

RESOLUTION OF EXTERNAL STAKEHOLDER COMMENTS

ON

INSPECTION PROCEDURE 95003

**“Supplemental Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs, or One Red Input,” Main Body and Enclosures A - F
(Enclosures A - F were previously titled Attachments 95003.02 - 95003.07 and were reordered based on order of appearance in IP95003 Main Body)**

**RESOLUTION OF STAKEHOLDER COMMENTS ON
IP 95003 Main Body**

Source	Comment	Added?	Remarks
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>	No	<p>02.07 - 02.12 are the requirements for documentation and sections 03.07 - 03.12 give guidance on how to assess the results and document the inspection. The inspection team for this type of inspection has been enhanced with the addition of individuals with specific knowledge in safety culture and assessment methods to assist in developing conclusions. The safety culture information will be tied to strategic performance area attributes.</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>	No	<p>IMC 0305 references IP95003 as is appropriate, since the IMC describes the entire "Operating reactor assessment program." The only other inspection procedures that reference IP 95003 are IP 71152, IP93800, and IP93812. The references in IP71152 are to the questions related to "environment for raising concerns" listed in attachment 2 to IP95003. Incorporating these into IP71152 would necessitate an additional attachment. In the other two IPs the reference is a parenthetical to explain potential future actions.</p>

Source	Comment	Added?	Remarks
NEI	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.	Yes	The procedures have been reviewed for terminology consistency. The aspect level of the safety culture components is defined in IMC 0305 , section 06.07 and is referenced in section 03.07 b.(2)(d) of IP95003. The aspects are the appropriate level for considering themes for substantive cross cutting issues. For IP 95003 inspections, the component level is appropriate.
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.	Yes	The inspectors are required by the inspection procedures to use the safety culture components listed in IMC 0305 as their standard for comparison. To the extent that the licensee provides the information in the terms of the NRC safety culture components, the inspectors will be able to ensure agreement. Where terms are not consistent the licensee should demonstrate that they have addressed all of the components whether or not they use the same terminology. A note has been added that states that licensee and NRC terminology may differ, i.e., that the licensee may call components by other terms such as attributes or principles.
NEI	02.01 b, Can’t find referenced Section 02.13. Only goes to 02.12.	Yes	2.13 changed to 2.12.
NEI	02.03 c.3, Redundant. The section is about human performance and the ability to use the program/procedures. Suggest deleting.	No	This section will gather information about human performance from the inspection perspective different from that of the safety culture assessment and will therefore supplement the information gathered during the assessment to provide a more-complete view of any human performance issues.

Source	Comment	Added?	Remarks
NEI	02.07 a, 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.	Yes	The tools and instruments are surveys, interview guides, behavioral observation checklists and the like. Any proprietary tools would be handled in accordance with standard NRC procedure for handling proprietary information. Therefore, the following note was added: “(If the tools or instruments are proprietary, handle them in accordance with standard NRC procedures for handling proprietary information.)”
NEI	02.07 a, In addition, need to state explicitly why five years worth of assessments are needed. Although culture is fairly stable, five year old assessments are not typically consistent with current performance.	Yes	Words have been added to this section to clarify that the reason for reviewing assessments over five years is to look for trends and actions taken to address issues raised by the assessments and the effectiveness of those actions.

Source	Comment	Added?	Remarks
NEI	<p>02.07 b.2(d), 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>	Yes	Added wording to this section which addresses licensee justification for not including specific safety culture components in the assessment.
NEI	<p>02.07 b.1 and b.5 (c), 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>	Yes	Added wording to this section. The most-recent assessment would be the assessment expected after entering Column 4. The comparison is to assessments conducted for the five year period indicated in 02.07.a.
NEI	<p>02.07 b.4, Section states: “Determine whether the licensee’s assessment team members were independent and qualified. As follows:” Remove “as follows.”</p>	Yes	Deleted “as follows:”

Source	Comment	Added?	Remarks
NEI	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.	No	The intent is to encourage inspection teams to not ignore any component. There is no need to state a basis in the IP for each selected inspection requirement.
NEI	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.	No	This section imposes requirements on NRC inspectors, and not on the licensee. The reference to "requirement" (in Enclosure A) is correct.
NEI	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.	No	The intent here was to exclude assessments that were not related to safety culture components. 03.08.c.1 (b) provides more specific guidance for the inspectors regarding the types of assessment to review.

Source	Comment	Added?	Remarks
NEI	02.08 c.1(d), This section has the inspectors obtain access to “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.	Yes	The purpose for these reviews is to provide evidence that the actual reviews implemented the guidance, especially with regard to the balance between safety and production. The generic categories would be insufficient to judge implementation. The question is not a level of acceptance but how safety vs production is used in performance reviews. It could be a basis for identifying a weakness when it comes to the question of safety over production. Provided guidance in section 03.08 c.1.(d).
NEI	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.	Yes	Added to 03.08.c.1.(h): “Review summaries of the corrective action documents and code them to the applicable safety culture components.”

