

Mendiola, Doris

Subject: FW: Comments on Revised Draft Safety Culture Policy Statement

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From: DR WILLIAM CORCORAN [mailto:williamcorcoran@sbcglobal.net]
Sent: Sunday, October 24, 2010 12:54 PM
To: Bladey, Cindy
Cc: CHAIRMAN Resource; Borchardt, Bill
Subject: Comments on Revised Draft Safety Culture Policy Statement

9/17/2010
75 FR 57081

This message is intended for

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

Ms. Bladey,

Would you be so kind as to enter my comments into consideration?

Thanks ever so much.

Take care,

Bill Corcoran

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Motto: If you want safety, peace, or justice, then work for competency, integrity, and transparency.

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Nuclear Safety Review Concepts Corporation

Saving lives, pain, assets, and careers through thoughtful inquiry
William R. Corcoran, PhD, PE
President



VIA INTERNET E-MAIL

October 24, 2010

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

RE: Revised Draft Safety Culture Policy Statement (RDSCPS)

Dear Ms. Bladey,

This letter provides my comments in response to the Commission's request in the Federal Register of September 17, 2010.

1. A definition of "nuclear safety culture", "positive safety culture", or the like is not needed if the key traits that characterize such a culture are provided. The set of key traits will define the desired result. More on traits is provided below.
2. In the interest of consistency it would be better to select one term and use it exclusively throughout the Statement of Policy. The Revised Draft Safety Culture Policy Statement (RDSCPS) uses several terms in ways that seem synonymous, but confusing.
3. If the Statement of Policy must have a definition then plain English would be preferred, e.g., "Nuclear Safety Culture is that part of safety culture that affects nuclear safety. Safety culture is that part of culture that affects safety. Culture is the mental content, norms, institutions, and artifacts (physical items) that characterize a group of people."

4. The Statement of Policy should clarify that "Nuclear Safety Culture" is closely related to "Quality Assurance" as defined in 10CFR50 Appendix B, in the sense that if the nuclear facility performs satisfactorily in service there is little need to talk about safety culture. Otherwise emphasis on "Nuclear Safety Culture" may be distracting attention and resources from "Quality Assurance" that is directed toward the assurance of quality. (10CFR50, Appendix B, Introduction, Sentence 6 is involved.)
5. Since most, if not all, instances of poor safety culture in facilities regulated by the NRC to 10CFR50, Appendix B, also involved clear departures from the requirements of that Appendix, it is apparent that better compliance with Appendix B would be a great improvement in safety culture. It might even eliminate the need for a policy statement on safety culture.
6. It is unlikely that "an inadequate safety culture" can ever be a root cause of adverse consequences in a nuclear facility, as indicated in the Revised Draft Safety Culture Policy Statement (RDSCPS), because the inadequate safety culture must itself be the result of deeper underlying harmful factors. Those deeper underlying harmful factors would include the root causes.
7. The logic for including security within safety culture is compelling: A key outcome of having a good nuclear safety culture is that changes to the nuclear facility are done in a planned and systematic way under the control of authorized licensee individuals. This logically includes preventing unauthorized and non-licensure persons, including saboteurs and terrorists, from changing the facility.
8. Since an objective of the physical security program is to assure that physical security measures "perform satisfactorily in service", which is the emphasis of 10CFR50, Appendix B, it would seem to make sense to apply Appendix B to physical security.
9. The logic for extending the Commission's expectations to contractors, suppliers, vendors, and the like, who are not strictly within the Commission's purview is appropriate, provided that the Commission makes it clear that the regulated entities are accountable for seeing that the involved non-regulated entities measure up. 10CFR50, Appendix B, Criteria IV and VII relate.
10. Since the list of desired traits provided in the Revised Draft Safety Culture Policy Statement (RDSCPS) is not exhaustive, i.e., the list does not purport to contain all necessary traits for a good nuclear safety culture, then the traits provided in the Statement of Policy should include those that are the most important.

11. The list of traits provided in the Revised Draft Safety Culture Policy Statement (RDSCPS) does not appear to include the most important ones, even though the traits that are provided are important.

12. In what follows I will copy the traits provided in the Revised Draft Safety Culture Policy Statement (RDSCPS), all of which I think should be retained, and then I provide a list of supplemental traits that are at least as important as the least important one in the RDSCPS.

13. Traits from the Revised Draft Safety Culture Policy Statement (RDSCPS):

- a. Leadership Safety Values and Actions in which leaders demonstrate a commitment to safety in their decisions and behaviors;
- b. Problem Identification and Resolution in which issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance;
- c. Personal Accountability in which all individuals take personal responsibility for safety;
- d. Work Processes in which the process of planning and controlling work activities is implemented so that safety is maintained;
- e. Continuous Learning in which opportunities to learn about ways to ensure safety are sought out and implemented;
- f. Environment for Raising Concerns in which a safety conscious work environment is maintained where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment or discrimination;
- g. Effective Safety Communication in which communications maintain a focus on safety; and
- h. A Respectful Work Environment in which trust and respect permeate the organization.

