

**EXTERNAL STAKEHOLDER COMMENTS ON
IP 95003 Main Body (April 26, 2006)**

Source	Comment
NEI	<p>General Comments: This procedure and associated attachment will provide the inspectors with a significant amount of information and also provides some guidance on evaluating certain components. However, the abundance of data collected, including answers to questions, personal biases, observations of imperfections, etc., must be effectively analyzed to draw an overall conclusion about the station's safety culture. Additional guidance is needed for the inspectors to be able to appropriately detail their conclusions and potential findings. For example, are the conclusions going to be written in terms of the health of any given component or of the overall safety culture? How will the conclusions be tied back to the performance issues associated with the reason for the inspection? Predictability and repeatability of these inspections will be questioned without further guidance on how the information is to be translated into an overall safety culture conclusion.</p>
NEI	<p>In addition, there are several instances where no guidance exists for terms such as "effective" and "adequate" [such as 03.03.c (b)(2)(dd) and 03.03.c(d)(4)(d)]. Suggest the staff review the procedures these instances and where appropriate, add guidance for the inspectors.</p>
NEI	<p>The comments industry previously submitted on the other procedures and manual chapters need to be addressed in terms of references to various IP 95003 sections. We do not believe that this procedure should be referenced by other IPs, as noted in our earlier comments. Suggest any references to IP 95003 be deleted from the other IPs and any necessary guidance be specifically incorporated into the other IP and manual chapter sections.</p>
NEI	<p>We continue to have concerns about terminology consistency. The 95003 procedure guidance must ensure that the inspectors get to the aspect level in assessing behaviors to have meaningful insights. However, in many instances, the procedure and attachments stop at the component level discussion and in some cases use new terminology such as "requirements." We therefore recommend re-reviewing the procedures against any clarifications in terminology the staff has developed.</p>

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NEI	In addition, in multiple instances the staff is looking to collect information in terms of the safety culture components. Given the differences in safety culture terminology (i.e., components, aspects, principles and attributes), those cases where the staff is asking for data to be presented against the components will result in an undue administrative burden on licensees. Specific guidance should be given to the inspectors in these areas to note that licensee information will not be provided in the NRC's terminology, and the staff must assume the burden for making the correlation of the data.
NEI	p. 6, 02.01b, C – Can't find referenced Section 02.13. Only goes to 02.12.
NEI	p. 9, 02.03 c.3, C – redundant. The section is about human performance and the ability to use the program/procedures. Suggest deleted.
NEI	p. 16, 02.04 c.4, C – This section states: "Review any recommendations for plant improvements to support radiation safety and determine whether the decision sufficiently supported radiation protection." Not all recommendations are worth implementing. Suggest modifying to state "Review any recommendations for plant improvements to support radiation safety and determine whether the recommendations were adequately evaluated and, as appropriate, implemented."
NEI	p. 16, 02.07 a, Q - What is meant by the "tools and instruments"? In some cases, licensees use vendors to perform surveys. The survey methodology may be proprietary to that vendor. If NRC takes possession of that information, it might be subject to FOIA requests. Might be prudent to add a statement about potential proprietary information in this area to prevent this or ensure that the information can be withheld from public disclosure.
NEI	p. 16, 02.07 a, Q - In addition, need to state explicitly why 5 years worth of assessments are needed. Although culture is fairly stable, 5 year old assessments are not typically consistent with current performance.

