Mendiola, Doris

Subject: FW: Safety Culture

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From: David Whitfill [mailto:dwhitfill@kdheks.gov]
Sent: Thursday, February 11, 2010 10:24 AM
To: Sapountzis, Alexander
Subject: Safety Culture

Since you are working this, I thought I'd give my perspective.

Materials licensing: Developing a Safety Culture Policy Statement

I do not think there should be any difference philosophically between the materials and reactor licensure programs with how we state our policy with regards to safety culture.

The answer to the question of "What is Safety Culture?" found at http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html can very easily be rewritten:

Safety culture is "the necessary full attention to safety matters" and the "personal dedication and accountability of all individuals engaged in any activity which has a bearing on the safe use of radioactive materials. A strong safety culture is one that has a strong safety-first focus."

The reactor culture already has this framework in place with defining cornerstones, crosscutting elements, and identifying and resolving problems through well established corrective action programs. This framework can be applied to materials licensing as well.

When you look at this as a whole, any radiation safety program has three elements: administrative controls, process and engineering controls, and training and experience of the users. What distinguishes one program from another becomes a function of the degree of emphasis placed on the individual elements.

A good start in achieving this would be to streamline the NUREG 1556 series as it is clear that some of the appendices regarding instrumentation, dosimetry, and ALARA (as low as reasonably achievable) programs were written at different times by different people. They need to be the same. We do not let up on the rigor of our expectations with regards to radiation protection. For example, the ability to use and interpret our radiation monitoring instrumentation is a cornerstone of any radiation safety and licensing program. It does not matter whether you are a fixed gauge user, a health physics technician at a power reactor inside the fence, or part of the offsite emergency response organization, the same degree of rigor with regards to how we use, maintain, and interpret our radiation detection instruments is required.

David J. Whitfill, P.E., CHP

Supervisor, Radioactive Materials Inspection Unit

Radiation and Asbestos Control Section

Bureau of Environmental Health

Kansas Department of Health and Environment

785-296-1989

(dwhitfill@kdheks.gov)

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Add = A. Sapountzis
(GPS)