Industry Comments on Safety Culture Policy Statement

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Industry Supports the Policy Statement

- ## Definition was developed by practitioners
  - Plain English
  - Calls for collective commitment by leaders and individuals
  - Emphasizes goal of protecting people and the environment

- ## Traits reflect appropriate behaviors and values inherent in a healthy safety culture

- ## Office of Enforcement commended

Industry Perspective

- Licensees have primary responsibility for ensuring a positive safety culture
- NRC has an independent oversight role
- Statement of policy is the appropriate regulatory action to address safety culture
- Common language of safety culture is essential
- Care is needed in implementing the policy for
  - Individual industry segments
  - Suppliers and vendors of safety-related equipment

Common Language of Safety Culture

- No sense to speak in two different languages
- Two sets of terms confuse proper cause identification and public communication
- Industry ready to work with NRC and other stakeholders
- We request the Commission encourage swift action to complete this task

Industry is proactively taking steps to ensure a strong nuclear safety culture

- CNOs approved industry initiative to comprehensively monitor and assess safety culture at all stations
  - Four pilots were conducted with NRC observation
- Each operating company will implement program described in NEI 09-07, *Fostering a Strong Nuclear Safety Culture*
- Key to success is placing responsibility on site senior leadership

Industry Initiative

- Uses corrective action program (CAP) to collect and analyze a comprehensive set of data to provide insights into emerging safety culture issues

▪NRC inspection reports	▪Station Performance Trends
▪Employee Concerns/Allegations	▪Culture Assessments
▪Industry Evaluations	▪In Field Observations
▪Oversight Findings	▪Work Force Issues
▪CAP Trends	▪Operating Experience
▪Self Assessments	▪Benchmarking

Industry Initiative

- Multiple sources of data to identify trends that may be caused by nuclear safety culture weaknesses

- Uses INPO *Principles for a Strong Nuclear Safety Culture*

- Site leadership team directs actions to resolve weaknesses

- Outside organizations provide insights to the site leadership team
  - NRC oversight welcomed and expected

NEI

Regulatory Footprint

- Industry believes this initiative provides significant advantages over the current NRC SCCI approach

- We would welcome discussion on improving the regulatory approach for overseeing nuclear safety culture

Initiative Reflects Industry's Commitment to a Strong Nuclear Safety

- Standardized, robust, integrated approach
- Nuclear operating company leadership responsible
- Constant reinforcement of nuclear safety culture leadership and individual behaviors
- Safety culture requires frequent evaluation
- Safety culture is a continuum – even the best plants work at it every day

BACKUP

Site Nuclear Safety Culture Process

External Review

Site Response
Policies
Program Modifications
Training
Assessments
Benchmarking

Site Leadership Team

Communication
Internal
Regulator
External

Actions

Other Input Sources

Regulatory Oversight (including IP 71152 PI&R)

Nuclear Safety Culture Monitoring Panel

Corrective Action Program

CAP Evaluations

NRC Inspection Results

Nuclear Safety Culture Assessment

Performance Trends

Industry Evaluations

Operating Experience

QA/Self Assessment/ Benchmarking

Employee Concerns Program

Workforce Issues

Process Inputs