Source	Comment
NEI	<p>p. 17, 02.07 b.2(d), C – This section states: “Verify that: (a) The assessment addressed all functional groups within the licensee’s organization, including the functional groups that have a clear nexus to safe plant operations (e.g., operations, engineering, maintenance); (b) The assessment included all levels of management with line responsibility for plant operations, up to and including corporate senior management; (c) Sample sizes were sufficient to ensure that assessment results were representative of the populations and subpopulations addressed in the survey; and (d) Information was collected relating to all of the safety culture components. Specifically note any component(s) of safety culture about which no information was collected within the scope of the licensee’s assessment.”</p> <p>Throughout this section the implication is that the assessment MUST include all components. There may be specific instances where some of the components or organizations are appropriately excluded from the assessment. Suggest that the last note be revised for the inspector to specifically ask the assessment team members why certain sections were omitted and judge the adequacy of those justifications.</p>
NEI	<p>p. 17, 02.07 b.1 and b.5(c), Q – b.1 states, “Review the documents relating to the licensee’s most-recent independent safety culture assessment.” Is this referring to the one done specifically for the Column 4 performance? Is there a limit as to how recent the previous assessments should be that are used for comparison? Depending on the amount of time in between these assessments, the comparison may be meaningless. This step contains no time limit or a limit on the number of assessments that should be compared.</p>
NEI	<p>p. 17, 02.07 b.4, E – Section states: “Determine whether the licensee’s assessment team members were independent and qualified. As follows:” Remove “as follows.”</p>
NEI	<p>p. 18, 02.08 a., Section states, “Ensure that the selected requirements include at least one requirement associated with each safety culture component.” No basis is given for this statement. Suggest either removing or revising to indicate why this is necessary.</p>
NEI	<p>p. 18, 02.08 a., Section states, “Ensure that the selected requirements include at least one requirement associated with each safety culture component.” Also, the word “requirement” is incorrect. The term “aspect” would appear to be more appropriate. There are no “requirements” in the list of safety culture components.</p>

Source	Comment
NEI	<p>p. 18, 02.08 c.1(b), Section has inspectors collect “reports of any self- or independent assessments related to the components of safety culture from the past five years;” Every assessment performed can be linked to a safety culture component. This will result in an excessive administrative burden, as licensees do not code against the components. Suggest collecting a list of the self-assessments, including a summary of the scope and summary of the assessment, and the NRC staff annotating applicable components based on a review of the scope and summary. The staff can then select pertinent assessments to review relative to the issues being assessed.</p>
NEI	<p>p. 18, 02.08 c.1(d), C/Q – This section has the inspectors “a sample of redacted job performance reviews from each functional group in the organization.” The industry does not agree that the collection of these documents is needed to support a safety culture assessment, whether redacted or not. In addition, collection of such documents, even in redacted form, may violate state labor laws. The intent of this review appears to be to see whether incentives are adequate to ensure a proper safety culture. If that is so, then you only need generic categories that are used in performance reviews, not the reviews themselves.</p>
NEI	<p>p. 19, 02.08 c.1(h), Section asks inspectors to collect “records from the corrective action program of issues that relate to the components of safety culture and were identified or resolved within the previous year.” Licensees do not code reports or evaluations to the NRC’s safety culture components. This will result in an undue burden on licensees. Suggest that the NRC staff ask for summaries of the corrective action documents and code them to the applicable components and aspects as a part of the inspection.</p>

Source	Comment
NEI	<p>p. 58, 03.07 b.4(a), This section states: "In determining the whether the licensee's assessment team members were independent and qualified: (a) Verify that the assessment team did not include any members of the licensee's organization (licensee team liaison and support activities are not team membership)." Industry fundamentally disagrees with this restriction. As written, this section would prohibit "any" licensee employee from participating (other than providing support and coordination) in an "independent" safety culture assessment. The assessment should be independent. The team leader and a majority of the assessors should be from outside the organization, but prohibiting any participation from the organization being assessed removes an important understanding of the culture and the organization, and is contrary to guidance on doing effective assessments. For example: Fleet operators might want to use employees from other sites or corporate oversight functions as part of an assessment team. Recommend modifying this statement to state "independent of the line functions" or similar language.</p>
PSE&G	<p>Page 17, item 02.07.b.4: The line ends with "as follows" and does not discuss means to ensure assessment team members are independent and qualified.</p>
PSE&G	<p>Page 17, item 02.07.b.5(c): This paragraph addresses instances where current and previous safety culture assessments have different results. It contains statements that infer the basis for differences are likely due to actual changes in safety culture components over time. This needs reworded to clarify the intent of the paragraph, which should be for NRC to look at and understand reasons for different assessment results over time.</p>
PSE&G	<p>Page 18, item 02.08.c.1(d): A sample of job performance reviews, regardless of redaction, and the basis for management compensation and incentives do not appear to be appropriate for NRC inspection. What is the acceptable standard? How will NRC assess the adequacy of job performance reviews? Will this be subject to a finding?</p>
PSE&G	<p>Page 19, item 02.08.c.1(e), fourth bullet: NRC requests minutes from site financial planning and budgets, including operating, maintenance, and capital improvement plans. What is the acceptable standard? How will NRC inspectors be in a position to assess the appropriateness of where funding was allocated? Will this be subject to a finding?</p>
PSE&G	<p>Page 19, item 02.08.c.1(h): In actuality, this is a substantial portion of the information in the Corrective Action Program, since nearly all issues have the performance and decision-making involved. NRC inspectors must provide more specificity when the data requests are made.</p>

