

**From:** Lizette Roldan-Otero  
**Sent:** Tuesday, October 18, 2022 11:35 AM  
**To:** Mary Hennings Frank  
**Cc:** Allyce Bolger (She/Her); Jeremy Groom; John Kramer  
**Subject:** FW: Confirmatory Order Inspection 030-39216/2021-002 Report 4-2019-007 Avera McKennan  
**Attachments:** Radiation Oncology Final copies of Willful Misconduct and Safety Culture content; 2022 8 5 Confirmatory Order Training Letter.pdf; Willful Misconduct Education PP RML 40-16571-02.pdf; Test Questions for Safety Culture RML 40-16571-02.pdf; Safety Culture Education PP RML 40-16571-02.pdf; Evaluation Questions for Willful Misconduct RML 40-16571-01.pdf; NRC Logo.png

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Hennings –

We have reviewed the enclosed documents pertaining to training and it meets the expectation of what is provided in the confirmatory order. This satisfies Item E of the confirmatory order.

Please let Ms. Allyce Bolger or myself know if you have any further questions.

Thanks,

*Lizette Roldán-Otero, Ph.D., Chief*

P:Y10 PQQ7B :-  
 E s5jn0 -' ~D' ~D' , ""

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**From:** R4Enforcement <R4Enforcement.Resource@nrc.gov>  
**Sent:** Monday, August 8, 2022 9:55 AM  
**To:** Muessle, Mary <Mary.Muessle@nrc.gov>; Miller, Geoffrey <Geoffrey.Miller@nrc.gov>; Roldan-Otero, Lizette <Lizette.Roldan-Otero@nrc.gov>  
**Cc:** Groom, Jeremy <Jeremy.Groom@nrc.gov>; Roberts, Austin <Austin.Roberts@nrc.gov>; Kramer, John <John.Kramer@nrc.gov>; Cylkowski, David <David.Cylkowski@nrc.gov>  
**Subject:** FW: Confirmatory Order Inspection 030-39216/2021-002 Report 4-2019-007 Avera McKennan

Email received from Avera McKennan.

John

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**From:** Mary Hennings Frank <[Mary.HenningsFrank@avera.org](mailto:Mary.HenningsFrank@avera.org)>  
**Sent:** Friday, August 05, 2022 12:27 PM  
**To:** R4Enforcement <[R4Enforcement.Resource@nrc.gov](mailto:R4Enforcement.Resource@nrc.gov)>  
**Cc:** Traci Hollingshead <[Traci.Hollingshead@avera.org](mailto:Traci.Hollingshead@avera.org)>  
**Subject:** [External\_Sender] Confirmatory Order Inspection 030-39216/2021-002 Report 4-2019-007 Avera McKennan

Dear Sir or Madam,

Please find enclosed, items to support the communication and training sections, of the Confirmatory Order dated May 19, 2022, for Avera McKennan.

We look forward in hearing from you soon,

**Mary Hennings-Frank** | Radiation Safety Officer  
Avera McKennan Hospital & University Health Center  
1325 S. Cliff Ave. | Sioux Falls, SD 57105  
Direct: 605-322-7155 | Cell: 605-368-4609 | Fax: 605-322-7181



**McKenna Hospital  
& University Health Center**

1325 S. Cliff Ave.  
P.O. Box 5045  
Sioux Falls, SD 57117-5045  
605-322-8000

[AveraMcKenna.org](http://AveraMcKenna.org)

August 5, 2022

U.S. Nuclear Regulatory Commission  
Region IV  
1600 E. Lamar Blvd  
Arlington, Texas 76011-4511

Re: Confirmatory Order Modifying License – NRC Inspection Report 030-39216/2021-002 and Investigation Report 4-2019-007, Avera McKenna

Dear Sir or Madam:

A Confirmatory Order, was issued to Avera McKenna on May 19, 2022, as a result of a successful alternative dispute resolution mediation session. Please find enclosed in this e-mail, the following documents for your review and approval.

- Communication D for approval 8 5 2022
  - Training – Section E for RML #40-16571-01
  - Training – Section E For RML # 40-16571-02

If you have any question or need additional information regarding this Confirmatory Order, please contact Mary Hennings-Frank at (605) 368-4609 or Traci Hollingshead at (605) 310-0916

Sincerely,

Mary Hennings-Frank, B.S., CNMT, RSO  
Radiation Safety Officer RML #40-16571-02  
Avera McKenna Hospital

Sincerely,

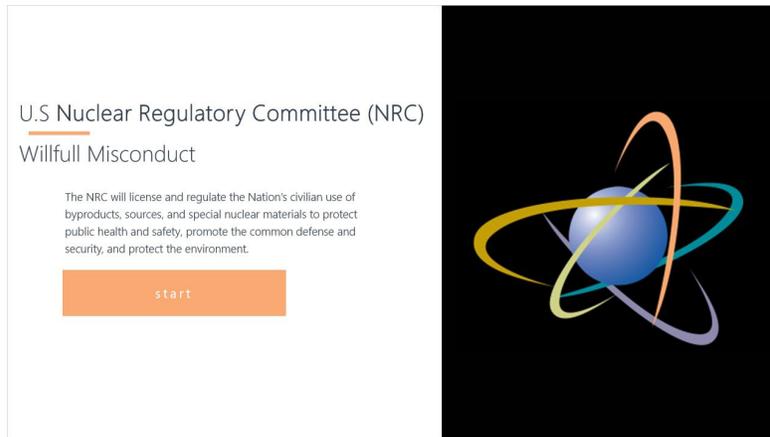
Traci Hollingshead, B.S, CNMT, RSO  
Radiation Safety Officer, RML #40-16571-01  
Avera McKenna Radiation Oncology

Enclosure: Supporting Documents for RML #40-16571-02 (Zip File)  
Supporting Documents for RML #40-16571-01 (Outlook Item File)

# Willful Misconduct

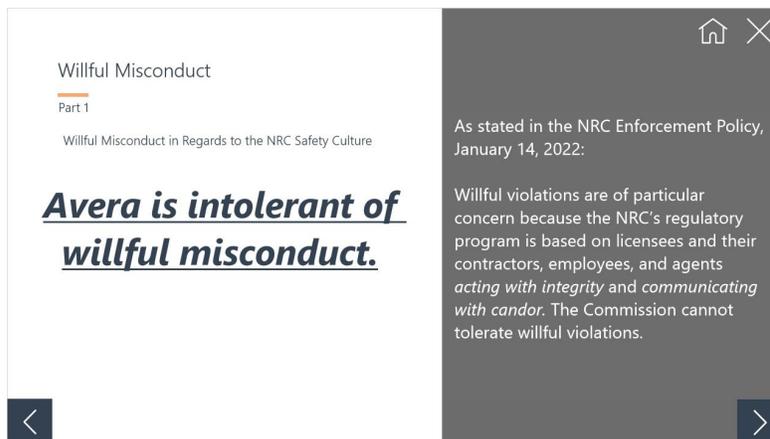
## 1. Self-Awareness

### 1.1 Title



Notes:

### 1.2 How do you know if you did it right?



### 1.3 How do you know if you did it right?

Willful Misconduct  
Part 1  
Willful Misconduct in Regards to the NRC Safety Culture

**Avera is intolerant of willful misconduct.**

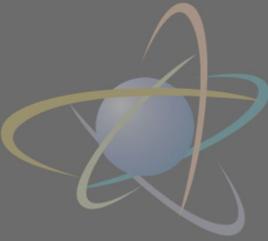
The term "willfulness" as used in the NRC Enforcement Policy refers to conduct involving either a careless disregard for requirements, a deliberate violation of requirements or falsification of information.

### 1.4 How do you know if you did it right?

Willful Misconduct  
Part 1  
Willful Misconduct in Regards to the NRC Safety Culture

In determining the significance of a violation involving willfulness, the NRC will consider such factors as the:

- Position
- Training
- Experience level
- Responsibilities of the person involved in the violation (e.g., licensee official or non-supervisory employee)
- Significant of any underlying violation
- Intent of the violator (i.e., careless disregard or deliberateness)
- Economic or other advantage, if any, gained as a result of the violation



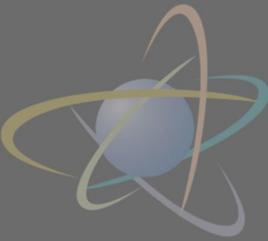
### 1.5 How do you know if you did it right?

Willful Misconduct  
Part 1  
Willful Misconduct in Regards to the NRC Safety Culture

Licensees are expected to take significant remedial action in responding to willful violations commensurate with the circumstances, such that the action reflects the seriousness of the violation, thereby creating a deterrent effect within the licensee's organization.

Civil penalty discretion should be considered for willfulness, particularly instances where the licensee made a conscious decision to be in noncompliance with NRC requirements in order to obtain an economic benefit.

*(For example, a staff member knowingly altered treatment for a patient to decrease treatment times so staff member can leave earlier).*



## 1.6 How do you know if you did it right?

Willful Misconduct  
Part 1

Willful Misconduct in Regards to the NRC Safety Culture

**The NRC Confirmatory Order to Avera McKennan dated May 19th, 2022 states:**

*"Pursuant to Section 223 of the Atomic Energy Act of 1954, as amended, any person who willfully violates, attempts to violate, or conspires to violate, any provision of the Confirmatory Order shall be subject to criminal prosecution, as set forth in that section. Violation of the Confirmatory Order may also subject the person to civil monetary penalties.*

The slide features a dark grey background on the right with a stylized atomic symbol. Navigation icons (home, close, back, forward) are visible.

## 1.7 How do you know if you did it right?

Willful Misconduct  
Part 1

Willful Misconduct in Regards to the NRC Safety Culture

**10 CFR § 75.53 – Criminal penalties**

(a) Section 223 of the Atomic Energy Act of 1954, as amended, provides for criminal sanctions or willful violation of, or conspiracy to violate, any regulation issued under sections 161b, 161i, or 161o. of the Act.

Please call the Regulatory Compliance Department at 605-322-7155 with questions.

The slide features a dark grey background on the right with a stylized atomic symbol. Navigation icons (home, close, back, forward) are visible.

## 1.8 Thank you

**THANK YOU**  
FOR YOUR PARTICIPATION

You will now be expected to complete an evaluation regarding willful misconduct. Please select the 'X' in the upper right-hand corner of the screen to complete this portion of the course.

The slide features a dark grey background on the right with a stylized atomic symbol. Navigation icons (home, close, back, forward) are visible.

**Notes:**

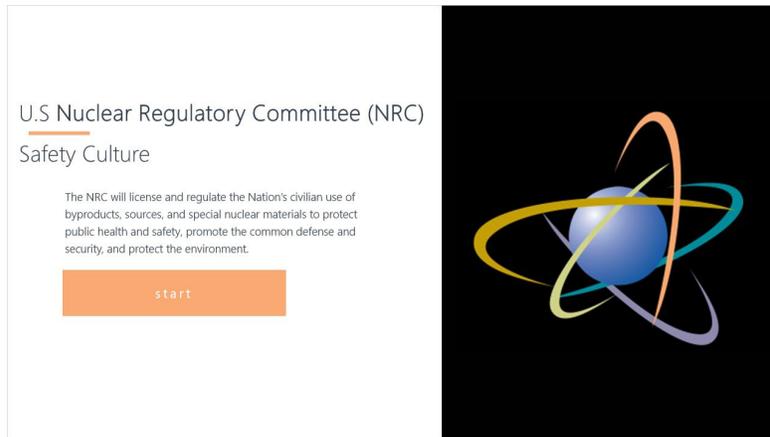
### **Evaluation Questions for Safety Culture and Willful Misconduct**

1. Was the willful misconduct training material and content helpful to you?
  - a. Yes
  - b. No
2. Before this training, were you aware of the NRC's intolerance of deliberate misconduct?
  - a. Yes
  - b. No
3. Before this training, were you aware of the potential enforcement actions that the NRC may take against employees who engage in deliberate misconduct?
  - a. Yes
  - b. No
4. Before this training, were you aware of the associated NRC enforcement actions that may be taken against a license as a result of deliberate misconduct?
  - a. Yes
  - b. No

