

October 1, 2013

MEMORANDUM TO: Roy P. Zimmerman, Director  
Office of Enforcement

FROM: Diane J. Sieracki, Sr. Safety Culture  
Program Manager */RA by Stephanie Morrow for/*  
Concerns Resolutions Branch  
Office of Enforcement

SUBJECT: SUMMARY OF THE AUGUST 7, 2013, PUBLIC MEETING  
BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION  
STAFF AND STAKEHOLDERS TO EXCHANGE INFORMATION  
AND DISCUSS ONGOING EDUCATION AND OUTREACH  
ASSOCIATED WITH THE SAFETY CULTURE POLICY  
STATEMENT

The U.S. Nuclear Regulatory Commission (NRC) staff met with stakeholders on August 7, 2013, at NRC headquarters in Rockville, MD. The purpose of the meeting was to 1) update stakeholders on the ongoing activities and related materials the NRC staff has engaged in, and is developing, to support continued education and outreach for the Safety Culture Policy Statement (SCPS); and 2) obtain feedback from stakeholders regarding their experiences applying the SCPS and associated traits within their organizations. This meeting was noticed as a Category 2 public meeting and the meeting agenda is available in the Agencywide Documents Access and Management System (ADAMS) under Accession Number ML13199A466. The enclosure provides a list of those in attendance at the meeting. The discussions that occurred during the meeting are summarized below.

Opening Remarks – Roy Zimmerman, Office of Enforcement (OE) Director

Roy Zimmerman opened the meeting and thanked the participants for joining the meeting. Mr. Zimmerman stated that we looked forward to catching each other up on our respective activities in the safety culture area. Following introductions by the participants and recognizing that this was a Category 2 public meeting where members of the general public would have several opportunities to ask questions or make comments, he introduced Diane Sieracki as the first presenter on the agenda.

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Safety Culture Outreach – Diane Sieracki, OE

Diane Sieracki discussed the various outreach activities OE staff has supported for the SCPS. The following are examples of conferences/workshops at which OE staff provided outreach on the SCPS:

- Waste Management Conference, February, 2013
- G8 Safety and Security Group, October, 2012
- DevonWay Continuous Improvement Conference in September, 2012
- Visit with Japanese regulator in March, 2012

Upcoming conferences that OE staff will be participating in to talk about safety culture and the SCPS include:

- DevonWay Continuous Improvement Conference, September, 2013
- Argonne National Lab for new countries embarking on nuclear power, September, 2013
- National Transportation Safety Board Forum on Safety Culture, September, 2013
- American Nuclear Society Risk Management Meeting, November, 2013

Ms. Sieracki also mentioned a number of international outreach activities:

- G8 Safety and Security Group presentations related to NRC's SCPS. This group recommended endorsement of the International Atomic Energy Agency (IAEA) Action Plan for Nuclear Safety in Light of the Fukushima Event by all member countries.
- IAEA meetings related to the IAEA Action Plan for Nuclear Safety have included presentations by NRC staff on the SCPS. The most recent meeting was related to human and organization factors in safety culture in May, 2013
- Maintaining involvement with IAEA in the safety culture area by assisting with development of IAEA documents such as Technical Documents and Report Series documents. The most recent consultancy meeting was held for the development of a common questionnaire/survey to be used in assessing safety culture in August, 2013.

Ms. Sieracki provided information on the interaction of NRC safety culture staff with other regulators involved in discussions related to safety culture and High Reliability Organizations (HRO). These government regulators meet periodically, and NRC will host the next HRO meeting to be held late in 2013 or early 2014. NRC staff provided information and gave presentations related to the SCPS at past HRO meetings, including:

- HRO meeting hosted by Department of Transportation in January, 2013
- HRO meeting hosted by Department of Energy in June, 2013

Ms. Sieracki also noted that the Bureau of Safety and Environmental Enforcement has adopted the NRC SCPS definition and traits in the development of their own policy statement for the offshore oil and gas industry.

Bob Link cautioned that a survey for assessing safety culture on an international level may not be appropriate for individual countries. Diane Sieracki acknowledged Mr. Link's comment by explaining that the international work is typically guidance and options to use rather than requirements.

