

Culture Monitoring “Touch Points”

Attachment to Diagram of “Alternative Model for Oversight in Lieu of Substantive Cross-Cutting Issues”

Licensees’ Typical Touch Points for Nuclear Safety Culture

1. Nuclear Safety Culture Monitoring Panel meetings (per NEI 09-07)
2. Site Leadership Team meetings (per NEI 09-07)
3. Corporate nuclear safety culture monitoring panel (common, but not universal)
4. Nuclear Safety Review Board assessments and oversight
5. INPO’s Organizational Effectiveness assessment of the licensee ever two years, which includes safety culture survey
6. Licensee’s Nuclear Safety Culture survey and assessment performed every two years (per INPO SOER 02-04)
7. Licensee’s independent Nuclear Oversight organization assessments
8. CAP Trending Program
9. Human performance review board review of significant human errors
10. Human performance clock resets
11. Employee Concerns Program
12. Monthly Management Review Meetings, which cover a wide range of issues, including indicators that touch on cross-cutting areas
13. CAP causal evaluations that flag human performance issues
14. Root cause evaluations, which commonly look at safety culture aspects that contributed to the problem being evaluated
15. Case studies on questioning attitude and engaged workforce (per INPO SOER 10-02)

Culture Monitoring “Touch Points”

Attachment to Diagram of “Alternative Model for Oversight in Lieu of Substantive Cross-Cutting Issues”

NRC “Touches” on Nuclear Safety Culture

1. IP 71152, PI&R Inspection – looks at CAP, ECP/SCWE (§02.04d; §03.04c), cross-cutting themes (§03.01), safety culture assessments (§03.04)
2. NRC allegations (MD 8.8, Management of Allegations) – NRC can request assistance from OI to get feedback on safety culture or SCWE; can request information from licensee provides insights into the safety culture during the allegation process.
3. Inspector field observations.
4. Residents can/do attend NSCMP and SLT meetings at the site.
5. Residents, per IMC 0305, do look at INPO evaluations, which touch upon organizational effectiveness and safety culture.
6. IP 95001 – Supplemental inspection looks at safety culture aspects that caused or contributed to the performance issue.
7. IP 95002 – Supplemental inspection allows NRC to request licensee to complete an independent NSCA; NRC inspection looks at safety culture aspects that caused or contributed to the performance problem(s).
8. IP 95003 – Supplemental inspection procedure indicates licensee is expected to do third party NSCA; NRC will assess this and can perform inspections and safety culture evaluations in parallel with the licensee’s root cause evaluation and third-party safety culture assessment.
9. IP 95003.02 – Supplemental inspection provides for an independent review of safety culture; NRC inspection looks at safety culture aspects that caused or contributed to the performance problem(s).
10. IMC 0305, Operating Reactor Assessment Program – Mid-cycle and end-of-cycle review includes INPO and OSART results (§07.03), which typically do touch on site culture.
11. IMC 0305, Section 0305-13.02b – “The purpose of this inspection [IP 92722] is to ensure that the causes of the violations are understood and that the licensee has adequately evaluated the extent of the cause and the impact of the violations on safety culture.”
12. IMC 0305, Section 0305-14 – “The ROP was developed with the presumption that plants that had significant performance issues in the cross-cutting areas would be revealed through the existence of safety-significant PIs or inspection findings.”
13. IMC 0310 – Section 0310-06, page 2: The NRC draws conclusions on the basis of licensee NSCA, not on the presence or absence of CCA.
14. IP 71153, Event Follow-up – Inspection looks at information on issues with components of safety culture in event follow-up.
15. IP 93800, Augmented Inspection Team – AIT evaluates safety culture component issues.
16. IP 93812, Special Inspection Team – SIT evaluates safety culture component issues.
17. IP 40100, Independent Safety Culture Assessment Follow-up – Guides NRC inspections of an INSCA performed at NRC’s request (e.g., in IP 95002) or performed in support of another regulatory process (e.g., alternative dispute resolution).