# Safety Culture Education

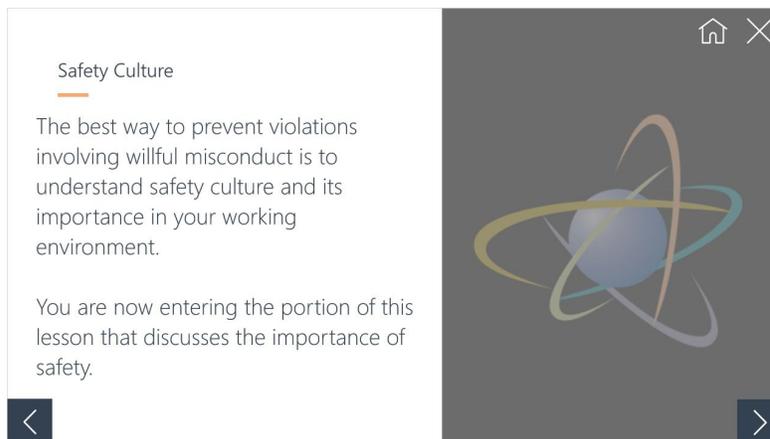
## 1. Self-Awareness

### 1.1 Title

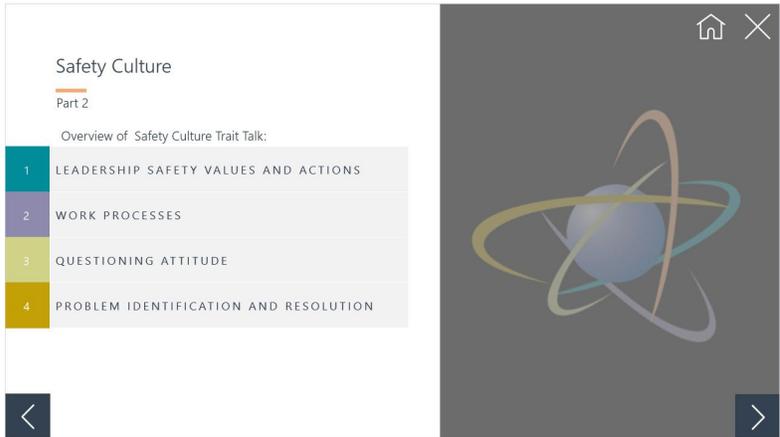


Notes:

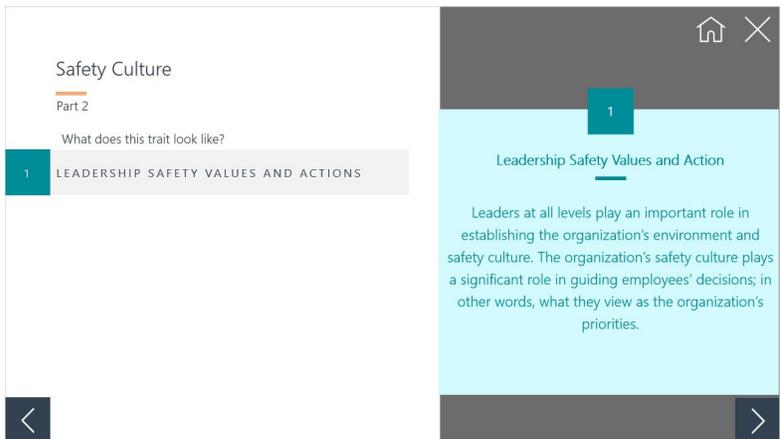
### 1.2 How do you know if you did it right?



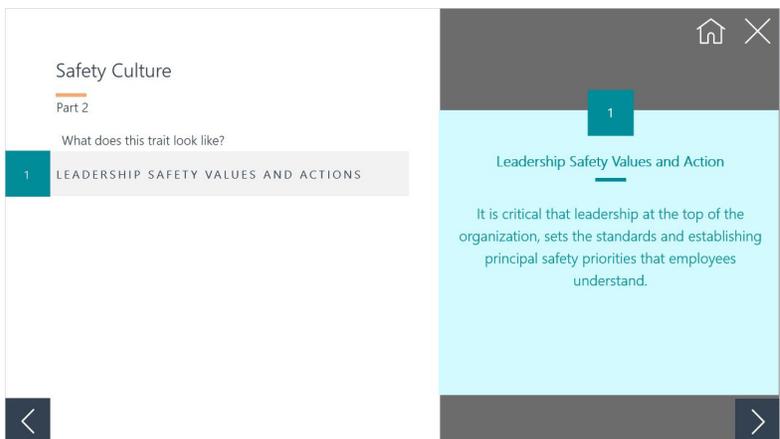
### 1.3 How do you know if you did it right?



### 1.4 How do you know if you did it right?



### 1.5 How do you know if you did it right?



## 1.6 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture Part 2'. On the left, a navigation menu lists six categories: LEADERSHIP SAFETY VALUES AND ACTIONS (highlighted with a dark teal bar and the number 1), RESOURCES, FIELD PRESENCE, INCENTIVES, SANCTIONS, AND REWARDS, STRATEGIC COMMITMENT TO SAFETY, CHANGE MANAGEMENT, and ROLES, RESPONSIBILITIES, AND AUTHORITIES. The main content area on the right is a light blue slide with a dark teal header containing the number 1 and the title 'Leadership Safety Values and Action'. The slide text reads: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected. Click '>' when you are ready to continue after each section has been completed.'

### Resources (Slide Layer)

This screenshot shows the 'Resources' slide layer. The navigation menu on the left is identical to the previous slide, but the 'RESOURCES' category is now highlighted with a dark teal bar and the number 1. The main content area on the right is a light blue slide with a dark teal header containing the number 1 and the title 'Resources'. The slide text reads: 'Leaders ensure that personnel, equipment, procedures, and other resources are available and adequate to support safety.'

### Field Presence (Slide Layer)

This screenshot shows the 'Field Presence' slide layer. The navigation menu on the left is identical to the previous slides, but the 'FIELD PRESENCE' category is now highlighted with a dark teal bar and the number 1. The main content area on the right is a light blue slide with a dark teal header containing the number 1 and the title 'Field Presence'. The slide text reads: 'Leaders are commonly seen in working areas of the organization observing, coaching, and reinforcing standards and expectations.'

## Incentives, Sanctions, and Rewards (Slide Layer)

The image shows a two-part presentation slide. The left part is a navigation menu titled 'Safety Culture Part 2' with the question 'What does this trait look like?'. It lists six categories: LEADERSHIP SAFETY VALUES AND ACTIONS (highlighted with a '1'), RESOURCES, FIELD PRESENCE, INCENTIVES, SANCTIONS, AND REWARDS, STRATEGIC COMMITMENT TO SAFETY, CHANGE MANAGEMENT, and ROLES, RESPONSIBILITIES, AND AUTHORITIES. The right part is a content slide with a dark header containing a home icon and a close icon. Below the header is a teal box with a '1' and the title 'Incentives, Sanctions, and Rewards'. The main text reads: 'Leaders foster an environment that promotes accountability and hold individuals accountable for their actions, by praising behaviors that reflect a positive safety culture'. Navigation arrows are visible at the bottom of both panels.

## Strategic Commitment to Safety (Slide Layer)

The image shows a two-part presentation slide. The left part is a navigation menu titled 'Safety Culture Part 2' with the question 'What does this trait look like?'. It lists six categories: LEADERSHIP SAFETY VALUES AND ACTIONS, RESOURCES, FIELD PRESENCE, INCENTIVES, SANCTIONS, AND REWARDS (highlighted with a '1'), STRATEGIC COMMITMENT TO SAFETY, CHANGE MANAGEMENT, and ROLES, RESPONSIBILITIES, AND AUTHORITIES. The right part is a content slide with a dark header containing a home icon and a close icon. Below the header is a teal box with a '1' and the title 'Strategic Commitment to Safety'. The main text reads: 'Leaders establish plans that reflect safety as the overriding priority.' Navigation arrows are visible at the bottom of both panels.

## Change Management (Slide Layer)

The image shows a two-part presentation slide. The left part is a navigation menu titled 'Safety Culture Part 2' with the question 'What does this trait look like?'. It lists six categories: LEADERSHIP SAFETY VALUES AND ACTIONS, RESOURCES, FIELD PRESENCE, INCENTIVES, SANCTIONS, AND REWARDS, STRATEGIC COMMITMENT TO SAFETY, CHANGE MANAGEMENT (highlighted with a '1'), and ROLES, RESPONSIBILITIES, AND AUTHORITIES. The right part is a content slide with a dark header containing a home icon and a close icon. Below the header is a teal box with a '1' and the title 'Change Management'. The main text reads: 'Leaders ensure safety is maintained when planning, communicating, and implementing change and ensure that unintended consequences are avoided. Individuals understand the importance of, and their role in, the change management process.' Navigation arrows are visible at the bottom of both panels.

## Roles, Responsibilities, and Authorities (Slide Layer)

The screenshot shows a presentation interface. On the left, a slide titled "Safety Culture" (Part 2) asks "What does this trait look like?". A list of traits is shown, with "1 LEADERSHIP SAFETY VALUES AND ACTIONS" selected. Below it are other traits: "RESOURCES", "FIELD PRESENCE", "INCENTIVES, SANCTIONS, AND REWARDS", "STRATEGIC COMMITMENT TO SAFETY", "CHANGE MANAGEMENT", and "ROLES, RESPONSIBILITIES, AND AUTHORITIES". On the right, a detailed slide for "Roles, Responsibilities, and Authorities" (slide 1) contains two bullet points: "Leaders clearly define roles, responsibilities, and authorities to ensure safety." and "Leaders appropriately delegate responsibility and authority to promote ownership and accountability."

### 1.7 How do you know if you did it right?

The screenshot shows a presentation interface. On the left, a slide titled "Safety Culture" (Part 2) asks "What does this trait look like?". A list of traits is shown, with "2 WORK PROCESSES" selected. Below it is a text box: "The NRC defines this trait as when the process of planning and controlling work activities is implemented so that safety is maintained." On the right, a detailed slide for "Work Processes" (slide 2) contains a paragraph: "Work activities will be prioritized, coordinated across workgroups, and communicated effectively. Policies and procedures will incorporate the appropriate risk insights and be effectively planned, executed, verified, and documented. The rigorous development, management and adherence to work processes helps ensure the safe use of radiation sources and reflects a positive safety culture."

### 1.8 How do you know if you did it right?

The screenshot shows a presentation interface. On the left, a slide titled "Safety Culture" (Part 2) asks "What does this trait look like?". A list of traits is shown, with "1 LEADERSHIP SAFETY VALUES AND ACTIONS" selected and marked with a checkmark. Below it is "2 WORK PROCESSES". Below the list is a text box: "The NRC defines this trait as when the process of planning and controlling work activities is implemented so that safety is maintained." On the right, a detailed slide for "Work Processes" (slide 2) contains a paragraph: "High reliability organizations, however, may base activities around individual expertise and professionalism, autonomy, and rapid team-based response, particularly during off-normal conditions, (pandemic, natural disaster, downtime, short staffing, etc)."

## 1.9 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture Part 2'. On the left, a table of contents lists five categories: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (selected with a '2' icon), 'RESOURCES', 'DOCUMENTATION', and 'PROCEDURE ADHERENCE'. The main content area on the right is titled 'Work Processes' and contains instructions: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected. Click 'Next >' when you are ready to continue after each section has been completed.'

### Resources (Slide Layer)

The screenshot shows the same mobile application interface, but the 'Resources' category is now selected. The main content area on the right is titled 'Resources' and contains the text: 'The organization implements a process of planning, controlling, and executing work activities such that safety is the overriding priority. The work process includes the identification and management of risk commensurate to the work.'

### Documentation (Slide Layer)

The screenshot shows the same mobile application interface, but the 'Documentation' category is now selected. The main content area on the right is titled 'Documentation' and contains the text: 'The organization creates and maintains complete, accurate, and up-to-date documentation.'

## Design Margins (Slide Layer)

The screenshot shows a mobile application interface. On the left, a 'Safety Culture' menu is visible with 'Part 2' selected. The menu items are: LEADERSHIP SAFETY VALUES AND ACTIONS (checked), WORK PROCESSES (2), RESOURCES, DOCUMENTATION, DESIGN MARGINS, and PROCEDURE ADHERENCE. The main content area on the right is titled 'Design Margins' with a sub-number '2'. The text reads: 'The organization operates and maintains equipment within design margins. Margins are carefully guarded and changed only through a systematic and rigorous process.'

## Procedure Adherence (Slide Layer)

The screenshot shows a mobile application interface. On the left, the 'Safety Culture' menu is visible with 'Part 2' selected. The menu items are: LEADERSHIP SAFETY VALUES AND ACTIONS (checked), WORK PROCESSES (2), RESOURCES, DOCUMENTATION, DESIGN MARGINS, and PROCEDURE ADHERENCE. The main content area on the right is titled 'Procedure Adherence' with a sub-number '2'. The text reads: 'Individuals follow processes, procedures, and work instructions.'

## 1.10 How do you know if you did it right?

The screenshot shows a mobile application interface. On the left, the 'Safety Culture' menu is visible with 'Part 2' selected. The menu items are: LEADERSHIP SAFETY VALUES AND ACTIONS (checked), WORK PROCESSES (2), and QUESTIONING ATTITUDE (3). The main content area on the right is titled 'Questioning Attitude' with a sub-number '3'. The text reads: 'Complacency may be a key contributor to many incidents involving radiation sources, such as the accidental overexposure of radiotherapy patients.' A quote box at the bottom left states: 'The NRC's defines this trait as when individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action.'

