

March 7, 2011

MEMORANDUM TO: R. W. Borchardt  
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary /RA/

SUBJECT: STAFF REQUIREMENTS – SECY-11-0005 – PROPOSED FINAL  
SAFETY CULTURE POLICY STATEMENT

The Commission has approved publication of the proposed final safety culture policy statement in the *Federal Register*, subject to the comments and changes noted below. The Commission expressed concern regarding the lack of specificity now available in the approach to implementing this policy statement. The staff should continue to engage with all stakeholders to communicate the contents of the policy statement, to educate stakeholders, and to ensure they have the necessary support to effectively employ the policy statement as they deem appropriate.

Since the policy statement is not a regulation or a requirement, staff activities beyond communication and education should not be pursued without further specific Commission approval.

Before staff implements new initiatives based on the policy statement, it should seek Commission policy review of its plan, including short-term and long-term goals, for implementation and the vision for each program office's oversight.

#### Changes to the final safety culture policy statement

1. On page 2, in the section on SUPPLEMENTAL INFORMATION, insert the standard *Federal Register* notice language regarding ADAMS. Throughout this notice, preface all "ML" numbers with "ADAMS Accession No."
2. On page 3, revise line 3 from the top to read ' ... certificate holder, as they ...'
3. On page 4, 1st full paragraph, revise line 5 to read ' ... questions, including ...'
4. On page 6, paragraph C., revise line 5 to read ' ... traits (previously referred to as "characteristics") that ...' Revise line 7 to read ' ... the Agreement States, including ...'
5. On page 14, last paragraph, revise line 2 to read ' ... organizations performing regulated activities establish and ...' Revise line 8 to read ' ... Agreement States, Agreement State licensees and other ...' Revise line 10 to read ' ... of Policy, within their regulated communities.'
6. On page 14, last paragraph, delete the last sentence (The NRC will ... management processes.)

7. On page 15, 1st full paragraph, revise line 1 to read '~~The Commission defines Nuclear Safety Culture is defined~~ as ...' Revise lines 4 and 5 to read '... responsibility for **safety and security** ~~safely handling and securing these materials.~~' Delete the last sentence (The Commission, ... safety culture.) and replace it with "**The performance of individuals and organizations can be monitored and trended and, therefore, may be used to determine compliance with requirements and commitments and may serve as an indicator of possible problem areas in the organization's safety culture. NRC will not monitor or trend values. These will be the organization's responsibility as part of its safety culture program.**" The staff may need to make corresponding changes to other sections of the *Federal Register* notice to ensure consistency of message.
8. On page 16, next to last paragraph, revise 2<sup>nd</sup> sentence to read 'It should ~~also~~ be noted that these traits ~~were~~ **are not necessarily inspectable and were not developed for that purpose to be used for inspection purposes.**'
9. On page 16, last paragraph, revise lines 1 and 2 to read '**It is the Commission's expectation** ~~The Commission expects~~ that all individuals and organizations, performing **or overseeing** regulated activities **involving nuclear materials, should** ~~will~~ take the ....'
10. On page 16, last paragraph, revise line 2 to read '... activities **should** ~~will~~ take the ....'

cc: Chairman Jaczko  
Commissioner Svinicki  
Commissioner Apostolakis  
Commissioner Magwood  
Commissioner Ostendorff  
OGC  
CFO  
OCA  
OPA  
Office Directors, Regions, ACRS, ASLBP (via E-Mail)  
PDR