

Resolution of Comments for
IMC 1245 (10/13/11)

Source	Comment	Added	Remarks
RII	Should there be any required reading of the NEI or INPO documents related to safety culture included in the SCA training? One would think they should have a good base familiarity those organizational approaches.	No	These are not NRC endorsed documents, and therefore are not included in our inspection program. If a supervisor thinks they are worthwhile, he/she can suggest to the staff member that they be reviewed.
RII	<i>Demonstrate knowledge of statistical and conceptual constraints on determining appropriate sample sizes for each method:</i> How will this consistently be accomplish (all examples for F and E)	No	We will develop ISAs and OJTs for the next revision of this qualification card. In the interim, for staff interested in becoming qualified per this card, the region can contact safety culture specialists in HQ to discuss these portions with the staff member.
RIII	Sections E and F of the Signature Cards are not consistent with any of the Signature Cards. Specifically, other cards acknowledge completion of a class, ISA, or OJT. The Signature Card for C-12, Sections E and F are evaluation criteria typically in ISAs/OJTs. Furthermore, such evaluation criteria is not consistent with the identified OJT/ISAs. That is, the available ISA/OJTs do not address the content of Sections E and F. For consistency, ISAs and OJTs should be developed. Specifically, Section E as written could be written as the ISA for a Level 2 and Section F as written could be written as the ISA for a Level 1.	No	These will be developed and issued during the next revision of IMC 1245.
RIII	Section D of the Signature Card mentions "OJT-1". What is OJT-1? Has this been developed?	No	This has been deleted. We will develop ISAs and OJTs for the next revision of the card.

Source	Comment	Added	Remarks
RIII	<p>Page 1 of Attachment 1: The table for Level Specific Knowledge and Skills lists:</p> <p>“Knowledge of the NRC’s Reactor Oversight Process and applicable inspection requirements and techniques”</p> <p>as a requirement. However, would have already been accomplished in ISA 9 and ISA 26 (signoffs in Section A or C of the Signature Card).</p> <p>In summary – this line item is redundant.</p>	yes	The wording has been changed to demonstrate that the attachment contains information from the core document.
RIII	<p>Page 15 of Attachment 1: The table for Improving Safety Culture Skills lists:</p> <ul style="list-style-type: none"> • Root cause/incident investigation workshop • Columbia self-study • Safety culture self-study <p>as activities to complete to meet the prerequisites of a Level 2. However, these activities are required for those ALREADY meeting the prerequisites of Level 2 as indicated by their inclusion in Sections A and B of the Signature Card.</p> <p>These classes should be removed from page 15.</p>	No	This attachment is only articulating the particular KSA needed for becoming either a level 1 or a level 2 assessor. No need to delete.
RIII	<p>Page 15 of Attachment 1: states: External Courses (see appendix A for examples of training resources)</p> <p>Appendix A of what procedure/section? Or is this a future product?</p>	Yes	Removed reference to appendix A and added in examples of external courses.
RI	It is unclear why the distinction between a “Level 1” assessor and “Level 2” assessor is necessary. Can one perform job functions that the other can’t? Suggest stating so if that is the case.	No	The difference between a level 1 and level 2 is mostly in the area of leadership and ability to lead the safety culture portion of the 95003 inspection team.

Source	Comment	Added	Remarks
OE	<p>Qualification as a SCA requires that you complete a variety of activities, each of which is designed to help you gain information or practice a skill that may be important during an IP 95003 inspection. When you have completed the entire qualification journal, you will have demonstrated each of the competencies listed below for a Safety Culture Assessor.</p> <p>Comment: After saying that you don't need all the inspector skills, this sounds like overkill for the SCA. Suggest delete</p>	No	The section has been reworded.
OE	<p>ISA-21, "Open Collaborative Working Environment & Ways to Raise Differing Views" --update links (see updated links below in this comment). Also delete "ING" in "Open Collaborative Working Environment" THROUGHOUT the section. Should read "Open Collaborative Work Environment."</p> <ol style="list-style-type: none"> 1. OCWE http://www.internal.nrc.gov/OE/ocwe/index.html 2. NCP http://www.internal.nrc.gov/OE/ocwe/nonconcur/index.html 3. DPO http://www.internal.nrc.gov/OE/dpo/index.html 	Yes	Updated the section and links.
OE	<p><i>Inspection On-the-Job Training (OJT) Activities</i> This should not be "grandfathered in under other inspections but should be an inspection focusing on safety culture.</p>	No	Agreed.
OE	<p><i>Demonstrate knowledge of methods for gathering safety culture data and their appropriate strengths and weaknesses, including:</i></p> <p>This comment applies to the remaining portions of this section. Add information as to HOW these competencies can be demonstrated. Recommend adding more guidance.</p>	No	We will develop ISAs and OJTs for the next revision of this qualification card. In the interim, for staff interested in becoming qualified per this card, the region can contact safety culture specialists in HQ to discuss these portions with the staff member.