## 1.11 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture Part 2'. On the left, a navigation menu lists three categories: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (checked), and 'QUESTIONING ATTITUDE' (selected with a green bar and the number 3). Below the menu is a text box: 'The NRC's defines this trait as when individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action.' On the right, the main content area displays 'Questioning Attitude' with a green bar and the number 3. The text reads: 'Avoiding complacency is essential to ensuring radiation protection of workers and patients and can be achieved by instilling a questioning attitude in every employee. From the medical radiation technologist questioning an anomalous data point, to the medical radiation practitioner questioning an unexpected change in treatment parameters, having a questioning attitude is vital for the safe use of radiation sources and a positive safety culture.'

## 1.12 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture Part 2'. On the left, a navigation menu lists four categories: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (checked), 'QUESTIONING ATTITUDE' (selected with a green bar and the number 3), and 'RADIATION SOURCES ARE SPECIAL' (with sub-items: 'CHALLENGE THE UNKNOWN', 'AVOID COMPLACENCY', 'CHALLENGE ASSUMPTIONS'). On the right, the main content area displays 'Work Processes' with a green bar and the number 3. The text reads: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected. Click 'Next >' when you are ready to continue after each section has been completed.'

## Radiation Sources are Special (Slide Layer)

The screenshot shows a mobile application interface for 'Safety Culture Part 2'. On the left, a navigation menu lists four categories: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (checked), 'QUESTIONING ATTITUDE' (selected with a green bar and the number 3), and 'RADIATION SOURCES ARE SPECIAL' (with sub-items: 'CHALLENGE THE UNKNOWN', 'AVOID COMPLACENCY', 'CHALLENGE ASSUMPTIONS'). On the right, the main content area displays 'Radiation Sources are Special' with a green bar and the number 3. The text reads: 'Individuals understand that complex technologies can fall in unpredictable ways.'

## Challenge the Unknown (Slide Layer)

The screenshot shows a mobile application interface. On the left, a sidebar menu titled 'Safety Culture' contains a list of items: 'LEADERSHIP SAFETY VALUES AND ACTIONS', 'WORK PROCESSES', 'QUESTIONING ATTITUDE', 'RADIATION SOURCES ARE SPECIAL', 'CHALLENGE THE UNKNOWN', 'AVOID COMPLACENCY', and 'CHALLENGE ASSUMPTIONS'. The 'QUESTIONING ATTITUDE' item is highlighted with a green bar and the number '3'. The main content area on the right has a dark header with a home icon and a close icon. Below the header, a green box with the number '3' is positioned above the title 'Challenge the Unknown'. The main text reads: 'Individuals stop when faced with uncertain conditions. Risks are evaluated and managed before proceeding.'

## Avoid Complacency (Slide Layer)

The screenshot shows a mobile application interface. On the left, a sidebar menu titled 'Safety Culture' contains a list of items: 'LEADERSHIP SAFETY VALUES AND ACTIONS', 'WORK PROCESSES', 'QUESTIONING ATTITUDE', 'RADIATION SOURCES ARE SPECIAL', 'CHALLENGE THE UNKNOWN', 'AVOID COMPLACENCY', and 'CHALLENGE ASSUMPTIONS'. The 'AVOID COMPLACENCY' item is highlighted with a green bar and the number '3'. The main content area on the right has a dark header with a home icon and a close icon. Below the header, a green box with the number '3' is positioned above the title 'Avoid Complacency'. The main text reads: '(Complacent: fault with oneself or one's actions) Individuals recognize and plan for the possibility of mistakes, latent problems, and inherent risk, even while expecting successful outcomes.'

## Challenge Assumptions (Slide Layer)

The screenshot shows a mobile application interface. On the left, a sidebar menu titled 'Safety Culture' contains a list of items: 'LEADERSHIP SAFETY VALUES AND ACTIONS', 'WORK PROCESSES', 'QUESTIONING ATTITUDE', 'RADIATION SOURCES ARE SPECIAL', 'CHALLENGE THE UNKNOWN', 'AVOID COMPLACENCY', and 'CHALLENGE ASSUMPTIONS'. The 'CHALLENGE ASSUMPTIONS' item is highlighted with a green bar and the number '3'. The main content area on the right has a dark header with a home icon and a close icon. Below the header, a green box with the number '3' is positioned above the title 'Challenge Assumptions'. The main text reads: 'Individuals challenge assumptions and offer opposing views when they think something is not correct.'

### 1.13 How do you know if you did it right?

The screenshot shows a learning interface for 'Safety Culture Part 2'. On the left, a list of traits is shown with a progress indicator. The fourth trait, 'PROBLEM IDENTIFICATION AND RESOLUTION', is highlighted in yellow and has a '4' in a yellow box next to it. Below the list is a text box with a definition: 'The NRC's defines this trait as when issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.' On the right, a yellow panel displays the title 'Problem Identification and Resolution' and a paragraph: 'An effective problem identification and resolution program uses the organization's corrective action program, operating experience, and self-assessment results to ensure safe operations. The corrective action program should have a transparent process for evaluating, prioritizing, and resolving issues.'

### 1.14 How do you know if you did it right?

The screenshot shows a learning interface for 'Safety Culture Part 2'. On the left, a list of traits is shown with a progress indicator. The fourth trait, 'PROBLEM IDENTIFICATION AND RESOLUTION', is highlighted in yellow and has a '4' in a yellow box next to it. Below the list is a text box with a definition: 'The NRC's defines this trait as when issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.' On the right, a yellow panel displays the title 'Problem Identification and Resolution' and a paragraph: 'Organizations can approach problem identification and resolution with different mindsets. One mindset focuses on finding existing problems and correcting weaknesses, typically through the organization's corrective action program. However, an organization with a positive safety culture also has a problem identification and resolution program that anticipates issues, reviews operating experience, and tracks emerging themes and trends.'

### 1.15 How do you know if you did it right?

The screenshot shows a learning interface for 'Safety Culture Part 2'. On the left, a list of traits is shown with a progress indicator. The fourth trait, 'PROBLEM IDENTIFICATION AND RESOLUTION', is highlighted in yellow and has a '4' in a yellow box next to it. Below the list is a text box with a definition: 'The NRC's defines this trait as when issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.' On the right, a yellow panel displays the title 'Problem Identification and Resolution' and two paragraphs: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected.' and 'Click 'Next >' when you are ready to continue after each section has been completed.'

## Identification (Slide Layer)

The screenshot shows a presentation slide titled "Safety Culture" with "Part 2" below it. The main heading is "What does this trait look like?". A list of four items is shown, each with a checkmark: "LEADERSHIP SAFETY VALUES AND ACTIONS", "WORK PROCESSES", "QUESTIONING ATTITUDE", and "PROBLEM IDENTIFICATION AND RESOLUTION". Below this list is a legend with four colored boxes: dark brown for "IDENTIFICATION", medium brown for "TRENDING", light brown for "RESOLUTION", and yellow for "EVALUATION". The "PROBLEM IDENTIFICATION AND RESOLUTION" item is highlighted with a dark brown box, and the "IDENTIFICATION" legend item is also highlighted with a dark brown box. The right side of the slide features a dark grey header with a home icon and a close icon, a yellow box with the number "4", the word "Identification" in bold, and a paragraph of text: "The organization implements a corrective action program with a low threshold for identifying issues. Individuals identify issues completely, accurately, and in a timely manner in accordance with the program."

## Trending (Slide Layer)

The screenshot shows a presentation slide titled "Safety Culture" with "Part 2" below it. The main heading is "What does this trait look like?". A list of four items is shown, each with a checkmark: "LEADERSHIP SAFETY VALUES AND ACTIONS", "WORK PROCESSES", "QUESTIONING ATTITUDE", and "PROBLEM IDENTIFICATION AND RESOLUTION". Below this list is a legend with four colored boxes: dark brown for "IDENTIFICATION", medium brown for "TRENDING", light brown for "RESOLUTION", and yellow for "EVALUATION". The "PROBLEM IDENTIFICATION AND RESOLUTION" item is highlighted with a dark brown box, and the "TRENDING" legend item is also highlighted with a medium brown box. The right side of the slide features a dark grey header with a home icon and a close icon, a yellow box with the number "4", the word "Trending" in bold, and a paragraph of text: "The organization periodically analyzes information from the corrective action program and other assessments in the aggregate to identify programmatic and common cause issues."

## Resolution (Slide Layer)

The screenshot shows a presentation slide titled "Safety Culture" with "Part 2" below it. The main heading is "What does this trait look like?". A list of four items is shown, each with a checkmark: "LEADERSHIP SAFETY VALUES AND ACTIONS", "WORK PROCESSES", "QUESTIONING ATTITUDE", and "PROBLEM IDENTIFICATION AND RESOLUTION". Below this list is a legend with four colored boxes: dark brown for "IDENTIFICATION", medium brown for "TRENDING", light brown for "RESOLUTION", and yellow for "EVALUATION". The "PROBLEM IDENTIFICATION AND RESOLUTION" item is highlighted with a dark brown box, and the "RESOLUTION" legend item is also highlighted with a light brown box. The right side of the slide features a dark grey header with a home icon and a close icon, a yellow box with the number "4", the word "Resolution" in bold, and a paragraph of text: "The organization takes effective corrective actions to address issues in a timely manner."

## Evaluations (Slide Layer)

**Safety Culture**  
Part 2

What does this trait look like?

✓	LEADERSHIP SAFETY VALUES AND ACTIONS
✓	WORK PROCESSES
3	QUESTIONING ATTITUDE
4	PROBLEM IDENTIFICATION AND RESOLUTION
	IDENTIFICATION
	TRENDING
	RESOLUTION
	EVALUATION

**4 Evaluation**

The organization thoroughly evaluates problems to ensure that resolutions address causes and extents of conditions commensurate with their safety significance.

### 1.16 How do you know if you did it right?

**Safety Culture**  
Part 3

Overview of Safety Culture Trait Talk:

5	ENVIRONMENT FOR RAISING CONCERNS
6	EFFECTIVE SAFETY COMMUNICATION
7	RESPECTFUL WORK ENVIRONMENT
8	CONTINUOUS LEARNING
9	PERSONAL ACCOUNTABILITY

### 1.17 How do you know if you did it right?

**Safety Culture**  
Part 3

What does this trait look like?

5	ENVIRONMENT FOR RAISING CONCERN
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*The NRC defines this trait as maintaining a safety-conscious work environment where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination.*

**5 Environment for Raising Concerns**

Employees should feel free to raise safety concerns to their management without fear of harassment, intimidation, retaliation, or discrimination.

The organization should clearly identify the process that employees may use to raise concerns, such as discussing issues with their supervisor or filing deficiency reports for problem identification and resolution.

## 1.18 How do you know if you did it right?

The screenshot shows a mobile application interface. On the left, a navigation pane titled 'Safety Culture' includes 'Part 3' and the question 'What does this trait look like?'. A list of options is shown, with '5 ENVIRONMENT FOR RAISING CONCERNS' selected. A text box at the bottom of the pane contains the NRC definition: 'The NRC defines this trait as maintaining a safety-conscious work environment where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination.' On the right, the main content area displays the title 'Environment For Raising Concerns' and a paragraph: 'Organizations should have a work environment where employees are encourage 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.'

## 1.19 How do you know if you did it right?

The screenshot shows the same mobile application interface as in 1.18. The navigation pane now shows three options: '5 ENVIRONMENT FOR RAISING CONCERNS', 'SAFETY CONSCIOUS WORK ENVIRONMENT', and 'ALTERNATE PROCESS FOR RAISING CONCERNS'. The main content area contains instructions: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected. Click 'Next >' when you are ready to continue after each section has been completed.'

## Safety Conscious Work Environment (Slide Layer)

The screenshot shows the mobile application interface with the 'Safety Conscious Work Environment (SCWE)' slide selected in the navigation pane. The main content area displays the title 'Safety Conscious Work Environment (SCWE)' and a paragraph: 'The organization supports individuals' right and responsibilities to raise safety concerns and does not tolerate harassment, intimidation, retaliation, or discrimination for doing so.'

## Alternate Process for Raising Concerns (Slide Layer)

The slide is titled "Safety Culture" and "Part 3". It asks "What does this trait look like?". On the left, a navigation menu shows three items: "5 ENVIRONMENT FOR RAISING CONCERNS" (highlighted in teal), "SAFETY CONSCIOUS WORK ENVIRONMENT", and "ALTERNATE PROCESS FOR RAISING CONCERNS" (highlighted in teal). The main content area is light blue and features a teal box with the number "5" and the title "Alternate Process for Raising Concerns". Below the title, it states: "Safety issues may be raised in confidence and are resolved in a timely and effective manner." Navigation arrows are visible at the bottom.

