays a critical role in setting expectations for timeliness across the agency. Therefore, it should hold itself to a high standard for timely decision-making. Internal Commission Procedures establish clear timelines for voting actions, spanning from 10 business days, for actions such as paper recommendations and Commission meetings, to 60 business days for final rulemakings.<sup>7</sup> As written, these timelines are almost never met. The Commission and the Commission Secretary should reexamine these timelines and adjust them as needed to be practical and reasonable. The Commission should consistently meet these revised timelines, and, if priorities shift, or in the case of exceptional circumstances, the Commission Secretary should communicate a succinct explanation to staff and stakeholders.

**Recommendation 1.4: The Commission should continue to coordinate voting priorities through their technical advisors and staff.**

Having a set of commissioners with relevant expertise and a range of perspectives makes Commission decisions more robust. However, several factors can make coordination challenging. For example, the Sunshine Act severely limits the ability of Commissioners to meet without calling a public meeting. Also, new Commissioners inherit a literal cart of 40 or more pending votes delivered on their first day in office, starting them off with a backlog of work as they assume their role in leadership.

---

<sup>7</sup> [Nuclear Regulatory Commission | Internal Commission Procedures | ML11269A125](#)

Additionally, different Commissioners approach their work according to their individual style, expertise, and the content of the action. For instance, in some cases the Commissioner may rely heavily on his or her staff, especially in the case of specialized technical content, whereas in others, the Commissioner may prefer to independently examine the content of the issue. Furthermore, in the past there was some perception that voting early was “not collegial,” but the Commission culture seems to have shifted since then with greater prioritization of timeliness.

To overcome these challenges, the Commissioners should utilize their technical advisors and staff to establish mutual understanding of voting priorities. This informal communication would allow for appropriate collaboration between Commissioners without violating rules and internal procedures for Commissioner interactions.

**Recommendation 1.5: The Commission, the Chairman, and the Executive Director for Operations should strengthen their alignment on roles and responsibilities to optimize agency operations, establish clear deadlines, and reinforce accountability.**

Alignment between the Commission, the Chairman, and the Executive Director for Operations (EDO) on roles and responsibilities has not always been consistent at the NRC. Misalignment creates uncertainty in decision-making and slows operational execution. Interviewees and workshop participants highlighted that the agency performs at its best when there is strong alignment between these leadership positions. They cited that this most notably occurred during the early 2000s, when clear deadlines and visible progress measures for license renewals and power uprates reinforced accountability both within the agency and in its reporting to Congress. Without consistent role clarity and communication, priorities risk being delayed or inconsistently applied, thus weakening accountability and reducing efficiency.

On a periodic basis, especially when adjustments are made in leadership positions, the Commission should reaffirm and communicate a clear framework for roles and responsibilities under the Atomic Energy Act. The EDO should maintain direct accountability to the Chairman while keeping the full Commission currently and consistently informed, ensuring early consultation when operational matters evolve into policy issues. The Chairman should likewise engage collaboratively with fellow Commissioners to prevent gaps between policy direction and execution. The Chairman and the EDO should also clarify areas of operational autonomy, matters requiring Commission awareness, and issues requiring consultation with the

Chairman. Clear institutionalization of these practices will reduce ambiguity, ensure policy is executed efficiently, and strengthen operations.

**Recommendation 1.6: The Commission should direct the Executive Director for Operations to establish a management model that includes systematic oversight mechanisms to assess progress and ensure accountability.**

Interviewees with experience as both NRC executives and industry leaders expressed that NRC needs a more cohesive management model that evaluates performance in a way that drives results and reveals opportunities for continuous improvement. Without a systematic framework, leadership changes contribute to uneven results and weaken long-term accountability.

Therefore, the Commission should direct the EDO to establish a management model that incorporates routine oversight mechanisms to ensure that progress is measured and reinforced over time. This model should set clear direction at the leadership level, define expectations and behaviors, and introduce structured tools such as annual and long-term goal setting, management reviews, and performance assessments, to identify gaps and track progress. The NRC can draw on lessons learned from high-performing government agencies as well as the nuclear industry and organizations such as the World Association of Nuclear Operators (WANO) to develop this model for accountability and continuous improvement.

