



NUCLEAR ENERGY INSTITUTE

**Thomas C. Houghton**  
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June 2, 2009

Mr. Frederick D. Brown  
Director, Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Submittal of NEI 09-07, *Fostering a Strong Nuclear Safety Culture*, Draft Revision 0

**Project Number: 689**

Dear Mr. Brown:

In our public meeting on April 16, we discussed industry's plans to develop and pilot a process for nuclear power plants to assess their nuclear safety culture and to address nuclear safety culture issues. We also discussed the important role of NRC oversight of that process. Enclosed for your information and comment is NEI 09-07, *Fostering a Strong Nuclear Safety Culture*, Draft Rev. 0.

The industry approach places primary responsibility on line management and, in particular, on the site leadership team to assess and address nuclear safety culture issues. The goal is to provide an ongoing holistic, objective, transparent and safety-focused process that uses all of the information available (e.g., the corrective action program, performance trends, NRC inspections, industry evaluations, nuclear safety culture assessments, self assessments, audits, operating experience, employee concerns program, etc.) to provide an early indication of potential problems, develop effective corrective actions and monitor the effectiveness of the actions. The ongoing assessment of nuclear safety culture is conducted using the terminology of the INPO principles and attributes of nuclear safety culture. The guideline includes a sample Nuclear Safety Culture Monitoring Procedure, which licensees can use to develop their site-specific procedure.

The industry guideline also provides for multiple external looks at the nuclear safety culture. These include the U.S. Nuclear Regulatory Commission, industry evaluations (e.g., INPO), external nuclear safety review boards, and external members of safety culture assessments.

We would like to meet with you in the near future to discuss this guideline and to develop a pilot program and schedule. The pilot could involve one site from each region and would need to be run

Mr. Frederick D. Brown

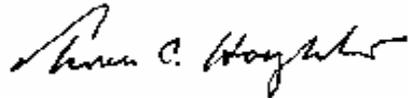
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for six to eight months. We envision the pilot program running concurrently with the current NRC safety culture approach. After the pilot is concluded, we will incorporate lessons learned into a revision of the guideline and provide it to the NRC for endorsement.

We look forward to working with the NRC staff and other stakeholders on this project. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas C. Houghton". The signature is fluid and cursive, with a prominent initial 'T'.

Thomas C. Houghton

Enclosure

c: Mr. R. William Borchardt, U.S. Nuclear Regulatory Commission  
Mr. Bruce S. Mallett, U.S. Nuclear Regulatory Commission  
Mr. Martin J. Virgilio, U.S. Nuclear Regulatory Commission  
Mr. Samuel J. Collins, U.S. Nuclear Regulatory Commission  
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