### 1.20 How do you know if you did it right?

The slide is titled "Safety Culture" and "Part 3". It asks "What does this trait look like?". On the left, a navigation menu shows three items: "5 ENVIRONMENT FOR RAISING CONCERNS", "6 EFFECTIVE SAFETY COMMUNICATION" (highlighted in purple), and "ALTERNATE PROCESS FOR RAISING CONCERNS". The main content area is light purple and features a purple box with the number "6" and the title "Effective Safety Communication". Below the title, it states: "Effective safety communication is vital to maintaining a safety culture. When employees regularly communicate with each other in an open, respectful manner, they are also more willing to give and receive feedback. Effective communication also supports teamwork and coordination between groups." A text box at the bottom left contains the text: "The NRC defines this trait as communications that maintain a focus on safety." Navigation arrows are visible at the bottom.

### 1.21 How do you know if you did it right?

The slide is titled "Safety Culture" and "Part 3". It asks "What does this trait look like?". On the left, a navigation menu shows three items: "ENVIRONMENT FOR RAISING CONCERNS" (highlighted in teal with a checkmark), "6 EFFECTIVE SAFETY COMMUNICATION" (highlighted in purple), and "ALTERNATE PROCESS FOR RAISING CONCERNS". The main content area is light purple and features a purple box with the number "6" and the title "Effective Safety Communication". Below the title, it states: "Top-down communication is most effective when senior managers communicate directly with immediate supervisors and immediate supervisors communicate with their staff. Ensuring that supervisors are informed about organizational issues, and then allowing them to communicate these issues to their staff, helps create and reinforce the supervisor's power." A text box at the bottom left contains the text: "The NRC defines this trait as communications that maintain a focus on safety." Navigation arrows are visible at the bottom.

## 1.22 How do you know if you did it right?

The screenshot shows a mobile application interface. On the left, a list titled "Safety Culture Part 3" asks "What does this trait look like?". The list includes: "ENVIRONMENT FOR RAISING CONCERNS" (checked), "EFFECTIVE SAFETY COMMUNICATION" (selected with a purple square labeled '6'), "WORK PROCESS COMMUNICATIONS", "FREE FLOW OF INFORMATION", "BASES FOR DECISIONS", and "EXPECTATIONS". On the right, a slide layer titled "Work Processes" contains the text: "Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected. Click 'Next >' when you are ready to continue after each section has been completed."

### Work Process Communications (Slide Layer)

The screenshot shows a mobile application interface. On the left, a list titled "Safety Culture Part 3" asks "What does this trait look like?". The list includes: "ENVIRONMENT FOR RAISING CONCERNS" (checked), "EFFECTIVE SAFETY COMMUNICATION" (selected with a purple square labeled '6'), "WORK PROCESS COMMUNICATIONS", "FREE FLOW OF INFORMATION", "BASES FOR DECISIONS", and "EXPECTATIONS". On the right, a slide layer titled "Work Process Communications" contains the text: "Individuals incorporate safety communications in work activities."

### Free Flow of Information (Slide Layer)

The screenshot shows a mobile application interface. On the left, a list titled "Safety Culture Part 3" asks "What does this trait look like?". The list includes: "ENVIRONMENT FOR RAISING CONCERNS" (checked), "EFFECTIVE SAFETY COMMUNICATION" (selected with a purple square labeled '6'), "WORK PROCESS COMMUNICATIONS", "FREE FLOW OF INFORMATION", "BASES FOR DECISIONS", and "EXPECTATIONS". On the right, a slide layer titled "Free Flow of Information" contains the text: "Individuals communicate openly and candidly, both up, down, and across the organization and with oversight, audit, and regulatory organizations."

## Bases for Decisions (Slide Layer)

Safety Culture  
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- 6 EFFECTIVE SAFETY COMMUNICATION
- WORK PROCESS COMMUNICATIONS
- FREE FLOW OF INFORMATION
- 6 BASES FOR DECISIONS
- EXPECTATIONS

6

### Basis for Decisions

Leaders ensure that the bases for operational and organizational decisions are communicated in a timely manner.

## Expectations (Slide Layer)

Safety Culture  
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- 6 EFFECTIVE SAFETY COMMUNICATION
- WORK PROCESS COMMUNICATIONS
- FREE FLOW OF INFORMATION
- BASES FOR DECISIONS
- 6 EXPECTATIONS

6

### Expectations

Leaders frequently communicate and reinforce the expectation that radiation safety is the organization's overriding priority.

## 1.23 How do you know if you did it right?

Safety Culture  
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- 6 EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT

7

### Respectful Work Environment

Trust and respect are among the most frequently discussed concepts in studies of organizational and safety culture. Trust and respect are fundamental to positive interpersonal relationships and central components of effective working relationships.

*The NRC defines the trait as when trust and respect permeates the organization.*

## 1.24 How do you know if you did it right?

Safety Culture  
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT

*The NRC defines the trait as when trust and respect permeates the organization.*

Respectful Work Environment

At an individual level, trust involves the willingness of one person to depend on another person, with a relative sense of security. The perception that an individual is competent, has integrity, and is predictable increases the likelihood that he is trusted and respected.

## 1.25 How do you know if you did it right?

Safety Culture  
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT

*The NRC defines the trait as when trust and respect permeates the organization.*

Respectful Work Environment

At an organizational level, trust and respect instill confidence that the organization is just and fair, which promotes open communication and accurate reporting, enhances organizational learning, and promotes the development of shared perceptions and norms. In studies of safety culture, higher levels of trust and respect are associated with positive safety attitudes, reduced risky behavior, and increased personal responsibility for safety.

## 1.26 How do you know if you did it right?

Safety Culture  
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT

- RESPECT IS EVIDENT
- HIGH LEVEL OF TRUST
- OPINIONS ARE VALUED
- CONFLICT RESOLUTION

*The NRC defines the trait as when trust and respect permeates the organization.*

Respectful Work Environment

Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected.

Click 'Next >' when you are ready to continue after each section has been completed.

## Respect is Evident (Slide Layer)

The screenshot shows a mobile application interface. On the left, a slide titled 'Safety Culture' (Part 3) asks 'What does this trait look like?'. It features a checklist with three items: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), and 'RESPECTFUL WORK ENVIRONMENT' (highlighted with a green bar and the number 7). Below this, a vertical stack of four colored boxes represents a hierarchy: 'RESPECT IS EVIDENT' (dark green), 'HIGH LEVEL OF TRUST' (medium green), 'OPINIONS ARE VALUED' (light green), and 'CONFLICT RESOLUTION' (very light green). On the right, a dark grey header contains a home icon and a close icon. Below it, a green box with the number 7 is positioned above the title 'Respect is Evident'. The main content area is light green and contains the text 'Everyone is treated with dignity and respect.' A dark grey footer contains left and right navigation arrows.

## High Level of Trust (Slide Layer)

The screenshot shows a mobile application interface. On the left, a slide titled 'Safety Culture' (Part 3) asks 'What does this trait look like?'. It features a checklist with three items: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), and 'RESPECTFUL WORK ENVIRONMENT' (highlighted with a green bar and the number 7). Below this, a vertical stack of four colored boxes represents a hierarchy: 'RESPECT IS EVIDENT' (dark green), 'HIGH LEVEL OF TRUST' (medium green), 'OPINIONS ARE VALUED' (light green), and 'CONFLICT RESOLUTION' (very light green). On the right, a dark grey header contains a home icon and a close icon. Below it, a green box with the number 7 is positioned above the title 'High Level of Trust'. The main content area is light green and contains the text 'Trust is fostered among individuals and work groups throughout the organization.' A dark grey footer contains left and right navigation arrows.

## Opinions are Valued (Slide Layer)

The screenshot shows a mobile application interface. On the left, a slide titled 'Safety Culture' (Part 3) asks 'What does this trait look like?'. It features a checklist with three items: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), and 'RESPECTFUL WORK ENVIRONMENT' (highlighted with a green bar and the number 7). Below this, a vertical stack of four colored boxes represents a hierarchy: 'RESPECT IS EVIDENT' (dark green), 'HIGH LEVEL OF TRUST' (medium green), 'OPINIONS ARE VALUED' (light green), and 'CONFLICT RESOLUTION' (very light green). On the right, a dark grey header contains a home icon and a close icon. Below it, a green box with the number 7 is positioned above the title 'Opinions are Valued'. The main content area is light green and contains the text 'Individuals are encouraged to voice concerns, provide suggestions, and raise questions. Differing opinions are respected.' A dark grey footer contains left and right navigation arrows.

## Conflict Resolution (Slide Layer)

The screenshot shows a slide layer interface. On the left, a sidebar titled "Safety Culture" contains a list of traits. The trait "CONFLICT RESOLUTION" is highlighted with a green bar and the number 7. The main content area on the right features a dark header with a home icon and a close icon, a green bar with the number 7, and the title "Conflict Resolution". Below the title, the text reads: "Fair and objective methods are used to resolve conflicts." Navigation arrows are visible at the bottom.

### 1.27 How do you know if you did it right?

The screenshot shows a slide layer interface. On the left, a sidebar titled "Safety Culture" contains a list of traits. The trait "CONTINUOUS LEARNING" is highlighted with a yellow bar and the number 8. The main content area on the right features a dark header with a home icon and a close icon, a yellow bar with the number 8, and the title "Continuous Learning". Below the title, the text reads: "At the individual and team level, continuous learning includes obtaining knowledge, determining how that knowledge applies to the work of the individual and the team, as well as sharing that knowledge and ensuring that it is retained in the organization." A text box at the bottom left contains the text: "The NRC defines the trait as opportunities to learn about ways to ensure safety are sought out and implemented." Navigation arrows are visible at the bottom.

### 1.28 How do you know if you did it right?

The screenshot shows a slide layer interface. On the left, a sidebar titled "Safety Culture" contains a list of traits. The trait "CONTINUOUS LEARNING" is highlighted with a yellow bar and the number 8. The main content area on the right features a dark header with a home icon and a close icon, a yellow bar with the number 8, and the title "Continuous Learning". Below the title, the text reads: "Leadership at all of these levels must focus on learning, teaching, and changing an organization into a learning organization." A text box at the bottom left contains the text: "The NRC defines the trait as opportunities to learn about ways to ensure safety are sought out and implemented." Navigation arrows are visible at the bottom.

## 1.29 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture Part 3'. On the left, a list of traits is displayed with checkboxes and colored indicators. The traits are: ENVIRONMENT FOR RAISING CONCERNS (checked, teal), EFFECTIVE SAFETY COMMUNICATION (checked, purple), RESPECTFUL WORK ENVIRONMENT (7, green), CONTINUOUS LEARNING (8, yellow), OPERATING EXPERIENCE TRAINING (dark brown), SELF-ASSESSMENT (yellow), and BENCHMARKING (light yellow). On the right, a slide layer is active for 'Continuous Learning', featuring a yellow background and a dark header with a home icon and a close icon. The slide content includes instructions: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected.' and 'Click 'Next >' when you are ready to continue after each section has been completed.'

### Operating Experience (Slide Layer)

The screenshot shows the same mobile application interface as above, but the slide layer is now active for 'Operating Experience'. The slide content includes the text: 'The organization systematically and effectively collects, evaluates, and implements, relevant internal and external operating experience in a timely manner.'

### Training (Slide Layer)

The screenshot shows the same mobile application interface as above, but the slide layer is now active for 'Training'. The slide content includes the text: 'The organization provides training and ensures knowledge transfer to maintain a knowledgeable, technically competent workforce and instill radiation safety values.'

## Self-Assessment (Slide Layer)

Safety Culture  
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT
- 8 CONTINUOUS LEARNING
- OPERATING EXPERIENCE
- TRAINING
- SELF-ASSESSMENT
- BENCHMARKING

Self-Assessment

The organization routinely conducts self-critical and objective assessment of its programs and practices.

This is conducted by the Radiation Safety Officer.

## Benchmarking (Slide Layer)

Safety Culture  
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT
- 8 CONTINUOUS LEARNING
- OPERATING EXPERIENCE
- TRAINING
- SELF-ASSESSMENT
- BENCHMARKING

Benchmarking

The organization learns from other organizations to continuously improve knowledge, skills, and safety performance.

## 1.30 How do you know if you did it right?

Safety Culture  
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- ✓ RESPECTFUL WORK ENVIRONMENT
- 8 CONTINUOUS LEARNING
- 9 PERSONAL ACCOUNTABILITY

The NRC defines the trait as all individuals take personal responsibility for safety.

Personal Accountability

Personal accountability reflects the belief that both leaders and employees are individually responsible for their performance and the roles they play in radiation protection. Personal accountability means taking radiation protection values seriously and taking responsibility for upholding radiation protection standards.