## **Pillar 2: Leadership Development & Qualifications**

The NRC's ability to sustain its mission depends on leaders with the technical acumen and management skills to guide it. Workshop participants described a noticeable experience gap within the agency, with younger, less experienced employees being promoted to replace retirees, while opportunities for structured development and technical specialization have diminished. As one participant described, some junior leaders have not yet "gotten battle scars" from early career experiences that build judgment and perspective. Moreover, leadership assignments are not always aligned with technical expertise, leaving some staff to shoulder responsibilities where they need more training.

At the same time, some participants noted that the agency had shifted towards cultivating "generalists" rather than specialists, creating challenges. Staff without strong subject matter expertise rely on prescriptive guidance to compensate for knowledge gaps. Training opportunities that previously provided hands-on

experience have been reduced, limiting staff exposure to helpful, real-world context of their work.

Management credibility is also shaped by how well managers apply their technical understanding with organizational skills. In some cases, project managers place insufficient emphasis on licensing timelines, while in others, first-line supervisors are perceived as overly deferential to their technical staff. Both dynamics point to the need for leadership development that promotes growth in balancing soft skills with technical expertise to manage effectively. The agency needs both highly specialized technical experts as well as leaders with the right combination of technical credibility and soft skills to effectively manage the technical experts. Re-establishing structured leadership development initiatives, ensuring vertical alignment on risk-informed practices, and strengthening collaboration across offices are all necessary to prepare leaders to guide the agency through an era of change.

**Recommendation 2.1: The NRC should reconsider its leadership structure to determine which positions require continuity and cannot afford the fungibility typically associated with Senior Executive Service positions.**

Excessive rotation of the NRC's Senior Executive Staff (SES) can drain resources and negatively impact continuity, institutional memory, and stability. Offices invest significant time in onboarding a new SES, only to have them depart soon after, which requires the training process to begin again. Fungibility has also reportedly led to a loss of technical knowledge. As one workshop participant explained, some "no brainer issues" are elevated to higher management simply because the SES in the role lacks the tenure to recognize that the matter could be resolved at a lower level, causing strain between managers and staff. Thus, the NRC should ensure that permanent positions remain for managerial roles that require exceptional technical expertise.

**Recommendation 2.2: NRC leadership should expand training opportunities for early career development, including the Nuclear Regulator Apprenticeship Network program, and encourage use of appropriately timed rotational programs to increase cross-divisional collaboration.**

Staff development initiatives, including early career programs, training, and rotations, can encourage depth and breadth of regulatory expertise among junior staff, creating highly competent subject matter experts on the individual level while also increasing cross-divisional collaboration.

### *Early Career Development Programs*

The Nuclear Regulator Apprenticeship Network (NRAN) is a highly valuable opportunity for early career staff, providing new college graduates with foundational regulatory knowledge through an initial 3-month bootcamp, followed by three, 5-month rotations. Workshop participants who completed earlier iterations of what is now the NRAN program praised it, specifically noting hands-on learning opportunities and the chance to “actually go see stuff.” It was stated that graduates of NRAN and its predecessors were some of the most positive contributors to the workforce. The exceptional opportunities “to grow and succeed” through these programs left them feeling valued and capable.

Yet cohort sizes within NRAN are notoriously small, and it remains to be seen how large the cohorts required under the ADVANCE Act will be. Expanding early career professional development is crucial for combatting what the workshop participants perceived as a noticeable decline in the technical expertise of its staff compared to the 1980s and 1990s. Participants noted that in the past the agency valued specialists, while more recently it seems that the NRC encourages staff to become “generalists.” Without subject matter expertise, generalist staff members default to (prescriptive) guidance to fill in their knowledge gaps. Furthermore, many NRC employees are “fresh out of college” and “out of their technical realm.” Thus, scaling up early-career programs would help fill experience and knowledge gaps in the agency.

### *Training*

Training opportunities, such as power plant site visits and simulation-based experiences at facilities like the Technical Training Center have decreased since the mid-2000s due to funding cuts. These kinds of opportunities are often reserved for staff in reactor-specific offices, excluding other employees who should also benefit from this exposure.