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PSE&G	Page 19, item 02.08.c.2(a): How will allegation data be used? It is not appropriate to use an unsubstantiated allegation as an indication of a station's safety culture. What criteria will be applied to determine if an allegation reveals some problem in a safety culture component?
PSE&G	Page 19, item 02.08.e: What does "special attention" mean? By the NRC or by the licensee? What criteria is used to make this determination?
PSE&G	Page 19, item 02.08.f.1: Based on experience at Salem/Hope Creek, focus groups provide insufficient information to be used without several other means to validate the data. This item would allow focus groups without interviews (and/or), resulting in only one other method to validate focus group data. A recent peer assessment coupled focus groups with individual interviews, observations, document reviews, and targeted interviews. Without this variety of tools applied, the team may have reached an inaccurate conclusion and the NRC fall into this same challenge.
PSE&G	Page 20, item 02.08.h: NRC has conducted focus groups at Salem/Hope Creek and maintained the results confidential. Some personnel have voiced frustration with the lack of feedback on the input provided. As a licensee, the inspection report or a contact number for the NRC team leader could be provided those who request this type of feedback; however, the feedback was being requested of the NRC, which is outside of the purview of the licensee.
PSE&G	Page 22 and 23: Delete or simplify significantly the qualification requirements for safety culture assessors. Does establishing extremely restrictive qualification requirements for safety culture assessors match the Commission's direction given in various SECY documents? This appears to limit the assessors to two or three members of the NRC staff. Few in the nuclear industry meet these requirements and even fewer participate on safety culture evaluations. It is not clear how these requirements contribute to being able to assess an organization's safety culture.
PSE&G	Page 56, item 03.07.b.2(a): What is the basis for the last statement on the page? There can be various sub-cultures at a station and sometimes even within an organization. The likelihood that a support organization fulfills a role in the organization that is as important to the culture as an operational group is low. More likely is that some of the reasons why an organization has specific issues may be attributable to weak HR practices or lack of support from ancillary organizations.

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PSE&G	Page 57, item 03.07.b.2(b)(1) and (2): What is the basis for the percentages listed in (1) and (2)? How does it relate to the participation in surveys conducted on behalf of the NRC? In Office of the Inspector General report OIG-06-A-08, dated 02/10/2006, pg. 4, it was stated "Of the 3,206 employees asked to participate, 2,269 completed valid surveys, for an overall return rate of 70%. This return is significantly higher than previous survey administrations and is more than sufficient to provide a reliable and valid measure of the current attitudes and perceptions of NRC employees and managers." How low before the percentage results in an invalid survey in the NRC's opinion?
PSE&G	Page 61, item 03.08.c.1(b), third bullet: Leadership assessments, regardless of redaction, do not appear to be appropriate for NRC inspection. What is the acceptable standard? There are too many negatives to sort out what this paragraph is really stating.
PSE&G	Page 61, item 03.09.c: Valid and reliable insights may be nothing more than common perceptions and not reality. What will the team do to validate perceptions that pass the "valid" or "reliable" measure?
PSE&G	Page 62, item 03.09.e, last paragraph: Asking the licensee to perform additional assessment activities to run to ground inconsistencies will require licensees to understand the manner in which questions were asked, the source (group, individual) and in some cases, the organizations involved. This seems to run contrary to other guidance in 95003 which says the information is held confidential. Without this information, it may provide very difficult for the licensee to explain differences.
PSE&G	Page 62, item 03.09.f: Why is it assumed that safety culture attribute shortfalls in a critical organization will directly result in performance issues that must be linked to a SPA key attribute? It seems like this leap would need to have a clear causal connection with a performance deficiency - not just that it existed so therefore it results in a performance issue.
Bille Garde	Page 5: Boundary condition #5: <u>BPG Comment</u> : Disagree with this prerequisite. The "blind spot" behind the loss of the Columbia was that NASA believed it had a good safety culture, and adding this prerequisite handicaps the Staff's ability to act when it believes it needs to.
Billie Garde	Page 7: Added to <u>02.02e</u> : "By reviewing selected aspects of the employee concerns program and the results of surveys or other workplace environment evaluations ensure that employees are not hesitant to raise safety concerns...."