### 1.31 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture - Part 3'. On the left, a list of traits is shown with colored checkmarks: Environment for Raising Concerns (green), Effective Safety Communication (purple), Questioning Attitude (light green), Continuous Learning (yellow), Personal Accountability (orange, selected), and Teamwork (light orange). Below the list is a quote: 'The NRC defines the trait as all individuals take personal responsibility for safety.' On the right, the 'Personal Accountability' trait is detailed: 'Leaders can develop personal accountability within their organization by empowering employees. They give employees the skills and training needed to communicate, explain, and do their jobs well. They set performance objectives with specific behaviors and outcomes and evaluate performance and give timely feedback.'

### 1.32 How do you know if you did it right?

This screenshot is similar to the previous one but includes instructions for the user. The trait list on the left now includes 'Teamwork' at the bottom. The right panel contains the text: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected. Click 'Next >' when you are ready to continue after each section has been completed.'

### High Standards (Slide Layer)

The screenshot shows the 'High Standards' trait selected in the list. The right panel provides the definition: 'Individuals encourage each other to adhere to high standards. They demonstrate a proper focus on radiation protection and reinforce this focus through peer coaching and discussions.'

## Job Ownership (Slide Layer)

The screenshot shows a mobile application interface. On the left, a 'Safety Culture' menu is visible with 'Part 3' and a list of traits: 'ENVIRONMENT FOR RAISING CONCERNS', 'EFFECTIVE SAFETY COMMUNICATION', 'RESPECTFUL WORK ENVIRONMENT', 'CONTINUOUS LEARNING', 'PERSONAL ACCOUNTABILITY', and 'TEAMWORK'. The 'PERSONAL ACCOUNTABILITY' item is highlighted with a '9' icon. On the right, the 'Job Ownership' slide is displayed, featuring a dark header with a home icon and a close button, a central orange box with the number '9', and a main orange area with the title 'Job Ownership' and a paragraph: 'Individuals understand their personal responsibility to foster a professional environment, encourage teamwork, and identify challenges to radiation protection and safety.'

## Teamwork (Slide Layer)

The screenshot shows a mobile application interface. On the left, a 'Safety Culture' menu is visible with 'Part 3' and a list of traits: 'ENVIRONMENT FOR RAISING CONCERNS', 'EFFECTIVE SAFETY COMMUNICATION', 'RESPECTFUL WORK ENVIRONMENT', 'CONTINUOUS LEARNING', 'PERSONAL ACCOUNTABILITY', and 'TEAMWORK'. The 'TEAMWORK' item is highlighted with a '9' icon. On the right, the 'Teamwork' slide is displayed, featuring a dark header with a home icon and a close button, a central orange box with the number '9', and a main orange area with the title 'Teamwork' and a paragraph: 'Individuals and work groups communicate and coordinate their activities within and across organizational boundaries to ensure radiation protection is maintained.'

## 1.33 How do you know if you did it right?

The screenshot shows a mobile application interface. On the left, a 'Safety Culture' menu is visible with 'What Did We Learn?' and a list of items: '1. Lead by Example:'. The '1. Lead by Example:' item is highlighted. On the right, the 'Lead by Example' slide is displayed, featuring a dark header with a home icon and a close button, a central graphic of an atom, and a main dark area with the title '1. Lead by Example:' and a paragraph: 'Lead by example by following all radiation protection and patient safety policies. Encourage your co-workers to do the same. This is crucial if you are a manager, employees will follow the example set by you. If employees believe management is committee, then they will also be committee. If you don't have policies and procedures in place this may be a good place to start. Demonstrate that the organization values radiation protection and safety.'

### 1.34 How do you know if you did it right?

Safety Culture

What Did We Learn?

**2. Communicate**

Start communicating with your co-workers and management. Strong communication will reduce errors and misunderstandings. This can lead to a better more effective radiation protection program. Developed policies and procedures need to be communicated to assure that these are understood and what expectations are expected of both employees and management. Employees should feel comfortable raising awareness to undesirable situations. A great way to improve communication is the hold weekly or monthly talks. Increase worker interest by letting them lead the talks. Policies and procedures should be easily accessible to all staff. Implement pathways for both the formal and informal communication. Consider electronic communication with and between staff.

### 1.35 How do you know if you did it right?

Safety Culture

What Did We Learn?

**3. Prioritize a few critical activities**

It is easily to be overwhelmed and achieve nothing. It is better to begin with small achievable steps. Formalizing through procedures and communication how to assure that the correct patient is imaged or treated. Develop or participate in an incident learning system. Establish technique charts that will be used for the purpose of optimization of radiation exposure in diagnostic imaging. Assure employees have the correct tools. Don't take short cuts, such as not optimizing when performing digital imaging examinations.

### 1.36 How do you know if you did it right?

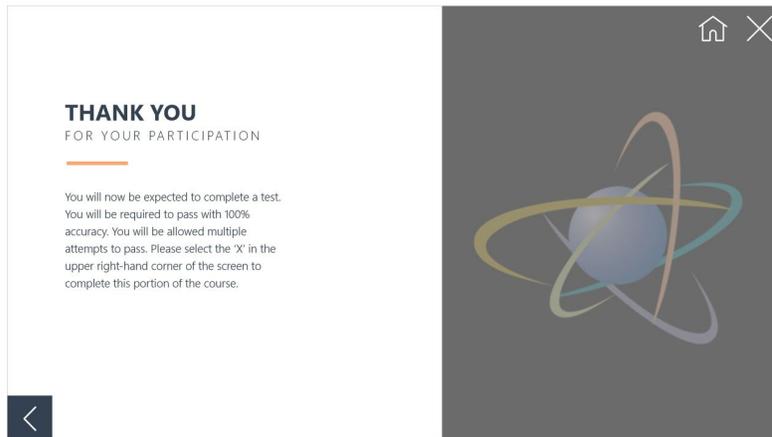
Safety Culture

What Did We Learn?

**4. Involve employees**

To build a strong radiation safety culture, it must start from the ground up. Employees must be included in the improvement project, they should identify challenges and solutions. Have employees participate in meetings where they can identify ways to improve radiation safety culture. Employees should demand a radiation safe environment. Employees should receive comprehensive training to assure a strong radiation safety culture is in place. Employees should have access to complete all the training for their positions.

## 1.37 Thank you



### Notes:

## Test Questions for Safety Culture and Willful Misconduct

1. Open communication, fairness, and management accountability are the most frequently identified mechanisms that build \_\_\_\_\_ in an organization.
  - a. **Trust and Respect**
  - b. Decision and Support
  - c. Roles and Authorities
  - d. Expectations and Rewards
2. What trait encourages employees to raise safety concerns to their management without fear of harassment, intimidation, retaliation, or discrimination?
  - a. Effective Safety Communication
  - b. Leadership Responsibility
  - c. Problem Identification and Resolution
  - d. **Environment for Raising Concerns**
3. The organization ensures that activities that could affect radiation protection or safety are conducted with particular care, caution, and oversight. Individuals recognize the special characteristics and unique hazards of radiation and radiation sources, and the importance of features designed to maintain nuclear safety.
  - a. **True**
  - b. False
4. What trait were individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action. All employees are watchful for assumptions, anomalies, values, conditions, or activities that can have an undesirable effect on facility safety.
  - a. Work Processes
  - b. **Questioning Attitude**
  - c. Continuous Learning
5. What trait allows leaders should ensure that they and the rest of the organization fully understand safety-related issues. Without full understanding, the organization cannot appropriately prioritize and resolve these tissues so that they do not occur again.
  - a. Individual Responsibility
  - b. Questioning Attitude
  - c. Leadership Responsibility
  - d. **None of the above**
6. In organizations with positive safety cultures, individuals have a strong sense of accountability for the safe operation of the facility, their own safety, and for the safety of their coworkers and the public. In medical settings, this includes accountability at all levels for the safety of the patients, and their family members.
  - a. **True**
  - b. False

7. Work Process Trait can be defined as: Individuals demonstrate a strong sense of collaboration and cooperation in connection with projects and operational activities. They work as a team to provide peer-checks, verify certifications and training, ensure detailed safety practices, actively peer coach new personnel, and share tools and publications. Individuals strive to meet commitments.
  - a. True
  - b. **False**
8. SCWE is a policy that stands for what?
  - a. **Safety Conscious Work Environment**
  - b. Safety Concern Work Environment
  - c. Safety Cause Work Environment
  - d. Safety Conscience Work Environment
9. Operating experience is highly valued, and the capacity to learn from experience is well developed. Safety is kept constant scrutiny through a variety of monitoring techniques, some of which provide an independent “fresh look” is considered what trait?
  - a. Problem Identification and Resolution
  - b. Respectful Work Environment
  - c. Individual Responsibility
  - d. **Continuous Learning**
10. Every morning, the nuclear medicine department receives delivery of all the radiopharmaceutical dosages they will be using on that day. These dosages are delivered in packages that each contain multiple dosages for different types of scans.

The individual dosages are labeled with the name of the radiopharmaceutical. Procedures require the medical radiation technologist receiving the material to review the day’s schedule, to ensure they have received the correct dosages, then to sort the dosages into drawers by type, according to the label (cardiac scan, bone scan, lung scan, etc.) in the nuclear medicine laboratory.

When a patient arrives, a medical radiation technologist takes a dosage from the appropriate drawer, checks the label, then removes the syringe, and checks the syringe label, before injecting the patient.

One morning, a package arrived, containing six individual dosages. There were five bone scan dosages and one dosage for a resting cardiac scan.

There were two medical radiation technologists on duty that morning. The technologist who arrived first, opened the package and distributed the dosages into the drawers without first reviewing the schedule. After she saw that the first three were all bone scan dosages, she stopped reading the labels and placed them all in the bone scan dosage drawer.

When the second patient of the morning arrived for a bone scan, the second technologist, who had arrived late, was in a hurry. He opened the drawer labeled bone scan and took out one of the shielded syringes. He did not read the label on the syringe shield, or on the syringe itself. He

injected the patient with the dosage, placed the used syringe in the syringe shield, and told the patient to return in three hours for the scan.

The first technologist then looked at the schedule, noting the next patient was scheduled for a resting cardiac scan. She did not recall seeing a cardiac scan dosage in the morning delivery, and searched through the bone scan drawer, where only four bone scan dosages remained. She contacted the second technologist, who checked the label on the dosage he had just injected to find out it was actually a cardiac scan dosage.

The second technologist notified the medical radiation practitioner and the radiation safety officer. The second patient was notified and counseled by the medical radiation practitioner and re-scheduled for the bone scan. The third patient was asked to re-schedule for later in the day.

Using the new tra(s) tools you have learned, what went wrong during this Nuclear Medicine case study?

- a. Individual Responsibility
- b. Effective Safety Communication
- c. Leadership Responsibility
- d. Only A&B
- e. **All of the above**

11. Which of the following would not be considered a NRC Willful misconduct act?

- A. Economic or other advantages, gained as a result of a violation
- B. Negligence or inadvertent clerical errors**
- C. Careless Disregard or deliberateness
- D. Overexposure to a patient, in-order to leave work earlier

12. What would falsification of documents be considered?

- A. Negligence
- B. Carelessness
- C. Willful**
- D. None of the above

13. Such factors as; Experience Level, Training, Careless disregard, and Licensee official are considered when determining the significance of a violation involving willfulness.

- A. True**
- B. False

14. An example of "Civil Penalty" when talking about a deliberate willful misconduct, according to the NRC, would be:

- A. Removal from work for a few days

**B. Criminal prosecution**

- C. Reporting to your supervisor
- D. Enforcing actions

15. Which governing body provides for criminal sanctions or willful violation of, or conspiracy to violate, any that are issued.

- A. Atomic Emission Acquisition
- B. Atomic Emission Act
- C. Atomic Energy Acquisition
- D. Atomic Energy Act**

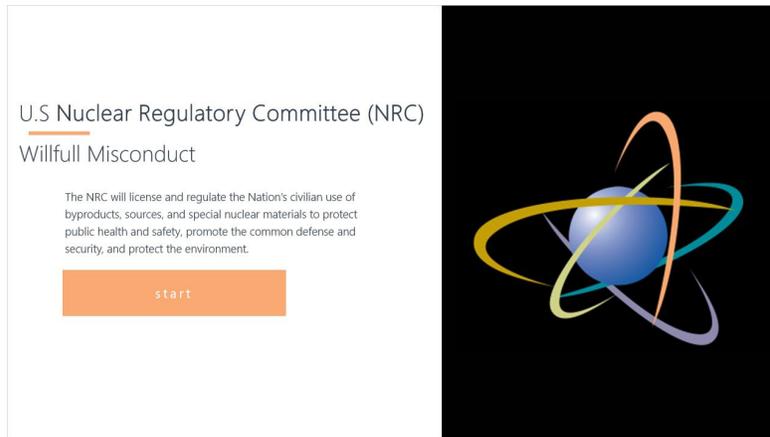
16. The term “willfulness” as used in the NRC Enforcement Policy, refers to conduct involving either a careless disregard for requirements.

