

# PUBLIC SUBMISSION

<b>As of:</b> 4/20/22 4:20 PM <b>Received:</b> April 04, 2022 <b>Status:</b> Pending_Post <b>Tracking No.</b> 111-8inp-gydn <b>Comments Due:</b> April 12, 2022 <b>Submission Type:</b> Web
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**Docket:** NRC-2021-0102

NRC Form 655, "EEO Counselor's Report", Information collection

**Comment On:** NRC-2021-0102-0003

Information Collection: NRC Form 655, "EEO Counselor's Report"

**Document:** NRC-2021-0102-DRAFT-0003

Comment on FR Doc # 2022-02944

---

## Submitter Information

**Name:** Cy Leist

**Address:** United States,

**Email:** cyleist@memphis.edu

---

## General Comment

Public Comment to Proposed Rule

DRAFT SUPPORTING STATEMENT FOR NRC FORM 655, "EEO COUNSELOR'S REPORT"

(3150-XXXX)

On February 10th, 2022, the Nuclear Regulation Committee proposed a rule including a new form, the Form 655. This form, also known as the "EEO Counselor's Report", would be used to help those who feel they were fired from their jobs due to unlawful discrimination in the workplace. This would be an extension of the Equal Employment Opportunity (EEO) complaint process. Discrimination that applies under this committee includes a myriad of circumstances, including but not limited to: age, race, religion, sexual orientation, gender identity, and marital status. Ultimately, the purpose of this proposal is to suggest that workers with such grievances must first consult a certified EEO Counselor before formally pressing charges, so that there is a period through which the matter can be solved internally.

While the goal is to resolve the issue peacefully, there will of course be times when such resolution is unattainable. In those cases, the Counselor will work the client to provide them with relevant information needed to move forward, as well as a Counselor-submitted report detailing their involvement up until this point. This is the report that is being proposed: the Form 655. Form 646 refers to the Formal complaint submitted by the terminated employee and is submitted electronically through a tracking network. There are many reasons to support this proposal in that it helps streamline the process for the fired employee and gives them a connection with a helpful resource who will guide them through the process. Navigating a case of discriminatory termination can be emotionally draining and hurtful to the affected individual, so to provide them with support is certainly a noble idea. Given the sensitive nature of the complaint, all information provided to EEO regarding the potential suit is protected by the Privacy Act of 1974.

One of the potential drawbacks to this proposal is the burden of cost. The annual cost of having an EEO Counselor fill out this form is estimated to be around \$8,640. It would cost another estimated \$4,320 to process the forms annually, as well as \$54,000 for contracting services. When you add these sums, the total cost is \$58,320. This cost is assigned to the Federal government. Another thing to keep in mind is to ensure the integrity of the EEO Counselors. It is crucial to maintain the Counselors as third-parties who will not sway the client in a direction that will lead to their detriment. Many terminated employees will arrive upset, confused, and with many questions. The ethical and moral obligations of the EEO staff is tantamount to the program's success. Overall, this proposal is a great way to further document the client's journey through the complaint process and helps them know the information they need to pursue their case. Their information is protected and it serves as a great resource for those who deserve help and support during a difficult time.