Source	Comment
Billie Garde	Page 7: Added to <u>02.02f</u> : “Is there a mechanism for all members of the workforce to report deficiencies, suggest improvements, and explain disagreements with technical resolutions to identify deficiencies? Is there a feedback mechanism in which the evaluations of deficiencies and follow-up corrective actions are reported back to the identifying workers? “
Billie Garde	Page 8: Added to 02.03c1: “Assess the effectiveness of corrective actions for identifying, evaluation and correcting deficiencies involving human performance.”
Billie Garde	Page 10, <u>02.03e4</u> : “...including communications gear ”??? Does this include review of the interface of communications equipment with local, state and federal first responders?
Billie Garde	Page 10, <u>02.03e6</u> : How are you going to do this, since there may well not have been anyone determining whether there was a delay? In the eyes of the licensee, unless there has already been an equipment failure, there may not have been any review of the decision at issue?
Billie Garde	Page 17, 02.07b: Insert independence and qualification criteria between Item #4 and #5.
Billie Garde	Page 17, Added to <u>02.07b5(c)</u> : “...the reasons for those differences are explained , known, and likely reflect...”
Billie Garde	Page 22, <u>General Guidance</u> : “Consideration should be given to using a member of the assigned resident staff or another inspector who has recently served as a resident at the site.” <u>BPG Comment</u> : I do not agree that the resident inspectors should be a member of the team. They would then be in the position of evaluating themselves. Instead I think the resident inspectors are team “advisors,” where knowledge of the site and the licensee should be relied upon as a resource, but not as a member of the team.
Billie Garde	Page 24, in the section on “Develop the Inspection Plan and Complete Inspection Preparations” : Added 1(d): BPG recommends: “ Identify all employment disputes that allege retaliation, intimidation or discrimination for raising any type of safety concern, and obtain copies of relevant files for review. ”
Billie Garde	Page 24, in the section on “Develop the Inspection Plan and Complete Inspection Preparations”: Added 1(e): BPG recommends: “ Contact the interested or concerned public stakeholders to obtain any relevant information to the safety culture assessment. ”

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Billie Garde	Page 59, <u>03.08a</u> : <u>BPG Comment</u> : I don't understand the addition of this entire section and its reliance upon "patterns". This eliminates a very important insight into the work environment and presents the ability for a licensee to ALWAYS say that actions or behaviors are isolated incidents and not patterns, thus should not be considered. I want to understand WHO came up with this concept and HOW has it been validated as the correct approach to evaluating safety culture. I disagree with it as the exclusive window of observation. Please call to discuss.
Billie Garde	Page 59, <u>03.08a</u> : "Therefore, identifying patterns in the way that individual members of an organization think and behave with respect to nuclear safety will also provide important insights into a licensee's safety culture. Sections 02.07 and 02.08 are intended to enable inspectors to identify those patterns of thinking and behaving that are indicative of safety culture" <u>BPG Comment</u> : Where did this patterns concept come from? It seems to eliminate the observation and evaluation of single or limited incidents of behaviors that can cause a "chilling effect" or dramatically and immediately impact the culture.
Billie Garde	Page 61, Added to <u>03.08c1(b)</u> : "...except if the leadership ineffectiveness or style demonstrates or causes patterns of thinking and behaving that are inconsistent with those described in the safety culture components. "
Billie Garde	Page 62: Added to <u>03.09f</u> : "Corporate and/or senior site management demonstrates patterns of thinking and behaving with respect to nuclear safety...."

**RESOLUTION OF COMMENTS FOR
IP 95003.02 (May 9, 2006)**

Source	Comment
EVF	Combine the first two paragraphs.
EVF	Several techniques were used to develop the example questions in this attachment. First, the questions were formulated after a review of a range of documents on safety culture assessments from the international community and the industry. Next, the questions were refined based on professional knowledge and experience in this area. Finally, after an initial list of questions was developed, the questions were compared against the safety culture component definitions in MC 0305 to ensure all aspects of the components were covered.
EVF	Change “questions is” to “questions are”
EVF	Change “openended” to “open-ended”
EVF	Each tends to be better suited for obtaining certain types of information.
EVF	Change “wellworded” to “well worded”
EVF	<u>Continuous learning environment</u> , 1. “... With other plants?” (How will they know this?)
EVF	<u>Continuous learning environment</u> , 3: “How does your management treat errors? Does your management consider errors as negative to the business, as learning opportunities, or somewhere in between?...” (It’s not an either/or: errors need to be considered negative to the business (and appropriate accountability applied) AND seen as learning experiences.)
EVF	<u>Continuous learning environment</u> , 6 :”During major organizational changes (reorganizations or lay offs)...” (Need to include voluntary reductions/buy-outs and retirements.)
EVF	<u>Corrective Action Program</u> (Need to ask if there are ‘gatekeepers’ in the CAP. For example, does an issue require immediate supv to proceed or can a shift manager kill a CAP item. Do the screening committees and management review committees relegate items they don’t like to low priority enhancement items or otherwise send them into a black hole?)

