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**(By Facsimile: 301-415-1672
and Electronic Mail)**

The Honorable Gregory B. Jaczko, Chairman
The Honorable Kristine L. Svinicki
The Honorable George Apostolakis
The Honorable William D. Magwood, IV
The Honorable William C. Ostendorff
U.S. Nuclear Regulatory Commission
Mail Stop O-16G4
Washington, DC 20555-0001

Re: Safety Culture Policy Statement

Dear Chairman Jaczko and Honorable Commissioners:

I very much appreciate the opportunity to appear before you and discuss this important issue. As you know I wanted to address some of the points that came up during the discussion with the Staff, and am taking the opportunity to include those points in this letter. Frankly, I was somewhat disappointed in the direction the questions of the Staff developed. From the audience, it appeared that several of you remain skeptical that Safety Culture is an appropriate area for a policy statement, and that the proposed statement would be impossible to implement in an effective and meaningful way. While I appreciate the dialog amongst you, I feel compelled to comment on two points.

First, the development of a Safety Culture policy and its supporting traits is a critical path to ensuring that all licensees understand the vital importance that a healthy safety culture plays in making safety the overriding priority at all facilities, and is long overdue. The definition of Safety Culture and the traits do an excellent job of capturing the various elements of a strong safety culture. While other traits could be identified or included, or different words used, the ones chosen provide a sound framework to define measurable and identifiable behaviors giving a common language and description across all licensees and the Agency. The studies of recent tragedies and accidents have all identified and confirmed that some failure in the safety culture of an organization was a prime contributor to the event. The NRC recognized a gap in its

regulatory framework following the Davis-Besse incident. After almost a decade, and a series of other less significant events and incidents, the issuance of this policy is long overdue.

Second, the work that the Staff has done in response to the Commission's construction has been extraordinary. Experts in this field, both by academic credentials and broad-based experience, have all agreed this is the next step. Their expertise and experience should not be ignored. It appeared to me that some of you were rejecting the recommendations and work of the Staff and the Stakeholders in this area in deference to the myth that safety culture cannot be defined, measured or evaluated. This is simply not the case. Since the issuance of the Safety Culture Report in 1991 by the International Nuclear Safety Advisory Group of the International Atomic Energy Agency (Safety Series No. 75-INSAG-4), the industry world-wide has recognized the importance of a site's safety culture, and has developed sound tools and processes to review and determine the health of a site's safety culture. Safety Culture is not analogous to the often quoted description of pornography, i.e., "you will know it when you see it." It is not based on shifting moral standards and community mores. It is a commonly held set of attributes that reflect the way things are done at a facility, the foundation of decision-making, the adherence to a set of processes and procedures, and the attitudes that govern an organization.

The NRC needs to finalize this piece of work and let the Staff and the industry take it to the next step. I would like to discuss this matter further with each of you, if the opportunity arises before your vote, and will be contacting each of your offices to try to schedule a brief meeting. Thank you again for your time and attention to this matter.

Sincerely,

Billie P. Garde
Billie Pirner Garde