- A. True**
- B. False

# Willful Misconduct

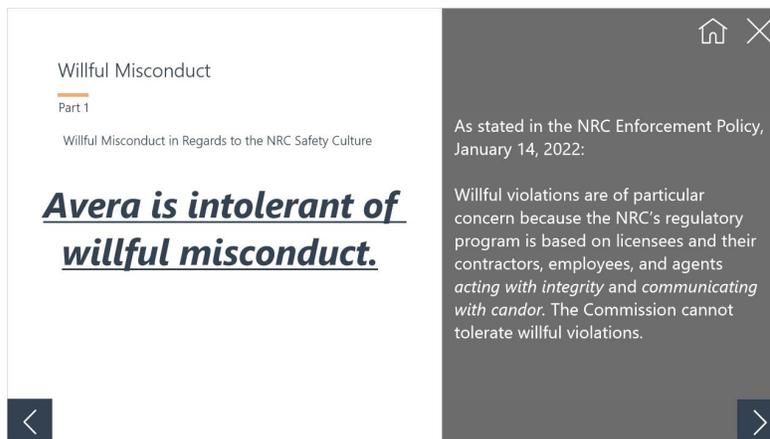
## 1. Self-Awareness

### 1.1 Title



Notes:

### 1.2 How do you know if you did it right?



### 1.3 How do you know if you did it right?

Willful Misconduct  
Part 1  
Willful Misconduct in Regards to the NRC Safety Culture

**Avera is intolerant of willful misconduct.**

The term "willfulness" as used in the NRC Enforcement Policy refers to conduct involving either a careless disregard for requirements, a deliberate violation of requirements or falsification of information.

### 1.4 How do you know if you did it right?

Willful Misconduct  
Part 1  
Willful Misconduct in Regards to the NRC Safety Culture

In determining the significance of a violation involving willfulness, the NRC will consider such factors as the:

- Position
- Training
- Experience level
- Responsibilities of the person involved in the violation (e.g., licensee official or non-supervisory employee)
- Significance of any underlying violation
- Intent of the violator (i.e., careless disregard or deliberateness)
- Economic or other advantage, if any, gained as a result of the violation

### 1.5 How do you know if you did it right?

Willful Misconduct  
Part 1  
Willful Misconduct in Regards to the NRC Safety Culture

Licensees are expected to take significant remedial action in responding to willful violations commensurate with the circumstances, such that the action reflects the seriousness of the violation, thereby creating a deterrent effect within the licensee's organization.

Civil penalty discretion should be considered for willfulness, particularly instances where the licensee made a conscious decision to be in noncompliance with NRC requirements in order to obtain an economic benefit.

*(For example, a staff member knowingly altered treatment for a patient to decrease treatment times so staff member can leave earlier).*

## 1.6 How do you know if you did it right?

Willful Misconduct  
Part 1

Willful Misconduct in Regards to the NRC Safety Culture

**The NRC Confirmatory Order to Avera McKennan dated May 19th, 2022 states:**

*"Pursuant to Section 223 of the Atomic Energy Act of 1954, as amended, any person who willfully violates, attempts to violate, or conspires to violate, any provision of the Confirmatory Order shall be subject to criminal prosecution, as set forth in that section. Violation of the Confirmatory Order may also subject the person to civil monetary penalties.*

The slide features a dark grey background on the right with a stylized atomic symbol. Navigation icons (home, close, back, forward) are visible.

## 1.7 How do you know if you did it right?

Willful Misconduct  
Part 1

Willful Misconduct in Regards to the NRC Safety Culture

**10 CFR § 75.53 – Criminal penalties**

(a) Section 223 of the Atomic Energy Act of 1954, as amended, provides for criminal sanctions or willful violation of, or conspiracy to violate, any regulation issued under sections 161b., 161i., or 161o. of the Act.

Please contact your Radiation Safety Officer or Supervisor if you have any questions.

The slide features a dark grey background on the right with a stylized atomic symbol. Navigation icons (home, close, back, forward) are visible.

## 1.8 Thank you

**THANK YOU**  
FOR YOUR PARTICIPATION

You will now be expected to provide feedback regarding willful misconduct. Please select the 'X' in the upper right-hand corner of the screen to complete this portion of the course.

The slide features a dark grey background on the right with a stylized atomic symbol. Navigation icons (home, close, back, forward) are visible.

**Notes:**

### **Evaluation Questions for Safety Culture and Willful Misconduct**

1. Was the willful misconduct training material and content helpful to you?
  - a. Yes
  - b. No
2. Before this training, were you aware of the NRC's intolerance of deliberate misconduct?
  - a. Yes
  - b. No
3. Before this training, were you aware of the potential enforcement actions that the NRC may take against employees who engage in deliberate misconduct?
  - a. Yes
  - b. No
4. Before this training, were you aware of the associated NRC enforcement actions that may be taken against a license as a result of deliberate misconduct?
  - a. Yes
  - b. No

## Test Questions for Safety Culture and Willful Misconduct

1. Open communication, fairness, and management accountability are the most frequently identified mechanisms that build \_\_\_\_\_ in an organization.
  - a. **Trust and Respect**
  - b. Decision and Support
  - c. Roles and Authorities
  - d. Expectations and Rewards
2. What trait encourages employees to raise safety concerns to their management without fear of harassment, intimidation, retaliation, or discrimination?
  - a. Effective Safety Communication
  - b. Leadership Responsibility
  - c. Problem Identification and Resolution
  - d. **Environment for Raising Concerns**
3. The organization ensures that activities that could affect radiation protection or safety are conducted with particular care, caution, and oversight. Individuals recognize the special characteristics and unique hazards of radiation and radiation sources, and the importance of features designed to maintain nuclear safety.
  - a. **True**
  - b. False
4. What trait were individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action. All employees are watchful for assumptions, anomalies, values, conditions, or activities that can have an undesirable effect on facility safety.
  - a. Work Processes
  - b. **Questioning Attitude**
  - c. Continuous Learning
5. What trait allows leaders should ensure that they and the rest of the organization fully understand safety-related issues. Without full understanding, the organization cannot appropriately prioritize and resolve these tissues so that they do not occur again.
  - a. Individual Responsibility
  - b. Questioning Attitude
  - c. Leadership Responsibility
  - d. **None of the above**
6. In organizations with positive safety cultures, individuals have a strong sense of accountability for the safe operation of the facility, their own safety, and for the safety of their coworkers and the public. In medical settings, this includes accountability at all levels for the safety of the patients, and their family members.
  - a. **True**
  - b. False

7. Work Process Trait can be defined as: Individuals demonstrate a strong sense of collaboration and cooperation in connection with projects and operational activities. They work as a team to provide peer-checks, verify certifications and training, ensure detailed safety practices, actively peer coach new personnel, and share tools and publications. Individuals strive to meet commitments.
- True
  - False**
8. Operating experience is highly valued, and the capacity to learn from experience is well developed. Safety is kept constant scrutiny through a variety of monitoring techniques, some of which provide an independent “fresh look” is considered what trait?
- Problem Identification and Resolution
  - Respectful Work Environment
  - Individual Responsibility
  - Continuous Learning**
9. Which of the following would not be considered a NRC Willful misconduct act?
- Economic or other advantages, gained as a result of a violation
  - Negligence or inadvertent clerical errors**
  - Careless Disregard or deliberateness
  - Overexposure to a patient, in-order to leave work earlier
10. What would falsification of documents be considered?
- Negligence
  - Carelessness
  - Willful**
  - None of the above
11. Such factors as; Experience Level, Training, Careless disregard, and Licensee official are considered when determining the significance of a violation involving willfulness.
- True**
  - False
12. An example of “Civil Penalty” when talking about a deliberate willful misconduct, according to the NRC, would be:
- Removal from work for a few days
  - Criminal prosecution**
  - Reporting to your supervisor
  - Enforcing actions
13. Which governing body provides for criminal sanctions or willful violation of, or conspiracy to violate, any that are issued.

- A. Atomic Emission Acquisition
- B. Atomic Emission Act
- C. Atomic Energy Acquisition
- D. Atomic Energy Act**

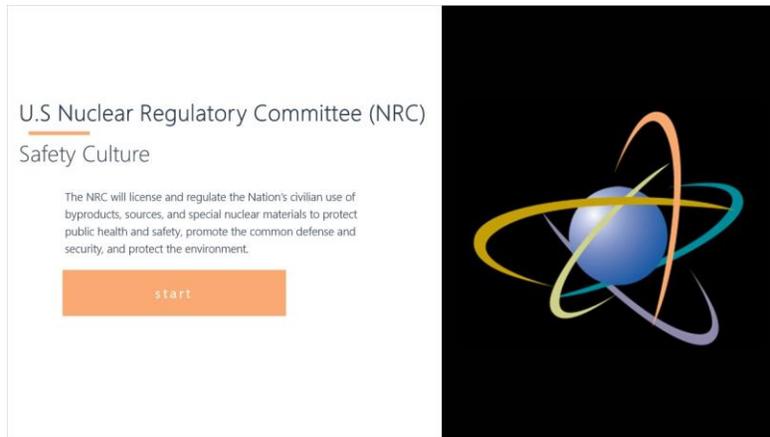
14. The term “willfulness” as used in the NRC Enforcement Policy, refers to conduct involving either a careless disregard for requirements.

- A. True**
- B. False

# Safety Culture Education

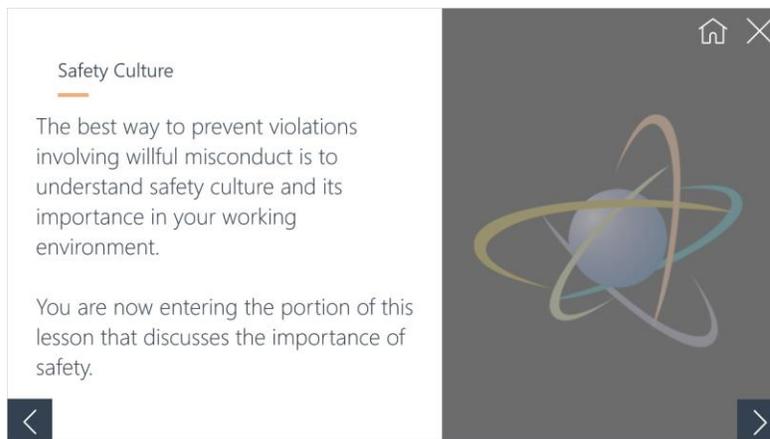
## 1. Self-Awareness

### 1.1 Title



Notes:

### 1.2 How do you know if you did it right?



### 1.3 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture'. On the left, there is a navigation menu with the title 'Safety Culture' and 'Part 2'. Below this, it says 'NRC Traits of Positive Safety Culture'. There are four items in the list: 1. LEADERSHIP SAFETY VALUES AND ACTIONS (highlighted in teal), 2. WORK PROCESSES (purple), 3. QUESTIONING ATTITUDE (yellow-green), and 4. PROBLEM IDENTIFICATION AND RESOLUTION (yellow). On the right, there is a dark grey text block with a home icon and a close icon at the top. The text reads: 'The Safety Culture Policy Statement includes a list of nine traits further defining a positive safety culture. These traits describe patterns of thinking, feeling, and behaving that emphasize safety, particularly in goal conflict situations, such as when safety goals conflict with production, schedule or cost goals. The traits listed to the left are not all-inclusive. Some organizations may find that one or more of the traits are particularly relevant to their activities. There may also be traits not included in the Safety Culture Policy Statement that are important in a positive safety culture.' Navigation arrows are visible at the bottom of the screen.

### 1.4 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture'. On the left, there is a navigation menu with the title 'Safety Culture' and 'Part 2'. Below this, it says 'NRC Traits of Positive Safety Culture'. There are four items in the list: 1. LEADERSHIP SAFETY VALUES AND ACTIONS (highlighted in teal), 2. WORK PROCESSES (purple), 3. QUESTIONING ATTITUDE (yellow-green), and 4. PROBLEM IDENTIFICATION AND RESOLUTION (yellow). On the right, there is a dark grey text block with a home icon and a close icon at the top. The text reads: 'The NRC 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 and the environment.' Navigation arrows are visible at the bottom of the screen.

