

Earning the Social Licence for Nuclear Operations

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Abstract

In addition to safe nuclear operation, a critical component of earning the social licence is effective communication. This paper outlines development of a communications strategy contributing to overall utility operation and project goals through:

1. Relationships with employees, host communities and the general public that are transparent and honest;
2. Processes that effectively interconnect the internal and external communications; and
3. Organizational leadership models that support communication excellence.

With strategic development of these three focus areas the nuclear operator will contribute to increased support of the operator's own 'licence to operate' and of support for the nuclear industry as a whole.

1. Introduction

Earning and maintaining permission – the 'social licence' – from the public, media, stakeholders and the host community is a key requirement of successful nuclear operations.

The 'social licence' is built upon a relationship of trust among the nuclear operator, its stakeholders, media and public, with the underpinning of a proven commitment to safe and transparent operations.

To meet the conditions of a 'social licence' it is not enough to do the right things; the operator must be seen to be doing them; and doing them to a standard the host community, stakeholders and the public deem acceptable.

This paper outlines a foundation for the nuclear social licence including:

- Key principles for earning a social licence;
- Case studies of public outreach at New Brunswick Power and Ontario Power Generation;
- A recognized communication excellence model and the importance of the relationship between the operator's management team with its Public Affairs managers and;
- The connection between internal and external communications in sustaining the social licence.

1.1 Key Principles for Earning a Social Licence:

There are some principles that can be applied to benchmark communication programs:

Principle 1: Be Open and Transparent

Transparency creates the basis on which public trust is built for complex, technical operations. It alleviates fear of the unknown and builds confidence in capability.

Transparency does not mean posting multiple technical documents on a website and expecting the public to interpret the information. It means providing information in a timely and relevant manner on both 'good' and 'bad' news.

Transparent communications are provided through clear channels of information access. Transparent communications provide information relevant to the particular audience's interests or concerns. For some, the interest may be employment opportunities or community programs; for others it may be information on safety or environmental performance.

Media outlets or individuals with a heightened interest in operations may want access to more in-depth information than a member of the general public or host community. Research shows people living closer to the nuclear station have a greater understanding of plant operations and don't worry about the station on a daily basis. They also want information more relevant to specific impacts on them. A clear path to information channels versus an information dump, provides transparency, develops trust and ensures relevancy. Access channels include (but are not limited to): an accessible media spokesperson, public information centres, dedicated information phone lines, website, advertising, email contact, community events and clear processes for more detailed requests for information.

The perception of openness and transparency depend upon:

- Information is communicated in a relevant and digestible manner to the appropriate audience;
- The operator demonstrates it will actively disclose information relevant to the public in an open and accessible manner;
- Relationships are based on mutual understanding, trust and shared values.

Principle 2: Respect and Understand the Audience

Effective communication is enhanced by recognizing the diversity of audiences with interests in the nuclear operation. Typically, the nuclear audience falls into a few broad groups:

- Host community public;
- Provincial (and to a lesser extent national) general public;
- Media;
- Key community, government and regulatory stakeholders and;
- Individuals and groups with a heightened interest in the nuclear station project or operations.

Within each of those broad categories will be diverse demographic needs. For example, research demonstrates a difference between perceptions of risk and comfort with nuclear technology on the basis of

gender, age and between attitudes held in the general population versus the host community (ie. Our neighbours).

A member of the host community may be more interested in direct impact issues versus social policy overall when compared to his provincial counterpart who lives further from the station. An individual or group that sees itself as a 'watchdog' organization may want access to very specific information while a host community member may be more likely to want to know broader information related to his or her own personal safety and an understanding of shared values.

Audience understanding is developed through interactive relationships as well as polling and research to confirm assumptions and to direct communication course changes as needed.

Principle 3: Build Understanding and Create Common Ground

Building on the principle of transparency and audience identification, a communication program should be developed to:

- Meet the needs and expectations of stakeholders (including media, the public, government and regulators);
- Provide context for understanding; and
- Build relationships to allow meaningful conversation and trust.

Information in public domain needs to be contextualized and delivered in an appropriate format understandable to the broadest audiences. What is an appropriate dialogue in a document between a regulator and utility can easily be misunderstood, and create an exaggerated perception of risk, when read by a member of the general public who is without sufficient background or technical expertise. This is not to say the information should not be shared. It should, but with appropriate mechanisms to facilitate understanding.

