

Enclosure 3
September 2009 Meeting NRC Handout
Meeting Summary of the 09/10/09 Public Meeting to
Discuss Industry's Proposed Safety Culture Process
Dated September 29, 2009

Fostering a Strong Nuclear Safety Culture

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Challenges with the Existing Situation

- Different NRC/INPO terminology creates confusion
- Industry has the responsibility, but has not taken the lead
- Inspection findings are a very limited set of data
- Industry is not taking full advantage of all the possible indications of safety culture weaknesses
- There is no industry-wide guidance for conducting safety culture assessments – self, independent, or third party

Objective: Achieve A Strong Nuclear Safety Culture Across Industry

- **A common language of nuclear safety culture**
- **Industry responsible and leading; NRC providing appropriate and transparent oversight**
- **Use all available assessment tools to assess, identify and correct weaknesses**
- **A common methodology for conducting assessments, including third party**

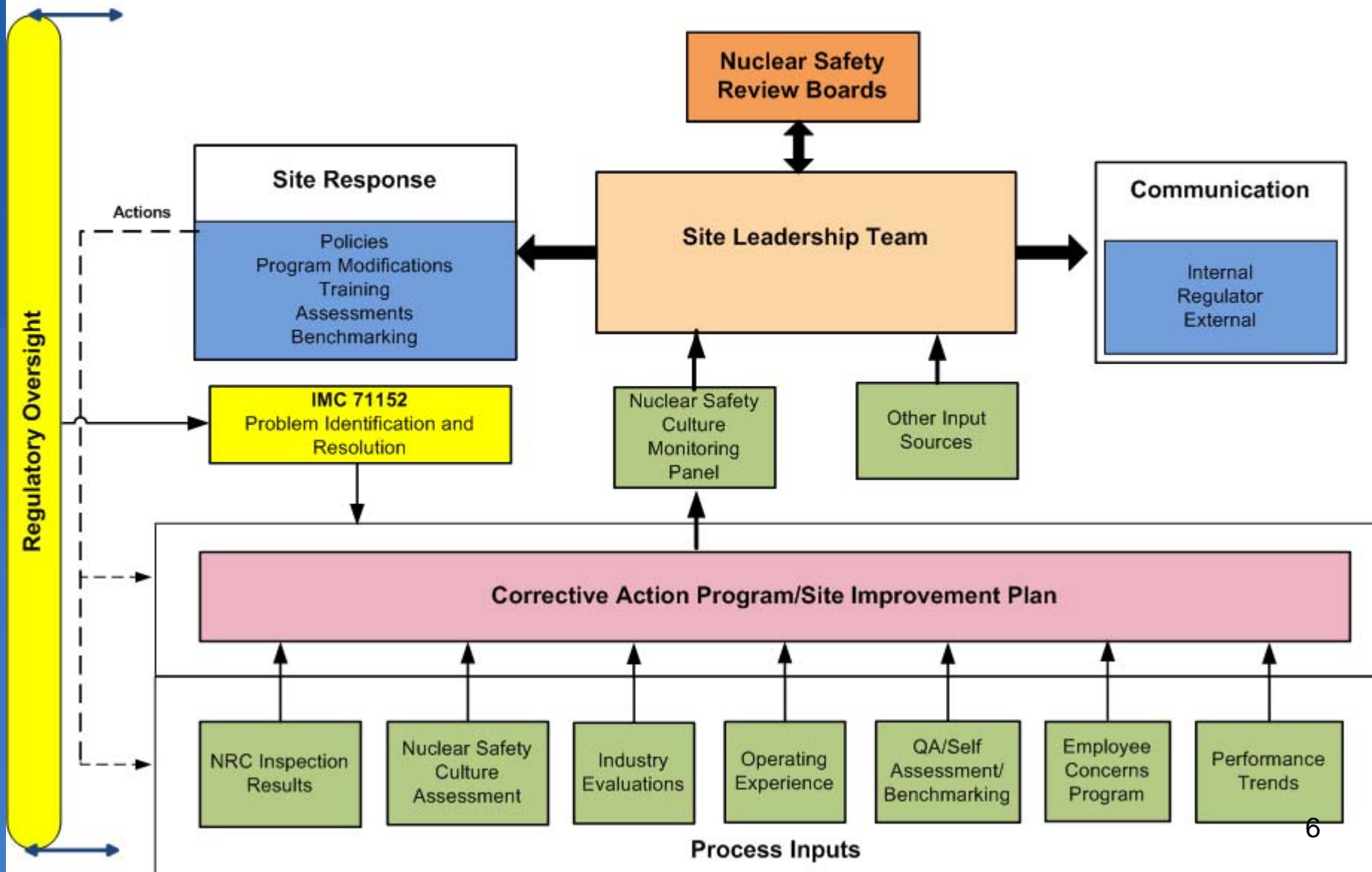
Alignment is Proceeding in Three Areas

- **INPO and NRC have begun discussions on creating a common language**
- **A common industry approach using all available tools to assess and address issues, and with effective NRC oversight, has been submitted to NRC**
- **A common industry approach for conducting self, independent and third party assessments has been submitted to NRC**

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- **Uses multiple inputs to the CAP and other key inputs including external assessments**
- **Licensee monitoring, oversight and communication**
 - Trends and analyzes input data
 - Ensures effective corrective action
 - Communicated to key stakeholders
- **Monitoring review panel and site leadership team conduct periodic reviews**
- **Provides systematic approach**

Site Nuclear Safety Culture Process



NRC Role is to Independently Assess Licensee Actions

- **Enhanced PI&R inspections**
 - Effectiveness of licensee program in identifying weaknesses
 - Corrective action effectiveness
- **Observation/assessment of licensee process**
