

## SAFETY CULTURE RESPONSE PLAN

8/3/05

In support of NRC's strategic mission to ensure public health and safety and to address lessons learned from recent events at licensee facilities, the Commission directed staff to undertake a number of activities, including: to enhance the Reactor Oversight Process (ROP) treatment of cross-cutting issues to more fully address safety culture, to develop a process for determining the need for a specific evaluation of safety culture for plants in the degraded cornerstone of the ROP's action matrix and to develop a process for conducting the specific safety culture evaluation. The Commission's direction was provided in a Staff Requirements Memorandum (SRM) "SRM-SECY-04-0111, Recommended Staff Actions Regarding Agency Guidance in the Areas of Safety Conscious Work Environment and Safety Culture," dated August 30, 2004. In response, the staff established a Safety Culture Steering Committee, a Safety Culture Working Group, and a Working Group Support Team to address the Commission's direction.

As an initial step, the Working Group developed a Safety Culture Response Plan (Plan). The Plan provides the activities that are thought to be needed to be responsive to the Commission's direction and to be supportive of the regulatory principles of being objective, risk-informed, understandable, and predictable. In general, the approach taken in the Plan is to:

- Define the terms Safety Culture Attribute (SCA), Element (SCE), Inspection Information (SCI), and Measures (SCM).
- Identify the specific Attributes and Elements and potential Inspection Information and potential Measures for each Element.
- Assess the identified SCEs, SCIs, and SCMs against the ROP's Cross-Cutting Areas (CCAs) and inspection procedures to determine what is currently available in the ROP that could be evaluated as potential safety culture features, and what is not currently available in the ROP that may be considered for inclusion.
- Propose and implement modifications to the ROP to more fully address safety culture, based on the results of the above.
- Develop a proposed approach for documenting inspection information, a methodology for trending and assessing the information, and potential agency actions that can be taken when criteria are reached.
- Develop a process for determining the need for a specific evaluation of safety culture for plants in the degraded cornerstone columns and develop a process to conduct the specific safety culture evaluation procedure. The development of these processes should apply the information gained from the enhancing the ROP's treatment of cross-cutting areas to better address safety culture.

Further, the Plan also addresses activities related to enhancing training for inspectors on safety culture, continuing to monitor industry efforts to assess safety culture, and continuing to monitor developments by foreign regulators.

Finally, and importantly, the Safety Culture Response Plan includes activities that ensure frequent interactions with internal and external stakeholders throughout the development process.

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<b>SAFETY CULTURE RESPONSE PLAN</b>		
<b>Item</b>	<b>Activity</b>	<b>Estimated Completion Date (ECD)</b> (last business day of the month)
1	<b>Assess and modify, as needed, ROP treatment of Cross-Cutting Issues and the ROP Inspection Procedures to more fully address Safety Culture</b>	
1.1	Identify safety culture attributes (SCAs), elements (SCEs), potential inspection information (SCIs), and potential measures (SCMs) from a variety of sources.	8/05
1.2	<p>Assess the SCAs and SCEs against the Cross-cutting Areas (CCAs) to determine which CCAs they each fall under.</p> <p>Identify those SCAs and SCEs that cannot be captured under the CCAs as presently defined/structured.</p> <p>Determine whether the CCAs need to be redefined/restructured to capture the identified SCAs and SCEs.</p> <p>Develop proposed modifications to the CCAs</p>	12/05
1.3	<p>Assess SCEs, SCIs, and SCMs against the ROP inspection procedures and identify those aspects of a licensee's program that inspectors currently review as part of the ROP inspections or that can be reviewed as features of safety culture.</p> <p>Assess SCEs, SCIs, and SCMs against the ROP inspection procedures to identify those aspects that are not currently captured in inspection procedures.</p> <p>Develop proposed modifications to ROP inspection procedures including methods to review and record the SCEs.</p>	12/05

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1.4	<p>Develop an approach to document safety culture information to determine potential or actual performance problems associated with the SCEs</p> <p>Develop a draft methodology for trending and assessing SCIs and SCMs.</p> <p>Develop Agency actions that can be taken when criteria are reached and on the results of trending and assessment.</p>	2/06
1.5	Conduct internal and external reviews, make modifications, and finalize 1.2 - 1.4 products	3/06-11/06
2	<p><b>Develop a <u>process for determining the need</u> for a specific evaluation of safety culture and develop a <u>process for conducting an evaluation</u> of the licensee's safety culture for those plants in the degraded cornerstone columns of the ROP Action Matrix</b></p>	
2.1	<p>Develop a draft process to determine the need for a specific evaluation of the licensee's safety culture for plants in the degraded cornerstone columns of the ROP Action Matrix or for plants identified by the enhanced ROP as having safety culture issues.</p> <p>Develop draft NRC decision criteria for assessment options (i.e., NRC safety culture evaluation, licensee self-assessment, licensee's third party assessment).</p>	2/06
2.2	<p>Develop scope of draft inspection guidance for (1) NRC specific evaluation of a licensee's safety culture based on NRC assessment of the need for an evaluation, (2) NRC review of the licensee's self assessment of the plant's safety culture, and, (3) NRC review of the licensee's 3<sup>rd</sup> party assessment of the plant's safety culture.</p> <p>Identify Agency actions that can be taken based on the results of each of the above inspections/evaluations.</p>	3/06
2.3	Develop draft inspection guidance for 2.2 evaluations	10/06
2.4	Conduct internal and external reviews, make modifications, and finalize 2.1 and 2.3 products	11/06 - 1/07
3	<p><b>Develop an enhanced training program for inspectors on safety culture that uses both insights from INPO's work and insights from the international community</b></p>	

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3.1	Determine what training is needed for inspectors in the enhanced ROP relative to Safety Culture and for trending of the inspection information  Determine what training is needed for inspectors in applying the inspection guidance for the specific safety culture inspection, the licensee self-assessment, and for the 3 <sup>rd</sup> party assessment.  Develop the training program	TBD on basis of extent of needed changes to the inspection program
3.2	On an interim basis, continue to provide training on safety culture for inspectors on a case-by-case basis as requested.	On-going
4	<b>Continue to monitor industry efforts to assess Safety Culture and ensure the Commission remains informed of industry efforts and progress.</b>	
4.1	Inform the Commission of industry's efforts and progress in assessing safety culture.	as needed
5	<b>Continue to monitor developments of foreign regulators</b>	
5.1	Engage the international community through various means (e.g., information exchanges, participation in international topical meetings, conducting an international workshop(s)) to both inform and get feedback on response plan products.	on-going

Activity #	External Stakeholder Interactions	Estimated Date(s)
1.1	Public Meeting	8/05
1.2	Public Meeting	10/05
2.1	Public Meeting	12/05
1.3, 1.4, 1.5	Public Meeting(s)	3/06 - 9/06
2.2	Public Meeting	6/06
2.3	Public Meeting(s)	8/06 - 10/06