

## Stakeholder Outreach Activities

### Summary

The proposed final policy statement benefits from consideration of a spectrum of views and provides a foundation for a policy statement on safety culture that is applicable across the array of activities regulated by the U.S. Nuclear Regulatory Commission (NRC). As directed by the Commission in Staff Requirements Memorandum (SRM)-SECY-09-0075, "Safety Culture Policy Statement," dated October 16, 2009, the staff has engaged a broad range of stakeholders, including the Organization of Agreement States (OAS) and other organizations with an interest in nuclear safety, throughout the development of the policy statement. The staff efforts to develop common terminology (i.e., safety culture terminology that can be used by the NRC and stakeholders) provided additional opportunities to further engage stakeholders. Although there has already been a substantial amount of outreach in the nuclear power plant area (for example, through the Reactor Oversight Process), the more recent initiative to develop a safety culture policy statement applicable to all licensees and certificate holders has significantly increased the outreach to materials stakeholders, including those located in the Agreement States. These efforts have contributed to the staff's progress in achieving the Commission's objective of increasing attention to safety culture in the materials area. The staff will continue to identify opportunities to discuss safety culture with materials licensees and certificate holders with the objective of advancing the progress they have made in increasing the attention that they give to safety culture.

### Outreach Activities

#### February 2009 Public Workshop

On February 3, 2009, the NRC held a public workshop on the "Development of a Policy Statement(s) on Safety and Security Culture," in which a broad range of stakeholders participated. The purpose of this workshop was to obtain public input on the draft definition and characteristics of a positive safety culture that the staff had developed. Additionally, mindful of the increased attention to the important role of security, the staff also sought input from the workshop participants on whether there should be a single safety culture policy statement or two policy statements addressing safety and security independently while considering the interface of both. The staff also sought input on the additional questions the Commission posed to the staff in SRM-COMGBJ-08-0001, "A Commission Policy Statement on Safety Culture," dated February 25, 2008. Ten different organizations, including OAS, licensees, and nongovernmental organizations, were represented on the workshop panels discussing the three topics. The use of a Webinar at the workshop allowed greater participation by smaller licensees and certificate holders, State government representatives, and other stakeholders. The staff devoted one session of the workshop to the question of how to increase attention to safety culture in the materials area. The workshops also addressed the questions of whether (1) the NRC should combine its expectations for safety and security in one policy statement or keep its expectations in separate documents, and (2) safety culture as applied to reactors needed to be strengthened. The staff also sought public input on these questions through the January 23 and February 9 *Federal Register* notices (FRNs) (74 FR 4260 and 74 FR 6433), respectively, and on the NRC's public safety culture Web site (<http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>).

## **February 2010 Workshop**

On February 2–4, 2010, the NRC held a 3-day public workshop. This workshop was part of the staff's efforts to further engage all NRC-regulated entities as well as OAS, Native American Indian Tribes, and organizations and individuals interested in nuclear safety. The goals of the February 2010 workshop were to (1) provide an additional opportunity for comments on the draft policy statement and (2) develop a common definition of safety culture and a high-level set of traits describing areas important to a positive safety culture. Before the meeting, the staff engaged a broad range of interested stakeholders to obtain their input on the most effective way to organize the meeting, including, for example, the composition and role of the panel members. The staff also discussed the goals of the workshop with the interested stakeholders.

The workshop participants represented a broad range of stakeholders regulated by the NRC or the Agreement States, including medical, industrial, and fuel cycle materials users and nuclear power reactor licensees, as well as the Nuclear Energy Institute (NEI), the Institute of Nuclear Power Operations (INPO), and members of the public. The workshop panelists reached alignment, with input from the other meeting attendees, on a common definition of safety culture and a high-level set of traits describing areas important to a positive safety culture. The NRC and OAS, as co-regulators, took a facilitative role during the workshop. The presentations that were made at the workshop, the workshop summary, and the products from the workshop can be found on the NRC's safety culture Web page at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>.

The approach the staff took (i.e., engaging stakeholders from the planning stages of the February 2010 workshop through the workshop itself) allowed the various stakeholders to reconcile differences in their needs and interests and develop, using common terminology, a draft definition and a draft set of traits that can be widely embraced. The staff believes that stakeholder involvement during the development of the policy statement has increased the prospects for the common terminology to be embraced and used by NRC stakeholders. This observation is based on (1) the comments made by members of the external panel at the March 30, 2010, Commission meeting, (2) the comments on the draft policy statement and revised draft policy statement, and (3) the comments made at the public meetings.

## **July 15, 2010, Public Meeting**

On July 15, 2010, the NRC held a public meeting with panelists who participated in the February 2–4, 2010, workshop to discuss the status of the activities associated with the development of the draft safety culture policy statement, which included, for example, the review of public comments, outreach activities, and a discussion of the definition and traits of safety culture. The details of that discussion can be reviewed in the materials for the July 15, 2010, public meeting, at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>.