Safety Culture Outreach – Cindy Flannery, Office of Federal and State Materials and Environmental Management Programs (FSME)

Cindy Flannery indicated that FSME has been focusing on safety culture training with a new training course under development. The objective is to: 1) provide consistent message for Agreement State regulators/personnel on what the SCPS says and means and how to implement it; and 2) communicate expectations for Agreement State personnel for what they should know and what they should share with their licensees related to the SCPS. The training will be presented as a webinar and is planned for September 2013.

Safety Culture Common Language Initiative – Molly Keefe, Office of Nuclear Reactor Regulation (NRR)

Molly Keefe described recent efforts to develop a common language for safety culture in the nuclear power industry. The initiative included a working group with participants from the Institute of Nuclear Power Operations (INPO), Nuclear Energy Institute (NEI), all four NRC Regional offices and several offices within NRC Headquarters. This initiative was requested by the industry in order to align terminology between the NRC's Reactor Oversight Program (ROP) inspection and assessment processes and the industry's assessment process. It began before the development of the SCPS and was put on hold until after the SCPS was finalized. The common language initiative uses the traits from the SCPS as a basic foundation, and contains definitions and examples to describe each trait more fully. During the development of the common language, the workshop participants determined that due to some recent events in the industry an additional trait, Decision Making, was needed. This trait was added to the common language terminology. The common language was finalized in January 2013. Since completion of the common language, NRR has put together a working group to determine how best to adopt the new language into the framework of the cross-cutting areas in the ROP. Next steps include incorporation of the language into a permanent NRC document, incorporation of the relevant parts into the ROP, and development of training for NRC inspectors. The Common language is available in ADAMS, on the INPO website and will be on the NRC's Safety Culture Website.

Safety Culture Outreach – Josie Piccone, Office of Nuclear Material Safety and Security (NMSS)

Josie Piccone stated that NMSS is continuing in the education and outreach mode by giving presentations at staff meetings, licensee and industry meetings, and workshops. A recent example is the June, 2013 Fuel Cycle Information Exchange, which included a poster and takeaway materials and two presentations: a presentation by NRC staff, "Safety Culture: A Continuous Journey," addressing the NRC's ongoing focus on safety culture, and "Raising the Bar," a presentation by a fuel facility representative (Global Nuclear Fuel – Americas (GNFA)) on their safety culture program. Also, over approximately the past 6 months, most public meetings in the spent fuel storage and transportation area have included key messages from the SCPS and inspectors have distributed copies of the SCPS brochure.

Additional current and future activities include: consideration of areas/issues that are informed by the SCPS in the staff's plan to revise the Fuel Cycle Oversight Process; further outreach efforts through sharing key messages and outreach products during licensing and inspection meetings; and consideration of incorporating a general discussion of the SCPS in future revisions of licensing guidance, noting that a policy statement is not a regulation, but an expectation.

Bob Link cautioned not to put policy statements into regulatory documents, because policy statements are an expectation, not a regulation. If the SCPS is included in guidance documents it may appear to be de facto regulation. Ms. Piccone acknowledged the comment.

Roy Zimmerman agreed with Mr. Link's comment and the importance of the NRC not overstepping the Commission's direction that implementing the SCPS is not a regulatory requirement, but rather the Commission's expectations. He reiterated the Commission's direction to the staff to engage the regulated industry through outreach and education regarding the SCPS.

Education Tools – Catherine Thompson, OE

Catherine Thompson discussed educational tools OE is developing as part of ongoing outreach and education. OE has developed four case studies which are on the NRC's public safety culture website. Three of the case studies are based on an accident or event that resulted, in part, from a weak safety culture. The fourth case study is an event where tragedy was prevented because of a positive safety culture.

OE is now focusing on developing case studies that are longitudinal; that is, they follow an organization's response to an accident over time to demonstrate the dynamic nature of safety culture. These studies will identify initiatives and actions taken by the organization to strengthen their safety culture.

OE is also developing studies on each of the nine traits from the SCPS. The definitions of these traits were included in the SCPS, but without a “third tier” description of how they might be implemented. These studies will discuss each trait and discuss why it is important and provide examples of what it could look like when implemented.

Finally, OE is considering developing a safety culture newsletter focusing on the agency’s external safety culture activities that would provide an overview of program office safety culture activities, IAEA safety culture activities, and other relevant safety culture issues that are in the news around the world.