14. The above list of eight traits from the RDSCPS should be supplemented to add the following traits, which are at least as important to a positive safety culture as the least important of the eight listed ones:

- a. Cultivating the Culture: Leaders at all levels describe the detailed behaviors and conditions they expect as a part of positive safety culture and assure that those behaviors and conditions are reinforced and that

behaviors and conditions inconsistent with positive safety culture are systematically eliminated.

- b. **Accountability for Culture:** Every leader is accountable for the culture in the organizations being lead. This includes the culture in ad hoc teams, task forces, committees, and project organizations. (10CFR50, Appendix B, Criterion I, Sentences 1 and 2 are involved.)
- c. **Integrity:** People tell the truth, do what they say they will do, call things by their right names, do not deceive, and do not tolerate the lack of integrity in people, processes, programs, data, or reports. (10CFR50.9 is involved.)
- d. **Authenticity:** People do not mislead, use loopholes, take advantage of narrow definitions, or game processes when safety may be involved. (10CFR50.9 is involved.)
- e. **Questioning Attitude:** Personnel question changes, differences, anomalies, inconsistencies, omissions, errors, and the like to promote the identification of harmful behaviors, inactions, and conditions (10CFR50, Appendix B, Criterion XVI is involved.)
- f. **Self-reporting:** Adverse conditions, behaviors, and inactions are reported by the person who creates them or they are investigated to identify and correct all missed opportunities to have reported them earlier. (10CFR50, Appendix B, Criterion XVI, Sentence 1 is involved.)
- g. **Competence:** Only people who know what they are doing are allowed to perform activities with a potential to affect safety. (10CFR50, App B, criterion II, Sentence 8 is involved.)
- h. **Systematic Training:** The training of personnel who perform activities with a potential to affect safety is done systematically and includes training in positive safety culture. (10CFR50, Appendix B, Criterion II, Sentence 8 and Criterion V, Sentence 1 are involved.)
- i. **Transparency:** People perform transparently, i. e., in such a way that it is not difficult to tell what is right and what is wrong. (10CFR50.9 is involved.)
- j. **Acceptance Criteria:** Activities affecting safety have qualitative or quantitative acceptance criteria for determining that the activity has been satisfactorily accomplished. (10CFR50, App B, Criterion V, Sentence 2 is involved.)
- k. **Compliance:** People performing activities affecting safety know what the requirements are and transparently comply with them. (10CFR50, App B, Criterion II, Sentences 4 through 7 are involved.)

- l. Fitness: People performing activities affecting safety are fully fit for the assigned duties. (10CFR50, App B, Criterion II, Sentence 5 is involved.)
- m. Decision Documentation: Decisions affecting safety are made considering all relevant documented facts and are documented in official records. (10CFR50, Appendix B, Criterion XVII is involved.)
- n. Change Management: Planned and de facto changes in policies, personnel, organizations, procedures, equipment, and the like are managed to support safety. (10CFR50.59 and 10CFR50, Appendix B, Criterion VI are involved.)
- o. Intolerance of Surprises: Surprises are not tolerated. Personnel at all levels insist on positive control, i. e., what happens is what is intended to happen and that is all that happens. When positive control is lost the situation is put in a safe, stable state until positive control is regained. (10CFR50, Appendix B, Criterion II, Sentence 4 is involved.)
- p. Flowdown: Personnel accountable for purchasing, acquisition, and procurement decisions assure that the essential relevant traits of a positive safety culture flow down to the entities chosen. (10CFR50, Appendix B, Criteria IV and VII are involved.)
- q. Complacency: Personnel at all levels act decisively to counteract indications of complacency. "Good enough" is never good enough.
- r. Ubiquitous and Perpetual Alertness: Personnel at all levels act as if they believe that there are lurking latent vulnerabilities that have not been identified, but that merit alertness and readiness. (10CFR50, Appendix B, Criterion XVI is involved.)
- s. Performance Metrics and Indicators: High integrity performance metrics and indicators tell the organization about the achievements of the organization in controlling system occurrences as well as individual occurrences involving safety and safety culture. (10CFR50, Appendix B, Criterion II, Sentences 9 and 10 are involved.)
- t. Reward Structure: Compensation, promotion, and other rewards are given out to people whose behaviors are consistent with a positive safety culture and withheld or taken back from others.
- u. Culture of Justice: Personnel at all levels provide personal due process before assigning blame and never hold others culpable for honest errors or for errors previously tolerated or reinforced. But the culture of justice

does not result in the perpetuation of behaviors, inactions, or conditions inconsistent with safety.

- v. Congruency: The activities of leadership and oversight reflect the same safety culture as the personnel accomplishing other activities affecting safety.
15. The Commission should encourage the use of the original and supplemental traits above in safety culture assessments.
 16. The Commission should encourage the use of the original and supplemental traits above in safety culture surveys.
 17. The Commission should encourage the use of the original and supplemental traits above as lines of inquiry in event investigations by the Staff as well as by nuclear facilities.
 18. The Commission should encourage industry organizations that provide standards, advocacy, and oversight to commit to the original and supplemental traits above.
 19. To avoid the appearance of "do as I say, not as I do", the Commission should commit itself and the Staff to the original and supplemental traits above.

Please contact me by phone or e-mail if I can provide additional information.

Sincerely yours,

William R. Corcoran

