

## MEETING SUMMARY

### JUNE 16, 2011, PUBLIC MEETING BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION STAFF AND PUBLIC STAKEHOLDERS REGARDING THE SAFETY CULTURE POLICY STATEMENT

U.S. Nuclear Regulatory Commission Offices  
11545 Rockville Pike  
Room: T-2B1  
Rockville, MD 20852

The public meeting began at 10:00 am

Roy Zimmerman, Director, OE, provided opening remarks:

- Noted that we want to discuss issues that are important to our stakeholders
- Thanked group for their efforts in working with us to develop a high-level policy statement
- Noted that we are trying to emulate the process we put in place as we developed the policy statement for other NRC initiatives
- Requested that participants introduce themselves

Participants:

<u>Name</u>	<u>Organization</u>
Roy Zimmerman	NRC-OE
David Solorio	NRC-OE
Maria Schwartz*	NRC-OE
Diane Sieracki	NRC-OE
Eric Fries	NRC-OE
Catherine Thompson*	NRC-OE
June Cai*	NRC-OE
Scott Dudley	NRC-OE
Leonard Wert*	NRC-RII
Undine Shoop*	NRC-NRR
Jose Jimenez*	NRC-NRO
Val Barnes*	NRC-RES
Kevin Witt*	NRC-NMSS
Josie Piccone	NRC-FSME
James Firth	NRC-FSME
Mauri Lemoncelli*	NRC-OGC
Trish Holahan	NRC-NSIR
Patrick Castleman	NRC-OCM
Jana Bergman	Scientech
Kevin Buckley*	American Association of Physicists in Medicine
Billie Garde*	Law Offices of Clifford and Garde

George Marshall*	American Portable Nuclear Gauge Association
Bruce Williams*	Shaw Group
Jim Lynch*	Institute for Nuclear Power Operations (INPO)
Gale Staton*	NDE
Tom Houghton*	Nuclear Energy Institute (NEI)
Jim Slider*	NEI
Lee Cox*	Organization of Agreement States (OAS)
Bob Link	AREVA
Don Rickards*	STARS Alliance
Gary Williams*	Veterans Administration
Shannon Barton*	Southern California Edison – San Onofre Nuclear Generating Station (SCE-SONGS)
David Breland*	Tennessee Valley Authority
Mike Gaffney*	PSEG-Hope Creek
Richard Burnside*	SCE-SONGS
Dean Mottam*	
Christie Branch*	Pacific Northwest National Lab
Bill Illing*	INPO

\*participated by telephone

- Reviewed Agenda and requested that after initial comments and questions, participants hold questions until the end of the staff's presentations.
- Provided status of the Safety Culture Policy Statement (SCPS):
  - High-quality policy statement
  - OMB review (under the Congressional Review Act) completed
  - Published in the *Federal Register* on June 14, 2011 (76 FR 34773)
  - Significant milestones have been completed included outreach activities

Maria Schwartz provided information on NRC's outreach activities:

- In March, the Commission provided direction to the NRC staff following their review and approval of the SCPS.
- The Commission directed the staff to continue to engage stakeholders through outreach and educational opportunities.
- Outreach activities included and will include:
  - January 5, 2011, presentation to the NRC's Advisory Committee on the Medical Uses of Isotopes.
  - February 10-11, 2011, presentation by OE staff in Charleston, SC, at the International Radiation Protection Workshop on Radiation Protection Culture.
  - On June 8, 2011, OE and NRR provided a presentation to Region III inspectors on the status of the policy statement and the ROP.
  - June 7-8, 2011, OE staff participated in the poster session at the Annual Fuel Cycle Information Exchange, held in Rockville, MD. Our Deputy Executive Director of Operations, Mike Weber, provided a presentation on the status of the policy statement at this meeting. NRR staff attended the Human Performance

Observations/Root Cause/Corrective Action-Trending/Self Assessment and Operating Experience Conference in Delray, FL, to provide a presentation on the SCPS.

- OE staff will attend the Annual Health Physics Society (HPS) meeting in W. Palm Beach, FL, from June 26-June 30, 2011. The Deputy Executive Director of Operations will be a keynote speaker at this meeting and will provide a presentation related to safety culture and the SCPS.
- On June 28, 2011, OE staff will provide a presentation on the SCPS at an international conference in Russia.
- In early September, the US State Department mission has asked OE to make a presentation to members of the Jordanian government on safety culture, in Jordan.
- NRC has a keen interest in continuing dialogue with our stakeholders.

