



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, DC 20555 - 0001**

February 28, 2011

Mr. R .W. Borchardt  
Executive Director for Operations  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:    RESPONSE TO THE JANUARY 21, 2011, EDO LETTER REGARDING THE  
SAFETY CULTURE POLICY STATEMENT**

Dear Mr. Borchardt:

In our December 15, 2010, letter regarding the staff's draft Commission paper and the Draft Final Safety Culture Policy Statement we concluded that the proposed definition of safety culture and its associated traits describe a positive nuclear safety culture and are based on the collective judgment of NRC staff and experts from the community of stakeholders. This letter contained additional comments by ACRS Members Dana A. Powers, J. S. Armijo, and Joy L. Rempe stating that "there is faint evidence that the listed traits (individually or collectively) are assured to produce measureable improvements in safety. Certainly, there is no quantitative evidence that they lead to cost effective improvements in safety." Your January 21, 2011, response states that "quantitative research in other domains, including the Institute for Nuclear Power Operations Safety Culture Construct Validation Study, indicates that these traits are associated with better safety performance." The ACRS Subcommittee on Reliability and Probabilistic Risk Assessment could not reach the same conclusion, finding that the claimed correlation was only slight. Additionally, the staff had not adequately resolved questions about the sensitivity of the results to a single data point, with the implication that even the modest correlation claimed during the presentation could be optimistic.

We would like an opportunity to review the validation study further during the implementation phase.

Sincerely,

**/RA/**

Said Abdel-Khalik  
Chairman

**REFERENCES:**  
See next page

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1. EDO Letter, "Response to the ACRS Letter Dated December 15, 2010, About The Safety Culture Policy Statement," dated January 21, 2011 (ML110200297)
2. ACRS Letter, "Safety Culture Policy Statement," dated December 15, 2010 (ML103410358)

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1. EDO Letter, "Response to the ACRS Letter Dated December 15, 2010, About The Safety Culture Policy Statement," dated January 21, 2011 (ML110200297)
2. ACRS Letter, "Safety Culture Policy Statement," dated December 15, 2010 (ML103410358)

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Letter to R.W. Borchardt, Executive Director for Operations, from Said Abdel-Khalik, ACRS Chairman dated February 28, 2011

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