Source	Comment
EVF	<u>Corrective Action Program</u> , 1: “Is there any difference in the handling of an immediate nuclear safety concern vs. a more long-term nuclear safety concern at this site?” (Need to use ‘issue’ more and ‘concern’ less. The term ‘concern’ has certain assumptions associated with it.)
EVF	<u>Corrective Action Program</u> , 7: Change “Are employees informed of the result?” to ““Are initiators informed of the result?”
EVF	<u>Decision-Making</u> , 3. “What do you take into consideration when making a decision on whether a situation is nuclear safe enough to continue operation?” (Safe enough???)
EVF	<u>Decision-Making</u> , 3. “Does management’s decisions regarding operational issues (such as changes to the scope of work or response to operational events) reflect the appropriate focus on safety?” (1) Change “Does” to “Do” (2) Need to also focus on deferred outage items, corrective vs. elective maintenance, and treatment of emergent outage items.
EVF	<u>Environment for Raising Concerns</u> (For working -level personnel), 10. “Did your supervisor receive any SCWE training? If yes, did you noticed a difference in the way they handled concerns after the training?”
EVF	<u>Environment for Raising Concerns</u> (For working -level personnel), 10. After “If there has been an assessment of SCWE, were the results effectively shared with you?”, add “Were any actions taken with the results? If yes, please describe.”
EVF	<u>Environment for Raising Concerns</u> (For supervisors and managers), Add: “Do you know what is expected of you in handling employee concerns? Do you feel able to effectively handle employee concerns? Are you held accountable for your handling of employee concerns? How?”
EVF	<u>Operating experience</u> , 1. Are you typically able to find out about what's going on in the rest of the industry? With the NRC? Please describe how. (TOO vague!)
EVF	<u>Operating experience</u> , 4. “Do you read relevant internal OE information? ...” (In addition, ask: Is it useful? Is it accessible? Can you quickly find what you need (without having to wade through everything)? If a supervisor, can you quickly find relevant information related to specific job to include in pre-job briefs?? Do you have sufficient time to effectively use OE (i.e., is it an organizational priority?))

Source	Comment
EVF	<u>Organizational change management</u> : Also ask, “Are key management positions expeditiously filled – ‘actings’ avoided?”
EVF	<u>Preventing, detecting, and mitigating perceptions of retaliation</u> : First question should be about existence/promulgation of policy. Second should be about training.
EVF	<u>Preventing, detecting, and mitigating perceptions of retaliation 2</u> . Are you aware of any actions taken by your management to prevent and detect retaliation and/or a chilling effect? (Recommend asking ‘What is the policy’)
EVF	<u>Resources</u> : (Adequate resources to assure accurate procedures, design documents and work packages)
EVF	<u>Resources 1</u> . What methods does your site use to maintain long term plant safety? (TOO vague!)
EVF	<u>Resources 11</u> . In the past year are there any long standing equipment issues at the site that were not addressed? Explain. (Deferred maintenance and/or PM’s. Deferred outage work/deferred emergent work. Unaddressed operator burdens and control room deficiencies. Long-standing temp mods.)
EVF	<u>Resources 5</u> . How do you balance production and safety? (This is mgt question as written. Otherwise, ‘can you give an example of a good balance between? Can you give an unacceptable example.....?’)
EVF	<u>Resources 6</u> . Have you received training concerning safety policies? (Also ask, ‘How are the policies reinforced? Management action? Goals? Incentives? Accountability?’)
EVF	<u>Self- and Independent Assessments</u> : (What’s the reaction to independent assessments from QA? External groups? INPO? NRC inspections? Is this input valued; by the org? by mgt? by your peers? Used to improve?)
EVF	<u>Self- and Independent Assessments, 1</u> . Have you ever been involved in a self-assessment or independent assessment? (Is self-assessment and self-improvement important at this site? Explain.)
EVF	<u>Work Control</u> (Accurate procedures and work packages; Balance between outage and on-line maintenance. Is outage duration artificially shortened and work forced into the on-line scope?)

