



Current Activities Related to Safety Culture

Robert Pascarelli
Office of Nuclear Reactor Regulation

Eugene Cobey
Region I

Industry Representative

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Current Regulatory Oversight Related to Cross Cutting Aspects

	<i>Existing</i>
INFORMATION SOURCES	<ul style="list-style-type: none"> • Inspectors complete inspections • Inspectors complete Plant Status activities • Inspectors identify cross-cutting aspects of findings • NRC personnel investigate and/or inspect allegations
DOCUMENTATION	<ul style="list-style-type: none"> • Document performance issues with identification of cross cutting aspects
ASSESSMENT	<p>In accordance with MC 0305, NRC managers:</p> <ul style="list-style-type: none"> • Identify substantive cross-cutting issues • Determine the appropriate response for plant performance
FOLLOW-UP	<p>In accordance with MC 0305, NRC staff responds in accordance with:</p> <ul style="list-style-type: none"> • The staff's evaluation of substantive cross-cutting issues • The Action Matrix



Post Davis-Besse ROP Enhancements

- IP 71152 – CAP screening review
- IP 71152 – Semi-annual trend review
- IP 71111.15 – Operability evaluation review includes deferred modifications
- Training on the Columbia Space Shuttle Accident
- Review of NRC baseline program and plant assessment processes
- Cross-cutting issue guidance
 - 01/2004 - provided follow-up options for substantive cross-cutting issue
 - 12/2004 - clarified criteria and added bins for HP & PI&R
 - 11/2005 - clarified treatment and development of substantive cross-cutting issues



Current NRC Activities Related to Safety Culture

- What does the NRC currently do related to safety culture?
 - NRC assesses plant performance
 - NRC activities evaluate elements of plant performance which provide varying degrees of coverage for each safety culture component
- What does the NRC not currently do regarding the evaluation of safety culture:
 - NRC does not explicitly inspect or assess a plant's safety culture



Determine the Current NRC Activities Related to Safety Culture

Objective

- Determine the extent to which NRC's current activities are related to safety culture components and subcomponents

Assumptions

- Safety culture components and subcomponents
- Levels of coverage



Determine the Current NRC Activities Related to Safety Culture

Methodology

- Perform a detailed review of the following elements of the NRC's oversight activities:
 - Reactor Oversight Process (ROP) baseline inspection program
 - ROP supplemental inspections
 - Reactive special inspection activities (MD 8.3 - SI, AIT, and IIT)
 - Plant status activities (MC 2515, Appendix D)
 - Allegation Program
- Infrequently performed inspections (MC 2515, Appendix C) were not included in the review



Determine the Current NRC Activities Related to Safety Culture

Work Planning & Human Performance	Organizational Learning	SCWE	Organizational Safety Accountability
<ul style="list-style-type: none"> • Work control • Systematic decision-making • Conduct of work • Questioning attitude 	<ul style="list-style-type: none"> • Internal & external operating experience • Self-assessment • Problem identification & resolution/CAP • Continuous learning environment 	<ul style="list-style-type: none"> • SCWE policies • Willingness to raise concerns • Alternative process for raising concerns • Preventing & detecting retaliation 	<ul style="list-style-type: none"> • Safety policies • Accountability & incentive programs • Adequate resources • Organizational change management



Determine the Current NRC Activities Related to Safety Culture

Levels of Coverage

- Direct – Guidance is clear that some aspects related to safety culture are covered during the activity
- Indirect – Guidance mentions at a high level that some aspects related to safety culture are covered or there is a reasonable opportunity to cover some aspects of safety culture during the activity
- No Coverage



Current NRC Activities Related to Safety Culture

Summary of Results

- Most NRC activities can be tied directly or indirectly to one or more of the safety culture components and subcomponents
- Most aspects of safety culture subcomponents are currently covered by NRC activities. The level of coverage varies significantly between subcomponents



Current NRC Activities Related to Safety Culture

- Several subcomponents of safety culture are covered extensively
 - Adequate Resources
 - Problem Identification and Resolution/CAP
 - Conduct of Work
- Several subcomponents of safety culture are covered directly, but to a lesser degree
 - Willingness to Raise Concerns
 - Alternative Process for Raising Concerns
 - Internal and External Operating Experience
 - Self-Assessment Process
 - Work Control



Current NRC Activities Related to Safety Culture

Many subcomponents of safety culture are covered indirectly, to varying degrees

- Safety Policies
- Accountability and Incentive Programs
- Organizational Change Management
- SCWE Policies
- Preventing and Detecting Retaliation
- Continuous Learning Environment
- Systematic Decision Making
- Questioning Attitude



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