Mr. Zimmerman indicated that stakeholder feedback on the case studies has been very positive, and that the case studies serve as a teaching tool to help demonstrate the importance of a positive safety culture. He indicated that we appreciated the feedback on ways to enhance the case studies. He supports the staff’s intent to develop additional case studies.

#### Effectiveness Review/Survey – Stephanie Morrow, OE and June Cai, FSME

Stephanie Morrow described a two-part project OE is undertaking in collaboration with FSME and NMSS to evaluate the effectiveness of the NRC’s outreach and education activities associated with the SCPS. The goals of the project are to: 1) benchmark how the NRC’s approach to communicating safety culture expectations compares to other regulatory agencies and non-government organizations; and 2) identify strengths and potential areas of improvement in the NRC’s current approach to communicating safety culture expectations to the materials licensee community. The project will include a survey to get feedback from FSME’s materials licensees, NMSS’s fuel cycle licensees, and licensees from any Agreement State volunteers. The survey will evaluate the effectiveness of the NRC’s outreach and education efforts and identify potential areas for improvement in the current approach to communicating about safety culture.

June Cai added that FSME recently sent a letter to the Agreement States asking for volunteers to participate in the survey effort. FSME asked the Agreement States to respond by September 13th. The request stresses that the survey will be voluntary, information will be collected confidentially by a third party contractor, and the survey will focus on feedback regarding NRC outreach and education efforts, not licensee activities. The timeline for administering the survey is still tentative as it will require clearance from the Office of Management and Budget which can take from six weeks to multiple months depending on the type of clearance for this activity.

#### Agreement State Implementation of Safety Culture – Lee Cox, North Carolina

Lee Cox indicated that his state is using the SCPS as an opportunity to develop common language across all materials regulated by his Agreement State. North Carolina has used the

NRC safety culture brochure as a basis for communicating with all materials stakeholders. They changed their mission statement to incorporate the safety culture language, and last year the governor of North Carolina proclaimed January as radiation safety month. They are also using the brochure to educate leaders at exit inspections, and they have been giving presentations and distributing brochures at locations that use nuclear materials such as dental offices, vet clinics, and chiropractor offices. Mr. Cox suggested that NRC should look at how safety culture can be brought into the emergency response world and discussed in that context. In addition, as licensees are trained on new requirements they should also learn about safety culture, which could include incorporating safety culture into the Part 37 Steering Committee activities.

Mr. Cox indicated that he found the brochure to be useful and a big success early on. Twenty different Agreement States have asked how North Carolina used the brochure for its specific needs. Mr. Cox also noted that he gets a lot of questions about applying the SCPS to X-ray programs. The SCPS language has helped bring North Carolina's X-ray program up to par with its radioactive materials program.

Public Comments/Questions:

Billie Garde made the suggestion to include a safety culture panel discussion at the next American Petroleum Institute conference. Diane Sieracki will contact Billie Garde for details.

Power Reactor Safety Culture Initiatives – Ken Koves, Institute for Nuclear Power Operations (INPO)

Ken Koves reported that the new INPO document 12-012, "Traits of a Healthy Nuclear Safety Culture" was published in December, 2012. After the common language effort was completed in January, 2013, INPO published Revision 1 of 12-012, which includes all of the examples developed during the common language workshop. INPO also rolled out Addendum 1, which includes the examples organized by leadership level. Addendum 2 is a cross-walk of the new common language traits to the old INPO principles and IAEA characteristics, and Addendum 2-2 is the pocket guide of the traits document. As part of the roll out of the new language, INPO held five meetings across the country and invited power reactors and vendors to talk about the new language. INPO also rolled out online training for the traits on July 1, 2013. The training covers each of the traits and related them back to the old INPO principles.

Dr. Koves noted that INPO has also worked with vendor suppliers to take the common language and apply it to their organizations. INPO officially started using the traits on July 1, and has asked power reactors to also begin transitioning to the common language traits.

Molly Keefe asked if Dr. Koves could provide more information about the online training offered by INPO. Dr. Koves stated that the online training is through the National Academy for Nuclear Training e-Learning, and INPO members and international members have access to the system.