Source	Comment	Added?	Remarks
NEI	<p>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>	No	<p>In order to be independent, the assessment team cannot be influenced by any level of management within the licensee's organization, which includes corporate managers. If a member of the assessment team is from another licensee site or a corporate oversight function they could be influenced by corporate management. The note "(licensee team liaison and support activities are not team membership)" allows for licensee staff to provide a level of understanding of the culture and the organization. Also the purpose of the assessment is to determine the culture from the assessment process.</p>
PSE&G	<p>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>	Yes	<p>Dropped the words "as follows"</p>
PSE&G	<p>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 to be 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>	Yes	<p>Changed some words to make the inspection focus more clear.</p>

Source	Comment	Added?	Remarks
PSE&G	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?	Yes	The purpose for these reviews is to provide evidence that the actual reviews implemented the guidance, especially with regard to the balance between safety and production. The generic categories would be insufficient to judge implementation. The question is not a level of acceptance but how safety vs production is used in performance reviews. It could be a basis for identifying a weakness when it comes to the question of safety over production. Provided guidance in section 03.08 c.1.(d).
PSE&G	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?	Yes	The response isn't evaluated against an acceptable standard, but is reviewed for evidence that safety has priority over costs in making improvements or maintaining systems. Provided guidance in section 03.08 c.1. (e).
PSE&G	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.	Yes	Added to 03.08.c.1.(h): "Review summaries of the corrective action documents and code them to the applicable safety culture components."
PSE&G	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?	No	This is NRC-supplied information and the inspectors would followup as appropriate to the IP95003 inspection. All allegations, substantiated or unsubstantiated, are evaluated to determine if their number or nature indicate a concern with the safety conscious work environment. In that respect, these data inform the NRC's evaluation of the SCWE component of safety culture.

Source	Comment	Added?	Remarks
PSE&G	02.08.e, What does "special attention" mean? By the NRC or by the licensee? What criteria is used to make this determination?	Yes	This means that the NRC inspectors could put more emphasis in their assessment on those groups that have been shown through the licensee's assessment to have safety culture issues or performance issues. Clarified Section 02.08.e.
PSE&G	02.08.f, 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.	No	In past practice as well as currently, including at Salem/Hope Creek, the NRC's assessment is not based on focus groups alone: section 02.08 describes using document reviews, inspections, focus groups, interviews, observations, and event followups. Other sections (e.g., 03.09) also refer to the NRC's use of multiple methods to perform the assessment.
PSE&G	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.	Yes	Confidentiality in this context is to protect individuals from attribution and therefore data are treated in aggregate. Added words to Enclosure C, Sections 1.4.3 and 2.4.1, to indicate that results from the data gathering are documented in the Inspection Report.

Source	Comment	Added?	Remarks
PSE&G	General Guidance - Qualification Requirements for Safety Culture assessors, 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.	No	These are the qualification requirements that members of the NRC inspection team should collectively possess. The NRC has and is developing staff to meet these qualifications. The NRC believes that knowledge listed is essential to develop a fair and adequate assessment of safety culture. The ability to use and interpret the tools is essential to their application and to the evaluation of licensee assessments.
PSE&G	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.	Yes	The various sub-cultures that may exist within an organization can impact other organizations; the causes of some issues within the operating group may be attributable to issues in ancillary organizations. Made some wording changes for clarity.
PSE&G	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?	No	The technical literature on surveys supports the percentages in 03.07.b.2.(b)(1) and (2), especially for closed populations as opposed to external consumer type surveys.

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PSE&G	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.	Yes	No standard applies; this section directs inspectors to consider leadership assessments only if leadership ineffectiveness or style in general are inconsistent with those described in the safety culture components. Section has been reworded for clarification.
PSE&G	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?	No	These terms are defined in the section to be consistent with the technical definitions in the literature. Safety culture is often driven by perceptions, as are personnel actions. These perceptions will be used to inform Strategic Performance Area key attributes, which are performance-based.
PSE&G	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.	No	The issue of confidentiality is linked to non-attribution to individuals. The information collected by the NRC will be aggregated at a level from which the licensee can perform additional assessments if there are significant inconsistencies.
PSE&G	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.	No	There is no assumption that safety culture weaknesses will directly result in a performance issue. It is the NRC inspectors' job to draw these linkages and justify them. This section describes how the information from the inspection will be used in the inspection report.

