

Counterfeit, Fraudulent, And Suspect Items (CFSI)

6th Public Meeting
Post-SECY 11-0154
Nov. 7, 2013

* IMPLEMENTATION STATUS UPDATE *

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United States Nuclear Regulatory Commission

Protecting People and the Environment



CFSI Categories (SECY 11-0154):

- 1. Industry process enhancements & best practices**
- 2. Regulatory guidance**
- 3. Communication**
- 4. Training**
- 5. Industry oversight for detecting & preventing CFSI**
- 6. Cybersecurity Supply Chain Oversight**
- 7. Outstanding Activities**

CFSI Implementation



1. Industry process enhancements & best practices

- a) (11) voluntary initiatives

2. Regulatory guidance

- a) Addition of CFSI to Part 21 guidance
- b) Staff Review of Industry's Voluntary Initiatives
- c) Proposed CFSI Rulemaking to 10 CFR 50 ← **post-effectiveness reviews**

CFSI Implementation



3. Communication

- a) Agency Enhancements
- b) Outreach Activities - Federal Government
- c) Outreach Activities - Industry
- d) International
 - IAEA
 - OECD's Nuclear Energy Agency (NEA)
- e) Public Awareness
 - Public meetings ← **11/07/13, #6**
 - NUREG/BR-500, "Safety Culture Policy Statement" (**ML12355A122**)
 - NRC Public Website ← **2014**

CFSI Implementation



4. Training

- Information Notice IN 2012-21, CFSI Training Offerings (*Non-NRC*)

5. Industry oversight for detecting & preventing CFSI

- NRC's CFSI Implementation Effectiveness Assessments
- Industry audits & surveys of suppliers by the Nuclear Procurement issues Committee (**NUPIC**), and Nuclear Industry Assessment Committee (**NIAC**)

6. Cyber Security Supply Chain Oversight

- NRC Staff engaging with industry (licensees and vendors) to proactively address on-going cyber security challenges and share knowledge
- 1st NRC inspection of licensee's cyber security plans implementation ← **Jan 2013**
- Revised Vendor Inspection Program criteria to include cyber security ← **Jul 2013**
- Full Cyber Security plan implementation required by: ← **2014-2017**

CFSI Implementation



7. Outstanding Activities

- Respond to Industry's submission of Voluntary Initiatives
- Complete implementation effectiveness review
- Finalize CFSI introduction into the Operating Experience/Construction Experience (**OpE/ConE**) Programs
- Commission Paper (**SECY**) needed to status the Commission ← **Oct. 2014**

Plan for Going Forward



- 1. Staff Assessment of the (11) Industry Voluntary Initiatives**
- 2. Assess Industry CFSI Implementation Effectiveness**
- 3. Issue Commission Paper (SECY) to Commission**

Plan for Going Forward



1. Staff Assessment of the (11) Industry Voluntary Initiatives

- a) CFSI Team Leader Review
- b) Quality & Vendor Inspection Center of Expertise (COE) Review
- c) CFSI Steering Committee Review
- d) Public meeting to discuss results
- e) Formal Public Response

Plan for Going Forward



2. Assess Industry CFSI Implementation Effectiveness

- a) Perform Implementation Effectiveness Assessments
- b) Compile & Review Industry Documentation
- c) Review Assessment Results

Plan for Going Forward



3. Issue Commission Paper (SECY) to Commissioners **Due Oct. 2014**

- Notes (1): Typically a 6-9 month internal review process*
- (2): Informational SECYs do not require a response*

NUREG/BR-0500

“Safety Culture Policy

Statement” [Rev. 1]

Dec. 2012 (ML12355A122)



*“This policy statement applies to
...holders of quality assurance program
approvals, vendors and suppliers of
safety-related components...”*

- **Problem Identification and Resolution**
Issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.
- **Questioning Attitude**
Individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action.

USNRC
U.S. Nuclear Regulatory Commission

SAFETY CULTURE

Policy Statement

DEFINITION OF NUCLEAR SAFETY CULTURE
Nuclear safety culture is 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.

TRAITS OF A POSITIVE NUCLEAR SAFETY CULTURE
Experience has shown that certain personal and organizational traits are present in a positive safety culture. The following are traits of a positive safety culture:

- **Leadership Safety Values and Actions**—Leaders demonstrate a commitment to safety in their decisions and behaviors.
- **Problem Identification and Resolution**—Issues potentially impacting safety are promptly identified, promptly evaluated, and promptly addressed and corrected commensurate with their significance.
- **Personal Accountability**—All individuals take personal responsibility for safety.
- **Work Processes**—The process of planning and controlling work activities is implemented so that safety is maintained.
- **Continuous Learning**—Opportunities to learn about ways to ensure safety are sought out and implemented.
- **Environment for Raising Concerns**—A safety-conscious work environment is maintained where personnel feel free to raise safety concerns without fear of retribution, intimidation, harassment, or discrimination.
- **Effective Safety Communication**—Communications maintain a focus on safety.
- **Respectful Work Environment**—Trust and respect permeate the organization.
- **Questioning Attitude**—Individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action.

These may be additional traits not included here that are also important in a positive safety culture. These traits were not developed for inspection purposes.

NRC MISSION
The mission of the NRC is to license and regulate the Nation's civilian use of hydrocarbon sources and special nuclear materials in order to protect public health and safety, promote the common defense and security, and protect the environment.

TO GET MORE INFORMATION
NUREG/BR-0500, Rev. 1
December 2012
www.nrc.gov
www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html



QUESTIONS ?

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