



# **Public Stakeholder Meeting**

## **NRC Safety Culture Initiatives**

**February 14, 2006**



# Purpose

To provide an opportunity to discuss the draft changes to manual chapters and inspection procedures needed to implement the safety culture enhancements to the Reactor Oversight Process



# Success for the Meeting

- Stakeholders have an understanding of the purpose of the draft changes to selected inspection procedures and manual chapters
- Stakeholders had an opportunity to ask questions about the draft changes in order to better inform their comments on the changes
- Stakeholders have an understanding of the next steps



# **IMC 0305, “Operating Reactor Assessment Program”**

**Bob Pascarelli  
Office of Nuclear Reactor Regulation  
February 14, 2006**



# IMC 0305, “Operating Reactor Assessment Program”

## Purpose of the procedure:

- To collect information from inspection findings and performance indicators
- To arrive at an objective assessment of licensee safety performance
- To assist NRC management in making timely and predictable decisions regarding appropriate Agency actions
- To provide a method for informing the public of NRC’s assessment of licensee performance
- To provide a process to follow-up on areas of concern



# IMC 0305, “Operating Reactor Assessment Program”

## Purpose of the change:

- To provide the circumstances under which the NRC would request or expect a licensee perform an assessment of their safety culture
- To provide definitions of cross-cutting areas which align with what is important to safety culture
- To provide criteria for a substantive cross-cutting issue in safety conscious work environment



# IMC 0305, “Operating Reactor Assessment Program”

Revisions to Section 06.05 of the procedure:

- Degraded Cornerstone column – Added an option that the NRC may request that a licensee have an independent assessment of their safety culture performed
- Multiple/Repetitive Degraded Cornerstone column – Added an expectation that the licensee have an independent assessment of their safety culture performed



## IMC 0305, “Operating Reactor Assessment Program”

Added Section 06.07 to the procedure:

- Provided definitions of cross-cutting areas which align with what is important to safety culture
- Provided criteria for a substantive cross-cutting issue in the safety conscious work environment cross-cutting area
- Added guidance on items that should be considered in the substantive cross-cutting issue evaluation when determining whether the NRC has a concern with the licensee’s scope of efforts or progress in addressing a performance issue
- Added expectations of licensee actions when a substantive cross-cutting issue is identified.



# IMC 0305, “Operating Reactor Assessment Program”

Questions?



# IP 71152, “Identification and Resolution of Problems”

**Robert M. Lerch**  
**Region III**  
**February 14, 2006**



# IP 71152, “Identification and Resolution of Problems”

Purpose of the procedure:

To assess licensee performance in the area of problem identification and resolution

- Daily review of condition reports
- Quarterly follow-up of selected issues
- Semi-annual trend reviews
- Biennial team inspection



# IP 71152, “Identification and Resolution of Problems”

## Purpose of the change:

- Direct inspectors to be aware of safety culture components
- Augment the inspection requirements and guidance
- Align performance assessment to be consistent with the revised problem identification and resolution cross-cutting area
- Revise the questions associated with evaluating safety conscious work environment



# IP 71152, “Identification and Resolution of Problems”

## Inspection Requirements:

- Direct inspectors to be aware of safety culture components
- Added requirements to inspect and assess elements of the corrective action program, operating experience, and self-assessment to be consistent with the revised problem identification and resolution cross-cutting area
- Added a requirement to review licensee self-assessments of safety culture



# IP 71152, “Identification and Resolution of Problems”

## Inspection Guidance:

- Inspection samples of self-assessments and alternate processes for raising concerns are mandatory for biennial inspections
- Include a review of the safety culture self-assessment, if performed, in the biennial inspection
- Added performance attributes for operating experience and self-assessments



# IP 71152, “Identification and Resolution of Problems”

## Inspection Guidance:

- Enhanced description of problems that may impact safety conscious work environment
- Expanded documentation instructions to address all elements of problem identification and resolution
- Replaced Appendix 1 questions with improved questions



# IP 71152, “Identification and Resolution of Problems”

Questions?



# **Supplemental Inspection Procedure 95001, “Inspection for One or Two White Inputs in a Strategic Performance Area”**

**Bob Hagar  
Region II  
February 14, 2006**



# Supplemental IP 95001

Purpose of the procedure:

To provide assurance that:

- Root and contributing causes are understood;
- Extent of condition and extent of cause are identified; and
- Corrective actions are sufficient to address the root and contributing causes, and prevent recurrence



# Supplemental IP 95001

## Purpose of the change:

To verify that the licensee's root cause, extent of condition, and extent of cause evaluations appropriately considered and addressed safety culture issues



## Supplemental IP 95001

### Inspection Requirements:

Added a requirement to determine that the root cause, extent of condition, and extent of cause evaluations appropriately considered all of the components of safety culture.



# Supplemental IP 95001

## Inspection Guidance:

- Added guidance for making the determination on whether or not the licensee's root cause, extent of condition, and extent of cause evaluations appropriately considered all of the components of safety culture.
- Added a note that failure to consider a safety culture component is not necessarily a violation



# Supplemental IP 95001

Questions?



