

Mendiola, Doris

Subject: FW: Reminder: For Comment: NRC Revised Draft Safety Culture Policy Statement
Attachments: Comments on the NRCs 9-17-2010SafetyCultureRevision.doc

From: Bruce Thomadsen [mailto:thomadsen@humonc.wisc.edu]
Sent: Sunday, October 17, 2010 10:02 PM
To: Cockerham, Ashley
Subject: Re: Reminder: For Comment: NRC Revised Draft Safety Culture Policy Statement

Ashley,

My comments.

Bruce

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Comments on the NRC's 9-17-2010 Revised draft Statement on Safety Culture.
Bruce Thomadsen

General Comment:

The revised draft is different, but not necessarily better than the previous. Some of the generalities have been removed, but whether the statement would serve either the intention of the NRC or any purpose depends highly on how it would be used by the NRC, not how it would be used by the regulated community.

VI. Questions for Which NRC Is Seeking Input:

(1) The revised definition of Nuclear Safety Culture is: "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 should it be revised?

*No. This places equal responsibility for safety on both the leaders and the workers. While the workers carry responsibility for safety in an ideal world, the leadership should not rely in any way on the worker to shoulder this responsibility. Rather, the work environment and the procedures should be structured so that safety will be maintained **regardless** of the actions of the workers.*

(2) Does including the safety culture traits in the SOP itself clarify your understanding of what the Commission means by a positive safety culture? If not, what additional guidance do you think is needed?

*Only the NRC can answer the question of whether it clarifies what the Commission means. A different question would be if they clarify what the NRC **should** mean. Interestingly, one of the characteristics from the previous list does not seem to show now, although it does in pieces here and there, that is; 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. This characteristic actually had some substance.*

(3) Does the revised draft SOP provide a clear statement of the NRC's expectations that the regulated community should maintain a safety culture that includes balanced consideration of safety and security? If not, what changes or additions should be made?

*The draft does not at all provide a clear statement of the NRC's expectations, only a general traits that would be hard to assess. Many organizations with a poor safety culture would think, from the list, that they have a good one. Particularly trait 6 that describes freedom from intimidation and trait 2 on addressing issues raised. The leadership and the workers may have very different takes on how an organization scores on these. As I commented on the previous draft, the clarity only comes with the explanation of how it will be enforced. As it is, these traits are only those for any effective organization. Organizations without these traits can still be very safe (see my comment for item 1) and organizations with these traits can be disasters – there are many examples. What makes a difference is the safe operation of an organization as measured against standards, not against ideology. Thus, to answer this question, and to evaluate this whole exercise **requires** knowledge of how this statement will be used.*

(4) Should a discussion regarding complacency be added to the SOP and/ or to the traits that describe areas important to safety?

No. Consistent with the notes above, complacency will happen from time to time, just due to human nature. High levels of alertness cannot be maintained continually. Complacency must be expected and built into the procedural plan.

(5) In late August 2010, the Institute of Nuclear Power Operations (INPO) completed a validation study to assess the extent to which the factors that emerged from analyzing responses to a safety culture survey match the traits that were identified during the February 2010 workshop. Only individuals working at nuclear reactors participated in the survey.

The study provides general support for the traits developed at the workshop; however, the study provides a slightly different grouping. Under the validation study, there are nine traits: (1) Management Responsibility/ Commitment to Safety; (2) Willingness to Raise Concerns; (3) Decision-making; (4) Supervisor Responsibility for Safety; (5) Questioning Attitude; (6) Safety Communication; (7) Personal Responsibility for Safety; (8) Prioritizing Safety; and (9) Training Quality. Four of these are consistent with the eight traits developed by the workshop participants, i.e., Management Responsibility is consistent with Leadership Safety Values and Actions; Willingness to Raise Concerns relates to Environment for Raising Concerns; Safety Communication relates to Effective Safety Communication; and Personal Responsibility for Safety is consistent with Personal Accountability. The remaining five traits identified in the study, i.e., Decision-making, Supervisor Responsibility for Safety, Questioning Attitude, Prioritizing Safety, and Training Quality, are not as closely related (although they are not completely dissimilar). This is new information. The NRC is seeking stakeholder comments on this information through the FRN and through the public meeting scheduled for September 28 in Las Vegas.

There has been much work on this issue. The list from INPO is but one example of work on-going outside of the stakeholder community. The fact that the NRC was not aware of this work supports a recommendation I made during the last round of reviews: "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."