Another consideration in developing context is recognizing the operator does not always play the same role, even to the same audience, at any given time. Some days, operators may be seen as the potential employer, the neighbour, a partner for economic development, a safety expert, a funding source, community leader or environmental benefactor. Conversely the operator can be seen as a potential threat to community or individual well-being if an issue arises to unsettle the positive perceptions and roles. Understanding the varied roles the operator plays for its communities and stakeholders is important to the responsiveness and effectiveness of the communication program.

Summary of Communication Best Practices

In 2009, the Canadian Nuclear Inter-Utility Communications Working Group – consisting of Public Affairs representatives from each of the nuclear utilities (Atomic Energy Canada Ltd., Bruce Power, Hydro Quebec, New Brunswick Power and Ontario Power Generation) – developed a position on communication best practices, which was presented by Jacquie Hoornweg of Ontario Power Generation and Kathleen Duguay of New Brunswick Power to the Canadian Nuclear Safety Commission Executive. Each utility has concurred it will adhere to the practices, using methods it deems most appropriate to reach out to its unique community and stakeholders.

Best practices agreed upon by the inter-utility communications working group and presented to the CNSC include:

- **Do:** Provide transparent paths for access to operational, environmental and safety information through face-to-face communication (discussion forums, community committees, outreach), contact information on websites and in printed materials, as well as regular updates on safety, environmental and reliability performance in a public context;
- **Do:** provide an appropriate contextual framework and is delivered with selected communication support mechanisms to make it relevant and understandable to the public;
- **Do:** Contextualize information exchanges between regulator and utilities discussed in a public forum to ensure the public's assessment of risk is not unnecessarily heightened;
- **Do:** Encourage benchmarking and on-going knowledge sharing between utility communicators on public disclosure;
- **Do:** Identify the events and actions that should be publicly communicated. For example: Reportable events, moderate or major spills, environmental infractions, public radiation exposure, off-site impact events and safety performance;
- **Do:** Respect the station's reputation flows onto the host-community and reflects on its members: Recognize their desire for us to properly contextualize information for the public to avoid undue alarm;
- **Do not:** Be prescriptive on communication tactics and disclosure methods: Recognize and respect that unique community and stakeholder communication needs vary by geography and tend to be site-specific. Ensure flexibility for communication tactics exist.

2. NB Power Nuclear - Point Lepreau Generating Station: A Case Study:

NB Power Holding's group of companies operates one of North America's most diverse generating systems and interconnected transmission networks. Through its subsidiaries, reliable, safe and economically priced electricity generated at sixteen facilities is delivered via terminals, substations and power lines to more than 370,000 direct and indirect customers within New Brunswick and surrounding markets.

NB Power Nuclear is responsible for operating the Point Lepreau Generating Station, to safely and reliably generate electricity for the wholesale market and provide a return to the owner. The 635 MW unit, commissioned in 1983, was the first CANDU-6 to begin commercial operation. Nuclear safety is the primary focus of station activities. CANDU is an established Canadian technology with an excellent nuclear safety record, and Point Lepreau is a safe working environment.

The decision to refurbish the Point Lepreau Generating Station would not have been possible without a social license to do so. Over the past ten years it has become increasingly important to engage the public and in particular the immediate community in major decisions. NB Power has undergone many new projects impacting the communities from installing a new sub-station to refurbishing major facilities. Each project requires a comprehensive public information program to provide key stakeholders with opportunities to gain knowledge about the station and to provide input through a process of informed, voluntary consent while gaining public confidence. In each instance NB Power engages the communities and key stakeholders to obtain a social license.

The social license exists to a great extent over and above formal environmental or planning permits and constitutes a powerful bond or social contract between NB Power and the hosting community. Although some aspects of a social license are embedded in regulatory compliance standards and serve to enhance these

mandated public involvement mechanisms, NB Power sees it as a natural process in each major project undertaken. The first stage in developing a mutually rewarding, constructive social contract involves informing community residents of exactly what is planned and how it will affect their day-to-day life in terms of traffic, noise, air or water quality, employment, security, lifestyle and so on. NB Power takes a systematic approach to such involvement, providing information directly to residents on a face-to-face basis or through intermediaries such as local municipal governments, public interest advocates, business stakeholders, and the media.

