



# NRC NEWS

**U.S. NUCLEAR REGULATORY COMMISSION**  
Office of Public Affairs Telephone: 301/415-8200  
Washington, D.C. 20555-0001  
E-mail: [opa.resource@nrc.gov](mailto:opa.resource@nrc.gov)  
Site: <http://www.nrc.gov>

---

No. S-09-027

## **“Recent NRC Initiatives in Safety Culture”**

**Prepared Remarks for**

**The Honorable Gregory B. Jaczko**  
**Chairman**  
**U.S. Regulatory Commission**

**at the**

**National Association of Employee Concerns Professionals**

**September 29, 2009**

Good morning. I am pleased to speak to this group of professionals whose work helps to promote safety conscious work environments at our nation’s nuclear power plants. The existence of a healthy work environment in which employees are free to raise safety concerns is a vital underpinning of the NRC’s regulatory oversight. Your work to establish and maintain an open and collaborative work environment directly supports our mission of ensuring safe operation of nuclear power plants and protecting public health and safety.

While the NRC is responsible for protecting public health and safety through regulation and oversight of the nuclear industry, the day-to-day responsibility for safe operation lies with the licensees. And licensees, in turn, rely on employees at all levels of the organization to recognize and report safety concerns. Therefore, the freedom of employees to raise safety concerns is an important underpinning of the NRC’s safety mission.

We know that an open and collaborative work environment encourages employees to promptly voice safety concerns—even if they conflict with management views or objectives. Employees are encouraged to raise safety concerns in work environments that promote trust, respect and open communication. All of these attributes are associated with positive work environments. And effective concern resolution programs are an important element of the work environment.

As important as safety culture is to safety, it is a complex area to oversee. Because licensees differ widely, requiring consistent standards can be difficult, and developing objective measures is a challenge. The NRC has the benefit, however, of a simple and straightforward mandate – protection of the public health and safety.

As a regulator, I care about safety culture because we find that a deteriorating safety culture is associated with safety problems. I believe in the importance of developing performance measures that identify weaknesses in safety culture and promote strengths before problems emerge. That is why I was a proponent of the effort to incorporate safety culture into the reactor oversight process.

The last time I spoke here, in 2007, the NRC staff had just begun evaluating safety culture in our Reactor Oversight Process as the result of that initiative. The Oversight Process had been modified to provide a transparent, objective, and predictable measure of safety culture. Essential safety culture components were identified based on an assessment of the characteristics of a positive safety culture. These safety culture components are subject to NRC inspections which can identify potential weaknesses. Safety culture assessments are tools used to determine the state of the existing safety culture and to assess whether corrective actions have resulted in demonstrative improvements.

This enhanced focus on safety culture by the NRC in the reactor oversight process has increased attention on this important area among licensees. We have seen an increasing number of licensees conducting periodic safety culture self-assessments independent of our regulatory oversight. Additionally, we are gaining valuable information about safety culture at nuclear facilities as we apply the oversight process. We are able to use that information to continuously refine and improve our safety culture efforts. These refinements are based on regular self assessments, which include special internal reviews and stakeholder feedback.

The Commission is now considering a broader view of the overall issue of safety culture, taking advantage of the knowledge we have gained in our Reactor Oversight Process. Our focus may extend beyond power reactors and may include the establishment of clear expectations for safety culture for all of our licensees. Additionally, we must remain mindful of the importance of the safety culture for all licensees and certificate holders, such as materials licensees; and also for vendors and contractors. The first step is to determine what we mean by safety culture and then whether there are regulatory changes, if any, that we need to make.

The staff has drafted a new and expanded policy statement to do just that—and it is currently before the Commission for review. Once approved, this draft will be put out for crucial stakeholder input. In developing this policy statement, the staff engaged in outreach to materials licensees to obtain views on how to increase attention to safety culture. While these efforts have yielded suggestions, more outreach remains to be done. In the future, the staff will be engaging Agreement States, Agreement State licensees, certificate holders, and the broader public. As these efforts continue, I want to encourage the crucial stakeholders in attendance here today to stay fully engaged with the NRC.

My focus on safety culture has not been limited to our licensees. I believe that we must continually assess how our internal processes and programs are performing in the area of safety culture. As many of you know, questions about our allegation process were raised following an allegation concerning sleeping security officers at the Peach Bottom nuclear reactor in 2007. This prompted a thorough review of our allegation program and changes to improve our handling of safety concerns.

