U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

SAFETY CULTURE TRAIT TALK

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Trait Talk *was developed to provide you with a better understanding of the nine safety culture traits found in the U.S. Nuclear Regulatory Commission's (NRC) Safety Culture Policy Statement (SCPS) and how they apply to you—whether you are an NRC licensee, a vendor or contractor employee, an organization interested in the safe and secure use of nuclear materials, or others involved in nuclear safety regulation. Please see page 4 of Safety Culture Trait Talk for more information on the SCPS.*

Experience has shown that certain personal and organizational traits are present in a positive safety culture. A trait, in this case, is a pattern of thinking, feeling, and behaving that emphasizes safety, particularly in goal conflict situations, for example, in situations where production, schedule, or just the cost of effort may conflict with doing the job safely. The NRC identified nine traits of a positive safety culture in the SCPS, although the agency recognizes that additional traits may also be important. In addition, please note that the traits were not developed to be used for inspection purposes.

Each Trait Talk includes a fictional scenario based on a different licensee or community. The scenario used in this Trait Talk is based on nuclear research facilities.

As you read through Trait Talk, consider the following questions:

1. *How does this trait apply to my organization?*
2. *Are there other attributes and examples that better fit my organization?*
3. *What impact does this trait have on the safety culture in my organization?*
4. *How does this increase my understanding of the safety culture in my organization?*
5. *How could I improve the performance of this trait in my organization?*

Environment for Raising Concerns

One of the traits of a positive safety culture as described in the U.S. Nuclear Regulatory Commission's Safety Culture Policy Statement.

What Is The Definition Of Environment For Raising Concerns?

The NRC's SCPS defines Environment for Raising Concerns as maintaining a safety-conscious work environment where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination.

Why Is This Trait Important?

Fostering an environment for raising concerns is an important attribute of a positive nuclear safety culture. Organizations should have a work environment where employees are encouraged to raise safety concerns and where those concerns are reviewed promptly, given the proper priority based on their potential safety significance, and appropriately resolved, with timely feedback to the originator of the concerns and to other employees as appropriate.

Employees should feel free to raise safety concerns to their management without fear of harassment, intimidation, retaliation, or discrimination. The organization is prohibited by law from taking adverse retaliatory actions against employees because they raised concerns. When allegations of discrimination or retaliation arise, the appropriate level of management must be involved to review the facts, evaluate or reconsider the action, and, where warranted, remedy the matter. In addition to the hardship caused to the individual employee, the perception by fellow workers that raising concerns has resulted in retaliation can generate a chilling effect that may discourage other workers from raising concerns. Any reluctance on the part of employees to raise concerns can be detrimental to nuclear safety.

The organization should clearly identify the processes that employees may use to raise concerns, such as discussing issues with their supervisor or filing deficiency reports for problem identification and resolution. However, it is important to recognize that some employees may not always be comfortable raising concerns through the normal channels, such as with their immediate supervisor. From a safety perspective, no method of raising potential safety concerns should be discouraged. Therefore, the organization should focus on achieving and maintaining an environment where employees feel free to raise their concerns directly to their supervisors, as well as ensuring that alternate means of raising and addressing concerns are accessible, credible, and effective. These alternative approaches may include an "open-door" policy that allows the employee to bring a concern to a higher-level manager, an ombudsman program, or an employee concerns program.

An organization that reinforces an environment for raising concerns typically has well-developed systems for prioritizing problems and directing resources, effective communications for openly sharing information and analyzing the root causes of identified problems, and management that promotes employee confidence in raising and resolving concerns.