### *Rotations*

Rotational programs can strengthen early career development by promoting cross-divisional collaboration and broadening perspectives on safety culture. *However, they must be implemented so as not to disrupt licensing review timelines.* Participants who completed regional rotations found them highly beneficial, providing well-rounded experience and exposure to varying practices across regions and plants. When timed appropriately and aligned with the employee’s technical expertise, early- and mid-career staff rotations can be an enriching experience that enhances cross-divisional understanding and collaboration.

### **Recommendation 2.3: NRC leadership should leverage artificial intelligence and training to better enable staff utilization through the Agency Project Management Initiative.**

Project management is uneven across the NRC. While many project managers are excellent, some are not being held accountable to deliver their projects on schedule. Others do not have adequate project management training. One workshop participant argued that the agency “needs stronger ownership and ability to drive projects.” In response, in early 2025 the NRC initiated the Agency Project Management Initiative (APMI),<sup>8</sup> which enhances visibility of workload in relation to project alignment, strengthens accountability, and helps ensure that staff effort is prioritized toward licensing activities. The NRC should leverage AI within this program to: 1) accomplish budget alignment, qualification matching, and gap identification described in APMI, 2) perform low value work that detracts from staff focus to mission-critical activities, and 3) enable staff accountability to the Principles of Good Regulation. In addition, the NRC should improve project management through training, documentation of best practices, and peer learning.

### **Recommendation 2.4: The NRC should address siloing through improving cross-office collaboration and trust-building, ensuring that the technical basis for decisions is clearly shared and understood across the agency.**

NRC management must make staff aware of how their office’s priorities align with other offices and who is ultimately responsible for each task. According to a workshop participant, “Talking to people across offices is like talking to a whole other planet.” Insufficient collaboration contributes to lack of understanding. One participant stated that there is a “perception that deterministic people do their thing then [...] PRA guys come in and wreck it” – PRA being probabilistic risk assessment. This lack of understanding and alignment leads to further miscommunication between offices that are in different stages of adopting risk-informed practices.

While the agency works towards unifying understanding and implementation of risk-informed, performance-based philosophy, differing offices working on licensing actions should share their technical bases (e.g., through regular cross-office meetings) and accept decisions made outside their scope.

---

<sup>8</sup> [Nuclear Regulatory Commission | Agency Project Management Initiative](#)

### **Recommendation 2.5: The NRC should ensure vertical alignment of risk-informed, performance-based approaches from leadership to staff.**

One participant stated that NRC managers today often “lack the technical depth to understand risk-informed decision-making.” Another provided a particularly telling anecdote, describing a case in which a technical reviewer misunderstood the broader safety design of a system, leading to elevation of a technical non-issue to the branch chief and division director. This incident revealed a breakdown in technical oversight, and a training session was later organized to help staff understand the licensee’s passive safety design in context.

This example illustrates the necessity of vertical alignment through all levels of the organization in risk-informed, performance-based regulation.<sup>9</sup> The NRC should consider re-writing guidance and developing training programs so that risk-informed, performance-based regulation is uniformly understood and implemented across the agency.

### **Recommendation 2.6: The NRC should prioritize leadership development through the Leaders at All Levels and Aspiring Leaders programs within the Leaders Academy.**

Workshop participants and interviewees recalled that their experiences in the Leadership Academy promoted leadership credibility, succession planning, and organizational continuity. “Effectiveness is directly tied to leadership,” as stated by one attendee, and during periods of instability, it is especially important to prioritize leadership development to strengthen organizational culture.

While the NRC navigates implementation of new initiatives under constrained resources and unprecedented personnel changes, it should continue to develop its leadership pipelines through the Leaders at All Levels and Aspiring Leaders programs within the Leaders Academy, as described in the Human Capital Operating Plan.<sup>10</sup> Continued emphasis on leadership development will increase continuity and stability in the medium and the long term for the agency.

