

Mendiola, Doris

From: Piccone, Josephine
Sent: Thursday, January 21, 2010 9:21 AM
To: Sapountzis, Alexander; Schwartz, Maria; Firth, James
Subject: FW: Draft Safety Culture Policy
Attachments: Docket_ID_NRC-2009-0485.doc

FYI

-----Original Message-----

From: Vargo, George [mailto:gvargo@state.pa.us]
Sent: Thursday, January 21, 2010 9:11 AM
To: Piccone, Josephine
Cc: Chipppo, John (DEP); Melnic, Joseph; Allard, David
Subject: Draft Safety Culture Policy

Dr. Piccone,

Our Division Chief, Joe Melnic, has asked me to provide comments on the draft Safety Culture policy statement. My comments are attached. Please note that I did not have specific responses for items 6, 7, and 8. I will call you to discuss.

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Template = ADM-013

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E-REDS = ADM-03
All = A. Sapountzis
(aps)

Draft Safety Culture Policy Statement: Request for Public Comments

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?

No. The description in the draft policy statement appears to be adequate.

(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?

No. The safety characteristics described in the draft policy are appropriate.

(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?

Yes. The policy statement should self-contained. Safety culture characteristics are an essential component of the statement and should be included.

(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?

No. The definition is clear.

(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. The policy is clear as stated.

(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?

(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?

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