## **September 16, 2010, Public Meeting/Teleconference**

On September 16, 2010, the staff held an additional public meeting/teleconference to provide information on the initial results of a validation study conducted by INPO, which was conducted, in part, to see whether and to what extent the factors that came out of INPO's safety culture

survey support the February 2010 workshop traits. The factors support the traits developed at the workshop. A discussion of the validation study is found in Enclosure 4.

### **September 28, 2010, Public Meeting**

The September 28, 2010, public meeting offered an additional opportunity for stakeholders to provide input on the revised draft policy statement included in the FRN seeking public comments for a 30-day period that began on September 17, 2010. The public meeting took place in the NRC Hearing Facility in Las Vegas, NV. This location provided the information technology and capabilities that allowed a large number of people to attend in two separate locations and also view the meeting via Web stream. The second location was at NRC Headquarters in Rockville, MD. Six of the panelists from the February 2010 workshop provided short presentations related to the definitions and traits, outreach activities, and any challenges they anticipate will need to be addressed when implementation begins. An additional interested stakeholder from the American Association of Physicists in Medicine provided comments concerning the next steps or implementation phase. A presentation related to the INPO validation study was provided and generated discussion. The agenda, presentation materials, and meeting summary can be found on the NRC's safety culture Web page at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>.

### **Additional Outreach Activities**

Following the February 2010 workshop, in addition to the NRC public meetings, the staff participated on panels and made presentations at various industry forums in order to provide information to stakeholders about the development of the safety culture policy statement, obtain additional input, and ascertain whether the draft definition and traits developed at the workshop accurately reflect a broad range of stakeholders' views. For example, on June 30, 2010, the staff cosponsored a special session on safety culture with the Health Physics Society at the American Conference on Radiological Safety and 22<sup>nd</sup> Biennial Campus Radiation Safety Officers Meeting. The Health Physics Society, as an affiliate member of the International Radiation Protection Association, is participating in efforts to develop guiding principles for promoting radiation safety culture. Through this session, the NRC was able to obtain increased visibility for its efforts relating to safety culture including an area of mutual interest (i.e., increasing the awareness of the relationship between safety culture and radiation safety).

Additional outreach activities included presentations on the development of the safety culture policy statement at the Annual Fuel Cycle Information Exchange, the Conference of Radiation Control Program Directors Annual National Conference on Radiation Control, the Institute of Nuclear Materials Management's Annual Meeting, the second NRC Workshop on Vendor Oversight for New Reactor Construction, and the OAS annual meeting. The attached chart lists the outreach activities the staff engaged in after the February 2010 workshop through November 2010.

### **Continued Involvement of External Panel Members within Their Organizations**

Since the February 2010 workshop, the NRC staff has encouraged external panel members to continue their involvement with their organizations in ways that contribute to the increased attention to safety culture among materials licensees and certificate holders. Organizations

such as the NEI, the Health Physics Society, the Institute of Nuclear Materials Management, and the American Association of Physicists in Medicine shared information on safety culture with their membership through cosponsored special sessions on safety culture or by adding NRC staff presentations on safety culture to their meeting programs. The session on safety culture at the OAS 2010 annual meeting also included a presentation by a member of OAS. Information on safety culture was included in newsletters and discussed as part of OAS' other activities (e.g., electronic mail bulletins, meetings with NRC or Agreement State licensees, seeking the views of their membership). Safety culture is also being discussed by external panel members and byproduct materials licensees in other forums, including other NRC public meetings.

### **Continuing and Future Outreach Activities**

The staff will continue to conduct widespread discussions concerning safety culture with external stakeholders whenever the opportunities arise. During several NRC management drop-in meetings with members of the industry and other external stakeholders, for example, safety culture has been an important topic of discussion. NRC management is consistently communicating the NRC's interest in the development of a positive safety culture with licensee representatives.

The staff has continued to engage the Agreement States during the development of the policy statement and continues to discuss safety culture in the periodic teleconferences with OAS and CRCPD and in other forums, including the 42<sup>nd</sup> National Conference on Radiation Control, the 2010 annual meeting of OAS, and the Mid-Atlantic States Radiation Control Conference. The staff will continue to work with the Agreement States on appropriate ways to increase the attention given to safety culture in the materials area. This will include the sharing of information and cooperation during the development of guidance documents that discuss safety culture. For example, the staff has begun updating the volumes of NUREG-1556, "Consolidated Guidance about Materials Licenses." The Agreement States are involved in this effort. The steering committee for the update to this series is co-chaired by an OAS representative. As the staff develops guidance that addresses safety culture, such as in the NUREG-1556 series, licensees and certificate holders will have an opportunity to provide comments or to participate in meetings associated with the guidance development.