Eric Fries provided information on a SCPS “marketing tool”, i.e., the SCPS brochure:

- Summarizes the key points and messages from the SCPS in a highly portable format – one that can be easily distributed to applicable and interested persons – either by hand, on-line, or through a mailing.
- Goal is to provide a useful tool to help communicate information about the SCPS and safety culture generally.
- Designed with a full color tri-fold layout, with the following sections and content:
  - Opening message from the Chairman
  - Overview of the SCPS
    - Development process
    - Provides the NRC’s expectations for individuals and organizations performing regulated activities
    - Policy statement applicability
  - Background
    - Starting with Chernobyl
    - Previous two NRC policy statements
      - 1989 – Conduct of nuclear power plant operations
      - 1996 – Safety conscious work environment (SCWE)
    - Post-9/11 security enhancements and implementation issues caused by security organizations’ safety culture shortfalls
    - While discernable progress has been made in safety culture, NRC wants to further emphasize the importance of safety culture
  - Importance for Regulated Entities
    - SCPS is not a regulation – it is the regulated entity’s responsibility, as part of their safety culture program, to consider how to apply the SCPS to their regulated activities.
  - Moving Forward
    - Outreach, interaction and cooperation – continued engagement and seeking feedback.
  - Overleaf

- Definition of nuclear safety culture
- The full text of the traits

Catherine Thompson provided information regarding staff's case study initiative:

- Reviewed the vision and purpose of this initiative, stating that the cases would be used as an educational tool for licensees and stakeholders to enhance understanding of safety culture and how the traits discussed in the SCPS are applicable to many accidents and events that have occurred across many industries.
- Noted that the first case study on the METRO accident would be available in ADAMS, and discussed the structure of the case study, noting that:
  - Each study will be two pages and include a description, analysis and cause of the event
  - Relevant safety culture traits and related evidence from the event will be included
  - Lessons learned from the event will be summarized
- Noted that all case information was taken from official reports and each case study will be sent to the industry representative or outside agency involved for comment
- Indicated that, when finalized, each case study will be available on the NRC's public safety culture website.
- Requested comment on the METRO case study and whether the stakeholders thought this was a useful initiative. (Note that the stakeholders in attendance agreed that the case studies would be beneficial and they looked forward to seeing the completed cases.)

Diane Sieracki provided information regarding planned activities:

- All program offices will continue to engage in dialogue and education with the regulated community.
- In particular, FSME will continue to dialogue with NRC licensees and the Agreement States through FSME Newsletters, FSME letters; and teleconferences with the Organization of Agreement States and the Conference of Radiation Control Program Directors.
- Regional inspectors will provide education and awareness of safety culture to the licensees using key messages which will be shared with licensees.
- NUREG-1556 series is in the process of being updated and will include safety culture-related updates.
  - Agreement States are involved in the updates to the NUREG-1556 series and are represented on the Steering Committee.
- NRR will continue its current approach with the Reactor Oversight Process (ROP) and will be working with the external stakeholders, both NEI and INPO, at a workshop planned in the September timeframe in Atlanta for the purpose of moving forward to a common language.
- NRO is working on the development of an ROP in the construction arena.
  - NRO will continue to work with the external stakeholders to ensure the revision to the oversight program remains aligned with the safety culture policy statement.

- NRO will also continue to engage the vendors and suppliers by communicating the SCPS through meetings, conferences and workshops in which they participate.
- NMSS's fuel cycle oversight process includes giving credit for corrective action programs that include safety culture.
  - With respect to spent fuel storage and transportation, there may be reviews of these programs and future revisions.
- Regional offices will coordinate with the appropriate program offices and will assist with communication activities.

Roy Zimmerman asked if the participants had any questions or comments.

Tom Houghton (NEI):

- Commented positively on overall usefulness of new materials
- Noted difficulty reading the brochure due to color contrast
- Question on case studies; wanted to know if individuals and/or organizations involved were contacted. Catherine Thompson responded that we plan to do this and, for example, we had contacted the NTSB regarding the METRO case

Roy Zimmerman noted that:

- OE only used formal reports to maintain objectivity and regulatory perspective and minimize opinions
- Called for renewed feedback from stakeholders, especially for first examples of case studies

Gary Williams (VA Health):

- Commented positively on particular usefulness of case studies as a training tool
- Raised concern on using the term "human error" when dealing with medical issues as this term is not commonly used and could be confusing
- The short format of the case studies is very useful

Diane Sieracki noted that the terminology comes directly from official reports and not from an NRC analysis and that NRC intends to continue with this approach.

Roy Zimmerman noted that the case studies are being developed for training purposes and are intended to be succinct, rather than all-encompassing.

Bruce Williams (Shaw Group):

- Commented positively on usefulness of new case studies and brochure
- Asked question concerning using language from NRC materials in their own training protocol for new facilities, supervisors and employees. Diane Sieracki responded that the materials that have been developed thus far are non-proprietary; thus, it is ok for stakeholders to use/reproduce language from NRC materials in their own materials on safety culture.

Kevin Buckley (AAPM):

- Expressed usefulness of Case Studies as a training tool
- Requested case studies that focus on medical cases

Dave Solorio requested feedback from stakeholders for specific medical cases that could be useful for a case study.

Roy Zimmerman again emphasized the need for teamwork for optimization of projects.