**Supplemental Inspection Procedure 95002,  
“Inspection for One Degraded Cornerstone  
or Any Three White Inputs in a Strategic  
Performance Area”**

**Bob Hagar  
Region II  
February 14, 2006**



# Supplemental IP 95002

## Purpose of the procedure:

- To provide assurance that the root and contributing causes are understood for the individual and collective risk significant performance issues
- To independently assess the extent of condition and extent of cause for the individual and collective risk significant performance issues
- To provide assurance that licensee corrective actions for the risk significant performance issues are sufficient to address the root and contributing causes, and to prevent recurrence



## Supplemental IP 95002

Purpose of the change:

To enable NRC inspectors to independently determine whether any safety culture component caused or contributed to the risk significant performance issues



## Supplemental IP 95002

### Inspection Objectives:

Added a new objective to independently determine whether any safety culture component caused or contributed to the risk significant performance issues



## Supplemental IP 95002

### Inspection Requirements:

- Added a requirement to determine that the root cause evaluation appropriately considered safety culture components
- Added criteria for referring to IMC 0305 to request a licensee have an independent assessment of their safety culture performed



## Supplemental IP 95002

### Inspection Guidance:

- Added guidance for making the determination on whether or not the root cause evaluation appropriately considered safety culture components
- Added a note that failure to consider a safety culture component is not necessarily a violation



# Supplemental IP 95002

Questions?



# IP 71153, “Event Follow-up”

**Robert M. Lerch**  
**Region III**  
**February 14, 2006**



## IP 71153, “Event Follow-up”

### Purpose of the procedure:

- To provide guidance on inspector response to licensee events and degraded conditions
- To provide guidance on reviewing Licensee Event Reports



## IP 71153, “Event Follow-up”

Purpose of the change:

Gather information on event contributing causes including those that are related to the safety culture components



## IP 71153, “Event Follow-up”

### Inspection Requirements:

- Collect information on the event
- Retain observations related to apparent performance issues and contributing factors



## IP 71153, “Event Follow-up”

### Inspection Guidance:

- Observe plant parameters and collect information
- Provide information on contributing factors for follow-up inspection



# IP 71153, “Event Follow-up”

Questions?



# IP 93812, “Special Inspection”

**Robert M. Lerch**  
**Region III**  
**February 14, 2006**



## IP 93812, “Special Inspection”

Purpose of the procedure:

Provide inspection guidance for special inspections conducted in response to operational events at power reactors



## IP 93812, “Special Inspection”

Purpose of the change:

Include the components of safety culture when reviewing potential contributing causes for an event



## IP 93812, “Special Inspection”

### Inspection Guidance:

Added direction during fact finding to include causes and contributors for an event, including the components of safety culture



## IP 93812, “Special Inspection”

### Documentation:

- Added safety culture components to the list of probable causes
- Indicated that results may be used to inform subsequent supplemental inspection



# IP 93812, “Special Inspection”

Questions?



# IP 93800, “Augmented Inspection Team”

**Robert M. Lerch**  
**Region III**  
**February 14, 2006**



# IP 93800, “Augmented Inspection Team”

Purpose of the procedure:

Review an event with a larger, more diverse and experienced inspection team based on the significance of the event



## IP 93800, “Augmented Inspection Team”

Purpose of the change:

Include the components of safety culture when reviewing potential contributing causes for an event. Forward the information to the follow-up inspection team



# IP 93800, “Augmented Inspection Team”

## Inspection Guidance:

Added direction during fact finding to include causes and contributors for an event, including the components of safety culture



# IP 93800, “Augmented Inspection Team”

## Documentation:

- Added safety culture components to the list of probable causes
- Indicated that results may be used to inform subsequent supplemental inspection



# IP 93800, “Augmented Inspection Team”

Questions?



# **IMC 0612, “Power Reactor Inspection Reports”**

**Bob Hagar  
Region II  
February 14, 2006**



# IMC 0612, “Power Reactor Inspection Reports”

Purpose of the procedure:

To define the content and format for reports of power reactor inspections

Purpose of the change:

To conform with the changes to IMC 0305



## IMC 0612, “Power Reactor Inspection Reports”

Revisions to Section 05.03 of the procedure:

- Added a note to remind inspectors that determining that an inspection finding has a cross-cutting aspect does not in itself justify that the finding is more than minor

Revisions to Section 06.03.c(5) of the procedure:

- Added clarification of the “recent”
- Added guidance for documenting cross-cutting aspects of findings and provided several examples



# IMC 0612, “Power Reactor Inspection Reports”

Questions?



# **IMC 0612, Appendix D, “Guidance for Documenting Inspection Procedure 71152 . . .”**

**Bob Hagar  
Region II  
February 14, 2006**



## IMC 0612, Appendix D

### Purpose of the appendix:

To define the content and format for documenting the results of Inspection Procedure 71152, “Identification and Resolution of Problems”

### Purpose of the change:

To conform with the changes to Inspection Procedure 71152, “Identification and Resolution of Problems”



## IMC 0612, Appendix D

Revised the guidance to include:

- Assessment of the corrective action program
  - Identification
  - Evaluation
  - Corrective Action
- Assessment of the use of operating experience
- Assessment of self-assessment capability
- Assessment of safety conscious work environment



# IMC 0612, Appendix D

Questions?



# Summary and Next Steps

- Comments due by close of business on February 16<sup>th</sup>
- Comment resolution completed by the end of February
- Manual chapters and inspection procedures processed through the formal revision process in March and April
- Training for inspectors and managers April through May
- Safety culture enhancements to the Reactor Oversight Process become effective on July 1<sup>st</sup>