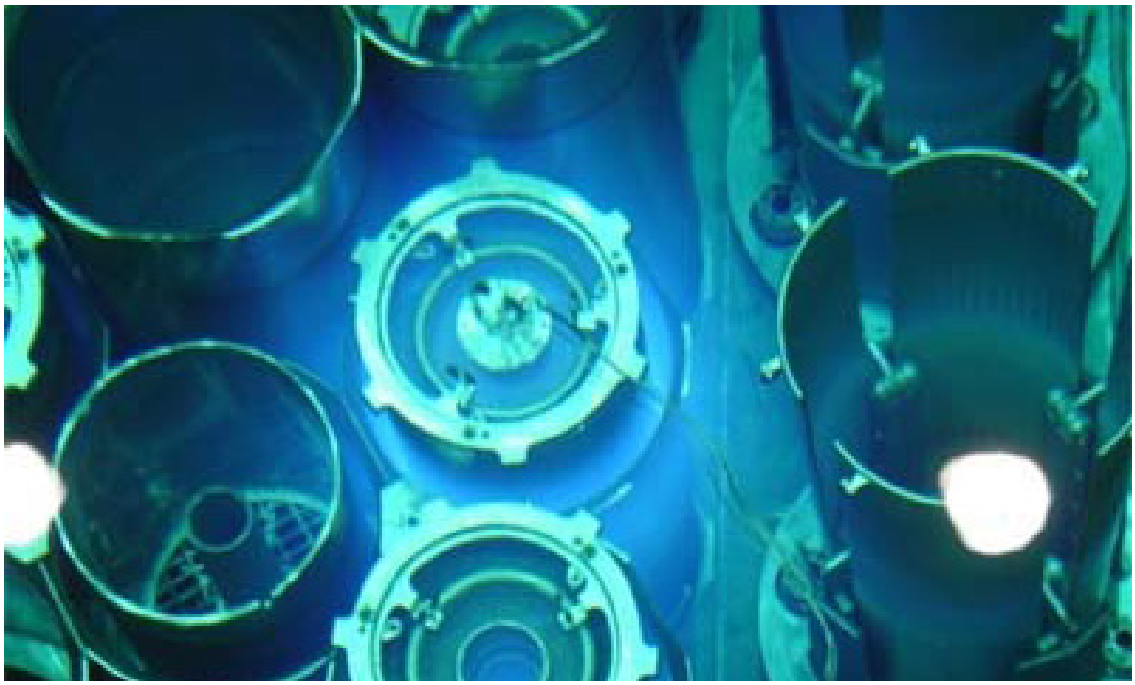
WHAT DOES THIS TRAIT LOOK LIKE?

Safety Conscious Work Environment (SCWE) Policy: The organization effectively implements a policy that supports individuals' rights and responsibilities to raise safety concerns and does not tolerate harassment, intimidation, retaliation, or discrimination for doing so.

Individuals feel free to raise nuclear safety concerns without fear of retribution, with confidence that their concerns will be addressed. Executives and senior managers set and reinforce expectations for establishing and maintaining a safety-conscious work environment. Policies and procedures reinforce that individuals have the right and responsibility to raise nuclear safety concerns and define the responsibilities of leaders to create an environment in which individuals feel free to raise safety concerns. Leaders are trained to take ownership when receiving and responding to concerns, recognizing confidentiality if appropriate, and ensuring they are adequately addressed in a timely manner. Individuals are trained that behaviors or actions that could prevent concerns from being raised, including harassment, intimidation, retaliation, or discrimination, will not be tolerated and are violations of law and policy. All claims of retaliation are investigated and any necessary corrective actions are taken in a timely manner, including actions to mitigate any potential chilling effect.

Alternate Process for Raising Concerns: The organization effectively implements a process for raising and resolving concerns that is independent of line management influence. Safety issues may be raised in confidence and are resolved in a timely and effective manner.

Executives establish, support, and promote the use of alternative processes for raising concerns and ensure corrective actions are taken. Leaders understand their role in supporting alternate processes for raising concerns. Processes for raising concerns or resolving differing professional opinions that are alternatives to the corrective action program and operate outside the influence of the management chain are communicated and accessible to individuals. Alternative processes are independent, include an option to raise concerns confidentially, and ensure these concerns are appropriately resolved in a timely manner. Individuals receive feedback in a timely manner. Individuals have confidence that issues raised will be appropriately resolved. Individuals assigned to respond to concerns have the appropriate competencies.



Experimental gamma irradiation source similar to the source referenced in the Trait Talk example.

WHAT IS A SCENARIO IN WHICH THIS TRAIT COULD PLAY A ROLE?

A research scientist in the nuclear physics program at a research laboratory moved a high activity radioactive source to temporary storage area of the irradiation pool. He was not aware that, three days prior to moving the source, maintenance workers had removed a small section of the concrete shielding from the irradiation pool wall. This allowed the source to emit radiation through the unshielded section of the pool wall and create an unplanned high radiation area. The procedures for moving the source did not clearly require cross- checking with maintenance activities.

During the investigation of this incident, the research scientist told the investigator that he previously raised concerns to his supervisor about the adequacy of procedures for moving the source and ensuring that the source was appropriately shielded. Further, he noted that he had told the supervisor on numerous occasions that many of the procedures dealing with the safety of laboratory activities may be insufficient. After this incident, he told the supervisor that he was going to notify the facility administration about his concerns and the supervisor's lack of response. The supervisor told the scientist that because of significant budget cuts in research programs, and subsequent reduction in staff, he did not have the resources to review and revise all of the procedures and he did not want to draw any more attention to the program. In addition, the supervisor said that if the scientist raised this concern with the administration, his "future employment" would be discussed. A few days later, the scientist discussed his concerns with the administration officials, and two weeks later, the scientist was laid off due to budget cuts. The remaining research staff was aware of the circumstances surrounding their colleague's termination. The supervisor told staff members that any concerns they have should never be "taken up the chain of command."