The Point Lepreau Generating Station is located on the shoreline of the world famous Bay of Fundy. This coast borders an area that has supported a number of different, important community fisheries for many generations. During the program to refurbish the Point Lepreau Generating Station, currently in progress, it became necessary to move several large sections of the turbine into and out of the facility. Shipment by sea was the most viable way of doing this and planning commenced immediately to set the process and schedule for accomplishing this task.

The Point Lepreau Generating Station team has a long-standing relationship with the host community and recognized it would need the community's help and support as well as the endorsement of fishers along the coast and specialists affected by the movement of the equipment by ship.

Communication plans were struck to inform the key constituencies and to engage them where it could be helpful to the outcome.

- Local subject matter experts' were consulted for their advice on the best way to bring the ship into the facility and move it out to its destination without having an accident or disturbing the lucrative seasonal fishery that would be going on at the time;
- Media and stakeholders received notifications;
- Employees were made aware of the plan.

The result of the communication was to increase host community satisfaction and avoid any negative feedback regarding disruption or damage to the fishery.

The learning from this experience adds to a long list of successes that have resulted from early and open dialogue with the host community and interested stakeholders on the activities of PLGS.

- a) People want to help if they understand what is needed;
- b) People do not like to be surprised;
- c) Alignment of internal employee communication with external public communication helps spread positive word-of-mouth; no one is surprised and messages of 'official' communicators match what employees are saying;
- d) Sticking to what matters to people is the key to excellent dialogue and positive communication results;
- e) Timely and regular communication pays dividends – often these can be measured in dollars, time, or general public support for the facility.

Another important learning in this case study and many other examples we could reference from the Point Lepreau Generating Station is the need to take a careful look at what things we celebrate as successes and how we do that.

In this case, the Point Lepreau Generating Station did the right thing by consulting experienced fishers from the community and using its informal communication network to get the word out on what was happening as well as to build support for doing it the right way. However, we should not congratulate ourselves for simply doing what our nuclear community code of conduct for good communication states. This is what we are expected to do every day. The essence of the success in this case study example is the satisfaction dividends among the host community members and the execution of the shipping without mishap.

NB Power has been successful in maintaining its various regulatory permits and licenses to operate because it has been proactive in early and ongoing community engagement. Transparency and cooperation have proven repeatedly to assure the best outcomes for all concerned.

3. Ontario Power Generation Darlington and Pickering Nuclear: A Case Study:

Ontario Power Generation (OPG) is the primary electricity generator in Ontario, supplying about two-thirds of the province's electricity through nuclear, hydro-electric and thermal generation. OPG is the 'people's generator' with the Government of Ontario as its sole shareholder. More than 7,500 of OPG's approximately 12,000 employees are located in Durham Region at three nuclear stations, and in offices and facilities supporting the stations. In total, OPG Nuclear generates about 30 per cent of Ontario's electricity through the 'Pickering A' and 'Pickering B' nuclear stations (which share a site and some common systems) and the Darlington Nuclear station. The stations book-end the Region of Durham with Pickering Nuclear operating in an urban centre of almost 100,000 people directly adjacent to the City of Toronto.

OPG strives to develop positive relationships in its every day operations through a commitment to safety, transparency and corporate citizenship that will provide a foundation for dialogue on any issues it may need to communicate to the public and stakeholders.

3.1 The Role of Public Affairs

OPG recognizes the value of the social licence and has built a Public Affairs team to lead accountability for activities related to it, working directly with OPG management teams. Public Affairs staff report centrally through the Vice President Public Affairs who is a member of OPG's Executive Management Team. The Director Nuclear Public Affairs is a dotted line member of the Nuclear Executive Committee; providing strategic advice on communications as it pertains to nuclear issues and the nuclear business plan. The Public Affairs group is also accountable for editorial services; media relations; community, stakeholder and public relations. Public Affairs also holds accountability for nuclear employee communications to ensure cohesion between internal and external messaging and to help drive best practices in workplace behaviours and aligned work activities.