The training starts with the Davis Besse event to explain why INPO is talking about safety culture, then the training relates the traits back to the INPO principles, then it details the attributes under each trait. Most licensees are doing annual or biannual training about Davis Besse, and this training might become part of that required training, but it is not currently.

Roy Zimmerman indicated that the NRC would be interested in seeing the online training that INPO developed, and Dr. Koves indicated his preliminary willingness to support the request. Diane Sieracki will follow-up with Dr. Koves.

#### Additional Comments – Rebecca Carr, Bechtel

Rebecca Carr indicated that Bechtel has been engaged in rolling out the SCPS traits to their management. Ms. Carr asked if the NRC intended to update the SCPS in light of the tenth trait, “Decision Making” that was added as a result of the common language workshops with the reactor community and the NRC.

Diane Sieracki noted that the SCPS states that the nine (9) traits may not be all inclusive. Some of the traits may resonate with some licensees and not others. Ms. Sieracki further indicated that the reactor community felt strongly about adding “Decision Making,” but that did not mean that some of the materials licensees would see that as a high enough priority to rise to the level of adding another trait. She further indicated that some regulated communities may find other areas that rise to trait level for their organizations. Ms. Sieracki indicated that there were no current plans to update the SCPS.

#### Closing Remarks – Roy Zimmerman, OE:

Mr. Zimmerman praised the participants for their voluntary initiatives and efforts to support the SCPS and associated traits. He indicated that the staff continues to recognize that a “one size fits all” approach isn’t the best option for the regulated community to voluntarily implement the SCPS, but rather each organization needs to tailor it to fit their situation and needs. He further stated that staff will continue to update the safety culture website periodically and staff is available to assist in getting the message out, should stakeholders request NRC involvement through speaking engagements, training activities, etc. Mr. Zimmerman suggested, and received agreement from the participants, that similar public teleconferences/meetings about twice a year would be beneficial. Lastly, he thanked the participants a final time for their efforts and for joining this public meeting. He stated that the Commissioners continue to follow the staff’s and regulated communities’ activities in the safety culture area with interest.

R. Zimmerman

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Ms. Sieracki indicated she would send all meeting attendees the ADAMS Accession number for the common language workshop results, along with the dates for the HRO public meeting to be hosted by the NRC, and the meeting feedback form.

Public meeting was adjourned.

Enclosure:

1. Meeting Participants

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Public meeting was adjourned.

Enclosure:

1. Meeting Participants

DISTRIBUTION:

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MDiaz, NMSS	UShoop, NRR	CFlannery, FSME
CMorell, NMSS	MKeefe, NRR	JCai, FSME
SPeters, RES	MThaggard, NSIR	MHayes, NRO
VBarnes, RES	AStang, NSIR	LDudes, NRO
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**ADAMS Package No.: ML13267A379**

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DATE	9/24/13	9/25/13	9/25/13	10/1/13

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## Meeting Participants

<u>Name:</u>	<u>Organization</u>
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Diane Sieracki	NRC-OE
Catherine Thompson	NRC-OE
Kaydian Beckford	NRC-OE
Stephanie Morrow*	NRC-OE
Marilyn Diaz	NRC-Office of Nuclear Material Safety and Security (NMSS)
Kevin Ramsey	NRC-NMSS
Josie Piccone	NRC-NMSS
Allyce Bolger	NRC- Office of Nuclear Reactor Regulation (NRR)
Molly Keefe	NRC-NRR
Len Wert*	NRC-NRR (RII)
Val Barnes*	NRC- Office of Nuclear Reactor Research (RES)
Sean Peters*	NRC-RES
June Cai*	NRC-Office of Federal and State Materials and Environmental Management Programs (FSME)
Cindy Flannery*	NRC-FSME
Mark Thaggard*	NRC-NSIR – Office of Nuclear Security and Incident Response
Michelle Hayes*	NRC- Office of New Reactors
James Slider	NEI
Janet Schlueter*	NEI
Curtis Wright*	Scientech
Ken Koves*	INPO – Institute of Nuclear Power Operations
Tom Houghton*	Certrec
Rebecca Carr*	Bechtel
Bob Link*	AREVA
Lee Cox*	Organization of Agreement State
Billie Garde*	Law Offices of Clifford and Garde
George Marshall*	American Portable Nuclear Gauge Association

\*Participated via telephone

ENCLOSURE