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OE	<p><i>Demonstrate knowledge of theories and research in organizational and human behavior.</i></p> <p><i>Comment:</i> Similar to Comment 3, this could cover a very broad spectrum of topics. Recommend adding guidance as to what the threshold is for determining this threshold has been met.</p>	No	We will develop ISAs and OJTs for the next revision of this qualification card. In the interim, for staff interested in becoming qualified per this card, the region can contact safety culture specialists in HQ to discuss these portions with the staff member.
OE	<p><i>Demonstrate leadership skills:</i></p> <p>Same as comments 3 and 4, provide additional guidance as to how this is accomplished.</p>	No	We will develop ISAs and OJTs for the next revision of this qualification card. In the interim, for staff interested in becoming qualified per this card, the region can contact safety culture specialists in HQ to discuss these portions with the staff member.
OE	<p>The supervisor should meet with the candidate to discuss relevant knowledge and experience and to determine qualification level or if the candidate needs additional training.</p> <p><i>Comment:</i> Recommend discussion regarding whether supervisor may choose to delegate these functions to a subject matter expert, since a supervisor may not have the depth of knowledge and experience needed to make a judgment on the level of knowledge, skills, and competencies of the individual for some of the areas listed.</p>	Yes	These areas will be changed to specify that this function may be delegated to a safety culture subject matter expert in NRR or the regional office, or the Branch chief for NRR/DRA/IHPB
OE	<p><u>External Courses</u> (see appendix A for examples of training resources)</p> <p><i>Comment:</i> Is there an Appendix A? Also, is the requirement to take separate courses in all of these areas, or can there be a comprehensive course that covers all of these areas? Also, are there any requirements on the level these course should be?</p>	Yes	No appendix A- the courses have been listed in this section of the card.

Source	Comment	Added	Remarks
RES	<p>Safety Culture Assessors are divided into two levels based on education/experience level. Level I are senior staff who meet all the knowledge, skills, and abilities (KSAs) listed in IP 95002 and 95003 for Safety Culture Assessors through education, experience or a combination of both and have demonstrated leadership skills. Level II assessors are staff who meet some, but not all of the KSAs through education and experience.</p> <p>Comments: Are the KSAs listed in IP 95002 and 95003, or should this read “KSAs needed to carry out the inspection activities listed in IP 95002 and 95003”</p> <p>Suggest new sentence: Level I Assessors should also demonstrate the ability to perform in a leadership role on safety culture inspection teams.</p>	Yes	Changed the sentence to read as suggested.
RES	<p>Ability to lead safety culture assessment activities, including:</p> <ul style="list-style-type: none"> • Supervise and train Level II Safety Culture Assessors • Coordinate and communicate effectively with the Team Leader, Assistant Team Leader, other members of the inspection team, Regional management, and plant senior management • Effectively manage unforeseen issues as they arise • Effectively articulate and respond to any questions/challenges from internal and external stakeholders on the safety culture assessment and findings <p>Comment: I would suggest reworking this entry to be more consistent with the wording of the other KSAs.</p>	Yes	Suggested wording has been added.

Source	Comment	Added	Remarks
RES	Any questions related to qualification as a SCA should be directed to the SCA in the Division of Inspection and Regional Support (DIRS). Comment: Is this still correct with the reorg?	Yes	This has been changed to only listing as the Brach Chief for IHPB regardless of the Division.
RES	Allegations: tasks 1, 2, 3, 4, 6, 8, 9, and 10, 11, 12, and 13, including completion of the web based allegation training and review of applicable guidance documents. Complete evaluation criteria. Comment: I did not see these tasks in Appendix A.	Yes	This section has been updated
RES	Comment: Are the KSAs listed in IP 95002 and 95003, or should this read "KSAs needed to carry out the inspection activities listed in IP 95002 and 95003"	Yes	Revised the wording to read as suggested.