Source	Comment	Added?	Remarks
Garde	Inspection Basis: Boundary condition 5., Disagree with this pre-requisite. The “blind spot” behind the loss of the Columbia was that NASA believed it had a good safety culture, and adding this pre-requisite handicaps the Staff’s ability to act when it believes it needs to.	No	The delay is essential to enable the staff to leverage the results of the licensee’s independent safety culture assessment into their plans for the staff’s evaluation.
Garde	02.02 e, Add “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....”	Yes	Incorporated.
Garde	02.02 f, Add “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? “	Yes	Added a sentence regarding a feedback mechanism.
Garde	02.03 c.1, “Assess the effectiveness of corrective actions for identifying, evaluating and correcting deficiencies involving human performance.”	Yes	Incorporated.
Garde	02.03 e.6, <i>For any unresolved long-term equipment issues, determine whether inadequate resources were a root cause or contributing cause to the delay in resolving those issues.</i> 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?	No	The staff considers that long-term equipment issues can be identified through routine inspection, and that after such issues are identified, an investigation can determine whether inadequate resources were among the reasons why those issues were long-term.
Garde	02.07 b, Insert independence and qualification criteria between Item #4 and #5.	No	These criteria are guidance for the inspectors, rather than inspection requirements, so they were moved to 3.07.b.4, under the Specific Guidance section.

Source	Comment	Added?	Remarks
Garde	02.07b5(c), "...the reasons for those differences are explained, known, and likely reflect..."	Yes	Incorporated.
Garde	General Guidance, "Develop the Inspection Plan and Complete Inspection Preparations," Add "Contact the interested or concerned public stakeholders to obtain any relevant information to the safety culture assessment."	No	IP 95003 does not include a method for obtaining public input into the assessment because the ROP doesn't include a method for public involvement in preparations for staff inspections.
Garde	General Guidance, "Develop the Inspection Plan and Complete Inspection Preparations" : Add "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."	No	This concern is addressed in section 02.08.c.2.
Garde	General Guidance, "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." 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.	No	The staff considers that resident inspector involvement in the activities described in 02.11 do not represent a conflict of interest, in that the focus of those activities is on the assessment process, and not on inspector performance.
Garde	03.08 a, 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 identified as the correct approach to evaluating safety culture. I disagree with it as the exclusive window of observation.	Yes	The "patterns of thinking and behaving" terminology is from Charles Packer. The key point here is the nature of the shared attitudes and behaviors among an organization's members with respect to nuclear safety. Clearly, assessing the attitudes and behaviors of a single individual provides a very limited perspective on the organization's safety culture as a whole. For this reason, the NRC's assessment focuses on identifying shared attitudes and behaviors among an organization's members, as well as other organizational characteristics. This section has

Source	Comment	Added?	Remarks
			been reworded for clarification.
Garde	03.08 a, <i>“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”</i> 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.	No	See previous remark above concerning “patterns.” Agree that a single or a few incidents of adverse behaviors can create a “chilling effect,” but disagree they immediately impact the underlying culture. Definitions of safety culture concur that it is comprised of deeply held attitudes, perceptions, values, long-standing norms, and is slow to change. However, agree that single or a limited number of adverse incidents can dramatically affect the organizational <i>climate</i> and SCWE. The behaviors described and their impact are included in several of the safety culture components.
Garde	03.08 c.1.(b), “...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.”	Yes	Revised to clarify concept.
Garde	03.09 f, “Corporate and/or senior site management demonstrates patterns of thinking and behaving with respect to nuclear safety....”	Yes	Revised to clarify concept.

**RESOLUTION OF STAKEHOLDER COMMENTS ON IP 95003 MAIN BODY
THAT REQUIRE FUTURE ACTION**

Source	Comment	Added?	Remarks
Equinox	Review appeals process, if one exists, and talk to those who have brought appeals for satisfaction, etc.	No	Because this comment is not specifically related to the changes associated with the safety culture initiative, it will be considered during the next revision of this procedure.*

Source	Comment	Added?	Remarks
Garde	02.02 f, Add "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? "	No	*
Garde	02.03 e.4, "...including communications gear"??? Does this include review of the interface of communications equipment with local, state and federal first responders?	No	*
NEI	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 for these instances and where appropriate, add guidance for the inspectors.	No	*
NEI	02.04 c.4, - 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."	No	*

**RESOLUTION OF STAKEHOLDER COMMENTS ON ENCLOSURE A (formerly Attachment 95003.03)
"Sample Inspection Requirements for Safety Culture Components"**

Source	Comment	Added?	Remarks
Equinox	<u>Accountability</u> , (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)	Yes	Section 02.08 c. 1.(d) in the main body, requires a sample of redacted performance reviews be obtained. This has been added to Att. 3.

Source	Comment	Added?	Remarks
Equinox	<u>Accountability</u> , <i>Observe whether personnel reinforce safety principles among themselves. (Need to add some example of typical behaviors that demonstrate this.)</i>	Yes	Added reference to Enclosure D.
Equinox	<u>Continuous Learning Environment</u> , 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: ... (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.)	No	The existing requirements go directly to the safety culture component aspect (i.e., "The licensee provides adequate training and knowledge transfer to all personnel on site to ensure technical competency").
Equinox	<u>Continuous Learning Environment</u> , <i>Review the records of benchmarking activities to verify that they included features which could improve licensee knowledge, skills, and safety performance. (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?</i>	(1) No (2) No	(1) The existing requirements go directly to the safety culture component aspect (i.e., "Personnel continuously strive to improve their knowledge, skills, and safety performance through activities such as benchmarking...") (2) the use of benchmarking information along with other information for planning, and evaluating safety impacts of decisions is implied under the organizational change management safety culture component.
Equinox	<u>Corrective Action Program</u> , This needs to be completely consistent with 71152.	Yes	Agreed; the staff believes that it is.
Equinox	<u>Corrective Action Program</u> , Review self /independent assessments of CAP conducted in the past 24 months.	Yes	Incorporated
Equinox	<u>Corrective Action Program</u> , Review CAP items that have been downgraded in priority. Explore reason why. Seek opinion from initiator.	Yes	Incorporated
Equinox	<u>Corrective Action Program</u> , Review cancelled items. Explore reason why. Seek opinion from initiator.	Yes	Incorporated

