

PUBLIC SUBMISSION

As of: December 09, 2009
Received: December 08, 2009
Status: Pending_Post
Tracking No. 80a66921
Comments Due: February 04, 2010
Submission Type: Web

Docket: NRC-2009-0485
Draft Safety Culture Policy Statement: Request for Public Comments

Comment On: NRC-2009-0485-0001
Draft Safety Culture Policy Statement: Request for Public Comments

Document: NRC-2009-0485-DRAFT-0001
Comment on FR Doc # E9-26816

11/06/09
74FR57525

2

Submitter Information

Name: Gary Williams
Address:
 2200 Fort Roots Drive (115HP/NLR)
 North Little Rock, AR, 72114
Organization: National Health Physics Program
Government Agency Type: Federal
Government Agency: VA

RECEIVED

2009 DEC -9 PM 1:00

RULES AND DIRECTIVES
BRANCH 1
12/10/09

General Comment

Please see attached file.

Attachments

NRC-2009-0485-DRAFT-0001.1: Comment on FR Doc # E9-26816

E-RIDS = ADM-03

add =

A. Sapountzis (APS)

SUNSI Renew Complete
Template = ADM-013

Veterans Health Administration (VHA) Comments for
Docket ID NRC-2009-0485

The VHA National Health Physics Program submits the following comments related to the draft Nuclear Regulatory Commission (NRC) policy statement that was published in the *Federal Register* on November 6, 2009.

The point of contact for these comments is the following:

Gary E. Williams
gary.williams3@va.gov
501-257-1571

NRC Question #2: Are there safety culture characteristics in the draft policy statement that do not contribute to a safety culture and, therefore, should not be included?

VHA Comments:

Yes, security should be addressed separately from safety.

Rather than redefining the scope of NRC oversight to include security issues, the draft statement appears to be redefining a safety culture to include security issues.

VHA disagrees with the argument for an “overarching safety culture policy statement which encompasses security.” The specific objection is derived from the NRC acknowledged challenge where those individuals involved in safety and in security activities use differing approaches to achieve risk mitigation or protection of public health and safety.

VHA recommends the safety culture policy statement be limited to the specific issues of safety with a clear and explicit definition in terms of error prevention. Security should be addressed under a separate policy statement.

NRC Question #5: The draft policy statement indicates licensees should have those safety culture characteristics needed to be consistent with scope of uses and organization structure. Given diversity among licensees regulated by the NRC, does this statement need further clarification?

VHA Comments:

Yes, this statement requires clarification.

Veterans Health Administration (VHA) Comments for
Docket ID NRC-2009-0485

Federal facilities and health care organizations routinely participate in a diverse range of safety related activities which are mandated by law and required by accreditation organizations. These diverse efforts are consistent with the “safety culture policy” approach advocated by NRC.

These facilities and organizations should not be required to establish a separate series of training efforts and records to meet redundant NRC goals.

VHA recommends that the “safety culture policy” be clarified to accept the extant safety efforts by a facility as adequate and sufficient so that a facility has the opportunity to demonstrate their own safety practices during any NRC oversight activities and not have to use methods that are developed by NRC staff who might have limited experience in the methods used by health care organizations.