



NUCLEAR ENERGY INSTITUTE

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June 29, 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 Nuclear Safety Culture Assessment Manual

**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 the U.S. Nuclear Regulatory Commission (NRC) in overseeing that process. On June 2, 2009, I sent to you NEI 09-07, *Fostering a Strong Nuclear Safety Culture*, Draft Rev. 0 for comment.

One of the key elements of NEI 09-07 is the Nuclear Safety Culture Assessment (NSCA). This is a biennial self assessment of a station's nuclear safety culture using as its basis the principles and attributes of the INPO *Principles for a Strong Nuclear Safety Culture*. Enclosed for your information and comment is the NSCA Manual. Ultimately, we would like to obtain NRC endorsement of this methodology for use in third-party nuclear safety culture assessments.

The self assessment consists of an electronic survey and one week on site conducting interviews and observations. The team is led by an executive and a team leader from outside the station, and half the team members are also from outside the station. The NSCA has been successfully conducted under the auspices of the Utilities Service Alliance for several years. Its survey has recently been upgraded to distinguish results by department and organizational level. A distinct advantage of the NSCA is that it can be adapted to conduct an independent or third-party assessment by increasing the scope, sample size, and independence of the team members, while retaining the same methodology, so that comparison to previous results can be obtained.

Mr. Frederick D. Brown

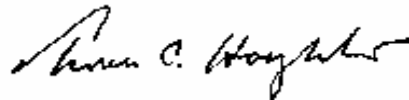
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As stated in my June 2 letter, we would like to meet with you in the next several weeks to discuss NEI 09-07 and the NSCA. We will be happy to answer questions and receive your recommendations for enhancing the product. We would also like to discuss the conduct of a pilot program and the schedule for the pilot. The pilot could involve one site from each region and would need to be run for about 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 the NSCA Manual and provide them 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,



Thomas C. Houghton

Enclosures

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