Source	Comment	Added?	Remarks
Equinox	<u>Corrective Action Program</u> , Sit in on initial screening, management screening, and closure meetings.	Yes	Incorporated
Equinox	<u>Corrective Action Program</u> , Review appeals process, if one exists, and talk to those who have brought appeals for satisfaction, etc.	No	Reviewing the appeals process isn't within the scope of this Appendix, but would be addressed in section 02.02 of the main body. Improving that section is not within the scope of the Safety Culture Initiative.
Equinox	<u>Corrective Action Program</u> , For a sample of issues identified in the CAP, verify that the evaluations were thorough... (Sufficient extent of condition and generic implications determination.)	No	This requirement would be addressed in section 02.02.a. of the main body. Improving that section is not within the scope of the Safety Culture Initiative.
Equinox	<u>Decision-Making</u> , Training given (and reinforced) to operators on structured decision making.	No	NRC does not prescribe specific training for licensees in decision making.
Equinox	<u>Decision-Making</u> , Methods to preclude group think and the potentiality of unintended intimidating effects of organizational positions.	No	NRC does not prescribe specific training for licensees in decision making.
Equinox	<u>Decision-Making</u> , Training provided on the lessons-learned from decision making on Challenger and Columbia.	No	NRC does not prescribe specific training for licensees in decision making.
Equinox	<u>Decision-Making</u> , When looking at the records of decisions, look for dissenting opinions and see how they were handled. Interview the dissenting individuals.	Yes	Incorporated, under Environment for Raising Concerns.
Equinox	<u>Decision-Making</u> , Consider the operation of the [Differing Professional Opinion] process as an example of decision making.	No	The DPO is an internal program for NRC staff, and is not a standard for evaluating licensee programs and processes.
Equinox	<u>Environment for Raising Concerns</u> , Need more of a focus on the 'free flow of information.	No	This is addressed in several of the items under this component.

Source	Comment	Added?	Remarks
Equinox	<u>Environment for Raising Concerns</u> , <i>Verify that measures have been taken...</i> (Deleted 'measure' add 'actions and supporting behaviors')	Yes	Incorporated
Equinox	<u>Operating Experience</u> , This needs to flange up w/ 71152.	No	The guidance in the enclosure is consistent with IP 71152.
Equinox	<u>Operating Experience</u> , Need to look at OE through put and dwell times to determine if sufficient resources and organizational focus is given.	No	This issue is addressed in the requirement to verify that the licensee processed OE "in a timely manner".
Equinox	<u>Operating Experience</u> , Observe the use of OE in tailboards, pre-job briefs and work packages.	Yes	Incorporated
Equinox	<u>Operating Experience</u> , Review the CAP for issues surrounding the use/effectiveness of OE.	Yes	Incorporated
Equinox	<u>Organizational Change Management</u> , How do they attempt to determine the unintended effects of change and how it can be mitigated.	Yes	Incorporated.
Equinox	<u>Organizational Change Management</u> , How are the effects of voluntary reductions, retirements and layoffs handled – i.e., knowledge transfer. What's their strategic personnel planning?	Yes	Incorporated
Equinox	<u>Organizational Change Management</u> , What steps are taken to get the organization culturally ready for change, to minimize fear, and increase tolerance of uncertainty?	Yes	Incorporated
Equinox	<u>Organizational Change Management</u> , <i>Review procedures for making decisions, immediate and longer-term...</i> (Seems to duplicate the DM section.)	Yes	Removed from Organization Change management.

Source	Comment	Added?	Remarks
Equinox	<u>Preventing, Detecting, and Mitigating Perceptions of Retaliation</u> , (1) Use [Harassment, Intimidation, Retaliation and Discrimination]. (2) Do management individuals (including supervisors) understand the behaviors on their part could constitute [Harassment, Intimidation, Retaliation and Discrimination]? Do workers understand peer to peer [Harassment, Intimidation, Retaliation and Discrimination]?	Yes	Incorporated
Equinox	<u>Preventing, Detecting, and Mitigating Perceptions of Retaliation</u> , <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?)	Yes	Incorporated
Equinox	<u>Resources</u> , <i>Determine the bases for staffing level determinations.</i> (Review strategic staffing plans.)	Yes	Incorporated.
Equinox	<u>Resources</u> , <i>Verify that long standing equipment issues (LSE) 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.)	Yes	Incorporated
Equinox	<u>Resources</u> , <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?)	Yes	Incorporated
Equinox	<u>Resources</u> , <i>Procedures for simulator fidelity and identification and resolution of simulator issues.</i> (Interview operators to get their perspective on simulator backlogs and effectiveness.)	Yes	Incorporated
Equinox	<u>Safety Policies</u> , <i>Review records which identify the personnel who have received training on those policies within the last two years.</i> (Including, as appropriate, contractors)	Yes	Incorporated

