



IAEA

Atoms for Peace

الوكالة الدولية للطاقة الذرية

国际原子能机构

International Atomic Energy Agency

Agence internationale de l'énergie atomique

Международное агентство по атомной энергии

Organismo Internacional de Energía Atómica

Wagramer Strasse 5, PO Box 100, 1400 Wien, Austria

Phone: (+43 1) 2600 • Fax: (+43 1) 26007

Email: Official.Mail@iaea.org • Internet: <http://www.iaea.org>

In reply please refer to:

Dial directly to extension: (+431) 2600-22520

Ms. Isabelle Schoenfeld

Senior Programme Manager and Chair,
NRC Safety Culture Working Group
Office of Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
USA

2009-04-01

Dear Ms. Schoenfeld,

In reference to the USNRC letter of 16 July 2008, I would first like to apologize for taking so long in responding. This is, to a large extent, due to several internal changes that took place inside the Nuclear Safety Installation Division. In particular, the departure of M. C. Viktorsson has directly affected the safety culture area.

Thank you very much for your letter that provided me and my team with your comments. We appreciated them very much and have already considered some suggested improvements in the approach, such as:

- The composition of the SCART (Safety Culture Assessment Review Team) team, more specifically, the IAEA considers that “Behavioural scientists, as team members” is not an option but is necessary.
- Concerning the leadership positions, the IAEA shares the opinion that one of the leadership positions, either the deputy position or the team leader position should be filled by a safety culture expert whether they are from outside or within the IAEA.
- Regarding the different data gathering tools used during a SCART review, there should be additional guidance on the observation step. The scope of document review should be also expanded to additional documents such as event analysis, root causes analysis.
- At a lower level of details, illustrations provided within the guidelines for purpose of clarifications but having generated misunderstandings will be reviewed or removed.

For the most fundamental areas, an open discussion involving Member States is still required.

As you know, safety culture is now a commonly used term. From INSAG 4 (report on safety culture by the International Nuclear Safety Advisory Group) to the newly published IAEA Safety Standards for protecting people and the environment, Safety Requirements No GS-R-3 (The Management System for Facilities and Activities) and Safety Guide No GS-G-3.1 (Application of the Management System for Facilities and Activities), there is a common understanding on the attributes which are essential for achieving a strong safety culture.

Nevertheless, there is still a need for a common understanding on how to oversight licensee safety culture and on how to assess, from the licensee's point of view, its own safety culture. In that regard, the IAEA has planned a Technical Meeting on safety culture oversight for 2010. The objective of the event is twofold: to exchange on developing methodologies used to maintain oversight of licensee safety culture as well as those used to assess safety culture at the facility level, and also on a more practical level, to share experience, good practices and concerns in this developing area. In particular, experience feedback on safety culture assessment including the SCART approach will be addressed. Furthermore, this Technical Meeting has been announced on 18 March 2009, at the last CSNI's WGHOFF meeting (Working Group on Human Organizational Factors reported to Committee on the Safety of Nuclear Installations-CSNI from the Nuclear Energy Agency-NEA), as being the continuity of the Chester Workshop organized in 2007 by the UK Nuclear Installations Inspectorate on behalf of the CSNI's WGHOFF. This Chester workshop revealed a broad consensus that nuclear regulators should have processes in place to maintain oversight of safety culture.

Furthermore, a consultancy meeting, focused on the SCART approach, may also take place later in 2010. The major objective of this consultancy meeting is to address experience feedback from the SCART missions as well as comments received from Member States.

For those two safety culture dedicated IAEA events, we would much appreciate USA participation. Because of the importance practical feedback can have on safety culture assessment, the IAEA offers the following suggestion. In the near term, the US NRC should consider inviting the IAEA in one of its upcoming safety culture inspections in the field. This will offer additional opportunities to share experience, good practices and concerns in assessing safety culture at a licensee installation and also to build a common understanding in that developing area. On the IAEA side, we would like to invite USA experts to take part in future SCART missions.

Once again, thank you for your time and your interest in the IAEA safety culture assessment approach.

Yours sincerely,



Ph. Jamet
Director
Division of Nuclear Installation Safety