



## **SAFETY CULTURE: CAN IT BE REGULATED?**

### **THE ROLE OF LICENCE CONDITION 36**

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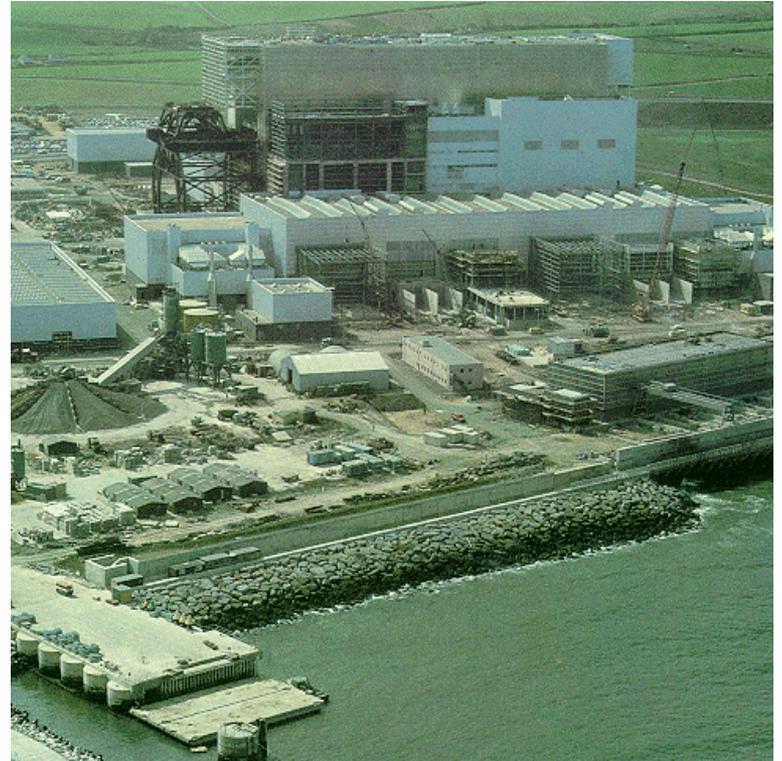
HM Chief Inspector of Nuclear Installations

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Director of HSE's Nuclear Safety Directorate

# Safety Culture

- Cannot be regulated directly
- Must use surrogates
- Management and organisations can influence culture
- Changes can have positive and negative effects
- Change can affect safety
- Change must be managed



# Regulatory Drivers in the UK

- Changing UK nuclear scene
- Declining safety performance
- The need to manage change



# The Changing Nuclear Scene

- Privatisation of electricity generation in 1989
- Privatisation of modern nuclear power stations in 1996
- Introduction of competitive electricity market
- Privatisation of UKAEA core of scientific expertise and increased use of contractors



# The Changing Nuclear Scene

- Downsizing
- Loss of technical skill base
- Reduction in R&D support
- Widespread organisational change
- Loss of 'Intelligent Customer' focus
- Loss of licensee safety performance



# The Need to Manage Change

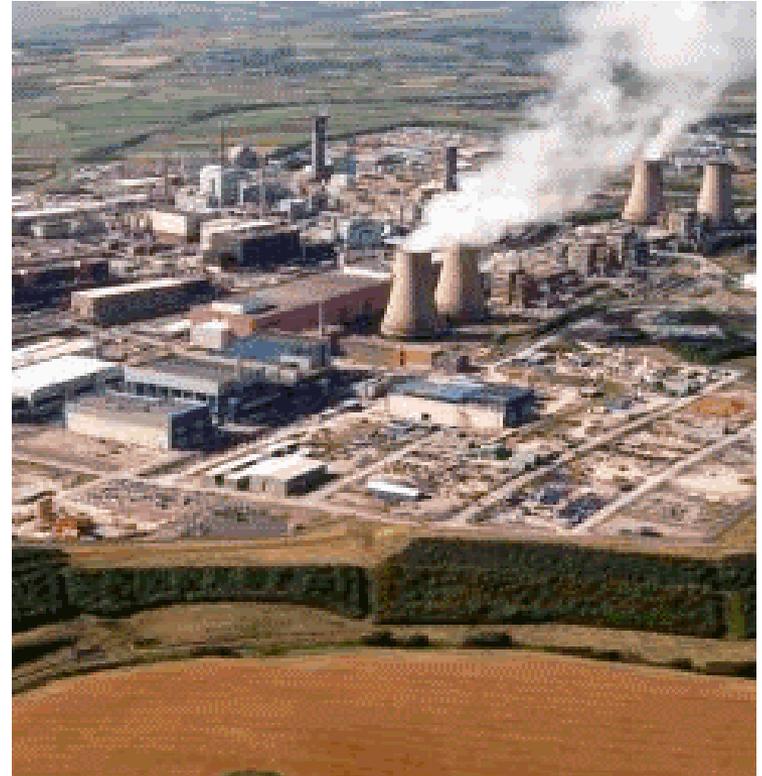
- Adverse impact of change recognised
- Licensee voluntary arrangements failed
- The need for licence condition - LC36