Source	Comment	Added?	Remarks
Equinox	<u>Work Control</u> , Observe selected meetings used to plan and coordinate 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.?	Yes	Incorporated
Equinox	<u>Work Practices</u> , (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 pre-job briefs.	Yes	(1) Incorporated (2) (not a sentence; don't understand the comment) (3) Incorporated
Equinox	<u>Work Practices</u> , <i>Verify that appropriate site personnel receive training on this topic.</i> (Reinforcement in pre-job briefs?)	Yes	Incorporated
	<u>Work Practices</u> , ... <i>verify that those managers and supervisors spend time in the plant.</i> (Interview these individuals to determine if they feel they have sufficient time in the field. If not, what's the hold-up?)	Yes	Incorporated

RESOLUTION OF STAKEHOLDER COMMENTS ON ENCLOSURE B (formerly Attachment 95003.02)
"Sample Questions for Safety Culture Components"

Source	Comment	Added?	Remarks
NEI	p. 1, 1 st Paragraph, Editorial errors in the following sentence. <i>"The following questions are examples of the types of questions which can be asked during focus or individual interviews."</i> Change "can" to "may." Insert the word "group" after the word "focus."	Yes	Change made

Source	Comment	Added?	Remarks
NEI	p. 1 , 4 th Paragraph, Editorial errors in the following sentence. <i>“On the other hand, open- ended questions can be used when the inspector doesn’t want to specify response choices, wants to give respondents a chance to state opinions, wants to let respondents vent frustrations, wants to let hear what has been overlooked, or further explore issues.”</i> Change “can” to “may” or “should.” Change “wants to let hear” to “wants to hear.” [Remove the word “let.”]	Yes	Change made
NEI	<u>Accountability</u> , Question 7, This question makes a significant negative assumption and presents it to the interviewee as a matter of fact. Seems to be an inappropriately “leading” question. Recommend modifying or deleting.	Yes	Deleted question
NEI	<u>Continuous learning environment</u> , Question 4, Part of question states: “Did you bring any ideas back that were implemented?” This question implies that only offsite trips constitute benchmarking opportunities. Many methods are used to capture benchmarking, including phone calls and questions asked to visitors. Suggest modifying to ask, “Were any of your benchmarking ideas implemented?”	Yes	Change made
NEI	<u>Continuous learning environment</u> , Question 5, Seems unreasonable to expect an interviewee to know what benchmarking is going on in other sections and what was done with the results. Suggest deleting this question.	Yes	Did not delete, but added a limitation for the types of individuals that would be asked this question.
NEI	<u>Continuous learning environment</u> , Question 6, This question would be reasonable if it is set in context of whether the interviewee was actually part of one of those situations where knowledge transfer took place. This is not an appropriate question if the individual is being asked to speculate. Suggest asking first whether the individual was involved in this type of situation.	Yes	Changed per the suggestion provided.

Source	Comment	Added?	Remarks
NEI	<u>Corrective Action Program</u> , Question 1, Editorial error in the following sentence. <i>“Can you describe the types of nuclear safety concerns are immediately addressed if they arise?”</i> Appears to be missing a word (i.e., types of nuclear safety concerns <u>that</u> are immediately addressed if they arise).	Yes	Change made
NEI	<u>Corrective Action Program</u> , Question 1, Question states: “Can you describe the types of nuclear safety concerns are immediately addressed if they arise? What types of nuclear safety concerns are associated with longer response times? In the past year, can you think of any long-term nuclear safety concerns that came up, were evaluated and discussed, but limited steps have been taken to resolve the concern? Please describe the situation. Do you know the reasons for delay in resolving the concern?” This question implies that a “long-term nuclear safety concern” must be resolved in one year, with “limited steps” being associated with a “delay” in correcting the problems. There are many reasons that “long-term” safety concerns may have “limited steps” completed in one year (e.g., outage related issues). The key step is the appropriate evaluation and priority given to each issue. Suggest revising to ask whether there are “long-term safety concerns which exist that either have not been appropriately evaluated or whose corrective actions have inappropriately, in their opinion, extended.”	Yes	Suggestion incorporated
NEI	<u>Corrective Action Program</u> , Question 3, Use of undefined acronym “ECP”. Need to spell out for this question. May not be a universally understood acronym (various names used for Employee Concerns type organizations).	Yes	Change made

