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To: <infocollects@nrc.gov>
Date: 3/16/04 4:31PM
Subject: Response from "Comment on NRC Documents"

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 69FR7025
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Rules and Directives
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Below is the result of your feedback form. It was submitted by

Don Eggett (dreggett@aesengineering.com) on Tuesday, March 16, 2004 at 16:30:55

Document_Title: Best Practices to Establish and Maintain a Safety Conscious Work Environment

Comments: General Comments:

- 1)Excellent draft to begin discussions
- 2)DATA INTERPRETATION: More emphasis needs to be brought out in the document on the interpretation of data that is obtained and its impact on safe plant operations. This was an underlying cause at Davis-Besse. There is a need for more emphasis in the document to state that any data point could lead to a serious safety concern if not properly analyzed and resolved.
- 3)COMMUNICATIONS: Communications although brought out in the draft still does not appear to have the emphasis it needs. There needs to be more emphasis on teamwork, as an example. Teamwork promotes communications especially in problem identification, data interpretation, and closure of issues.
- 4)EFFECTIVENESS OF TRAINING: The effectiveness of any training is imperative especially when it comes to lessons learned on safety issues both within and outside the plant, i.e. industry benchmarking. We can learn much from the Davis-Besse event. These lessons learned which are real should be more visible in the document.
- 5) SCWE PERFORMANCE INDICATOR: Consideration should be given to the development of a SCWE performance indicator. Objective measurements standards will need to be established for this performance indicator if agreed upon. I believe that the measurement standards will be relatively easy to identify for this indicator.
- 6) DOE's SAFETY CULTURE: What can we learn from DOE and there commitment to safety and a safety culture environment? DOE holds a safety workshop either every year or every other year as a means to communicate to DOE personnel issues on safety. I sat in on one of these workshops in 2001 and found it to be very effective. This avenue should be pursued for the nuclear utilities.
- 7)WHAT HAS WORKED AND WHAT HASN'T WORKED?: What have we found that is working at the nuclear plants? Do we have a list of positives that have promoted a SCWE and a list of negatives that we can turn into positives? (industry benchmarking)
- 8) PROCESS OF FEEDBACK: Feedback to all site personnel especially must be carried out ASAP especially if the safety issue might be of a serious nature.
- 9)INCENTIVES: Bonuses, if a consideration for an incentive payout on a SCWE, might be tied to an established SCWE performance indicator.

Specific Comments:

- 1)I have a number of suggested comments on the draft that are editorial in nature or provide added value enhancements to an existing statement but have not included them here. My intent was to provide general comments first and if requested by the NRC to followup with these specific comments as this draft document becomes further developed.

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