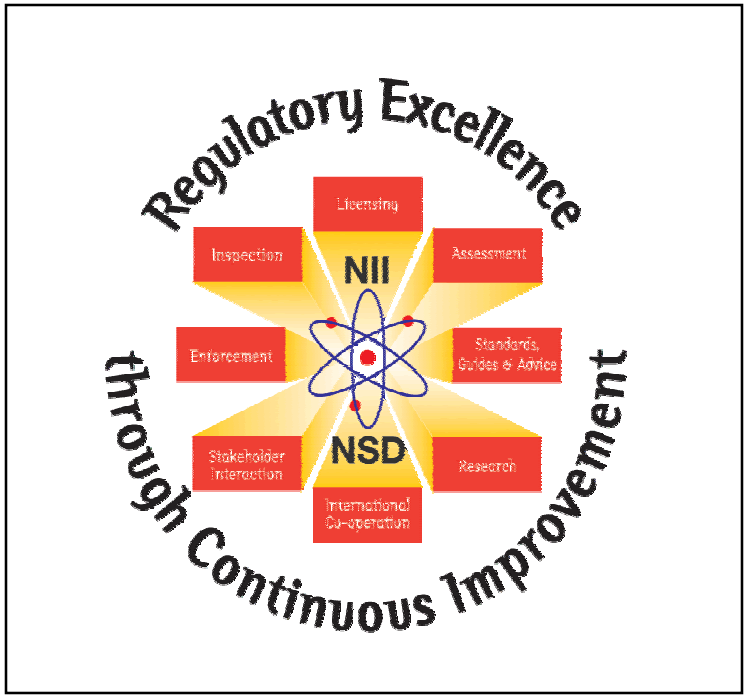

SAFETY CULTURE: CAN IT BE REGULATED?

THE ROLE OF LICENCE CONDITION 36

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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