Source	Comment	Added?	Remarks
NEI	<p><u>Environment for Raising Concerns (For working-level personnel)</u>, Question 2, asks “Are you aware of situations where any employee or contractor may be hesitant to raise concerns, internally or externally? If yes, please explain. (If NRC inspector is aware of specific incident that may have caused such hesitation, then ask about it. Focus on whether or not the interviewee or others may be less likely to report concerns since that incident).” People have long memories and may recall events from long in the past that may, or may not, be relevant to the current safety culture. This and the following questions should include asking when (in some form) to qualify the applicability of the information. In contrast, pg 7, Question 8 asks “Have events or circumstances occurred in the past six months that have reduced: your willingness to identify or raise safety issues? Your confidence in the corrective action program? Your willingness to challenge actions or decisions you believe are wrong? Your comfort level in voicing your viewpoints and opinions?”</p>	Yes	<p>Changed question to focus on “In the past year, . . .”</p>

Source	Comment	Added?	Remarks
NEI	<p><u>Environment for Raising Concerns (For supervisors and managers)</u>, Question 2, “Are you aware of situations where any employee or contractor may be hesitant to raise concerns, internally or externally? If yes, please explain. (If NRC inspector is aware of specific incident that may have caused such hesitation, then ask about it. Focus on whether or not the interviewee or others may be less likely to report concerns since that incident).” People have long memories and may recall events from long in the past that may, or may not, be relevant to the current safety culture. This and the following questions should include asking when (in some form) to qualify the applicability of the information. In contrast, pg 7, Question 8 asks “Have events or circumstances occurred in the past six months that have reduced: your willingness to identify or raise safety issues? Your confidence in the corrective action program? Your willingness to challenge actions or decisions you believe are wrong? Your comfort level in voicing your viewpoints and opinions?”</p>	Yes	Changed question to focus on “In the past year, . . .”
NEI	<p><u>Work Control</u>, Question 7, “Have you ever found that the work you were assigned to do couldn’t be performed because it was scheduled in a way that it interfered or conflicted with other work being performed? Did the work have to be stopped or delayed? Over the past year, about how often would you estimate that this has happened to you?” People have long memories and may recall events from long in the past that may, or may not, be relevant to the current safety culture. This and the following questions should include asking when (in some form) to qualify the applicability of the information. In contrast, pg 7, Question 8 asks “Have events or circumstances occurred in the past six months that have reduced: your willingness to identify or raise safety issues? Your confidence in the corrective action program? Your willingness to challenge actions or decisions you believe are wrong? Your comfort level in voicing your viewpoints and opinions?”</p>	Yes	Changed question to focus on “In the past year, . . .”

Source	Comment	Added?	Remarks
NEI	<u>Work Control</u> , Question 8, “Have you ever had to make a decision with nuclear safety implications and did not have any procedure to follow? Please explain. Have you ever had to deviate from procedure in order to assure the nuclear safety of the site? Please explain.” People have long memories and may recall events from long in the past that may, or may not, be relevant to the current safety culture. This and the following questions should include asking when (in some form) to qualify the applicability of the information. In contrast, pg 7, Question 8 asks “Have events or circumstances occurred in the past six months that have reduced: your willingness to identify or raise safety issues? Your confidence in the corrective action program? Your willingness to challenge actions or decisions you believe are wrong? Your comfort level in voicing your viewpoints and opinions?”	Yes	Changed question to focus on “In the past year, . . .”
NEI	<u>Preventing, detecting, and mitigating perceptions of retaliation</u> , Question 2, Editorial error in the following sentence. “ <i>Are their actions effective is addressing the situation?</i> ” Change the word “is” to the word “in.”	Yes	Change made
NEI	<u>Self- and Independent Assessments</u> , Question 6, Editorial error in the following sentence. “ <i>In your job, are do you track or trend performance indicators?</i> ” Remove the word “are.”	Yes	Change made
NEI	<u>Work Practices</u> , Question 9, There seems to be no basis for this question – what is its purpose? Question appears to be out of place and not needed.	Yes	See resolution listed 2 items below
NEI	<u>Work Practices</u> , Question 9, Editorial error in the following sentence. “ <i>If another department makes a change in how they perform their work that affects yours work, are you informed of the change?</i> ” Change the word “yours” to “your.”	Yes	Change made

Source	Comment	Added?	Remarks
NEI	<u>Work Practices</u> , Question 9, The following question seems nonsensical. <i>“Have you ever been surprised knowing about it in advance?”</i> Suggest rewording, something like, “Have there been instances where changes were made that directly impacted your job that you were not made aware of? If so, please explain.”	Yes	Change made
NEI	<u>Work Practices</u> , Question 11, Editorial error in the following sentence. <i>“Are you able to provided feedback on safety performance to your peers or supervisors?”</i> Change the word “provided” to “provide.”	Yes	Change made
NEI	<u>Work Practices</u> , Question 13, Editorial error in the following sentence. <i>“In your experience, is the oversight been adequate?”</i> Either change the word “is” to “has” or remove the word “been.”	Yes	Change made
Equinox	Pg. 1, Combine the first two paragraphs.	No	These are two separate thoughts and belong in different paragraphs.
Equinox	Pg. 1, Delete “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.”	No	This paragraph was added in response to another commenter’s request to briefly describe the source(s) of these questions.
Equinox	Pg. 1, Change “questions is” to “questions are”	Yes	Change made
Equinox	Pg. 1, Change “openended” to “open-ended”	Yes	Change made

