

May 12, 2009

MEMORANDUM TO: Rani L. Franovich, Chief
Performance Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Audrey L. Klett, Reactor Operations Engineer */RA/*
Performance Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE APRIL 16, 2009 PUBLIC MEETING TO
DISCUSS INDUSTRY'S PROPOSED SAFETY CULTURE
PROCESS

On April 16, 2009, the United States Nuclear Regulatory Commission (NRC) staff hosted a Category 2 public meeting. The purpose of this meeting was for the Nuclear Energy Institute (NEI) to describe its proposed safety culture oversight process and its view of an independent regulatory role for the NRC in that process. The NEI also discussed its safety culture assessment process manual that may serve as a standardized guideline for performing safety culture assessments. The attendance list for the meeting is contained in Enclosure 1. The meeting agenda is contained in Enclosure 2. Industry handouts from the meeting are contained in Enclosure 3, and an NRC handout is contained in Enclosure 4.

The NRC staff informed the meeting participants that no formal agency decisions would be made during this meeting.

The NEI presented an overview of its proposed safety culture oversight process (Enclosure 3). The NEI is developing a draft paper, NEI 09-07, "Fostering a Strong Nuclear Safety Culture," which will describe the process in more detail. The NEI process would be based on the Institute for Nuclear Power Operations (INPO) document, "Principles for a Strong Nuclear Safety Culture," (ADAMS Accession Number ML053410342), dated November 2004, and the process would be incorporated into a site's corrective action program infrastructure. The NEI proposed that the NRC's role would be to focus on the corrective action program and safety culture assessment processes using NRC Inspection Procedure (IP) 71152, "Problem Identification and Resolution." The NEI stated that in its process, the NRC would no longer assign substantive cross-cutting issues (SCCIs).

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The NRC staff acknowledged that there may be value added and improved performance resulting from the industry's efforts to have a proactive ownership of safety culture by the people closest to the issues. The NRC staff posed questions to the NEI regarding the translation of the INPO safety culture principles into the process, NRC's oversight role in the process, and the mechanism by which process outcomes would be transparent to the public. The NRC also asked the NEI to clarify the thresholds of safety culture issues that would warrant licensee and regulatory responses.

The NEI proposed that a pilot of the process be implemented in calendar year 2010. The NRC staff stated that if the NEI process is piloted, the pilot would be implemented in parallel with the NRC's current safety culture oversight process. The NEI stated that it will revise NEI 09-07 in consideration of the comments provided at the meeting and that this revision may take a few months to complete.

The NEI also discussed its proposal to develop a standardized approach for performing safety culture assessments in the form of an industry guideline (Enclosure 3). The NEI and industry are modifying the Utilities Service Alliance (USA) safety culture methodology to create a "Nuclear Safety Culture Assessment Process Manual." The NEI noted its plans to make the guideline available to the NRC by May 15, 2009, and requested additional public meetings to discuss the proposal in more detail. The NEI also informed the NRC staff that there would be opportunities to observe application of the USA safety culture methodology at various sites this calendar year.

The NRC staff recognized and acknowledged that there may be benefit to both the industry and the NRC if there is an agreed-upon approach defining how licensees should conduct safety culture assessments.

During this meeting, the NRC staff discussed the possibility of developing a graded safety culture assessment process in which the regulatory and industry response to performance issues would vary depending on the implications of associated organizational dynamics, if applicable. The graphic in Enclosure 4 illustrates this concept. A high level of regulatory response would be warranted for safety culture issues that resulted in unsafe practices. For example, a safety conscious work environment issue or a licensee decision that reflects a weak organizational safety culture would be in this category. A lesser degree of regulatory response would be warranted for program implementation issues. Licensees would be responsible for addressing organizational issues that detract from corporate excellence and are contrary to best business practices.

The NRC's Office of Enforcement staff noted its plans to contact INPO regarding establishing a common language with respect to safety culture principles and characteristics for the nuclear industry.

Enclosures:

1. Attendance List – 4/16/09
2. Agenda – 4/16/09
3. 4/16/09 Meeting Industry Handouts
4. 4/16/09 Meeting NRC Handout

The NRC's Office of Enforcement staff noted its plans to contact INPO regarding establishing a common language with respect to safety culture principles and characteristics for the nuclear industry.

Enclosures:

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2. Agenda – 4/16/09
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ADAMS Accession Number: Package - ML091270862, Memo - ML091260768,
Enclosure 3 - ML091270850, Enclosure 4 - ML091270858

OFFICE	DIRS/IPAB	BC:DIRS/IPAB
NAME	AKlett	RFranovich
DATE	05/07/2009	05/13/2009

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ATTENDANCE LIST
PUBLIC MEETING ON SAFETY CULTURE PROCESS
April 16, 2009

Sue Simpson	American Electric Power
Barbara Byron	California Energy Commission
Jerry Phifer	Constellation Energy
Diane Sieracki	Dominion
Mark Giles	Entergy
John McCann	Entergy
Robin Ritzman	First Energy
Bill Illing	INPO
Tom Houghton	NEI
Tony Pietrangelo	NEI
Audrey Klett	NRC
Cynthia Carpenter	NRC
Fred Brown	NRC
Isabelle Schoenfeld	NRC
Julio Lara	NRC
June Cai	NRC
Patrick Boyle	NRC
Rani Franovich	NRC
Ray Powell	NRC
Robert Pascarelli	NRC
Ron Frahm	NRC
Roy Caniano	NRC
Valerie Barnes	NRC
Brian McCabe	Progress Energy
Christine Neely	PSEG Nuclear
Don Rickard	STARS
Fred Mashburn	TVA
Raúl Muñoz Gómez	UNESA
Carlos Sisco	Winston & Strawn

INDUSTRY SAFETY CULTURE PROCESS PROPOSAL PUBLIC MEETING AGENDA

April 16, 2009 - 9:30 AM – 12:00 PM – TBMP 05-E01

9:30 – 9:40 AM	Opening Remarks and Introductions
9:40 – 10:30 AM	Status of Industry Activities: • Nuclear Safety Culture Assessment Guideline • Independent Safety Culture Assessment at SONGS • Nuclear Safety Culture Process Guideline
10:30 – 11:40 AM	Discussion of Industry's Vision for NRC Role in Proposed Nuclear Safety Culture Process
11:40 – 11:50 AM	Public Comments
11:50 – 12:00 PM	Meeting Summary/Action Items/Next Steps