Diane Sieracki made clear the NRC's commitment to outreach and willingness of NRC staff to speak and make presentations on safety culture at seminars, workshops and training events.

Tom Houghton (NEI) commented that:

- There are four Regional Workshops planned
- ANS is having their annual conference on June 27 and asked if NRC was attending.

Diane Sieracki responded that Mike Weber, Deputy Executive Director Materials, Waste, Research, State, Tribal and Compliance Programs, NRC, is making a presentation on the SCPS at the ANS meeting.

Tom Houghton also indicated that there would be a joint effort for common language.

Billie Garde (Clifford and Garde) is interested in what plans had been made to achieve the common language.

Undine Shoop clarified that there would be a workshop between industry (INPO and NEI) and the regulator in the September timeframe to be held in Atlanta

Jim Lynch (INPO) noted that the SCPS was being discussed at Site VP level sessions.

Bob Link (AREVA) noted that the Fuel Cycle Committee has been meeting and has been discussing the SCPS.

Gary Williams (VA Health) noted that on July 19, NRC is holding a public meeting at HQ with Master Materials Licensees and suggested that a presentation on safety culture would be useful.

Kevin Buckley (AAPM) commented that the annual AAPM meeting will be held in Canada in July.

Tom Houghton (NEI) asked the objective of the outreach effort, wondering about concrete dates and an objective endpoint.

Diane Sieracki noted that currently there is not endpoint set up but that the objective is to get the word out and encourage dialogue about the SCPC.

Maria Schwartz/Dave Solorio noted that objectives and timeframes could change based on additional direction from the Commission.

Roy Zimmerman noted that:

- The Commissioners and the NRC staff are interested in licensees' responses and efforts regarding the SCPS
- Although unlikely, if interest does wane, the Commission can change the direction of the SCPS efforts
- Support for the new policy rather than just "going through the motions" will produce tangible and measurable results

Lee Cox (OAS) stated that:

- North Carolina Inspectors share policy statements with licensees and that inspectors will receive new training based on new policy, brochure and case studies
- He appreciated NRC's work with marketing

Diane Sieracki requested that stakeholders provide additional ideas that the NRC staff can use to develop additional "marketing tools" that would be effective for the various licensees to use.

Lee Cox noted that they have gone "paperless" and electronic versions, especially of the pamphlet, would be helpful.

Roy Zimmerman requested that stakeholders and licensees send the NRC progress and plans of industry initiatives regarding safety culture so the NRC can consistently update the efforts that are being made.

Lee Cox noted that they are seeing benefits from these efforts carrying over to other regulatory programs such as North Carolina's x-ray program.

Diane Sieracki asked stakeholders to send NRC specific plans and in what ways they need assistance, particularly concerning marketing items.

David Breland (TVA):

- Requested videos, particularly to be used to introduce the concept of safety culture
- Suggested said these videos have some recognizable leader(s) explaining the importance of safety culture

Roy Zimmerman noted that we have discussed making videos in the future that, additionally, might include statements from other agencies, as a possibility.

Gary Williams (VA Health) mentioned that the Joint Commission is making a video covering three main areas of High Reliability Organizations, one of which is safety culture, which could be used as a baseline example of a video.

Roy Zimmerman requested that the video be sent to his office.

Dave Solorio asked Lee Cox what the reaction has been since starting to hand out policy statement media.

Lee Cox replied that they it has been received very well and people are getting used to seeing it now.

Gary Williams (VA Health) asked whether the revisions to NUREG 1556 will involve changes in explicit licensing qualifications due to safety culture, and, if so, when these changes will be implemented. He also indicated that he has accompanied inspectors from Regions I, III, and IV, and has seen a common approach and the NRC taking a similar approach to the States.

Josie Piccone replied that one of the last volumes of NUREG-1556 from the management response refers to safety culture and noted that revisions to the volume involving medical issues is slated to be completed May 2012 and the volume for Master Materials Licensees is scheduled for late 2011. Safety culture is being addressed consistent with the Commission's direction, focusing on education and awareness. These revisions will not include new requirements relating to safety culture.

Gary Williams (VA Health) asked about changes to the requirements for research and broad scope licensees?

Josie Piccone and James Firth responded that these are slated to be completed (respectively) in November 2010 and February 2013. James Firth indicated that the current approach is to address safety culture in a consistent way across the various NUREG-1556 volumes and information on the first draft to be issued would provide the manner in which safety culture will be addressed in future volumes.

Gary Williams (VA Health) asked whether we will develop short-term, specific guidelines that incorporate the SCPC as it relates to Materials Inspections. James Firth responded that they are only looking at education and awareness at this time and that there is nothing concrete in the short-term.

Roy Zimmerman asked if there were additional comments or questions. Hearing none, the meeting was adjourned with Roy noting that on behalf of the NRC, he appreciated the attendance and appreciated the attendance of the Agreement States.

The public meeting was adjourned at 11:25AM.