Source	Comment
EVF	<u>Work Control</u> , 2. What messages have you received from various folks regarding the priority of safety? (“Folks” is too down-home.)
EVF	<u>Work Control</u> , 4. Has your supervisor provided you with “abort criteria”? (WHAT is this in relation to?)
EVF	<u>Work Practices</u> , 1. In terms of safety, what are your personal guiding principles that you have for your own work? (Delete ‘guiding principles – use ‘approach’)
EVF	<u>Work Practices</u> 3. Are self and peer checking procedures used at the site? (Training on HE reduction techniques? Reinforcement? Accountability?)
EVF	<u>Work Practices</u> 4. Do you participate in pre-job briefs? (Need to determine if PJB’s are routinely held and effectiveness.)
EVF	<u>Work Practices</u> 7. Is just-in-time training conducted for infrequently performed tasks? (Too narrow. Need to first ask the approach for first-time or IP tasks. Then get into details. Also, need to determine the mgt/test supv role in oversight and mgt of evolution.)

**RESOLUTION OF COMMENTS FOR
IP 95003.03 (May 9, 2006)**

Source	Comment
EVF	Accountability (Also need to look at performance reviews (for inclusion and weighting of safety goals, incentive programs (focus on executive and sr mgt), and progressive discipline program)
EVF	<i>Observe whether personnel reinforce safety principles among themselves.</i> (Need to add some example of typical behaviors that demonstrate this.)
EVF	Continuous Learning Environment <i>For each major work group (including but not necessarily limited to Operations, Engineering, Maintenance, Radiological Protection, Security), review the continuing-training program for the group: ...</i> (What's outlined here is TOO mechanical and just record auditing. What's needed is the type of training – inclusion of topics to prevent errors, enhance safety, and learn from the experiences of others.)
EVF	<i>Review the records of benchmarking activities to verify that they included features which could improve licensee knowledge, skills, and safety performance.</i> (1) Need to assess whether the information is integrated into the culture of the organization with appropriate measures to determine effectiveness. Or, was the benchmarking information implemented without consideration of cultural effects? (2) What's the role of change management in the use of benchmarking information?
EVF	<i>Review the method(s) or process(es) used by the licensee for planning, coordinating, and evaluating the safety impacts of decisions related to major changes...</i> (This is Change Mgt, was the heading left off or did my conversion from PDF to Word drop it?)
EVF	Corrective Action Program: (1) This needs to be completely consistent with 71152.
EVF	(2) Review self /independent assessments of CAP conducted in the past 24 months.
EVF	(3) Review CAP items that have been downgraded in priority. Explore reason why. Seek opinion from initiator.
EVF	(4) Review cancelled items. Explore reason why. Seek opinion from initiator.

Source	Comment
EVF	(5) Sit in on initial screening, management screening, and closure meetings.
EVF	(6) Review appeals process, if one exists, and talk to those who have brought appeals for satisfaction, etc.
EVF	For a sample of issues identified in the CAP, verify that the evaluations were thorough... (Sufficient extent of condition and generic implications determination.)
EVF	Decision-Making (1) Training given (and reinforced) to operators on structured decision making.
EVF	Decision-Making (2) Methods to preclude group think and the potentiality unintended intimidating effects of organizational position.
EVF	Decision-Making (3) Training provided on the lessons-learned from decision making on Challenger and Columbia.
EVF	Decision-Making (4) When looking at the records of decisions, look for dissenting opinions and see how they were handled. Interview the dissenting individuals.
EVF	Decision-Making (5) Consider the operation of the DPO process as an example of decision making.
EVF	Environment for Raising Concerns (Need more of a focus on the 'free flow of information')
EVF	<i>Verify that measures have been taken...</i> (Deleted 'measure' add 'actions and supporting behaviors')
EVF	Operating Experience (1) This needs to flange up w/ 71152.
EVF	Operating Experience (2) Need to look at OE through put and dwell times to determine if sufficient resources and organizational focus is given.
EVF	Operating Experience (3) Observe the use of OE in tailboards, pre-job briefs and work packages
EVF	Operating Experience (4) Review the CAP for issues surrounding the use/effectiveness of OE.
EVF	Organizational Change Management (1) How do they attempt to determine the unintended effects of change and how it can be mitigated.