- **Continue identifying crosscutting aspects in inspection findings**
- **Maintain SCWE and traditional enforcement**
- **Document oversight in inspection reports and assessment letters**

Key Steps Going Forward

- **Establish a pilot program to test industry approach against success criteria**
- **NRC observe pilots in parallel with current oversight approach**
- **Jointly assess success of the pilot program and apply lessons learned to governing documents**
- **Conduct industry workshops and implement nationwide**

NUCLEAR SAFETY CULTURE PROCESS IMPLEMENTATION PLAN

Complete
NSCA Manual
NSCP Guideline

Commence
Pilots (4)

Complete
Pilots

Implement
Nationwide

Lessons Learned
Revise
Guidelines

Industry
Workshops

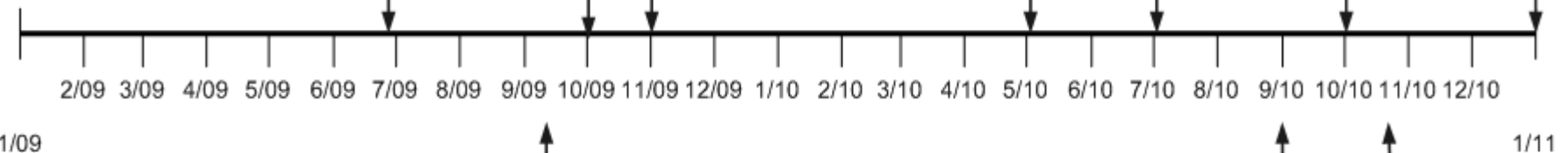
Pilot
Workshop

Observe Conduct
Of NSCA/NSCP

Revise
NRC
IMC

NRC/Industry
Meeting on
conduct of pilots

NRC
Approval



Nuclear Safety Culture Assessment

Nuclear Safety Culture Assessment

- **NRC and industry dissatisfied with 95003 safety culture assessment experience at Palo Verde**
- **NEI agreed to develop industry guideline**
- **Established task force to develop guideline that could be used for self, independent and third party assessments**
- **All sites required to perform biennial self assessments**
 - Required by INPO SOER 02-4
 - Some use contractors for surveys and/or assessments
 - No industry-wide consistency
 - USA has a methodology it has used successfully for five years
- **Industry is modifying the USA approach to create a Nuclear Safety Culture Assessment Process Manual**

USA NSCA Process

- **Structured on INPO's *Principles and Attributes for a Strong Nuclear Safety Culture*; results are provided in that context**
- **Pre-assessment automated survey and document review**
- **Assessment of leadership and worker attitudes, opinions, and perceptions through structured interviews and behavioral observations**
- **Full week evaluation with Friday exit**
- **Can be scaled up for “independent” or “third party” assessment**

What the Process Looks Like

Pre-Work



Developed a Pre-Survey to given 2 Weeks prior to assessment

For Example: Expectations and standards are well defined and effectively communicated.

