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Revised Draft Safety Culture Policy Statement: Request for Comments

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75 FR 57081

Submitter Information

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General Comment

See attached file(s)

Attachments

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Add = M. Schwartz (UCS)



HEALTH PHYSICS SOCIETY

"Specialists in Radiation Safety"

Submitted Electronically

October 15, 2010

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Attn: Rulemaking and Adjudications Staff

Re: Docket ID NRC-2010-0282 - Revised Draft Safety Culture Policy Statement: Request for Comments [75FR57081]

Dear Ms. Blady:

The Health Physics Society (HPS) is a professional organization whose mission is to support its members in the practice of their radiation safety profession and to promote excellence in the science and practice of radiation safety. Consequently, HPS is very supportive of an emphasis on a commitment to a culture of safety, of the efforts of NRC to increase attention to safety culture in the materials area, and in the efforts of NRC to involve stakeholders in the development of a radiation safety culture. HPS is pleased to offer the following general comments on the Nuclear Regulatory Commission (NRC) Revised Draft Safety Culture Policy Statement (75FR57081) and to provide a response to one of the questions asked.

HPS is supportive of the NRC Draft Safety Culture Policy Statement, but we have two issues that we encourage NRC to consider. First, the Draft Safety Culture Policy Statement does recognize that not all organizations that use radiation and radioactive or nuclear materials are the same. But HPS would like to recommend that the safety culture policy statement emphasize the distinction between environments where errors could result in severe radiation injuries and fatalities such as nuclear power reactors and those where low levels of radioactive materials are utilized such as research environments. We recognize that there is a continuum of activities that involve the use of radiation or nuclear or radioactive materials from small tracer studies to medical uses to large scale irradiators and reactors and that development of a single safety culture policy statement that acknowledges this distinction is a challenge. Thus, while all organizations should be expected to embrace general safety culture principles such as maintaining a questioning attitude and freedom from retribution against workers who identify safety issues, small organizations that utilize low risk radiation sources should not be expected to devote extensive resources to implementing the principles of high reliability organizations. HPS strongly supports the NRC's intent to develop a safety culture policy that expects organizations to "establish and maintain a positive safety culture commensurate (emphasize added) with the safety and security significance of their activities and the nature and complexity of their organizations and functions."

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Second, HPS has been very involved in the stakeholder activities associated with the NRC effort to develop a Safety Culture Policy Statement. For example, HPS hosted the NRC Special Session on Safety Culture at the 2010 HPS Annual Meeting in Salt Lake City. HPS continues to be committed to excellence in radiation safety and encourages the NRC to continue its effort to involve stakeholders in the development of a safety culture policy statement that leads organizations to commit to a strong safety culture. HPS recognizes and complements the NRC on its efforts to involve stakeholders, through invitations for public comments and numerous workshops, in the development of the Draft Safety Culture Policy Statement. However, HPS is also aware of the multiyear efforts of The Joint Commission to require hospitals and other medical organizations to develop a patient safety culture. HPS leadership believes that much of the progress in the evolution of a patient safety culture is due to the patience of The Joint Commission in allowing the medical industry itself to drive development of the principles of a patient safety culture. HPS encourages NRC to continue to involve stakeholders in both the process of developing a radiation safety culture and in advancing the science of a radiation safety culture.

In response to the questions for which NRC is seeking input, we offer the following comment on question no. 1. Due to the short timeline (30 days) to respond to the request for comments and the complexity of developing an organizational position on these issues, we are unable to provide comments on the other four questions.

- (1) "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." Should this be retained as currently written or revised?

HPS response: HPS considers the phrase "emphasis on safety over competing goals" to be a little bothersome. One of the principles of a positive safety culture is Employee Empowerment which provides employees with substantial voice in safety actions and decisions and allows them to initiate and achieve safety improvements. While in some activities it may be appropriate for an employee to shut down a line due to a safety consideration, the consequences of taking a drastic action (emphasis of safety over production) may have greater consequences than the safety issue itself. Consider, for example, interruption of a medical procedure, which decreases risk to the healthcare worker but increases risk to the patient. Thus, HPS recommends that this statement be restated in a way that makes organizations responsible to address this issue for their particular application(s). For example, inclusion of the phrase 'commensurate with the risks involved' following the phrase 'over competing goals' would make the definition fully applicable to all licensee operations."

HPS thanks the NRC for the opportunity to comment on the Revised Draft Safety Culture Policy Statement and looks forward to additional opportunities to participate in development of a policy that requires materials users to develop a radiation safety culture.

Sincerely,



Edward F Maher, ScD, CHP
President