We are requiring more structure in our allegation procedures and documentation to ensure that allegations are handled consistently across regions. We want to make sure that our allegation process is followed every time. We must be diligent in ensuring that no concerns “fall through the cracks.” Better documentation will also aid us in focusing inspections on areas where allegations have identified potential problems.

We have taken steps to improve communication with the individuals who raise safety concerns to make our resolution of their concerns as transparent as possible. Under our new allegation guidance, the staff may – in appropriate circumstances - initiate communication with individuals who initially decline further NRC contact. We believe that it is important to follow up in order to be sure that we obtain all information relevant to the concern, inform the individual of our plan to evaluate the concern, and encourage the individual to stay involved in the allegation process. We hope that more individuals will remain engaged in the process if they understand that they will receive feedback regarding our understanding of the concerns and plans to address them, and if they appreciate how valuable we consider their feedback about our allegation process.

We have also revised our guidance to provide better direction on how concerns should be addressed – whether by a technical inspection by the NRC, an OI investigation, an evaluation by the licensee, or a combination of those actions. When a licensee evaluation is appropriate, we will clearly communicate our expectations regarding their response to us. We expect that the evaluators are highly qualified and independent, and that the evaluation is of sufficient scope and depth to reach reliable conclusions. We also recognize that, in certain situations, we will not be able to rely on a licensee’s evaluation alone to address a concern. In those cases, the staff will also conduct an NRC inspection or investigation to verify the licensee’s assessment.

In addition, the Commission has recently undertaken new initiatives to strengthen the safety culture within our own staff. I firmly believe that a strong safety culture within our agency is fundamental to our safety mission, and I would like to see the NRC set an example for the industry we regulate. That is why I am such a strong supporter of our differing professional opinions and non-concurrence programs. These programs offer employees clearly defined, alternative processes to raise concerns. At the same time, we must ensure that employees feel free to use ordinary management channels to raise concerns. To do this we must maintain a work environment that encourages open communication, trust and respect.

To further that goal, the Commission recently asked an internal task force to assess our safety culture and make recommendations for improvement. The task force included individuals from all parts of the agency, bringing diverse perspectives and expertise in allegations, our differing professional opinion program, human resources and enforcement. In its final report,

issued in April of this year, the task force proposed recommendations to further strengthen our safety culture by establishing an agency-wide framework to express our expectations and effectively communicate them to reinforce our safety-first focus.

The task force identified a number of safety culture characteristics that correlate with the safety culture standards applied to NRC licensees. These fall into three primary groups. The first group concerns problem identification, evaluation and resolution. These emphasize the need for a work environment in which employees feel free to raise concerns without fear of retaliation, issues are promptly identified and fully evaluated, and actions are promptly taken to correct safety and security issues. The next safety culture characteristics concern the contribution of individuals to the mission of the agency. They emphasize individual ownership of safety and security goals, clear communication and coordination between employees to accomplish those goals and clearly defined roles and responsibilities. The final set of characteristics focuses on organizational support of the mission, ensuring sufficient resources and personnel, a continuous learning environment and high level management support for safety and security.

These comprehensive goals set a high standard for safety culture. I believe by working toward these goals, the NRC can set an example for licensees and the public. Already, the task force's specific recommendations for strengthening safety culture are in the process of being implemented. I recognize that this will not end our work on safety culture and we will continue to strive to enhance our work environment.

Later this week, the Commission will learn the results of an independent Safety Culture and Climate Survey, which was recently conducted by the Office of the Inspector General. These surveys are conducted approximately every three years and offer a snapshot of employee attitudes, perceptions and beliefs regarding safety culture. I expect that the survey results will offer further insights into the status of our safety culture. The task force will be reviewing the survey results and advising the Commission in the near future of any further recommendations on safety culture.

I share the Task Force's conclusion that safety culture expectations must be constantly reinforced and ultimately woven into the characteristics of agency programs and the attitudes and behaviors of the workforce. I look forward to working towards this goal in the NRC through enhancements in our agency safety culture and further clarification to our licensees regarding the agency's expectations for safety culture. I appreciate the efforts of everyone at this forum to support safety conscious work environments and I welcome your questions.