

# STAKEHOLDER ENGAGEMENT: *Challenges and Pitfalls*



B. L. Hamrick, CHP, JD  
University of California, Irvine Medical Center

Orange, California, USA



## I. Background

### *Guiding Principles for Radiation Protection Professionals on Stakeholder Engagement*

- Identify opportunities to engage
- Start early and develop a sustainable plan
- Enable transparency
- Seek out relevant stakeholders and experts
- Clearly define roles and responsibilities
- Develop objectives and boundaries
- Develop a culture of shared understanding
- Respect different perspectives
- Use feedback to continually improve
- Act in accord with the IRPA Code of Ethics

## II. Focus

### *Principle 2: Start early and develop a sustainable plan.*

- Process provides actual transparency and is perceived as transparent.
- Plan describes who should be involved, and how that will be communicated.
- Plan defines roles for everyone involved.
- Plan provides for how decisions are reached, and how the boundaries of the issues will be decided.
- The plan is flexible, and includes processes for revision based on feedback during the process.

## III. Transparency Challenges

- Personal privacy concerns:
  - Historical personnel monitoring records
  - Historical incidents with employee discipline
- Security concerns:
  - Classified information
  - Unclassified, but security sensitive
- Plan should provide:
  - Types of potentially protected information
  - Legal references for prohibiting disclosure
  - Who may access the information
  - Which information may be declassified
  - A plan for redaction with justification
  - An option for limited disclosure to specifically cleared individuals

## IV. Participant Selection

- Self-selection bias:
  - Strong negative reaction to project or issue
  - Frequent volunteer
  - Personally invite a cross-section of the community
- Expert vs. Non-Expert:
  - Define how expert vs. non-expert comment will be evaluated or weighted in advance
- Local vs. Regional vs. National
  - Consider the role of non-local participants
    - Full participation, including decision-making
    - Limited participation, to provide information only
    - No participation
- Plan ahead for participant replacement

## V. Outreach

- Initial Communications:
  - Governmental notices (e.g., in the United States federal agencies use the Federal Register to make initial notice)
- Public and commercial notices:
  - Web-page, social media, traditional media
  - Targeted notices to specific groups
- Personal invitations to ensure:
  - Stakeholder diversity
  - Appropriate experts
  - Government oversight agency participation
- Ongoing Communications:
  - Provide multiple avenues
  - Allow for innovative solutions during the process

## VI. Decision-making and Boundaries

### *This element is critical to success!*

- Who makes the final decisions:
  - Governmental agency
  - Advisory Board
  - Property or project owner
  - Stakeholder consensus
- How are those decisions made:
  - Majority, supermajority, non-majority consensus
- What decisions will be made:
  - Technical – define limitations (feasibility, cost, threshold)
  - Policy – acceptable risks, acceptable benefits

## VII. Case History

### *Santa Susana Field Laboratories*

- Decommissioning action begun in 1989 – still ongoing
- Multiple federal, state and local agencies with overlapping jurisdiction and poorly defined roles
- In a survey of 100,000 nearby residents, only 3% responded
  - Those responding were highly motivated, and negatively biased against anything relating to “nuclear” activities
- There were no limitations on public involvement
  - Out-of-town activist dominates many of the proceedings
- Technical questions were subject to non-expert opinion
  - How to define “background” radiation
  - How to calculate risk from radiation
- No process for decision-making, resulting in no finality

## VIII. Conclusions

- Don't simply create a plan that works – create a plan that works when things go wrong:
  - Define the roles of experts, agencies, community and commercial stakeholders, as well as facilitators or other neutral third parties early in the process.
  - Delimit the questions to be answered – distinguishing between technical and policy questions.
  - Identify the decision-making process.
  - Include a conflict resolution process in the plan.

For additional information, please contact:  
Barbara L. Hamrick, CHP, JD  
Radiation Safety Officer  
University of California, Irvine Medical Center  
[bhamrick@uci.edu](mailto:bhamrick@uci.edu)