# Management of Change

## Key Features

- Policy on handling change
- Transparent Process
- Assess business risk
- Allocation of responsibilities
- Monitor outcomes
- Review
- Audit to improve process
- Quality management



# Licence Condition 36

- Licensee must make and implement arrangements to control change to its organisational structure and resources which may affect safety
- These must categorise changes in relation to safety significance
- Key changes must be agreed by NII before implementation
- Exceptionally NII could prevent changes taking place



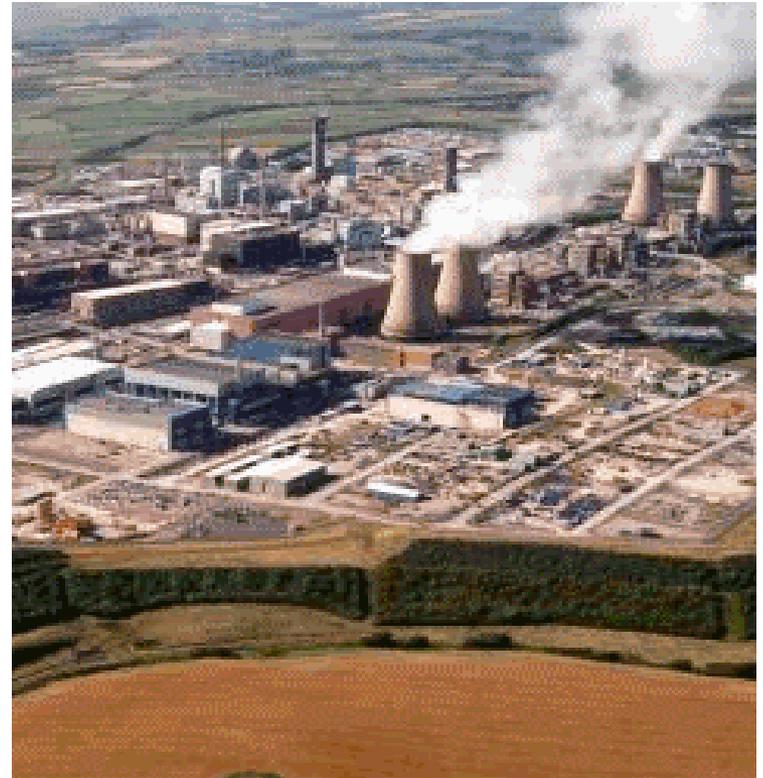
# Key Features of Arrangements

- Coherent and holistic control arrangements:-
  - Similar to management of engineering change
  - Consistent with other safety management processes
  - Can / Should be integral with Quality Management System



# Key Features of Arrangements

- Policy on change management
- Transparent quality process
- Allocate of responsibilities
- Identify business risk
- Identify enablers for changes
- Monitor outcomes
- Review, Audit and Feedback



# Benefits of LC 36

- Framework for making the licensee assess the safety implications of proposed changes
- Licensee can justify changes to himself and staff and demonstrate good safety management
- Regulators can see the safety case for change
- Good understanding of change promotes good safety culture



# Conclusions

- LC 36 – a significant contribution to safe management of Nuclear Facilities
- Licensees seeing business benefits
- Other regulators recognising value of similar regulatory controls
- Licensee safety performance and culture improving