Continuing budget cuts and their colleague's termination have resulted in the remaining research staff members being concerned about their jobs, the future of the research programs, and their safety while working at the research facility. Staff members have expressed reluctance to raise any concerns to their supervisor or the administration, and they continue to be worried about the adequacy of procedures and policies. This chilling effect prevents the staff from feeling free to raise nuclear safety concerns without fear of retaliation, and weakens the facility's safety culture.

Thinking about the scenario discussed above, consider the following questions:

1. How does this scenario apply to the safety culture trait Environment for Raising Concerns?
2. What kinds of actions and behaviors would have reinforced safety as the overriding priority?
3. How could this situation have been handled differently?

WHO CAN I CONTACT WITH A QUESTION OR SUGGESTION?

The NRC looks forward to continuing to provide you with information about the traits of a positive safety culture. If you have a question or would like to make a suggestion, please contact the U.S. Nuclear Regulatory Commission, Office of Enforcement, Safety Culture Team, at external_safety_culture.resource@nrc.gov.

Sources of Information:

1 "Why is this trait important?" was derived, in part, from a literature review (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13023A054) prepared by Pacific Northwest National Laboratories for the NRC Office of Nuclear Regulatory Research, and from the NRC Regulatory Issue Summary 2005-18, "Guidance for Establishing and Maintaining A Safety Conscious Work Environment" (ML052220239).

2 "What does this trait look like?" was derived from the Safety Culture Common Language effort (ADAMS Accession No. ML13031A343), under the direction of the Office of Nuclear Reactor Regulation. Panelists from the NRC, nuclear power industry, and the public created attributes of a positive nuclear safety culture, and examples of each attribute that a nuclear power organization should demonstrate in maintaining a positive safety culture. Although these attributes and examples were created specifically for the reactor community, they may also be applicable to various other communities and organizations. For purposes of Trait Talk, the examples were partially rewritten to increase applicability to nuclear as well as non nuclear communities.

3 "What is a scenario in which this trait played a role?" was developed specifically for Safety Culture Trait Talk for educational purposes only. The scenario is fictional and any resemblance to actual events, people, or organizations is purely coincidental.

WHAT IS THE NRC'S SAFETY CULTURE POLICY STATEMENT?

There are many definitions of safety culture. Most of these definitions focus on the idea that in a positive safety culture individuals and organizations emphasize safety over competing goals, such as production or costs, ensuring a safety-first focus. The NRC's SCPS defines nuclear safety culture as ***the core values and behaviors resulting from a collective commitment by leaders and individuals to emphasize safety over competing goals to ensure protection of people and the environment.*** Experience has shown that certain personal and organizational traits are present in a positive safety culture. The following traits were included in the NRC's SCPS, although additional traits may also be important in a positive safety culture:

Leadership Safety Values and Actions	Problem Identification and Resolution	Personal Accountability
Leaders demonstrate a commitment to safety in their decisions and behaviors.	*Issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.*	*All individuals take personal responsibility for safety.*
Work Processes	**Continuous Learning**	**Environment for Raising Concerns**
The process of planning and controlling work activities is implemented so that safety is maintained.	*Opportunities to learn about ways to ensure safety are sought out and implemented.*	*A safety conscious work environment is maintained where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment or discrimination.*
Effective Safety Communications	**Respectful Work Environment**	**Questioning Attitude**
Communications maintain a focus on safety.	*Trust and respect permeate the organization.*	*Individuals avoid complacency and continually challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action.*

The NRC's SCPS provides the NRC's expectation that individuals and organizations performing regulated activities establish and maintain a positive safety culture commensurate with the safety and security significance of their activities and the nature and complexity of their organizations and functions. Because safety and security are the primary pillars of the NRC's regulatory mission, consideration of both safety and security issues, commensurate with their significance, is an underlying principle of the SCPS.

The NRC's SCPS applies to all licensees, certificate holders, permit holders, authorization holders, holders of quality assurance program approvals, vendors and suppliers of safety-related components, and applicants for a license, certificate permit, authorization, or quality assurance program approval subject to NRC authority. In addition, the Commission encourages the Agreement States (States that assume regulatory authority over their own use of certain nuclear materials), their licensees, and other organizations interested in nuclear safety to support the development and maintenance of a positive safety culture within their regulated communities. The SCPS is not a regulation; therefore, it is the organization's responsibility, as part of its safety culture program, to consider how to apply the SCPS to its regulated activities.

The NRC's SCPS, which includes the definition of nuclear safety culture and the nine traits of a positive safety culture, can be found on the NRC's Safety Culture Web site. The Web site includes additional safety culture information, as well as the NRC safety culture case studies, which describe how the presence or absence of safety culture traits affects the outcome of the events.