

November 8, 2002

Anthony J. DiVenere
McDonald, Hopkins, Burke & Haber
2100 Bank One Center
600 Superior Avenue, E.
Cleveland, OH 44114-20653

Dear Mr. DiVenere:

Thank you for your letter of October 22, 2002, attaching the National Safety Council report and RMI Environmental Services (RMIES) recommendations for corrective actions. After reviewing the information, as well as the actual survey questions, the Staff has a number of questions regarding the survey that was conducted. In addition, the Staff would like to discuss in greater detail the corrective actions you have proposed.

With regard to the survey results, we note that NSC compared the responses to 196 other organizations using the surveys for the first time over a 10-year period. However, the types of companies used for comparison is not specified. The Staff is interested in obtaining this information, particularly whether any of those 196 organizations are in the nuclear industry and are licensees of the NRC or an Agreement State. In addition, to assist the Staff in better understanding the survey results, please describe the survey respondents' answers to the narrative question about the RMIES radiation safety program. The Staff would also like a breakdown of how many survey respondents were management versus non-management employees.

To address the safety conscious work environment, RMIES has proposed the reestablishment of an Error Cause Removal system under which employees may voice concerns anonymously. If the concern is raised anonymously, and the concern is raised the concern is considered legitimate, both the concern and the answer is to be publicized through ALARA and safety meetings and through e-mail. The Staff would like the opportunity to better understand the process of how a radiological safety concern will be determined to be legitimate in order to ensure that radiological safety concerns from anonymous sources are answered and publicized. In addition, the Staff would like RMIES to address whether timelines should be established to ensure that concerns are addressed promptly.

The Staff would like to discuss whether RMIES considered the option of providing training to all RMIES employees, both staff and management, to emphasize the importance of a work environment in which all employees are free to express safety concerns. In our experience, corrective action programs to address these types of issues generally contain some training in the safety conscious work environment.

Finally, the NSC indicated that many of the survey questions were standardized and used in other NSC safety culture surveys. Your attention is directed to 10 C.F.R. 2.790 of the NRC, "Rules of Practice," should the NSC consider any of the questions to be proprietary in nature. Copies of NRC regulations can be found on the NRC Web site at www.nrc.gov/reading-rm/doc-collections/cfr/.

We look forward to meeting with you to discuss these issues on November 27th.

Sincerely,

/RA/

Lisa B. Clark