Source	Comment
EVF	(2) How are the effects of voluntary reductions, retirements and layoffs handled – ie, knowledge transfer. What’s their strategic personnel planning?
EVF	(3) What steps are taken to get the organization culturally ready for change, to minimize fear, and increase tolerance of uncertainty?
EVF	<i>Review procedures for making decisions, immediate and longer-term...</i> (Seems to duplicate the DM section.)
EVF	Preventing, Detecting, and Mitigating Perceptions of Retaliation (1) Use HIRD. (2) Do mgt individuals (incl supvs) understand the behaviors on their part could constitute [Harassment, Intimidation, Retaliation and Discrimination]? Do workers understand peer to peer [Harassment, Intimidation, Retaliation and Discrimination]?
EVF	<i>Review the disciplinary actions taken ...</i> (Whether or not there is an ERG, etc, do the discipline/forced reduction procedures contain sufficient provisions to preclude adverse employee actions being taken as retaliation for PA?)
EVF	<i>Determine the bases for staffing level determinations.</i> (Review strategic staffing plans.)
EVF	<i>Verify that long standing equipment issues and deferring preventive maintenance are minimized to the extent practical</i> (Need to verify the justification for tolerance of LSE issues and whether they have a risk-informed basis.)
EVF	<i>Review the engineering backlogs...</i> (How does the licensee triage the backlogs? Do easy things first to knock down numbers, or is it risk based?)
EVF	<i>Procedures for simulator fidelity and identification and resolution of simulator issues.</i> (Interview operators to get their perspective simulator backlogs and effectiveness.)
EVF	<i>Review records which identify the personnel who have received training on those policies within the last two years.</i> (Including, as appropriate, contractors)

Source	Comment
EVF	<p><i>Observe selected meetings used to plan and coordinates work activities to verify that work groups communicate, coordinate, and cooperate with each other. (1) Verify the free flow of information, including dissenting opinions, etc. (2) Verify a lead operations presence/focus. (3) IS there an appeals process for decisions, etc.?</i></p>
EVF	<p>Work Practices (1) Need to consider peer to peer reinforcement and coaching. (2) Process for on-line work activities. (3) Verification that workers understand the risk impact of their work activities and the presence of this topic in PJB's.</p>
EVF	<p><i>Verify that appropriate site personnel receive training on this topic. (Reinforcement in pre-job briefs?)</i></p>
EVF	<p><i>...verify that those managers and supervisors spend time in the plant. (Interview these individuals to determine if they feel they have sufficient time in the field. If not, what's the hold-up?)</i></p>

**RESOLUTION OF COMMENTS FOR
IP 95003.04 (May 9, 2006)**

Source	Comment
EVF	Surveys MUST NOT be considered an end-all. Despite any pedigree due to design and/or multiple performance with multiple sites, surveys must be followed up with face to face interviews or focus groups to understand results and develop relevant conclusions and recommendations.
EVF	Quantitative surveys can and should have provisions for written comments/feedback in every section and, preferably, in every question.
EVF	Add a limitation: Susceptible to 'halo' effect due to general work environment conditions. For example, first survey conducted just after a forced reduction and second conducted after the biggest incentive payout in the company's history. What was the influence on the survey results.
EVF	Change "Requires large sample size to generalize across the population and subpopulations" to "Requires large sample size to draw valid conclusions and comparisons and assure statistical validity across the population and subpopulations."
EVF	With respect to "Related questions are grouped", some in the field insist that questions should be randomized.
EVF	with respect to "Unique or unusual questions are prefixed with an explanation to avoid confusion.", (1) Explanation needs to be provided so that people know what they answering – for example items like 'your supervisor', 'management' and 'upper management' need to be defined. Also, SCWE needs to be defined so that people don't consider it to include industrial safety, etc. (2) If questions change from a positive focus to a negative focus that this is noted to the respondents. (3) On the flip side, assure the instructions do not bias survey respondents.
EVF	with respect to "Consider whether the survey developer assessed test-retest or split-half reliability of the survey instrument", Not sure this has relevance when asking inspectors or inspection teams to assess the usefulness of a survey.

