

Mendiola, Doris

Subject: FW: Response from "Contact Us About Enforcement"

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-----Original Message-----

From: george_usova@mnes-us.com [mailto:george_usova@mnes-us.com]
Sent: Wednesday, September 29, 2010 12:08 PM
To: OEWEB Resource
Subject: Response from "Contact Us About Enforcement"

Below is the result of your feedback form. It was submitted by

(george_usova@mnes-us.com) on Wednesday, September 29, 2010 at 12:07:58

comments: Regarding Safety Culture Policy Statement FRN 75 57086, Question #5: Training Quality is identified as a probable trait underlying safety culture. However, it is not clear whether the terminology "training quality" refers to nuclear safety training quality, in general, or whether the term refers to the training quality of the safety culture program. I assume the latter since the term, "training quality" is presented at the end of the trait listing. Yet there was one industry slide (NEI) in the public meeting of 28 September 2010 that used the phrase "continuous learning," suggestive that "training quality" applied to all training, in general.

Most people would agree that "training quality" to be an essential attribute for any and all training that is developed and implemented. Consequently, in that context, it may not need to be even stated. Moreover, as mentioned above, because the term, "training quality," is listed as the last item of the listing of traits, it implies that "training quality" belongs to the previously listed traits. As such, a safety culture training course, module, or lesson would focus upon the previously listed traits. If this is the intent, then the term, "training quality" should be clarified to state its relationship and connection to the other traits, such as, "safety culture training quality."

If this type of focused training is not what is intended, then "training quality" may not necessarily be associated with organizations believing that there is any need to develop focused instructional training on safety culture, itself.

I believe that direct and focused safety culture training is necessary as initial and refresher training and essential toward ongoing communication and overcoming complacency.

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