---

<sup>9</sup> [Nuclear Regulatory Commission | Risk and Performance Concepts in the NRC's Approach to Regulation](#)

<sup>10</sup> [Nuclear Regulatory Commission | Human Capital Operating Plan | ML23163A083](#)

## Pillar 3: Differing Professional Opinions, Concurrence Processes, and Interactions with the Office of General Counsel

The NRC's Differing Professional Opinions (DPO)<sup>11</sup> and Non-Concurrence Process are critical pathways for ensuring that individual expertise is considered, documented, and preserved. They allow staff to voice concerns that differ from prevailing views, thereby strengthening safety culture and reinforcing confidence that decisions are based on a full range of perspectives. As one former Branch Chief recalled, many significant concerns might have gone unaddressed without the DPO process, while another participant cautioned, "I shudder to think about what would happen if you didn't have a DPO."

However, these processes can be resource-intensive and are not always scaled to the safety significance of the issue. Participants noted that some filers are not seeking to overturn outcomes, but simply want their perspective acknowledged and recorded. As one former Commissioner observed, "Risk is in the eye of the beholder," underscoring the importance of carefully considering staff concerns without allowing low consequence matters to consume disproportionate resources.

The challenge is often less with the processes themselves than with how they are used. Some participants described DPOs as languishing because managers "aren't technical enough to quash staff," while others noted that lengthy concurrence exchanges can produce "a subpar answer." Leadership confidence and timeliness in resolving concerns are essential for ensuring these pathways strengthen, rather than stall, decision-making.

Along the same vein, while OGC has reportedly improved its responsiveness, its timeliness and helpfulness to staff can be improved. Participants emphasized that transparent and solution-oriented legal advice is necessary in addressing novel issues without undue delay.

### Recommendation 3.1: The NRC should create clear lines of accountability and optimize centralized decision-making.

Too many overlapping points of accountability within the NRC blur responsibilities, strain supervisor-employee relationships, and hinder timely decision-making. Some

---

<sup>11</sup> [Nuclear Regulatory Commission | Management Directive 10.159 | NRC Differing Professional Opinion Program](#)

workshop participants described having multiple supervisors at once, resulting in conflicting direction and “circular decision-making” rather than top-down clarity. This environment fosters prolonged deliberation instead of decisive action. In response, the NRC is in the process of reorganizing itself. In order to improve organizational clarity, the NRC should reduce excessive layers of management, centralize decision-making authority, and establish clear lines of accountability so that staff understand which senior managers are the decision-makers and who holds responsibility. At the same time, centralized authority should not translate into over-reliance on a single individual; rather, responsibilities should be distributed in a way that ensures decision-making is efficient and consistent.

### **Recommendation 3.2: The NRC should continue to improve the timeliness of Differing Professional Opinions and develop off-ramps that allow for resolution without escalation.**

The DPO process is an important mechanism for capturing staff expertise and documenting alternative views after a decision has been made. Participants emphasized that the value of the DPO process is to ensure that expert perspectives are heard and recorded in case a similar issue arises again. However, the process often involves lengthy deliberation – sometimes years – and diverts the attention of those involved from their mission-critical activities and safety-significant issues.

The NRC recognizes and has begun to address these challenges through ongoing efforts to issue guidance for the Differing Views Program, develop an analysis tool to evaluate safety significance, and resolve DPOs in a timelier fashion.<sup>12</sup> This lays a strong foundation. Further, managers should narrow the scope of DPOs at the outset, clarify filer intentions, and establish off-ramps to avoid unnecessary escalation. This will improve DPO efficiency and allow leadership to focus resources where they matter most.

### **Recommendation 3.3: The NRC should improve internal communication procedures in the Differing Professional Opinions process.**

The Non-Concurrence Process requires NRC leadership to articulate a summary of the dissenting individual’s concern in their own words, with the dissenter formally reviewing and signing off on the summary. This step ensures mutual understanding before the issue proceeds further. Incorporating this practice into the DPO process would have similar benefits. While DPOs occur *after* a decision has been made,

---

<sup>12</sup> [Nuclear Regulatory Commission | Improving Oversight and Inspection Programs | ML25077A251](#)

asking the filer to confirm that their concern has been accurately summarized would ensure that their perspective is faithfully captured, thereby strengthening filer confidence in the process.

