Carl B. Corbin, Chairman
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STARS-10002

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Michael T. Lesar
Chief, Rulemaking and Directives Branch
Office of Administration
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

STRATEGIC TEAMING AND RESOURCE SHARING (STARS) COMMENTS ON THE DRAFT SAFETY CULTURE POLICY STATEMENT; DOCKET ID NRC-2009-0485

References: 1. 74 FR 57525, Draft Safety Culture Policy Statement: Request for
Public Comments, dated November 6, 2009
2. 75 FR 1656, Draft Safety Culture Policy Statement: Request for
Public Comments; Extension of Comment Period, dated
January 12, 2010

Dear Mr. Lesar,

The Strategic Teaming and Resource Sharing (STARS)[1] alliance is submitting comments in response to the Federal Register notice (reference 1) requesting comments on the Draft Safety Culture Policy Statement. The comments are provided in the enclosure to this letter. STARS appreciates the NRC request for comments on this topic.

STARS believes that stakeholder consensus on the policy statement is an important element of a broader initiative to strengthen the safety culture at nuclear power stations. That consensus includes the alignment of the NRC safety culture terminology with that of the Nuclear Energy Institute's and the Institute of Nuclear Power Operations' terminology and the refinement of the processes for identifying safety culture issues.

STARS believes the NRC's stakeholder workshop on February 2 through 4, 2010 in Rockville, Maryland was highly beneficial. STARS requests that the NRC accept this group's proposed

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[1] STARS consists of thirteen plants at seven stations operated by Luminant Power, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company, Arizona Public Service Company, and Southern California Edison.
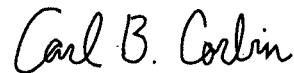
Callaway · Comanche Peak · Diablo Canyon · Palo Verde · San Onofre · South Texas Project · Wolf Creek

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definition for "safety culture." STARS also requests that the NRC continue to include these stakeholders in the development of the traits (or characteristics) used to describe the behaviors of individuals within the stakeholder's organization that positively contributes to a robust nuclear safety culture.

Thank you for your consideration of these comments. If there are any questions regarding these comments, please contact me at 254-897-0121 or carl.corbin@luminant.com, or Donald Rickard at 314-225-1731 or drickard@ameren.com.

Sincerely,

Carl B. Corbin

Carl B. Corbin, Chairman
STARS Integrated Regulatory Affairs Group

Enclosure   STARS Comments on the Draft Safety Culture Policy Statement Docket ID NRC-2009-0485

Enclosure

STARS Comments on the Draft Safety Culture Policy Statement
Docket ID NRC-2009-0485

References: 1. 74 FR 57525, Draft Safety Culture Policy Statement: Request for
Public Comments, dated November 6, 2009
2. 75 FR 1656, Draft Safety Culture Policy Statement: Request for
Public Comments; Extension of Comment Period, dated
January 12, 2010
3. Meeting Notice: Forthcoming Meeting Between The U.S. Nuclear
Regulatory Commission And Stakeholders Regarding Safety
Culture Policy Statement, Definition, And Description/Traits, dated
January 15, 2010

General comments on the proposed Draft Safety Culture Policy Statement

STARS believes that the development and communication of only one policy statement
addressing safety culture is the most appropriate course of action.

STARS believes that the finalized policy statement should refer to only nuclear safety culture
and not include a specific reference to security safety culture. The artificial differentiation of
nuclear safety culture and security safety culture is problematic because it predisposes a
competition in the goals of protecting the health and safety of the public. On the whole, STARS
believes that the differentiation introduces more issues than it resolves. STARS believes that the
goal of the NRC for the inclusion of the security considerations can be encompassed through the
appropriate development of the traits (or characteristics) of a positive safety culture.

STARS believes that the draft safety culture definition developed during the February 2 through
4, 2010 NRC facilitated workshop (reference 3) constitutes an excellent start in the process of
developing an overarching safety culture policy. The group's definition was as follows:

> **Nuclear safety culture is the core values and behaviors resulting from a collective
> commitment by leaders and individuals to emphasize safety over competing goals to
> ensure protection of people and the environment.**

STARS encourages the Staff to consider a comparable activity, series of workshops, or broad
industry working group to develop the supporting traits (or characteristics) of a positive safety
culture. That activity would provide the best response to the eight (8) questions for which the
Staff is seeking input (reference 1). The February 2 through 4, 2010 workshop provided the
opportunity to gain insight into the similarities and differences of the various licensees (and non-
licensees). The additional workshops should build on the draft traits developed in the workshop.

