

Response to NRC on Safety Culture Components and ROP Revisions
January 6, 2006

By email to stakeholders on December 20, 2005, the NRC staff requested:

“that the expected Dec. 15th meeting follow-up actions be provided via e-mail to me by the end of the week of Jan. 2nd:

- (1) stakeholders comments on what's important to safety culture and comments on the associated NRC component definitions and
- (2) stakeholders comments on the NRC's placement of the components in the cross-cutting areas.”

In response to Item 1, the industry continues to view the safety culture principles and attributes set forth in the 2003 INPO Safety Culture Principles and Attributes document as an accurate reflection of “what's important to safety culture.” The introduction of a second set of terms will create unnecessary confusion for both the NRC staff and licensees. We therefore request that the staff reconsider its position regarding the development and maintenance of a components list different from that currently being used by the industry in terms of what is important to safety culture.

The industry continues to believe that the safety culture components ultimately would be best used by the NRC staff to guide its evaluation of the quality of licensee safety culture assessments and in performing its own assessment of a licensee's safety culture. Although this is not the staff's current position, until we achieve a common understanding of the intended use of the components, the industry views it as premature to comment on the Staff's proposed components and their definitions.

In response to Item 2, the industry does NOT agree with the NRC's placement of the safety culture components in the cross-cutting areas as proposed in the staff's December 21, 2005, paper entitled Safety Culture Initiative Summary Results. As discussed, the industry believes that modification to the cross cutting areas is not necessary to accomplish the results that the staff, industry, and other stakeholders would like to achieve from this initiative, *i.e.*,

- Identifying safety culture attributes that are drivers of performance issues and
- Ensuring that safety culture attributes that may impact a licensee's performance are detected and fixed prior to a significant performance issue occurring.

In addition, revising the cross-cutting areas as suggested by the Staff paper is not consistent with the December 21, 2005 SRM. Further, such a change will require

inspectors to evaluate without the assistance of objective standards. This is inconsistent with the principles for revision to the ROP process, as described in the December 21, 2005, SRM. It is also likely to be difficult to implement, thereby removing Staff resources from other important inspection work. In addition, since the existing subcomponents were recently revised, additional revisions at this time could undermine attempts to develop data streams and might introduce even greater instability into the process. Finally, the changes being proposed are not necessary because the majority of the components are already embodied by the existing subcomponents. Significant insights regarding a station's safety culture can be gained from evaluations of the existing cross-cutting areas.

We believe that more work is needed to show how insights on each of the proposed components is provided through existing regulations or the current ROP, including the existing cross-cutting areas, in order to show how our proposal will adequately address any minor gaps that may exist. We will plan to undertake that work for presentation to the Staff at our January 18, 2005 meeting.

While we disagree with the staff's proposed approach regarding the components list or incorporating many of the components into the existing cross-cutting areas, we believe the proposal delineated in the staff's December 21, 2005 draft initiative paper provides early insights into a plant's safety culture and fulfills the directions provided in both SRM-SECY 04-0111 and the December 21, 2005 SRM through the proposed interactions with licensees in both the Degraded Cornerstone and Multiple Degraded Cornerstone columns of the Action Matrix.

We look forward to continuing interactions with the NRC staff on this matter. Please contact Mike Coyle (202-739-8112) or me (202-739-8058) if you have any questions regarding our comments or any other matter on this issue.