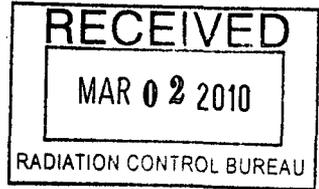


Rio Algom Mining LLC



February 24, 2010

New Mexico Environment Department
Environmental Control Bureau
Harold Runnels Building
1190 St. Francis Drive
PO Box 5469
Santa Fe, NM 87502-5469

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BRANCH
USNRC

Attn: Michael Ortiz, Acting Staff Manager

Re: Cultural Policy Statement

Rio Algom Mining LLC (RAM) would like to provide the following comments to the questions presented in the NRC's "Draft Safety Culture Policy Statement: Request for Public Comments", NRC-2009-0485.

1. Are their special cultural characteristics relevant to RAM's SUA type License, or other types of licenses or certificates?

The RAM facility operates under Surface Use Agreements and Radioactive Materials License type regulation. The cultural characteristics relevant to this segment of the industry seem to be to be addressed. One comment is provided however. There may be a trend by some companies to utilize more contractor or vendors to perform work jobs. Although it is the responsibility of the hiring company to ensure that all workers have the proper cultural safety characteristics, it would be helpful if there were a network or group that could provide basic nuclear cultural characteristics to the owners of the contractor companies. This would help ensure that they, as owners of the contracting company, are prepared for the needed cultural safety and security required in this industry.

2. Are their any safety culture characteristics listed in the draft policy statement that should be removed?

No

3. Should a "positive safety culture" meaning be included in the Statement of Policy section in the policy statement?

Not necessary

4. Does the 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" need further clarification to be useful?

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Add = A. SAPONTZIS (GPS)

Rio Algom Mining LLC

No. Several corporations have recently begun developing similar safety culture characteristics for all safety items.

5. *Does the statement "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" need further clarification?*

No.

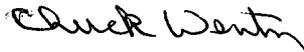
6. *How well does the draft safety culture policy statement enhance licensees' and certificate holders' understanding of the NRC's expectations that they maintain a safety culture that includes issues related to security?*

The safety culture portion has been in effect for some time; however, the security aspect is newer, but was well covered.

7. *What might the NRC consider doing, or doing differently, relative to safety culture in the materials area?*

Future action should depend on the results obtained after reviewing comments received during this survey.

8. *How can the NRC better involve stakeholders to address safety culture, including security, for all NRC and Agreement State licensees?*



Chuck Wentz
Environmental Department Supervisor/RSO
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