**Recommendation 3.4: The NRC technical staff and Office of General Counsel should jointly engage early in the development of concurrence documents where legal expertise is most needed.**

Early coordination between staff and OGC helps resolve disputes around new and novel issues efficiently, ensuring that legal and technical considerations are fully integrated. For non-routine issues, the NRC technical staff and OGC should work in parallel on concurrence documents using collaborative resources that enable parallel and simultaneous legal and technical reviews. Workshop participants cited this kind of internal collaboration as a key factor in the successful and efficient reviews of recent new reactor projects.

**Recommendation 3.5: The NRC should continue to scale Non-Concurrence and Differing Professional Opinion responses to the safety significance of the issue.**

Historically, all DPOs were treated with equal weight regardless of risk significance, which made the process unnecessarily resource intensive. Interviewees stressed that “issues need to be addressed, not dismissed, but in an appropriate manner related to safety significance,” pointing to the Very Low Safety Significance Issue Resolution (VLSSIR) process as a useful model. The VLSSIR process allows inspectors to limit or discontinue review of licensing basis questions once determined to be of very low safety significance. It requires documentation of the rationale for no further pursuit, while leaving the option to revisit the issue if new information arises.

These principles could be applied to DPOs and Non-Concurrences to help leadership right-size responses to align with the safety significance of the issue. Narrowing the scope of filings and clarifying intentions at the outset would preserve the integrity of the processes, reinforce safety culture, and ensure resources remain focused on safety-significant issues.

**Recommendation 3.6:** Under the guidance of the Commission, the Office of General Counsel should strive for timely, collaborative support for technical staff by clearly communicating legal risks and offering practical, legally sound options.

Although OGC reports to the Commission, its advice and guidance remain an essential resource for NRC staff. Interviewees and workshop participants noted that OGC support for staff is not always timely, as it is not bound by schedules when working with staff, which can delay projects that require legal clarity to move forward. Participants also perceived a decline in the substantive assistance provided by OGC over the last decade or two, leaving staff without sufficient clarity on legal considerations.

The Commission should direct OGC to set reasonable expectations for responsiveness, communicate legal risks clearly, and proactively suggest legally sound options that enable staff to achieve their objectives. While OGC does not need to provide extensive written memoranda for every legal issue, establishing timeliness norms and providing constructive, solution-oriented advice would enhance the efficiency of interactions.

## **Pillar 4: Retention**

Attrition of subject matter experts has led to “brain drain,” leaving the NRC with reduced continuity of expertise and a less knowledgeable workforce. Current federal workforce instability, attractive salaries and benefits in the nuclear industry, and inconsistent use of incentives like contractual student loan repayment are just some of the factors that contribute to retention challenges.

According to an NRC audit, the agency offers a range of retention programs, including “salary advancement process, flexible work schedule, telework, transit subsidies, insurance, leave and holidays, training and development opportunities, tuition reimbursement, performance awards, and employee assistance programs.”<sup>14</sup> Yet participants noted that these efforts are not implemented consistently and do not deliver as intended. As one participant observed, “The exodus of quality talent scares the hell out of me [...] Every day the agency is taking a hit on the level of knowledge and wisdom.”

Participants also emphasized that limited advancement opportunities for technical experts and compensation structures that stagnate over time can diminish motivation

and morale. Without authentic opportunities for growth and recognition, staff may become disengaged at a time when their expertise is most critical. Recently, the NRC has demonstrated that targeted adjustments can strengthen both oversight and retention. For example, in May 2025 the Commission supported extending resident inspector tours,<sup>13</sup> a change that reduces retention issues in these positions, reinforces deep institutional knowledge, and demonstrates that the NRC is committed to supporting staff capacity.

#### **Recommendation 4.1: The NRC should expand its technical leadership pathways.**

For employees who prefer mastery of technical subjects over managerial roles, advancement opportunities are limited and compensation stagnates. This lack of opportunities to progress can be deeply demotivating. Once they reach the General Grade (GG) -14 or GG-15 level, many technically skilled employees “just sit there,” with few advancement options beyond personnel management, and limited raises, based primarily on cost of living. As one participant stated, it is “not enticing to never get another [meaningful] raise ever.” A former early-career engineer noted that watching a GG-13 employee remain at the same level for decades “just doing okay” also sends a discouraging message to younger staff.