3.2 Accountability and the Licence to Operate

Accountability to OPG's stakeholders, media and public is a key component of its communication program. The commitment to be accountable for our operations means communicating our performance when it is good and even when we wish it were better. OPG seeks ways to communicate with its varied stakeholders through diverse channels of communications that include:

- Proactively providing information to stakeholders through:
 - Face-to-face updates in regularly scheduled, publicly-held committee meetings related to station operations;
 - Updates to local municipal councils;
 - Presentations and station tours;
 - Website, mailed newsletters, website and local advertisements related to station performance, operations and OPG community activities;
- Maintaining dedicated media and public information line (media line is monitored 24/7);
- Providing timely response to issues and questions raised by stakeholders and the public, and tracking those issues and questions to identify trends in order to further refine proactive communications; and
- Real-time community notifications for events and activities relevant to the community.

3.3 Corporate Social Responsibility and the Licence to Operate

OPG uses a number of communication paths to reach the different segments of the population interested in its operations and projects. For each stakeholder group the approach and activities are tailored to appropriately meet the need for method, depth and frequency of communications with the key objective being to develop and maintain a relationship based on transparency, mutual respect and shared values.

For example, in the host communities, the communication program is built on communicating shared values and respect through a commitment to Corporate Social Responsibility (CSR) in the areas of education, environment and community involvement for the betterment of community quality of life.

OPG views communication as a two-way street, frequently seeking formal and informal opportunities to receive feedback from the community; a process enhanced by relationships developed through the CSR activities.

To this end, OPG operates a corporate citizenship and communication program within its nuclear host communities that includes:

- Demonstrating our shared values for public safety and education, respect for the environment, and a commitment to the continued betterment of the community, through the extensive partnerships, programs and financial support we have established with community and local business organizations, stakeholders and residents including programming at our information centres and on OPG land adjoining the station. Examples:
 - Programming through summer and school break periods for families at each of the nuclear station information centres and adjoining lands – the most recent March Break program resulted in approximately 7,000 visitors in one week at Pickering and Darlington Nuclear;
 - OPG-led environmental activities such as bi-annual tree plantings involving more than 250 residents and stakeholders participating for the betterment of the environment and community;

- Partnerships and initiatives within the host community that have resulted in civic awards and other recognition for leadership in safety, business and community life;
- Developing curriculum and supporting materials for elementary and secondary students province-wide;
- Developing partnerships with post-secondary institutions for training and development of highly-skilled and knowledgeable industry workers and improved nuclear processes.

Like personal relationships, the relationship between a corporate citizen, community and stakeholders takes significant investment of effort. It is not always perfect and at any moment in time there will be areas of strength and weakness. The key to maintaining the social licence is the authenticity of the commitment. Above all, this means a commitment to operational and environmental safety in our station operations and projects. This is the commitment to excellence we continue to strive for every day at OPG.

4. A Communication Leadership Model for Excellence

To earn and to obtain the benefits of a social licence an organization must value the balanced scorecard (one that has both financial and non-financial measures).

The value of relationships fostered through a nuclear operator's Public Affairs and Communication program are intangible assets that are not easily measured in financial terms. But the communications program certainly contributes to the bottom line through avoidance of financial cost from stakeholder conflict or lost trust.

An analogy to the intangible quality exists in community policing. It is recognized community policing has a positive influence in preventing crime. But it is difficult to define and measure what would have occurred if the program, and the relationships developed through it, were not in place.

If there ever is doubt on the value of social licence, it can be dispelled by the consequences for companies that lose it. This lesson was learned by OPG's predecessor company, Ontario Hydro in the 1990s when relationships and communication channels broke down and the company's regulated licence was put in peril.

Direct involvement of the communications organization in the management decisions of the organization is another key factor in maintaining the social licence.

This is supported by research results in the study 'Excellence in Public Relations and Communication Management' developed through the International Association of Business Communicators (IABC) Research Foundation. The study validates the importance of ensuring a qualified communication professional is in a position to advise and influence decisions at a senior level of the organization related to all aspects of the Public Affairs function.

The study, which reviewed business communications effectiveness, concluded that when a senior communicator is responsible for providing strategic direction and is in a position to influence an organization's management decisions, the scores on communication excellence are significantly higher. A key determinant was the manager's ability to play a strategic role versus an administrative role; influencing business decisions to ensure sound communication principles are built into those decisions. The results of organizations with a senior communicator influencing management team decision-making contrasts

favourably with the results in organizations where communicators are handed business decisions to communicate without upfront input.

