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Subject: CORAR Comments on NRC Revised Draft Safety Culture Policy Statement.

**Reference: Federal Register Vol.75, No 180, September 17, 2010. Pages 57081-57086.
Revised Draft Safety Culture Policy Statement: Request for Public Comments.**

These comments are submitted on behalf of the Council on Radionuclides and Radiopharmaceuticals (CORAR)¹. CORAR members have well established safety and security cultures and fully support the NRC's policy to ensure that both safety and security are given appropriate priority. CORAR appreciates the opportunity to comment on this important subject and would be glad to provide clarification or additional information.

Yours Sincerely,

Leonard R. Smith, CHP
Co-chair CORAR Committee on Manufacturing Quality and Safety.

1. CORAR members include the major manufacturers and distributors of radioactive chemicals, radioactive sources, radiopharmaceuticals and research radionuclides used in the U.S. for therapeutic and diagnostic medical applications and for industrial, environmental and biomedical research and quality control.

SUNSI Review Complete
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CORAR COMMENTS ON NRC REVISED DRAFT SAFETY CULTURE POLICY

Specific Comments:

1. **Page 57086, paragraph 4, (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 with people and the environment"**

This statement is appropriate as a high level definition suitable for a broad range of material licensees.

2. **Page 57086, paragraph 5, (2), "Does including the safety culture traits in the SOP [Statement of Policy] itself clarify your understanding of what the Commission means by a positive safety culture?"**

These traits are both necessary and, as written, do clarify understanding of the NRC's intent. They seem appropriate to a high level policy statement and are generally applicable to a broad range of material licensees. However, licensees could also benefit from guidance on implementation with more explicit examples of appropriate attitudes and practices, in an appendix to this statement or in a separate document.

3. **Page 57086, paragraph 7, (3), "does the revised draft SOP provide a clear statement of the NRC's expectation that the regulated community should maintain a safety culture that includes balanced consideration of safety and security?"**

The revised policy statement clearly indicates that there needs to be a balanced consideration of "safety and security", these being components of "Safety" as used in the high level definition. In comments submitted to the NRC on February 12, 2010, CORAR recommended that the NRC consider renaming this policy "Safety and Security Culture Policy". This was in response to the NRC's specific question on how to emphasize that both Safety and Security are given appropriate priority. However, the revised policy statement seems to be better as a high level statement with general application. CORAR now thinks that the Statement of Policy could be more comprehensive if the "overarching" term Safety was stated to include industrial safety and hygiene, security, radiation protection, safeguards, material control and quality, physical protection, and emergency preparedness, etc. This could be expressed in a single sentence in the Statement of Policy or explained in an implementation section.

4. **Page 57086, paragraph 8, (4), "Should a discussion regarding complacency be added to the SOP and/or to the traits that describe areas important to safety?"**

The issue of complacency could be better and more constructively addressed in guidance on implementation.

5. Page 57086, paragraph 9, (5) “[Institute of Nuclear Power Operations validation study] 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**
- (9) Training Quality”**

We agree with the NRC’s observation that some of these traits are similar to those in the NRC’s revised draft safety culture policy while “Decision making” and “Prioritizing Safety” are new. INPO’s different traits seem to more reflect implementation. They do not all apply to a small materials licensee. However, since they are pertinent to the power industry they should be considered. Any traits that are important to specific licensees could be included in a guidance document on implementation.

In CORAR’s comments, dated February 12, 2010, we recommended several additional traits that have not been mentioned subsequently. These were:

- (1) Safety is a condition of employment**
- (2) Employees should be empowered to stop unsafe operations and actions**
- (3) Personnel performance reviews should include assessment of performance against safety objectives**
- (4) Senior management should promulgate safety policies defining expectations and responsibilities**
- (5) Employees should be actively encouraged to participate in safety improvement programs**
- (6) It should be a licensee policy that all accidents are preventable**
- (7) Employees should be required to report all incidents, accidents and unsafe conditions and practices**
- (8) Significant process, procedure, facility and personnel changes should be routinely safety evaluated.**

These additional items could be included in a comprehensive check list of safety traits contained in an implementation document. Such a list would be helpful to licensees developing a safety program. Additionally, including examples of good safety practices that address common situations, particularly on resolving potential conflicts between safety and security or other objectives, would be beneficial. Finally, providing information on how NRC inspectors would evaluate licensee safety culture would allow licensees to better comply with the intent of the policy..