The NRC must create clear, rewarding pathways that allow subject matter experts to continue advancing without being forced out of technical work. It should increase the number of Senior Level (SL) positions, which OPM established for employees whose duties exceed the GG-15 level but do not involve executive or managerial responsibilities.<sup>14</sup> These positions are specifically designed to retain highly skilled subject matter experts, providing appropriate recognition and better compensation while preserving a technical career track.<sup>15</sup>

#### **Recommendation 4.2: The NRC should adopt the Office of Personnel Management’s “special rates” to retain high-quality talent.**

The GG pay scale system constrains promotion to time in position rather than merit or performance.<sup>16</sup> Employees advance one step annually for only the first four steps,

---

<sup>13</sup> [Nuclear Regulatory Commission | Recommendation to Increase Resident Inspector Tour Length | ML24274A345](#)

<sup>14</sup> [Office of Personnel Management | Senior-Level \(SL\) & Scientific and Professional \(ST\) Positions](#)

<sup>15</sup> [Nuclear Regulatory Commission | Senior Level System | NRC Management Directive | ML19051A001](#)

<sup>16</sup> [Defense Counterintelligence and Security Agency | Pay & Benefits](#)

then every two years for steps five through seven, and every three years for steps eight through ten. Thus, it takes 18 years to advance from step 1 to step 10 within a single GG grade if an employee remains in that grade. In effect, employees with the greatest experience and tenure within their grade face time dilation, with advancement stretching out into longer intervals as they approach the top of the scale. This leaves many employees feeling undervalued and lacking financial incentive to stay.

Adopting “special rates” authority from the Office of Personnel Management (OPM)<sup>17</sup> would allow NRC to offer compensation that is more competitive with the private sector, where salaries are significantly higher for similar technical roles. This approach would reduce the attrition of subject matter experts whose expertise is critical to the agency’s mission.

**Recommendation 4.3: The NRC should conduct its performance appraisals with clearer distinction relative to performance of peers, greater specificity, and constructive feedback.**

The current performance appraisal system at the NRC is perceived as demotivating because it yields little meaningful differentiation among staff. One workshop participant noted, “Everyone ends up excellent or outstanding.” Another stated that staff often receive a “Fully Successful” rating simply for being new, then they advance to “Outstanding” the following year without measurable improvement. This practice diminishes the significance of truly outstanding performance and undermines the incentive to improve. In addition, performance reviews are a significant administrative burden, with some branch chiefs stepping away from their regular duties for weeks at a time to complete them, and multiple levels of management required to review.

To make performance management more meaningful, the NRC should set clear, specific standards for what constitutes different levels of performance, provide constructive feedback related to such standards, and hold supervisors accountable for distinguishing between employee contributions. At the same time, there should be no quotas for ratings; supervisors should not be penalized for giving many high ratings if employees are being evaluated fairly against the standard.

---

<sup>17</sup> [Office of Personnel Management | Special Rates](#)

**Recommendation 4.4: The NRC should strengthen staff enrichment and morale through mentorship, student loan repayment, and industry site visits.**

#### *Mentorship*

Formal mentorship programs foster strong connections between early-career and senior staff, motivating junior employees to remain at the agency. NRC should treat mentorship as a deliberate element of staff retention.

#### *Student Loan Repayment*

Although offered on paper, workshop participants relayed that the student loan repayment program is rarely implemented. In some cases, new employees were told after hiring, “we don’t really do that.” This inconsistency is frustrating and undermines trust in the agency. The NRC should create a culture of consistent follow-through to retain employees with student debt.

#### *Site Visits*

A former office director recommended taking staff on tours of nuclear power plants. These types of initiatives can help staff visualize nuclear technology at play, thereby instilling “a sense of pride in working at the agency” and serving as “important morale builders.” Such opportunities are especially valuable for non-technical staff, as they reinforce connection to the agency’s mission and strengthen organizational culture.