Source	Comment
EVF	with respect to “Consider whether the survey has been previously used at the licensee’s facility, or in other organizations, and evaluate any evidence provided by licensee that indicates whether the previous results were valid and accurately identified strengths and weaknesses that could be verified from other sources of information”, While a certain ‘tool box’ survey is in broad use across the industry, it does not appear to pass this measure.
EVF	with respect to “Evaluate the procedures used to administer the survey to verify that they were systematic and were unlikely to have biased the responses”, (1) Essential that it was administered consistently across the site and all organizations. Did all personnel have an equal opportunity to participate? Were accommodations made for shift personnel? Did people given sufficient time to take the survey? Where the locations where the survey was taken conducive to honest, candid responses – ie, not under the prying eye of the supv, etc. (2) If the survey used a sample population – how was the sample determined to assure a representative population? (3) Review the CAP for issues relating to survey administration. Consider contacting ECP. Check for survey-related NRC allegations.
EVF	with respect to “Questionnaires were administered in a consistent location under a consistent set of conditions”, What does this refer to? What if the survey was conducted on the web? What if there were several locations where it was proctored? What if the survey was handed out by supervisors?
EVF	with respect to “Evaluate the statistical methods used to analyze the results”, (1) were sufficient responses received to assure statistical validity? Is the licensee trying to draw conclusions from the survey that are not statistically supported. (2) Is the licensee driving beyond their headlights – drawing conclusions and facts from too little or irrelevant survey results?
EVF	Add new section 5: Communication and use of survey results; Need to consider this also., especially with surveys over time. Do workers believe in the survey or are they just going through the motion? Do they feel anything is done w/ the survey results – does positive change flow from the survey?

**RESOLUTION OF COMMENTS FOR
IP 95003.05 (April 26, 2006)**

Source	Comment
NEI	<p>Section 2 “<i>Group Interviews</i>”, Subsection 2.4, “<i>Guidance</i>” Note (Page 5)</p> <p>It seems to be a fundamental problem with coming in to do focus groups of interviews and mining that information exchange to populate the allegations data for a station. Allegations should be confined to situations where employees have felt compelled to go outside the established processes for reporting concerns. In the setting of group interviews, the employees may not feel as though they are going outside the process, rather that the process is being opened to them.</p>
PSE&G	<p>Some personnel have been dissatisfied with participating in individual NRC interviews and focus groups due to the lack of feedback from the efforts that they put into providing their input. With its confidential nature, the licensee is unable to provide such feedback. This needs to be addressed, since it can create a reluctance to participate in such sessions.</p>
PSE&G	<p>Page 3, item 2.2, second bullet: Efficiency is not necessarily accurate. Although many may be involved in a group setting, a station's culture plays a role in how confrontational individuals will be when they disagree with a fellow group member. Therefore, considering that a larger sample size is obtained through a focus team is inaccurate - the opinions vocalized are not necessarily indicative of the group and perhaps may be only the vocal members.</p>
PSE&G	<p>Page 3, item 2.3: Focus groups allow more vocal participants to inadvertently suppress the engagement of other group members when their is a reluctance to be singled out. Recent experience with focus groups at Sale/Hope Creek show that results must still be validated through other means to compensate for group dynamics.</p>

**RESOLUTION OF COMMENTS FOR
IP 95003.06 (April 26, 2006)**

Source	Comment
NEI	<p>Page 3 states, "Maintain the checklists used for each observation, even if no data were collected, in order to document the sample size and calculate behavior rates." Behavior rate calculations are neither an important nor statistically meaningful factor unless meticulously implemented; rather, the identification of behaviors in multiple persons and multiple organizations is much more valuable. Without significant diligence in data collection, rates have the potential to be very misleading. Agree with the capturing of all data, but at best any "rates" will be extremely subjective. Suggest deleting words after "collected." The use of rates also occurs on page 4 ("The rates at which behaviors that are consistent with the safety culture components were observed"). Also, not all component aspects are written in a manner that will be identified as a positive safety culture component aspect. Focus should be on comparing to component aspect data and noting both strongly negative and positive observations, particularly where such data is cited in multiple occurrences.</p>

RESOLUTION OF COMMENTS FOR
IP 95003.07 (April 26, 2006)

Source	Comment
NEI	Page 2: Typo – “Investigation and analyzing a single event or condition often provides information related to multiple safety culture components.” “Investigation” should be “Investigating.”