5. The Ties that Bind: The Relationship Between Internal and External Communications

Good internal and external communication practices work hand-in-hand to strengthen the reputation of a nuclear facility among all its key constituencies and anchor the 'social licence' to operate the plant.

5.1 Aligning the Internal and External Message

Essential to aligned internal and external messaging is an established 'official' voice of the company through a dedicated spokesperson who speaks for the company and a communications organization within the company that supports well-defined channels of official communications for employees, external stakeholders and the public.

Nuclear employees are the front-line ambassadors for any facility. As such they should have enough general and specific knowledge to address basic questions about issues that could affect the public. While employees do not speak on behalf of the company, a worst case scenario is having an employee 'surprised' or 'ambushed' by a question and appearing to have no knowledge of the issue. This lowers public confidence. For example, when you ask an airline employee about why a flight is delayed or how long it might be before more information is available, your satisfaction and confidence in the airline is increased by a straightforward, informed response even from someone not directly involved in that area of the work.

External communication must also be timely and straightforward. Regardless, community residents, stakeholders, and interested members of the public may not believe everything they get from the media or from 'official' company publications. When an employee provides similar information to what is communicated through meetings, outreach, corporate material or the media, it goes a long way to reinforce the reputation of the facility as honest and transparent. This is a valuable perception in terms of strengthening support for the 'social licence'. Internal and external communications should operate according to the same values and exhibit a recognizable style that is both accountable and meaningful.

Employees should be confident they will hear news relevant to them from the company first. Wherever possible, employee communications should go out ahead or in tandem to news releases or other forms of announcements. For significant announcements or information releases, a timely, cascaded approach to face-to-face communications should be implemented so employees can engage in an interactive dialogue with their immediate supervisor and management team. Benchmarking studies consistently demonstrate face-to-face communication; particularly through the direct supervisor is the most effective form of communication. A strategic approach, supported by the company's communication specialists, to ensure an informed and aligned middle and frontline management provides a key resource for effective communication.

5.2 Influencing Nuclear Behaviours through Internal Communication

Equally important to effective internal communication on announcements and newsworthy items is ensuring strong communication as a fundamental driver for organizational behaviour and work plan alignment. This communication role also supports the social licence. External communications are only as good as the content they are supporting. If station performance is weak; this will challenge the social licence regardless of the strength of the external communication process.

As one example: Commonly, nuclear operators recognize the need to drive appropriate behaviour under the cornerstones of safety, reliability, human performance and value for money. Driving a coordinated communication effort that ties those behaviours to all business plan initiatives helps employees understand the co-relation between their specific behaviours and business plan success.

Communications support of consistent messaging at the senior, middle and frontline management levels can align understanding of expected behaviours and goals throughout the organization. A strongly-supported cascade for messaging enables both consistency of the broader message and the appropriate level of related detailed instruction to reach the individual employee. It will help them understand the big picture and, as importantly, provide them understanding and direction on their own role and impact on the organization's goals.

A strong communications program doesn't only support top-down communication but effectively provides forums and opportunity for employees to push up valuable information and feedback to the management team. This is a critical component of ensuring nuclear safety and organizational effectiveness that can be facilitated by the internal communications function.

How does this support the social licence? Aligned and open communication processes drive improved employee performance and positively impact results in key program areas, including safety. Improved organizational performance improves public confidence and thus strengthens the social licence.

6. Conclusion

In recent years, there has been further appreciation of the role of communications in maintaining the social licence and the value that licence brings to a company. This has resulted in improved host community relations and has benefitted utilities.

Even for the most progressive nuclear operators, there is still opportunity to improve on this work. As an industry we will continue to refine and improve upon this process. However, recognizing the need and placing a value on social licence is the critical first step.

The evolution in the past two years in the Canadian Nuclear Safety Commission public communications program and the positive impact in improved issues management and public confidence is an excellent illustration of this point.

As we move forward as an industry, we must continue to recognize the need to bring qualified communication practitioners to the senior leadership table to ensure social acceptance is inherent in development of technical solutions, not an afterthought. As an industry we must ensure communication expertise is applied, not only as it relates to communicating to the public, but in affecting positively on the work behaviours and actions within the organizational work program.

If we can accomplish this, we will build a solid foundation for earning and maintaining the social licence key to the success of the nuclear industry and its operators.