Strongly Disagree	Disagree	Somewhat Disagree	Neutral	Somewhat Agree	Agree	Strongly Agree	Don't Know
1	2	3	4	5	6	7	8

- Workers understand and demonstrate buy-in to expectations and standards.
- Procedures, policies and other documents that define expectations and standards are clearly written.
- Expectations and standards are realistic for implementation.
- Expectations and standards are consistent with best industry practices.
- Expectations and standards are consistent with and support business plan goals and objectives.
- Departments and workgroups use progressively detailed expectations and standards to link worker performance to higher tier goals.
- Self assessments are used effectively to identify shortcomings (such as conflicts or lack of clarity) in defined expectations and standards.
- Operating experience is used as input when defining expectations and standards.

Pre-Survey & Discussion

Plant Records - CAP
Bus. Plan Indicators
Prior Assessments, Prior NSCA
Focus Areas
Equipment History etc.

Sunday

Travel to Site



Training & Schedule

Monday

Individual Contributor Interviews



Multiple Meeting Observations



Tuesday



Field Observations



Wednesday



Supervisory Interviews



Thursday



Final Consolidation Discussion



Recommendations



Friday

Exit Meeting



Travel Home



Data Consolidation Meetings

Typical Coverage Pattern

- **Start with individual contributors, then supervision**
- **Data tracking ensures coverage of all INPO attributes and all organizations**
- **Generally includes:**
 - **40 to 60 interviews of individuals or small groups**
 - **Attend 10-15 meetings and make 10-12 Field Observations**
- **Provides varying levels of coverage for 250-300 employees on site**
- **Typically over 1000 data points go into profile**

Assessment Results

- Exit meeting followed by written report
- Can include other areas of Site VP interest
- Both descriptive and graphic results
- Strengths, weaknesses, recommendations
- Follow-up from previous assessment
- Entered in the CAP and/or improvement plan
- Wide communication of results

NSCA Process Manual has Been Upgraded

- **Modified to reflect three levels of assessment (self, independent and third party)**
- **Upgrade survey to distinguish between departments and levels in the organization**
- **Conducted validation study of process**
- **Reviewed against revised 95003**
- **Continuous improvement built into process**

In conclusion

- **Efforts continue to develop common language**
- **Industry has completed two guidelines and has provided them for NRC comment:**
 - **NEI 09-07 Fostering a Strong Nuclear Safety Culture**
 - **Nuclear Safety Culture Assessment Process Manual**
- **NRC is invited to observe pilot plants this year**
- **Industry is interested in refining the approach, including NRC's oversight role, for Commission consideration and implementation in 2011**

Pilot Program

Pilot Plants

- **Hope Creek**
- **North Anna**
- **Braidwood**
- **South Texas Project**

Preparation

- **Site Procedures using NEI 09-07**
- **Training**
- **Communications**

NRC Involvement

- **Continue baseline inspection program**
- **Observe Nuclear Safety Culture Assessment**
- **Observe Nuclear Safety Culture Monitoring Panel**
- **Observe Site Leadership Team meeting**

Pilot Activities

- NSCA survey and onsite
- Use of previous surveys/assessments
- Nuclear Safety Culture Monitoring Panel Meetings
- Site Leadership Team Meetings
- Action Plans/Corrective Actions
- Nuclear Safety Review Board

Post Pilot Activities

- **Lessons Learned, plus, deltas**
- **Success Criteria met?**
- **Process Modifications**