From: Bruce Thomadsen [mailto:thomadsen@humonc.wisc.edu]
Sent: Thursday, February 25, 2010 11:54 AM
To: Cockerham, Ashley; Milton Guiberteau; Eggli, Douglas; Fisher, Darrell; Gilley, Debbie; Langhorst, Susan; Malmud, Leon; Mattmuller, Steve; Suleiman, Orhan; Van Decker, William; Jim Welsh; Zanzonico, Pat
Cc: Flannery, Cindy; Firth, James; Houston, Nancy; Pavone, Debra; Santiago, Tanya; Schmalz, Barbara; Wanda Holmes
Subject: Re: Action: NRC safety culture policy

Ashley,

Attached are my comments on the Safety Culture Policy Statement.

Bruce

11/06/2010

74FR57525

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Comments on the NRC's Draft Statement on Safety Culture.
Bruce Thomadsen

6) Characteristics of a Positive Safety Culture
• Personnel demonstrate ownership for nuclear safety and security in their day-to-day work activities by, for example, ensuring that their day-to-day work activities and products meet professional standards commensurate with the potential impacts of their work on safety and security. They proceed with caution when making safety- or security-related decisions and question their assumptions, especially when faced with uncertain or unexpected conditions, to ensure that safety and security are maintained.

• Processes for planning and controlling work ensure that individual contributors, supervisors, and work groups communicate, coordinate, and execute their work activities in a manner that supports safety and security. For example, individuals and work groups communicate and cooperate during work projects and activities to ensure their actions do not interact with those of others to adversely affect safety or security. In addition, managers and supervisors are accessible to oversee work activities, including those of contractors or vendors, and they challenge work activities and work products that do not meet their standards.
While the description in this paragraph is of what happens in an organization with a safety culture, it is not very helpful and seems idyllic. It might be better to describe how that would come about, such as "The organization plans work activities using techniques that establish effective communication and coordination and facilitates the safe and effective execution of the activity."

• The organization maintains a safety conscious work environment in which personnel feel free to raise safety and security concerns without fear of retaliation. For example, claims of harassment, intimidation, retaliation, and discrimination are investigated consistent with the regulations regarding employee protection. If an instance of harassment, intimidation, retaliation, or discrimination for raising a safety or security concern is identified, corrective actions are taken in a timely manner.
The problem here is that this intimidation is as likely at the top of the hierarchy as the bottom. Rather than say that the organization maintains such an environment, it might be more effective to say the organization has effective procedures in place to prevent intimidation.

• The organization ensures that issues potentially impacting safety or security are promptly identified, fully evaluated, and promptly addressed and corrected, commensurate with their significance.
Again, better to have procedures in place.

• The organization ensures that the personnel, equipment, tools, procedures, and other resources needed to assure safety and security are available. For example, training is developed and implemented or accessed to ensure personnel competence. Procedures, work instructions, design documentation, drawings, databases, and other job aids and reference materials are complete, accurate, and up-to-date.

• The organization's decisions ensure that safety and security are maintained. For example, production, cost, and schedule goals are developed, communicated, and implemented in a manner that demonstrates that safety and security are overriding priorities.

A great characteristic, but one that only can be assessed post facto.

• Roles, responsibilities, and authorities for safety and security are clearly defined and reinforced. For example, personnel understand their roles and responsibilities in maintaining safety and security. Programs, processes, procedures, and organizational interfaces are clearly defined and implemented as designed. Leaders at all levels of the organization consistently demonstrate that safety and security are overriding priorities.

• The organization maintains a continuous learning environment in which opportunities to improve safety and security are sought out and implemented. For example, individuals are encouraged to develop and maintain current their professional and technical knowledge, skills, and abilities and to remain knowledgeable of industry standards and innovative practices. Personnel seek out and implement opportunities to improve safety and security performance.

(7) Implementation of Policy
This policy statement describes areas important to safety culture, but it does not address how the nuclear industry, the Agreement States, and the NRC should establish and maintain a positive safety culture in their organizations. The nuclear industry, the Agreement States, and the NRC differ in their size and complexity, infrastructure, and organizational frameworks. Therefore, a single approach for establishing and maintaining a positive safety culture is not possible. Nevertheless, the Commission expects that nuclear safety and security issues receive the attention warranted by their significance, and all organizations 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.
Yes, and this is the great problem with this project. There should have been a clear, top-down statement of what this policy statement was intended to achieve and how, with a plan to sculpt the statement and then how it would be implemented and used. If it is not going to be used in some concrete way, it is wasting many persons' time and resources. If it is going to be used, it should be developed with an eye to how it will be used so the development flows from the goal. That is, the NRC should be exhibiting the same traits described above in generating this policy statement.

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?
The traits are so general they should apply anywhere.

(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?
In fact, several of the traits do not affect safety, such as the education statement, but only those who work in quality would understand that, so at this time deleting the obvious, but ineffectual mother-and-apple-pie statements would be inadvisable.

(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?

The phase ambiguous and needs clarification. How would the characteristics differ from the traits? Again, this all relates to the lack of direction for the document.

(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?
It is clear but total not useful.

(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?
No, since it only states the obvious.

(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?
Not at all. After reading the statement, any licensee would wonder what it is all about. ALL organizations would see themselves as in compliance (except rouges). There are no benchmarks for a licensee to use to evaluate their operation.

(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?
Almost anything additional. Providing standards for a safety culture and tools to achieve the goal would go a long way.

(8) How can the NRC better involve stakeholders to address safety culture, including security, for all NRC and Agreement State licensees and certificate holders?
The NRC has done a good job with this so far. There is a lot of work going on in this field right now. Identifying the players (they are not all stakeholders) and working with them would be good.