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Draft Safety Culture Policy Statement: Request for Public Comments

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General Comment

See attached file.

Attachments

NRC-2009-0485-DRAFT-0005.1: Comment on FR Doc # E9-26816

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Subject: Comments on Proposed Policy

Docket: NRC-2009-0485

Thank you for the opportunity to comment on the Draft Safety Culture Policy Statement published in the Federal Register of 6 November 2009. Each comment is referenced to the specific questions asked by NRC in its request for public comments.

Question 5. The draft policy statement states, "All licensees and certificate holders should consider and foster the safety culture characteristics (commensurate with the safety and security significance of activities and the nature and complexity of their organization and functions) in carrying out their day-to-day work activities and decisions." Given the diversity among the licensees and certificate holders regulated by the NRC and the Agreement States, does this statement need further clarification?

The above statement should go beyond "day-to-day" activities to include fostering safety culture in an organization's procedures, policies, planning, training, management, etc. That is, safety culture characteristics should be an integral part of all activities ranging from the shop floor to top management.

Question 6. How well does the draft safety culture policy statement enhance licensees' and certificate holders' understanding of the NRC's expectations that they maintain a safety culture that includes issues related to security?

The draft policy falls short at the point where a licensee asks, “what is now required that was not required before?” The draft policy seems to be all about NRC’s expectations rather than the licensee’s requirements. Since the draft policy is neither a regulation nor an order from the NRC, it is our impression that it imposes no specific requirements on a licensee. The NRC should clarify whether or not this draft policy will require any specific action or implementation on the part of licensees. Also, the NRC should make clear whether or not it expects it might take any enforcement actions based on this policy.

The draft safety culture policy speaks multiple times about the expectations for both organizations and individuals. The policy does not differentiate between organizations and individuals as to NRC’s level of expectations. Normally NRC directs its enforcement toward the organization (i.e., the licensee), rather than the individual within the organization. Does this draft policy impose additional requirements or expectations upon the individual? If so, the NRC should be explicit about any new expectations of individuals arising from this policy.

Question 7. In addition to issuing a safety culture policy statement, what might the NRC consider doing, or doing differently, to increase licensees' and certificate holders' attention to safety culture in the materials area?

All licensees are required [10 CFR 20.1101(c)] to periodically (at least annually) review the radiation protection program content and implementation and maintain a written report subject to review by NRC. Commonly called an “annual audit”, this process provides an excellent opportunity for a licensee to review its safety culture. The NRC should consider modifying its regulation [10 CFR 20.1101] to include the topic of safety culture within the required written “radiation protection program”.

Very truly yours,
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