### 1.5 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture'. On the left, there is a navigation menu with the title 'Safety Culture' and 'Part 2'. Below this, it says 'What does this trait look like?'. There are four items in the list: 1. LEADERSHIP SAFETY VALUES AND ACTIONS (highlighted in teal), 2. WORK PROCESSES (purple), 3. QUESTIONING ATTITUDE (yellow-green), and 4. PROBLEM IDENTIFICATION AND RESOLUTION (yellow). On the right, there is a dark grey text block with a home icon and a close icon at the top. The text is titled 'Leadership Safety Values and Action' and reads: 'Leaders demonstrate a commitment to safety in their decisions and behaviors. Leaders have significant power to affect an organization's safety culture through the priorities they establish, the behaviors and values they model, the reward systems they administer, the trust they create, and the context and expectations they establish for interpersonal relationships, communication, and accountability. Leaders also exert significant influence on change initiatives.' Navigation arrows are visible at the bottom of the screen.

## 1.6 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture'. The left sidebar contains the title 'Safety Culture', 'Part 2', and the question 'What does this trait look like?'. Below this is a menu with two items: '1 LEADERSHIP SAFETY VALUES AND ACTIONS' (highlighted in teal) and 'RESOURCES'. The main content area on the right is titled 'Leadership Safety Values and Action' and contains the text: 'They have the power and responsibility to set strategy and direction, align people and resources, motivate and inspire people, and ensure that problems are identified and solved in a timely manner. Behavior matters and leadership behaviors that support a positive safety culture are critical.' The interface includes a home icon and a close icon in the top right, and navigation arrows at the bottom.

## 1.7 How do you know if you did it right?

The screenshot shows the same mobile application interface as above, but with the 'RESOURCES' menu item highlighted in teal. The main content area is titled 'Resources' and contains the text: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected. Click '>' when you are ready to continue after each section has been completed.'

## Resources (Slide Layer)

The screenshot shows the same mobile application interface as above, with the 'RESOURCES' menu item highlighted in teal. The main content area is titled 'Resources' and contains the text: 'Leaders ensure that personnel, equipment, procedures, and other resources are available and adequate to support safety.'

## 1.8 How do you know if you did it right?

The screenshot shows a two-pane interface. The left pane is titled 'Safety Culture Part 2' and asks 'What does this trait look like?'. It has two main sections: '1 LEADERSHIP SAFETY VALUES AND ACTIONS' and '2 WORK PROCESSES'. The '2 WORK PROCESSES' section is highlighted with a purple bar. The right pane is titled 'Work Processes' and contains the text: 'The process of planning and controlling work activities is implemented so that safety is maintained.' Navigation arrows are visible at the bottom of both panes.

## 1.9 How do you know if you did it right?

The screenshot shows a two-pane interface. The left pane is titled 'Safety Culture Part 2' and asks 'What does this trait look like?'. It has two main sections: '1 LEADERSHIP SAFETY VALUES AND ACTIONS' and '2 WORK PROCESSES'. The '1 LEADERSHIP SAFETY VALUES AND ACTIONS' section is highlighted with a teal bar and has a white checkmark icon to its left. The right pane is titled 'Work Processes' and contains the text: 'High reliability organizations, however, may base activities around individual expertise and professionalism, autonomy, and rapid team-based response, particularly during off-normal conditions, (pandemic, natural disaster, downtime, short staffing, etc).' Navigation arrows are visible at the bottom of both panes.

## 1.10 How do you know if you did it right?

The screenshot shows a two-pane interface. The left pane is titled 'Safety Culture Part 2' and asks 'What does this trait look like?'. It has two main sections: '1 LEADERSHIP SAFETY VALUES AND ACTIONS' and '2 WORK PROCESSES'. The '1 LEADERSHIP SAFETY VALUES AND ACTIONS' section is highlighted with a teal bar and has a white checkmark icon to its left. Underneath it, three sub-sections are listed: 'RESOURCES', 'DOCUMENTATION', and 'PROCEDURE ADHERENCE'. The right pane is titled 'Work Processes' and contains the text: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected. Click 'Next >' when you are ready to continue after each section has been completed.' Navigation arrows are visible at the bottom of both panes.

## Resources (Slide Layer)

The screenshot displays a two-panel interface. The left panel, titled 'Safety Culture Part 2', asks 'What does this trait look like?' and features a vertical menu with four items: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (selected with a '2'), 'RESOURCES', 'DOCUMENTATION', and 'PROCEDURE ADHERENCE'. The right panel shows a slide titled 'Resources' with a '2' in a purple box at the top. The slide text reads: 'The organization implements a process of planning, controlling, and executing work activities such that safety is the overriding priority.'

## Documentation (Slide Layer)

The screenshot displays a two-panel interface. The left panel, titled 'Safety Culture Part 2', asks 'What does this trait look like?' and features a vertical menu with four items: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (selected with a '2'), 'RESOURCES', 'DOCUMENTATION', and 'PROCEDURE ADHERENCE'. The right panel shows a slide titled 'Documentation' with a '2' in a purple box at the top. The slide text reads: 'The organization expects all employees to maintain complete, accurate, and up to date documentation.'

## Procedure Adherence (Slide Layer)

The screenshot displays a two-panel interface. The left panel, titled 'Safety Culture Part 2', asks 'What does this trait look like?' and features a vertical menu with four items: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (selected with a '2'), 'RESOURCES', 'DOCUMENTATION', and 'PROCEDURE ADHERENCE'. The right panel shows a slide titled 'Procedure Adherence' with a '2' in a purple box at the top. The slide text reads: 'All employees are expected to follow processes, procedures and work instructions.'

### 1.11 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture Part 2'. On the left, a table of contents lists three items: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (checked), and 'QUESTIONING ATTITUDE' (selected with a green bar and the number 3). The main content area on the right is titled 'Questioning Attitude' and contains the text: 'Individuals avoid complacency and continually challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate actions.'

### 1.12 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture Part 2'. On the left, a table of contents lists three items: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (checked), and 'QUESTIONING ATTITUDE' (selected with a green bar and the number 3). The main content area on the right is titled 'Questioning Attitude' and contains the text: 'Complacency may be a key contributor to many incidents involving radiation sources, such as the accidental overexposure of radiotherapy patients.'

### 1.13 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture Part 2'. On the left, a table of contents lists three items: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (checked), and 'QUESTIONING ATTITUDE' (selected with a green bar and the number 3). The main content area on the right is titled 'Questioning Attitude' and contains the text: 'Avoiding complacency is essential to ensuring radiation protection of work and patients and can be achieved by instilling a questioning attitude in every employee.'

## 1.14 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture Part 2'. On the left, a list of traits is displayed under the heading 'What does this trait look like?'. The traits are: LEADERSHIP SAFETY VALUES AND ACTIONS (checked), WORK PROCESSES (checked), QUESTIONING ATTITUDE (selected with a green square and the number 3), and RADIATION SOURCES ARE SPECIAL. On the right, a detailed view of the 'Questioning Attitude' trait is shown. It includes a green square with the number 3, the title 'Questioning Attitude', and two paragraphs of text: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected.' and 'Click 'Next >' when you are ready to continue after each section has been completed.'

## Stop Work (Slide Layer)

The screenshot shows a mobile application interface for 'Safety Culture Part 2'. On the left, a list of traits is displayed under the heading 'What does this trait look like?'. The traits are: LEADERSHIP SAFETY VALUES AND ACTIONS (checked), WORK PROCESSES (checked), QUESTIONING ATTITUDE (selected with a green square and the number 3), and RADIATION SOURCES ARE SPECIAL. On the right, a detailed view of the 'Stop Work' trait is shown. It includes a green square with the number 3, the title 'Stop Work', and a paragraph of text: 'All employees are given the responsibility and authority to stop work when employees believe that a situation exists that places them, their coworker(s), or the patient at risk or in danger; that could reasonably be expected to cause adverse effects including death or serious injury, a medication or treatment delivery error or cause damage to the facility or environmental harm. Maintaining a diligent questioning attitude is vital to safe execution of work. This procedure extends the authority to stop work to situations where an employee believes there is a need to clarify work instructions; or to propose additional controls or changes.'

## 1.15 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture Part 2'. On the left, a list of traits is displayed under the heading 'What does this trait look like?'. The traits are: LEADERSHIP SAFETY VALUES AND ACTIONS (checked), WORK PROCESSES (checked), QUESTIONING ATTITUDE (selected with a green square and the number 3), and PROBLEM IDENTIFICATION AND RESOLUTION (selected with a yellow square and the number 4). On the right, a detailed view of the 'Problem Identification and Resolution' trait is shown. It includes a yellow square with the number 4, the title 'Problem Identification and Resolution', and a paragraph of text: 'Issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.'

## 1.16 How do you know if you did it right?

Safety Culture  
Part 2

What does this trait look like?

- ✓ LEADERSHIP SAFETY VALUES AND ACTIONS
- ✓ WORK PROCESSES
- ✓ QUESTIONING ATTITUDE
- 4 PROBLEM IDENTIFICATION AND RESOLUTION

Problem Identification and Resolution

An effective problem identification and resolution program uses the organization's corrective action program, operating experience, and self-assessment results to ensure safe operations. The corrective action program should have a transparent process for evaluating, prioritizing, and resolving issues.

## 1.17 How do you know if you did it right?

Safety Culture  
Part 2

What does this trait look like?

- ✓ LEADERSHIP SAFETY VALUES AND ACTIONS
- ✓ WORK PROCESSES
- ✓ QUESTIONING ATTITUDE
- 4 PROBLEM IDENTIFICATION AND RESOLUTION

Problem Identification and Resolution

Organizations can approach problem identification and resolution with different mindsets. One mindset focuses on finding existing problems and correcting weaknesses, typically through the organization's corrective action program. However, an organization with a positive safety culture also has a problem identification and resolution program that anticipates issues, reviews operating experience, and tracks emerging themes and trends.

## 1.18 How do you know if you did it right?

Safety Culture  
Part 2

What does this trait look like?

- ✓ LEADERSHIP SAFETY VALUES AND ACTIONS
- ✓ WORK PROCESSES
- 3 QUESTIONING ATTITUDE
- 4 PROBLEM IDENTIFICATION AND RESOLUTION

IDENTIFICATION  
TRENDING  
RESOLUTION

Problem Identification and Resolution

Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected.

Click 'Next >' when you are ready to continue after each section has been completed.

## Identification (Slide Layer)

**Safety Culture**  
Part 2

What does this trait look like?

✓	LEADERSHIP SAFETY VALUES AND ACTIONS
✓	WORK PROCESSES
3	QUESTIONING ATTITUDE
4	PROBLEM IDENTIFICATION AND RESOLUTION
	IDENTIFICATION TRENDING RESOLUTION

**4**

### Identification

The organization implements a corrective action program with a low threshold for identifying issues. Individuals identify issues completely, accurately, and in a timely manner in accordance with the program.

## Trending (Slide Layer)

**Safety Culture**  
Part 2

What does this trait look like?

✓	LEADERSHIP SAFETY VALUES AND ACTIONS
✓	WORK PROCESSES
3	QUESTIONING ATTITUDE
4	PROBLEM IDENTIFICATION AND RESOLUTION
	IDENTIFICATION TRENDING RESOLUTION

**4**

### Trending

Problem identification and resolution is an important element of safety culture. Leaders are responsible for identifying and diagnosing organizational or technical deficiencies, taking corrective action, and anticipating emerging issues.

## Resolution (Slide Layer)

**Safety Culture**  
Part 2

What does this trait look like?

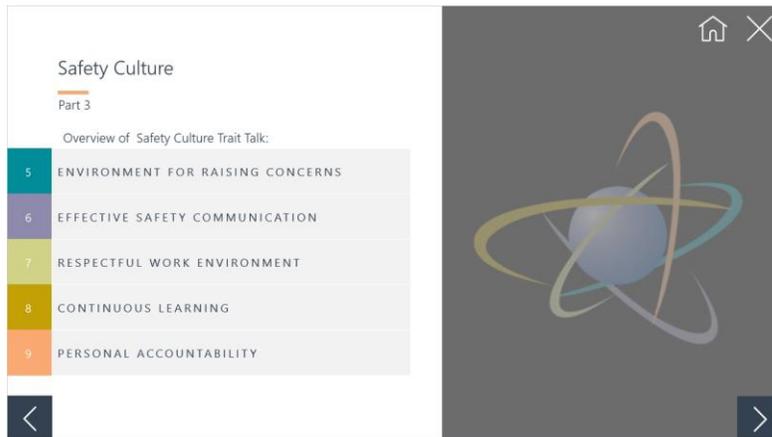
✓	LEADERSHIP SAFETY VALUES AND ACTIONS
✓	WORK PROCESSES
3	QUESTIONING ATTITUDE
4	PROBLEM IDENTIFICATION AND RESOLUTION
	IDENTIFICATION TRENDING RESOLUTION

**4**

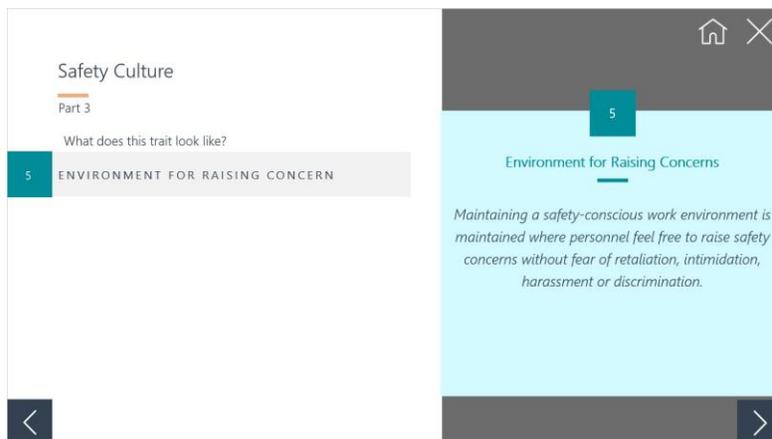
### Resolution

The leaders of the organization are expected to take effective corrective actions to address issues in a timely manner.