Source	Comment	Added?	Remarks
Equinox	Pg. 1, Delete "Each tends to be better suited for obtaining certain types of information."	Yes	Change made
Equinox	Pg. 1, Change "wellworded" to "well worded"	Yes	Change made
Equinox	<u>Continuous learning environment</u> , Question 1, "... With other plants?" (How will they know this?)	Yes	Added a qualifier to the question about other plants to say "that you might know of..."
Equinox	<u>Continuous learning environment</u> , Question 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.	Yes	Revised "somewhere in between" to "or both."
Equinox	<u>Continuous learning environment</u> , Question 6, "During major organizational changes (reorganizations or lay offs)..." (Need to include voluntary reductions/buy-outs and retirements.)	Yes	Change made
Equinox	<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?	Yes	Added a new question to address supervisor/mgt approval. The second issue here is already addressed in Question 1.
Equinox	<u>Corrective Action Program</u> , Question 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.	Yes	Did a search for "concern" in the CAP section and replaced it with "issue," where appropriate.
Equinox	<u>Corrective Action Program</u> , Question 7, Change "Are employees informed of the result?" to ""Are initiators informed of the result?"	Yes	Change made

Source	Comment	Added?	Remarks
Equinox	<u>Decision-Making</u> , Question 3, “What do you take into consideration when making a decision on whether a situation is nuclear safe enough to continue operation?” (Safe enough???)	Yes	Clarified the question.
Equinox	<u>Decision-Making</u> , Question 7, “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.	Yes	Added a question.
Equinox	<u>Environment for Raising Concerns</u> (For working-level personnel), Question 10, Delete “Did your supervisor receive any SCWE training? If yes, did you notice a difference in the way they handled concerns after the training?”	No	Answers to this question may provide useful information about training effectiveness.
Equinox	<u>Environment for Raising Concerns</u> (For working -level personnel), Question 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.”	Yes	Change made
Equinox	<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?”	Yes	Added a question
Equinox	<u>Operating experience</u> , Question 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!)	Yes	Clarified question. As discussed in the intro to the attachment, the interviewers would introduce the topic of operating experience before asking any specific questions in this section.

Source	Comment	Added?	Remarks
Equinox	<u>Operating experience</u> , Question 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?))	Yes	Change made
Equinox	<u>Organizational change management</u> , Also ask, “Are key management positions expeditiously filled – ‘actings’ avoided?”	Yes	Added a question
Equinox	<u>Preventing, detecting, and mitigating perceptions of retaliation</u> , First question should be about existence/promulgation of policy. Second should be about training.	Yes	Reversed the order of Questions 1 and 2.
Equinox	<u>Preventing, detecting, and mitigating perceptions of retaliation</u> , Question 2, 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’)	Yes	Change made
Equinox	<u>Resources</u> , Add “Adequate resources to assure accurate procedures, design documents and work packages”	Yes	Change made through modification of Question 8
Equinox	<u>Resources</u> , Question 1, What methods does your site use to maintain long term plant safety? (TOO vague!)	No	This question is a lead-in and would not be used alone. It also includes several examples of activities that are related to maintaining long-term safety. The examples and follow-up questions are more specific.
Equinox	<u>Resources</u> , Question 11, 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.)	Yes	Change made

Source	Comment	Added?	Remarks
Equinox	<u>Safety Policies</u> , Question 5, 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.....?')	Yes	Change made
Equinox	<u>Safety Policies</u> , Question 6, Have you received training concerning safety policies? (Also ask, 'How are the policies reinforced? Management action? Goals? Incentives? Accountability?')	Yes	Added a question
Equinox	<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?)	Yes	Added a question
Equinox	<u>Self- and Independent Assessments</u> , Question 1, Have you ever been involved in a self-assessment or independent assessment? (Is self-assessment and self-improvement important at this site? Explain.)	Yes	Added this as a first question in the section. Renumbered accordingly.
Equinox	<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?)	Yes	Added a question
Equinox	<u>Work Control</u> , Question 2, what messages have you received from various folks regarding the priority of safety? ("Folks" is too down-home.)	Yes	Change made
Equinox	<u>Work Control</u> , Question 4, Has your supervisor provided you with "abort criteria"? (WHAT is this in relation to?)	Yes	Clarified question
Equinox	<u>Work Practices</u> , Question 1, In terms of safety, what are your personal guiding principles that you have for your own work? (Delete 'guiding principles – use 'approach')	Yes	Change made

