

Mendiola, Doris

Subject: FW: Docket ID NRC-2010-0282
Attachments: Safety culture 10-10.doc

From: McBaugh, Debra (DOH) [mailto:Debra.McBaugh@DOH.WA.GOV]
Sent: Monday, October 18, 2010 7:57 PM
To: Schwartz, Maria; Thompson, Catherine
Cc: Frazee, Terry (DOH)
Subject: Docket ID NRC-2010-0282

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RULES AND DIRECTIVES
BRANCH
USNRC

Dear Maria,

I am new to this job and could not tell from the federal register notice where the electronic comments should go. I could see the address for mailing them but since I am sending them the day they are due that will not work. Tomorrow I will ask those more knowledgeable than I and send it elsewhere but I thought I would at least send it your way on the due date.

I read the powerpoint presentation you did at the workshop and it was helpful to me. Thanks for providing that.

<<Safety culture 10-10.doc>>

DMcB

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SUNSI Review Complete
Template = ADH-013

E-RIDS = ADH-03
Att = M. Schwartz
(mes)

Date: October 18, 2010

Ms. Cindy K. Blady, Chief
Rules, Announcements, and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop: TWB-05-B01M
Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Comments on Revised Draft Safety Culture Policy Statement; Docket ID NRC-2010-0282

Dear Ms. Blady:

Below are our comments on the Revised Draft Safety Culture Policy Statement, noticed in the *Federal Register* on September 17, 2010. We recognize a positive safety culture plays a vital role in everyday use of radioactive materials. Indeed, we believe it is an underlying foundation for regulations, not a regulation itself. In considering the policy, it is important to remember that practices will differ for the nuclear power industry compared to nuclear medicine, laboratories, and other industrial uses of radioactive material. Regulations will also differ, but the underlying policy will remain the same. The revised draft policy more correctly supports that concept.

We provide the following in response to NRC's request for input on individual questions:

- 1) Should...the revised definition of Nuclear Safety culture...be retained, as currently written, or should it be revised?

We suggest leaving "Nuclear" out since it connotes specific uses of SNM such as at power plants or fuel fabrication facilities. We recommend using "Radiation Safety Culture."

- 2) Does including the safety culture traits in the SOP itself clarify your understanding of what the Commission means by a positive safety culture?

Yes

- 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 considerations of safety and security?

Yes, the additional statement following the definition that states: "As part of this collective commitment, organizations should have an appreciation for

the importance of each, emphasizing the need for integration and balance to achieve optimized protection” makes this clear.

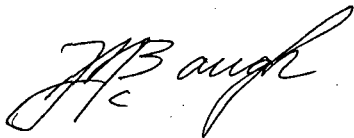
- 4) Should a discussion regarding complacency be added to the SOP and/or to the traits that describe areas important to safety?

No, we believe a policy should focus on the positive traits, not the negative ones such as complacency. A positively worded policy is stronger.

- 5) Input on traits to be included:

Originally there was a trait regarding curiosity and having a questioning attitude. The trait “Continuous Learning” could be enhanced by adding words that encompass seeking ways to ensure safety. It is not just learning, but having an attitude that questions what is being done or has always been done.

We appreciate the opportunity to comment on the revised policy. If you have any questions, please do not hesitate to contact me at 360-236-3221 or debra.mcbaugh@doh.wa.gov

A handwritten signature in black ink, appearing to read 'McBaugh', with a stylized flourish.

Debra McBaugh, CHP
Manager, Radioactive Materials
Washington Department of Health