During the development of the revised fuel cycle oversight process, the staff focused on developing a methodology for incorporating safety culture into its oversight processes through the Office of Nuclear Material Safety and Safeguards (NMSS) Safety Culture Pilot, which was implemented in 2007. This multiyear effort required working with both internal and external stakeholders on items related to safety culture. Through numerous interactions with internal and external stakeholders, the staff proposed in SECY-10-0031, "Revising the Fuel Cycle Oversight Process," dated March 19, 2010, that safety culture be an important aspect of the revised fuel cycle oversight process. Subsequent Commission direction on SECY-10-0031 directed that the staff should provide incentives for licensees to maintain strong corrective action programs, which would be consistent with the Commission's ongoing safety culture initiatives.

Through the staff's ongoing work with Commission-directed activities, such as the revised fuel cycle oversight process (SRM-SECY-10-0031, "Revising the Fuel Cycle Oversight Process," dated August 4, 2010) and the Extended Storage and Transportation Plan

(SRM-COMDEK-09-0001, "Revisiting the Paradigm for Spent Fuel Storage and Transportation Regulatory Programs," issued February 2010), the staff will appropriately incorporate safety culture into the evaluation of those activities, commensurate with Commission direction on the overall agency safety culture policy statement. Development of these tasks will certainly require outreach and interaction in various areas, which will include safety culture.

Where it is appropriate, the staff will continue to use its current approaches to increase the awareness of and attention given to safety culture. These approaches include interactions with licensees, public meetings, and using licensee newsletters to discuss safety culture.

### Safety Culture Outreach/Conference Dates for Industry/Groups

NRC Responsible Office	Conference Dates	Conference	Conference Location	NRC-Regulated Industry/Groups
NRO	1. May 13, July 1, Aug 19, 2010,  2. June 17, 2010	1. Category III Public Meetings on Construction Inspection  2. NRC Workshop on Vendor Oversight	1. At/near NRC HQ  2. New Orleans, LA	New Construction, Suppliers/Vendors, Research and Test Reactors
NRR	1. June 7–10, 2010  2. June 21–25, 2010  3. July 25–28, 2010  4. September 19– 24, 2010	1. Mid-Atlantic Nuclear Training Group  2. Human Performance, Root Cause and Trending  3. NEI Health Physics Forum  4. Joint Meeting National Organization of Test Research, & Training Reactors	1. Gettysburg, PA  2. Baltimore, MD  3. Clearwater Beach, FL  4. Knoxville, TN	Power Reactors, Research and Test Reactors
NMSS	1. May 4–6, 2010  2. June 23–24, 2010  3. June 29–July 1, 2010	1. NEI Dry Storage Forum (SFST, cask suppliers/vendor/certificate holder/licensee)  2. SFST Licensing Conference  3. Fuel Cycle Information Exchange	1. Baltimore, MD  2. Rockville, MD  3. Bethesda, MD	Fuel Cycle, SFST, Cask Suppliers/Vendors

	4. July 12–15, 2010	4. Institute of Nuclear Materials Management Annual Meeting	4. Baltimore, MD	
FSME	1. April 22, 2010	1. 42 <sup>nd</sup> Annual National Conference on Radiation Control: Opportunities and Innovations in Radiation Protection	1. Newport, RI	1. Conference of Radiation Control Program Directors
	2. May 24–25, 2010	2. Advisory Committee on the Medical Uses of Isotopes	2. Rockville, MD	2. Medical
	3. May 24, 2010	3. American College of Medical Physics Annual Meeting	3. San Antonio, TX	3. Medical Physicists
	4. June 24–25, 2010	4. Safety in Radiation Therapy: A Call to Action	4. Miami, FL	4. Medical, Medical Physicists, Diagnostic, Therapeutic, and Radio Pharmacy
	5. July 18–22, 2010	5. American Association of Physicists in Medicine	5. Philadelphia, PA	5. American Association of Physicists in Medicine
	6. August 23–26, 2010	6. Organization of Agreement States	6. Portland, OR	6. Organization of Agreement States
	7. October 21, 2010	7. Advisory Committee on the Medical Uses of Isotopes	7. Rockville, MD	7. Medical
	8. November 15, 2010	8. Mid-Atlantic States Radiation Control Conference	8. Newark, DE	8. States and Federal Staff and Radiation Protection Staff

	9. December 13, 2010	9. Advisory Committee on the Medical Uses of Isotopes	9. Teleconference	9. Advisory Committee on the Medical Uses of Isotopes
NSIR	1. Monthly meetings 2. June 21–24, 2010	1. Monthly Nuclear Security Working Group Meetings 2. National Nuclear Security Conference	1. Washington, DC 2. Charlotte, NC	1. Security 2. Security
OE	1. July 11–15, 2010 2. Sept. 20–24, 2010 3. June 27–July 1, 2010	1. Institute of Nuclear Materials Management 2. National Association of Employee Concerns Professionals 3. 55 <sup>th</sup> Annual Health Physics Society and 22 <sup>nd</sup> Biennial Campus Radiation Safety Officers Meeting	1. Baltimore, MD 2. Annapolis, MD 3. Salt Lake City, UT	1. Safeguards, Physical Protection, Waste, Packaging, and Transportation 2. Employee Concern Issues 3. Academic, Government, Medical, Research and Development, Analytical Services, Consulting, Industrial