Source	Comment	Added?	Remarks
Equinox	<u>Work Practices</u> , Question 3, Are self and peer checking procedures used at the site? (Training on HE reduction techniques? Reinforcement? Accountability?)	Yes	Change made
Equinox	<u>Work Practices</u> , Question 4, Do you participate in pre-job briefs? (Need to determine if pre-job briefs are routinely held and effectiveness.)	Yes	Change made
Equinox	<u>Work Practices</u> , Question 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 management/test supervisor role in oversight and management of evolution.)	Yes	Change made

**RESOLUTION OF STAKEHOLDER COMMENTS ON ENCLOSURE C (formerly Attachment 95003.05)
“Guidance for Focus Groups and Individual Interviews”**

Source	Comment	Added?	Remarks
NEI	Group Interviews, 2.4, Note, 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.	No	The purpose of the interviews is not to elicit allegations. The note only indicates that if something comes up that could be an allegation the inspectors cannot ignore it. It goes on to say that the inspectors are to use MD8.8 to deal with potential allegations. This would be the case in any inspection.
PSE&G	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.	Yes	Confidentiality in this context is to protect individuals from attribution and therefore data are treated in aggregate. Added words to Sections 1.4.3 and 2.4.1 to indicate that results from the data gathering are documented in the Inspection Report.

Source	Comment	Added?	Remarks
PSE&G	Group Interviews, 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.	No	Efficiency here is in terms of numbers of people interviewed in a time period by a fixed size inspection team. The issue of confrontation and overly vocal group members has to be handled through the use of trained and experienced focus group interview leaders. The team will include personnel with training and experience in this area.
PSE&G	Group Interviews, 2.3, Focus groups allow more vocal participants to inadvertently suppress the engagement of other group members when there is a reluctance to be singled out. Recent experience with focus groups at Salem/Hope Creek show that results must still be validated through other means to compensate for group dynamics.	No	Focus group leaders are trained and experienced to handle these situations. Also multiple methods of gathering data are used in this inspection, including being available for individual interviews on or off site. The various data gathering methods are described in other sections.

**RESOLUTION OF STAKEHOLDER COMMENTS ON ENCLOSURE D (formerly Attachment 95003.06)
"Guidance for Structured Behavioral Observations"**

Source	Comment	Added?	Remarks
NEI	5. <u>Guidance</u> , bullet 9, 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."	Yes	Deleted behavioral rates.

Source	Comment	Added?	Remarks
NEI	5. <u>Guidance</u> , last bullet, (“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.	Yes	Changed the subject bullets to <ul style="list-style-type: none"> • The extent to which behaviors were observed that are consistent with the safety culture components; • The extent to which behaviors were observed that are inconsistent with the safety culture components;
	Sit in on initial screening, management screening, and closure meetings.	Yes	It’s been added to this guidance.

**RESOLUTION OF STAKEHOLDER COMMENTS ON ENCLOSURE E (formerly Attachment 95003.07)
“Guidance for Safety Culture Event Follow-up Studies”**

Source	Comment	Added?	Remarks
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.”	Yes	Fixed typo

**RESOLUTION OF STAKEHOLDER COMMENTS ON ENCLOSURE F (formerly Attachment 95003.04)
“Guidance for Evaluating Safety Culture Surveys”**

Source	Comment	Added?	Remarks
Equinox	<u>Guidance</u> , 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.	Yes	Added a #5
Equinox	<u>Guidance</u> , Quantitative surveys can and should have provisions for written comments/feedback in every section and, preferably, in every question.	Yes	Added to #5

Source	Comment	Added?	Remarks
Equinox	<u>Guidance</u> , Add “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.	Yes	Added to #5
Equinox	<u>Limitations</u> , 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.”	Yes	Incorporated
Equinox	<u>Guidance 1</u> , With respect to “Related questions are grouped”, some in the field insist that questions should be randomized.	No	The research literature doesn’t support randomizing the order of presenting questions, except if they each address a separate topic. Changing question order can be useful to assess order effects, but, otherwise, it’s too difficult for respondents to switch mental gears to answer related questions that are dispersed throughout a survey.
Equinox	<u>Guidance 1</u> , 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.	Yes	Added a “for example” sentence to this bullet. Didn’t address (3) because it’s addressed elsewhere.

Source	Comment	Added?	Remarks
Equinox	<u>Guidance 2</u> , 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.	No	We are addressing this by adding relevant expertise to the team and providing inspector training.
Equinox	<u>Guidance 2</u> ,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.	No	This comment doesn’t indicate that the commentor disagrees with the criterion. Rather, it appears to only suggest that some survey instruments currently in use may not meet the criterion.
Equinox	<u>Guidance 3</u> , 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 – i.e., 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.	Yes	Most of the suggestions under (1) and (2) are addressed in 3. Number 6 was added to address (3).
Equinox	<u>Guidance, 3</u> , 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?	Yes	Addressed in current bullet.

Source	Comment	Added?	Remarks
Equinox	<u>Guidance</u> , 4, 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?	Yes	Addressed in current bullets.
Equinox	<u>Guidance</u> , 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?	Yes	Addressed in new #6