Questions for Which NRC Is Seeking Input

(1) The draft policy statement provides a description of areas important to safety culture, (i.e., safety culture characteristics). Are there any characteristics relevant to a particular type of licensee or certificate holder (if so, please specify which type) that do not appear to be addressed?

STARS encourages the Staff to continue its initiative of fostering a broad industry collaborative approach to the development of the safety culture traits (characteristics).

(2) Are there safety culture characteristics as described in the draft policy statement that you believe do not contribute to safety culture and, therefore, should not be included?

STARS encourages the Staff to continue its initiative of fostering a broad industry collaborative approach to the development of the safety culture traits (characteristics).

(3) Regarding the understanding of what the Commission means by a "positive safety culture," would it help to include the safety culture characteristics in the Statement of Policy section in the policy statement?

STARS believes that the identification of the characteristics in the Statement of Policy is unnecessary. This belief is based upon the expected differences in the manner in which the traits will be communicated and possibly characterized to the various licensees, certificate holders, etc. STARS recommends that there be an acknowledgement in the Statement of Policy that supporting traits (characteristics) exist in another location. For example, STARS would expect that the power reactor organizations would customize the language and examples to apply to nuclear power plants while other groups, such as medical imaging personnel, would similarly develop their own discipline-specific examples.

(4) The draft policy statement includes the following definition of safety culture: "Safety culture is that assembly of characteristics, attitudes, and behaviors in organizations and individuals which establishes that as an overriding priority, nuclear safety and security issues receive the attention warranted by their significance." Does this definition need further clarification to be useful?

STARS believes that the draft safety culture definition developed during the February 2 through 4, 2010 NRC facilitated workshop (reference 3) constitutes an excellent start to the process of developing an overarching safety culture policy. The definition was as follows:

> **Nuclear safety culture is the core values and behaviors resulting from a collective commitment by leaders and individuals to emphasize safety over competing goals to ensure protection of people and the environment.**

STARS believes that it is very important for the power reactor industry to operate to one definition of safety culture. The Institute of Nuclear Power Operations (INPO) has developed an excellent framework of programs and guidelines for fostering a positive nuclear safety culture. When combined with the guidance for developing and maintaining excellent performance improvement programs, the stations have comprehensive tools for safety culture excellence which at its heart serves to promote protection of the health and safety of the public. The INPO guidance was recently enhanced by the Nuclear Energy Institute's development of NEI 09-07, Fostering a Strong Nuclear Safety Culture. These integrated guidelines allow all station personnel to understand their role and the role of their activity in achieving the overall outcomes directed at a strong safety culture. Today, when regulatory issues develop, the station management must speak in a language consistent with the Reactor Oversight Process (ROP) which introduces a second vocabulary relative to what has been developed by the industry (INPO and NEI). This conflict is capable of being resolved by having all parties agree to make changes to support a common, agreed upon definition with supporting traits (characteristics).

(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-today 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?

STARS encourages the Staff to continue its initiative of fostering a broad industry collaborative approach to the development of the safety culture traits (characteristics). Recognizing that there are both advantages and disadvantages to this approach, the commitment that the stakeholders should have to the finished product is believed to outweigh the disadvantages. STARS agrees with the statement less the parenthetical content e.g. "(commensurate with the safety and security significance of activities and the nature and complexity of their organization and functions)". Although the parenthetical content is important, it is more appropriate for the supporting definitions and discussion of the positive safety culture traits (characteristics).

(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?

Licensees and certificate holders already understand that issues related to security are inherent in a robust safety culture. Amplification of this NRC expectation is not necessary.

STARS fully appreciates the NRC's expectation that all licensees and certificate holders establish and maintain a positive safety culture that protects public health and safety and the common defense and security. STARS believes that the NRC's objectives are more appropriately accomplished by including the attributes of a positive security culture within the supporting traits of a nuclear safety culture.

(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?

Licensees and certificate holders in the materials area are stakeholders that participated in the February 2 through 4, 2010 workshop. To increase their attention to safety culture their input should continue to be solicited through future workshops.

(8) How can the NRC better involve stakeholders to address safety culture, including security, for all NRC and Agreement State licensees and certificate holders?

STARS believes that the draft safety culture definition developed during the February 2 through 4, 2010 NRC facilitated workshop (reference 3) constitutes an excellent start to the process of developing an overarching safety culture policy. STARS encourages the Staff to consider a comparable activity, series of workshops, or broad industry working group to help develop the supporting traits (or characteristics) of a positive safety culture.