**Recommendation 4.5: NRC leadership should continue to celebrate and reward exceptional staff achievements.**

Rapid change at the agency has strained staff morale. With ongoing personnel changes, many staff are taking on new responsibilities and engaging in creative problem-solving in order to meet new requirements and ambitious deadlines. To the highest extent possible, NRC leadership should highlight and reward staff achievements, for example, with the Exceptional Performance Bonus authorized by the ADVANCE Act,<sup>18</sup> to bolster staff morale.

---

<sup>18</sup> [U.S. Congress | Accelerating Deployment of Versatile, Advanced Nuclear for Clean Energy \(ADVANCE\) Act of 2024](#)

## Pillar 5: Recruitment

The NRC faces significant recruitment challenges at a time when staffing demand is rising. Nearly one third of the agency is already eligible for retirement, and many senior leaders have recently departed, raising concerns about continuity of expertise. At the same time, lengthy hiring processes and rigid salary structures make it difficult for the NRC to compete with private industry, which offers both higher starting salaries and clearer opportunities for advancement. One participant described the current hiring process as “painful,” noting that extended delays often cause the agency to lose promising candidates who cannot wait.

Interviewees emphasized that engineering and technical acumen should be prioritized in recruitment, ensuring that new hires arrive prepared to contribute to mission-critical work. Others noted that while broad outreach through career fairs and university events raises awareness, it can miss candidates whose training most directly aligns with NRC’s technical needs, such as those from shipyards, maritime academies, and military nuclear programs. At the same time, several participants highlighted that NRC’s mission remains one of its most powerful recruitment tools, attracting individuals motivated by public service and national impact.

The NRC must strengthen its pipeline, streamline hiring processes, better communicate its value proposition, and create clear pathways that balance technical expertise with the values of safety and service at the core of the agency’s mission.

### Recommendation 5.1: The NRC should continue utilizing its mission as a highly effective recruitment tool.

The NRC’s mission statement now reads:

*The NRC protects public health and safety and advances the nation’s common defense and security by enabling the safe and secure use and deployment of civilian nuclear energy technologies and radioactive materials through efficient and reliable licensing, oversight, and regulation for the benefit of society and the environment.*

The NRC’s public-serving mission has long been one of its most compelling strengths. When asked what drew them to work for the agency, workshop participants pointed to the strong sense of purpose in their roles and a sense of pride in serving their country. The NRC should continue to promote its mission as a central tenet of recruitment efforts.

**Recommendation 5.2: The Office of the Chief Human Capital Officer should institute a recruitment program to target talent pools already immersed in specialized work where training and discipline directly translate to technical roles at the NRC.**

Workshop participants suggested that the NRC's traditional recruitment approach may miss candidates most naturally aligned with its mission and culture. In FY 2023, the NRC attended over 50 recruitment events, ranging from university job fairs to industry hiring events, and the NRC's own hiring expo. Participants characterized this high-level approach as "casting a wide net." While this strategy is useful for reaching broad talent pools, it risks overlooking individuals whose talent and expertise directly match NRC's technical needs.

The Office of the Chief Human Capital Officer (OCHCO) should therefore formalize a targeted pipeline strategy focused on shipyards, maritime academies, and military nuclear programs, which are valuable sources of mission-ready talent. Candidates from these environments bring discipline, operational familiarity, and technical expertise that directly translate to inspector roles and other positions. The NRC should also give priority to the recruitment of individuals who have engineering and technical degrees. Such a program would not only improve hiring efficiency but also strengthen retention by ensuring new employees enter the agency with both the technical foundation and cultural alignment to succeed.

**Recommendation 5.3: The NRC should increase early career staff attendance at career fairs.**

The agency's current reliance on Human Resources (HR) representatives at career fairs misses a key opportunity to connect with prospective hires. One workshop participant, who joined the NRC as an apprentice and later became an engineer, recalled being discouraged from attending a college career fair at his alma mater. Other participants noted this was a missed opportunity to showcase the perspective of someone students could readily relate to.

The NRC should prioritize including early career technical staff at career fairs alongside HR. Young, energetic staff can speak directly to the day-to-day realities of NRC work and provide an authentic picture of career growth, making them effective ambassadors for the agency.

