



U.S. NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

**Incorporating Safety Culture Common Language
into the Reactor Oversight Process (ROP) and
Construction Reactor Oversight Process (cROP)**

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Background and Recent Activities

- NRC engaged with INPO, NEI, and others to develop a common safety culture language for nuclear power reactors
- NRC issued Final Safety Culture Policy Statement in June 2011 (76 FR 34773)
- Common language finalized in early 2013 as noted in INPO 12-012 and meeting summary
- Staff issuing NUREG 2165 to formally document common language to apply to all NRC programs
- Staff revised ROP guidance to reflect the common language; revised IMC 0310 issued in December 2013, implemented on January 1, 2014, and will be used for all ROP 2014 findings



IMC 0310 Revisions

- Revised cross-cutting aspects (CCAs) to align with the safety culture common language attributes of NUREG-2165 and the Commission's safety culture policy statement
- Changes in terminology and coding; no change to policy or process
- Similar changes will be made to IMC 0613 – Appendix F
- Changes do not affect the process for applying CCAs per IMCs 0612/0613 or evaluation of substantive cross-cutting issues (SCCIs) per IMCs 0305/2505
- More substantive process changes will be considered as part of ROP enhancement project, particularly as related to the evaluation of SCCIs



Cross-Cutting Aspects

- “New” CCAs grouped by cross-cutting areas of:
 - human performance (H)
 - problem identification and resolution (P), and
 - safety conscious work environment (S)
- Supplemental CCAs to be used during supplemental inspections and when performing safety culture assessments
- Removed the component level to simplify alignment and consistency
- Included crosswalks from “old” CCAs and common language attributes to “new”



Approach

- Construction inspector training will be completed in June 2014
- Affected cROP documents identified for future change
 - IMC 0613 - Appendix F
 - IPs 90000, 90002, and 90003
- Additional ROP documents also identified for future change
 - IPs 95001, 95002, and 95003 (including 95003.02)
- Other related changes under review (training, web pages, cROP guidance, etc)



Assessment Process

- 2013 End-of-Cycle Meetings conducted per existing guidance using “old” CCAs
- 2013 Annual assessment letters will reflect “old” CCAs
- 2014 Mid-cycle meetings to be conducted per revised guidance; findings from 2nd half of 2013 will be converted to “new” CCAs
- New cROP guidance documents to be issued by June 30, 2014 and implemented July 1, 2014
- 2014 End-of-cycle meetings to be conducted per revised guidance; all 2014 findings will be converted to “new” CCAs



Communications

- February 27, 2014 Public Meeting
- Draft IMC 0613 Appendix F to be made publicly available
- Future Public Meeting for feedback, if requested
- Annual Assessment Meetings
- cROP Annual Self-Assessment SECY Paper