

11/4/09

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Good morning -

In regards to question 1 of the Characteristics of a Positive Safety Culture:

The current version does not address engineering as well as it could, in relation to the safety of the original design/modifications/upgrades. The first bullet (Personnel demonstrate ownership. . .) addresses it in a roundabout way, but it would be good to specify designing safety into a plant as well as working safely. Example: "Personnel shall ensure that all new and modified designs shall take into consideration the future safety and security of personnel and equipment."

Thank you for your time,

Scott

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A. Sapountzis (aps)

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