**Recommendation 5.4: The NRC should continue its efforts to improve hiring and onboarding timeliness by reducing its average time-to-hire to 80 days, fully leveraging direct hire authority, and issuing interim security clearances.**

Workshop participants expressed concern that the agency's average time-to-hire weakens its ability to compete for top candidates. In 2023, the NRC Office of the Inspector General (OIG) reported that the agency's average time-to-hire was 148 days, ranking 23rd of 24 mid-sized federal agencies. By comparison, OPM's government-wide time-to-hire model is 80 days. The OIG attributed delays to turnover among HR staff, insufficient support personnel, and a cumbersome hiring process, challenges that were compounded in FY 2023 when NRC aimed to hire 400 new employees in preparation for increased licensing demand.

The NRC's Human Capital Operating Plan<sup>19</sup> already identifies improving time-to-hire as a top priority, with initiatives such as HIRENRC, which is designed to streamline hiring through expanded use of direct hiring authority, shared certificates, and targeted recruitment, as well as technology modernization efforts such as the Workforce Transformation and Tracking System and Monster Government Solutions. The ADVANCE Act further provides NRC with authority to make external direct-hire appointments for covered positions, bypassing traditional competitive procedures to accelerate hiring for mission-critical roles. To maximize these tools, the NRC should institutionalize Direct Hiring Authority use through its workforce planning, set reasonable milestones for timeliness, and ensure hiring managers understand and apply the authority consistently.

Another major factor slowing onboarding is the time required to obtain security clearances, with final adjudication taking up to a year. The NRC should expand the use of interim clearances so new hires can begin work while awaiting full adjudication.

**Recommendation 5.5: The NRC should adopt the Office of Personnel Management's "special rates" to attract quality talent.**

Participants noted that the NRC's rigid GG pay structure is a major barrier to recruitment, with many strong candidates declining offers because industry provides higher starting salaries and more attractive salary progression over time. Even modest differences in raises can tip a candidate's decision, and the long-term trajectory of compensation strongly influences whether applicants view the NRC as a

---

<sup>19</sup> [Nuclear Human Capital Operating Plan | ML23163A083 | NRC.gov](#)

viable career path. The agency should adopt OPM's "special rates" authority, allowing NRC to offer more attractive entry salaries and clearer growth potential, strengthening its ability to recruit top-tier technical talent.

**Recommendation 5.6: The NRC should offer a pathway for regional offices to serve as entry points for new hires, providing hands-on experience before transitioning to headquarters roles.**

While not all disciplines may benefit equally, interviewees recommended strengthening the recruitment pipeline by offering new hires a pathway through regional offices to gain practical exposure before transitioning to headquarters roles. This approach was described as an attractive means for candidates seeking hands-on experience and mentorship from senior staff. One participant noted that "if a third to half of staff are new and they don't have a chance to learn from tenured staff, knowledge can be lost," underscoring the value of practical experience in building technical judgment.

By providing opportunities to make regional experience part of the entry process, NRC can offer recruits a compelling value proposition. New staff would receive immediate exposure to fieldwork, structured learning opportunities, and a clear trajectory toward headquarters assignments. Former resident inspectors at the nuclear units have been among the most effective employees at the agency because they have a hands-on understanding of how nuclear reactors operate. Greater emphasis on these positions, or even structured opportunities for new employees to shadow resident inspectors, would help with training and retention. Establishing regional pathways, where appropriate, would also differentiate NRC's recruitment process from other federal employers and strengthen workforce development.

## Conclusion

The credibility of the NRC stems from the commitment of its staff and its strong sense of mission. The NRC must preserve and reinforce its technical excellence and improve its role as an effective regulator. Its ability to meet new licensing demands will depend on a workforce that is capable, accountable, motivated, and aligned at every level.

NIA's recommendations are designed to strengthen the NRC's readiness for new nuclear reactor licensing by building leadership capacity, improving internal processes, and aligning workforce strategies with agency needs. This report outlines actionable steps to improve accountability and vertical alignment, increase organizational efficiency, and enhance recruitment and retention. Improving organizational culture can ensure the NRC will remain both a trusted steward of safety and an enabler of the nation's energy security and decarbonization goals.