

Nuclear Safety Review Concepts Corporation

Saving lives, pain, assets, and careers through thoughtful inquiry

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President



VIA INTERNET E-MAIL

February 1, 2010

2/1/2010
RDB Rec'd.

To: Mr. Alexander Sapountzis,
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Mail Stop O-4 A15A,
U.S. Nuclear Regulatory Commission,
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Alexander.Sapountzis@nrc.gov

11/06/09
74 FR 57525
9

Subject: Comments on Draft Safety Culture Policy Statement:(Docket ID NRC-2009-0485)

References:

1.0 Federal Register 57525 2009.11.06 Draft Safety Culture Policy Statement: Request for Public Comments <http://edocket.access.gpo.gov/2009/pdf/E9-26816.pdf>

Purpose: This letter responds to the request in Reference 1.0 for comments within 90 days

Comments:

1.0 Safety Culture is simply that part of culture that relates to safety. Culture is that which characterizes a group or organization. It includes the shared mental content, norms, institutions, and physical objects that characterize the group or organization.

2.0 I have yet to see a record of any behavior, institutional performance, or physical object in the U.S. nuclear industry that would qualify as bad safety culture or weak safety culture that was not also clearly at variance with the expectations stated in 10CFR50, Appendix B, Quality Assurance Criteria. Therefore, I conclude that if the NRC enforced its own requirements there would be no need to even talk about safety culture.

3.0 In light of 2.0 above, the top characteristic of a good safety culture in the nuclear industry is the open and transparent emphasis on compliance with regulatory requirements, especially quality assurance criteria. The NRC's Characteristics of a Safety Culture should include the open and transparent emphasis on compliance with regulatory requirements, especially quality assurance criteria. For example, when undesired and/or unexpected adverse behaviors, inactions,

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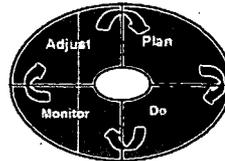
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Cdd = A. Sapountzis (APS)

or conditions transpire the investigation of them should include the involvement of non-compliance as a factor or factors.

4.0 The second most significant omission from the NRC's Characteristics of a Safety Culture is "transparency." Transparency is doing business in such a way that it is easy to see what is wrong or that something is wrong. The NRC's Characteristics of a Safety Culture should include transparency in design, performance, and communication.

Sincerely yours,

William R. Conroy



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