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Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
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Comments on the NRC Draft Safety Culture Policy Statement
Docket NRC-2009-0485

RULES AND DIRECTIVES
BRANCH
USNRC

Dear Mr. Lesar:

The Colorado Department of Public Health and Environment Radiation Control Program appreciates the opportunity to comment on the Draft Safety Culture Policy Statement under consideration at NRC. The lofty statements in the policy are commiserate with high level goals; however, the Commission has stated that it will "include appropriate means to monitor safety culture in its oversight programs and internal management processes." Thus, our comments are directed more to specific implementation issues rather than the overall policy, and we did not address the specific questions that were asked.

It is unclear what the motivation is for this national effort to establish a new safety culture among radioactive materials users. The examples cited in the Safety Culture Summary included two types of medical errors and a loss of control concern. Two of the five weaknesses listed were for nuclear power plants where the existing Safety Culture Policy already applies. While we take no issue with continued and reemphasized diligence in the safe (and secure) management of radioactive materials, it is not clear what problem the revised policy is to address. A key element in determining how to implement the policy is defining the problem to be solved. What problem are we to address?

The Policy Statement also notes "A safety culture that accomplishes this would include all nuclear safety and security issues associated with NRC-regulated activities including radiation protection, safeguards, material control and accounting, physical protection, and emergency preparedness issues among the issues that receive attention as a matter of priority." Also the policy states, "These regulated activities include industrial radiography services; hospitals, clinics and individual practitioners involved in medical uses of radioactive materials; research and test reactors; large-scale fuel fabrication facilities; as well as nuclear power plants. ...the Commission is emphasizing that it expects all of its licensees and certificate holders to place the highest priority on nuclear safety commensurate with the risks inherent in

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the regulated activities." Since the existing regulatory framework mandated by NRC already encompasses these issues, it is unclear what the policy is adding.

It would be helpful if the policy could identify a problem that needs to be addressed, so that implementation of the policy could be appropriately focused. In the development of implementation measures, it will be necessary to determine what measurements are being used to evaluate the success of the program. Therefore, if the issue is lack of diligence among medical facilities in ensuring patient safety, the evaluation of the effectiveness of the measures can rely on information or data related to training, compliance rates or some other quantifiable value.

If the policy is not crafted to address a problem, it can be a fine statement of ideals and an appropriate representation of the aspirations of the Commission. Implementation can be accomplished through greater diligence in compliance with existing requirements, and additional tracking or corrective measures are not necessary. As an Agreement State with responsibility for implementing the NRC-driven radiation safety program, Colorado remains interested in placing our resources and priorities for nuclear safety on activities commensurate with the risks entailed.

Thank you for the opportunity to comment in this matter.



Steve Tarlton, Manager
Radiation Control Program