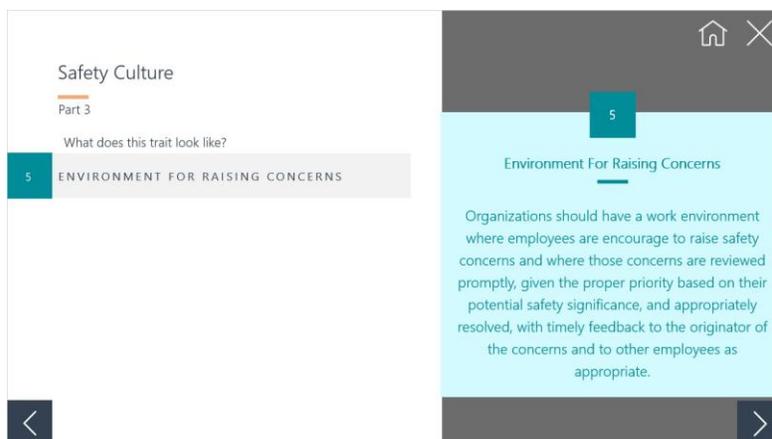
## 1.19 How do you know if you did it right?



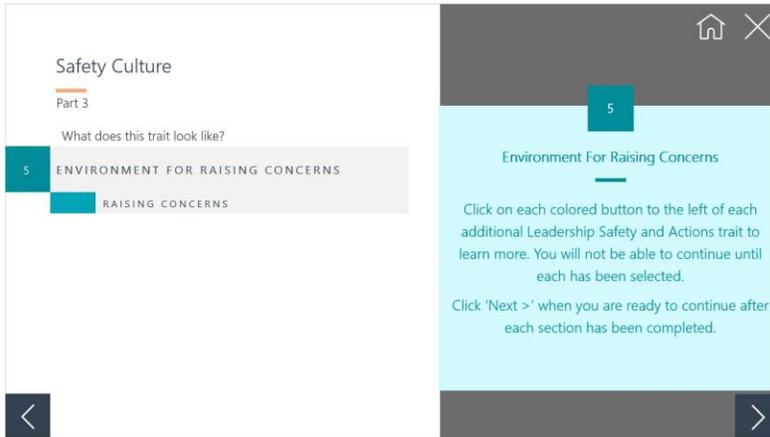
## 1.20 How do you know if you did it right?



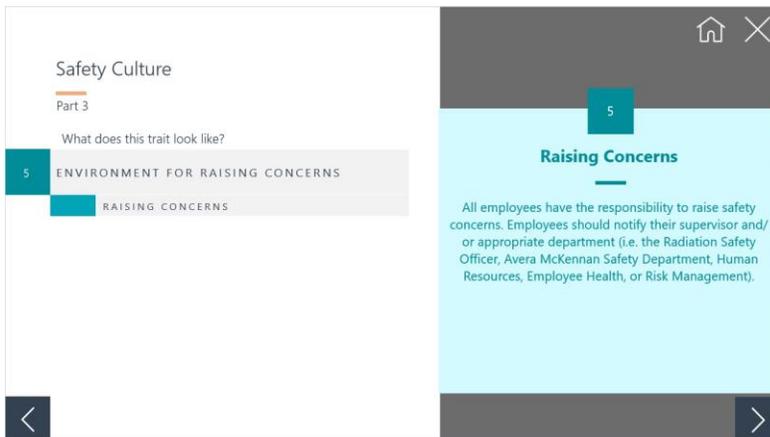
## 1.21 How do you know if you did it right?



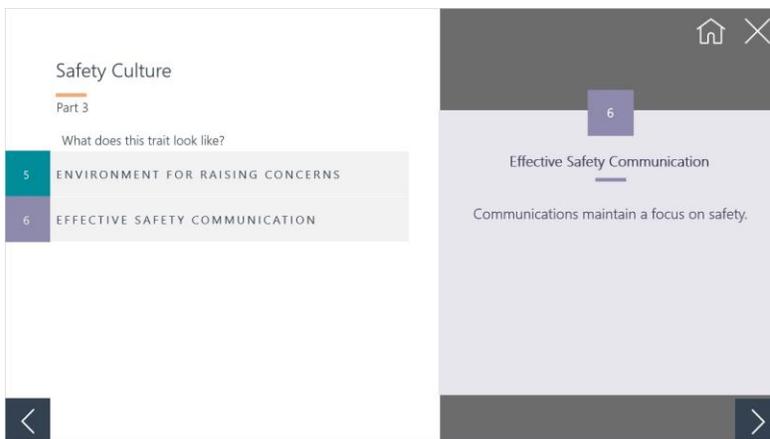
## 1.22 How do you know if you did it right?



## Raising Concerns (Slide Layer)



## 1.23 How do you know if you did it right?



### 1.24 How do you know if you did it right?

The screenshot shows a mobile application interface. On the left, a sidebar menu titled 'Safety Culture' includes 'Part 3' and the question 'What does this trait look like?'. Three menu items are listed: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (highlighted with a purple bar and the number 6), and 'RESPECTFUL WORK ENVIRONMENT'. The main content area on the right displays a purple header with the number 6, followed by the title 'Effective Safety Communication'. Below the title, the text reads: 'Top-down communication is most effective when senior managers communicate directly with immediate supervisors and immediate supervisors communicate with their staff.' Navigation arrows are visible at the bottom of the screen.

### 1.25 How do you know if you did it right?

The screenshot shows a mobile application interface. On the left, a sidebar menu titled 'Safety Culture' includes 'Part 3' and the question 'What does this trait look like?'. Three menu items are listed: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (highlighted with a purple bar and the number 6), and 'RESPECTFUL WORK ENVIRONMENT' (highlighted with a green bar and the number 7). The main content area on the right displays a green header with the number 7, followed by the title 'Respectful Work Environment'. Below the title, the text reads: 'Trust and respect permeate the organization.' Navigation arrows are visible at the bottom of the screen.

### 1.26 How do you know if you did it right?

The screenshot shows a mobile application interface. On the left, a sidebar menu titled 'Safety Culture' includes 'Part 3' and the question 'What does this trait look like?'. Three menu items are listed: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), and 'RESPECTFUL WORK ENVIRONMENT' (highlighted with a green bar and the number 7). The main content area on the right displays a green header with the number 7, followed by the title 'Respectful Work Environment'. Below the title, the text reads: 'At an individual level, trust involves the willingness of one person to depend on another person, with a relative sense of security. The perception that an individual is competent, has integrity, and is predictable increases the likelihood that he/she is trusted and respected.' Navigation arrows are visible at the bottom of the screen.

## 1.27 How do you know if you did it right?

Safety Culture  
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT

Respectful Work Environment

At an organizational level, trust and respect instill confidence that the organization is just and fair, which promotes open communication and accurate reporting, enhances organizational learning, and promotes the development of shared perceptions and norms. In studies of safety culture, higher levels of trust and respect are associated with positive safety attitudes, reduced risky behavior, and increased personal responsibility for safety.

## 1.28 How do you know if you did it right?

Safety Culture  
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT

RESPECT IS EVIDENT  
HIGH LEVEL OF TRUST  
OPINIONS ARE VALUED  
CONFLICT RESOLUTION

Respectful Work Environment

Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected.

Click 'Next >' when you are ready to continue after each section has been completed.

## Respect is Evident (Slide Layer)

Safety Culture  
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT

RESPECT IS EVIDENT  
HIGH LEVEL OF TRUST  
OPINIONS ARE VALUED  
CONFLICT RESOLUTION

Respect is Evident

Everyone is treated with dignity and respect.

## High Level of Trust (Slide Layer)

The screenshot shows a mobile application interface. On the left, a sidebar menu titled 'Safety Culture' includes 'Part 3' and a question 'What does this trait look like?'. Below this are four items: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), 'RESPECTFUL WORK ENVIRONMENT' (selected with a '7'), and a sub-menu with 'RESPECT IS EVIDENT', 'HIGH LEVEL OF TRUST' (selected), 'OPINIONS ARE VALUED', and 'CONFLICT RESOLUTION'. On the right, the main content area has a dark header with a home icon and a close icon. Below is a green box with a '7' and the title 'High Level of Trust'. The text below reads: 'Trust is fostered among individuals and work groups throughout the organization.'

## Opinions are Valued (Slide Layer)

The screenshot shows a mobile application interface. On the left, a sidebar menu titled 'Safety Culture' includes 'Part 3' and a question 'What does this trait look like?'. Below this are four items: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), 'RESPECTFUL WORK ENVIRONMENT' (selected with a '7'), and a sub-menu with 'RESPECT IS EVIDENT', 'HIGH LEVEL OF TRUST', 'OPINIONS ARE VALUED' (selected), and 'CONFLICT RESOLUTION'. On the right, the main content area has a dark header with a home icon and a close icon. Below is a green box with a '7' and the title 'Opinions are Valued'. The text below reads: 'Individuals are encouraged to voice concerns, provide suggestions, and raise questions. Differing opinions are respected.'

## Conflict Resolution (Slide Layer)

The screenshot shows a mobile application interface. On the left, a sidebar menu titled 'Safety Culture' includes 'Part 3' and a question 'What does this trait look like?'. Below this are four items: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), 'RESPECTFUL WORK ENVIRONMENT' (selected with a '7'), and a sub-menu with 'RESPECT IS EVIDENT', 'HIGH LEVEL OF TRUST', 'OPINIONS ARE VALUED', and 'CONFLICT RESOLUTION' (selected). On the right, the main content area has a dark header with a home icon and a close icon. Below is a green box with a '7' and the title 'Conflict Resolution'. The text below reads: 'Fair and objective methods should be used to resolve conflicts.'

### 1.29 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture Part 3'. On the left, a list of traits is displayed with checkmarks: 'ENVIRONMENT FOR RAISING CONCERNS', 'EFFECTIVE SAFETY COMMUNICATION', 'RESPECTFUL WORK ENVIRONMENT', and 'CONTINUOUS LEARNING'. The 'CONTINUOUS LEARNING' trait is highlighted in yellow. On the right, a detailed view of 'Continuous Learning' is shown, featuring a yellow background and the text: 'Opportunities to learn about ways to ensure safety are sought out and implemented.'

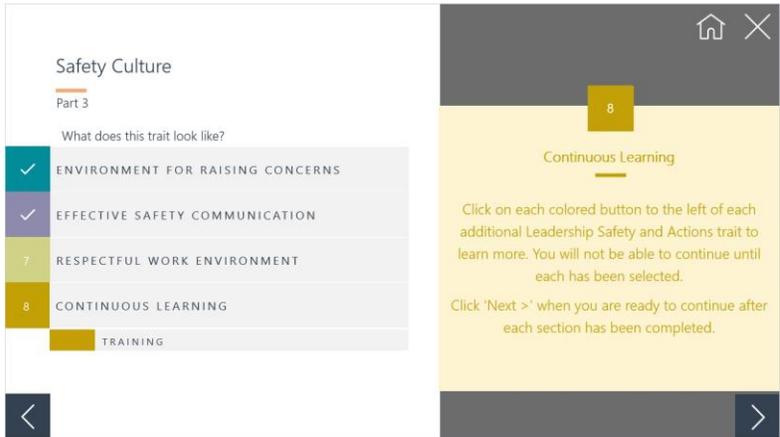
### 1.30 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture Part 3'. On the left, a list of traits is displayed with checkmarks: 'ENVIRONMENT FOR RAISING CONCERNS', 'EFFECTIVE SAFETY COMMUNICATION', 'RESPECTFUL WORK ENVIRONMENT', and 'CONTINUOUS LEARNING'. The 'CONTINUOUS LEARNING' trait is highlighted in yellow. On the right, a detailed view of 'Continuous Learning' is shown, featuring a yellow background and the text: 'At the individual and team level, continuous learning includes obtaining knowledge, determining how that knowledge applies to the work of the individual and the team, as well as sharing that knowledge and ensuring that it is retained in the organization.'

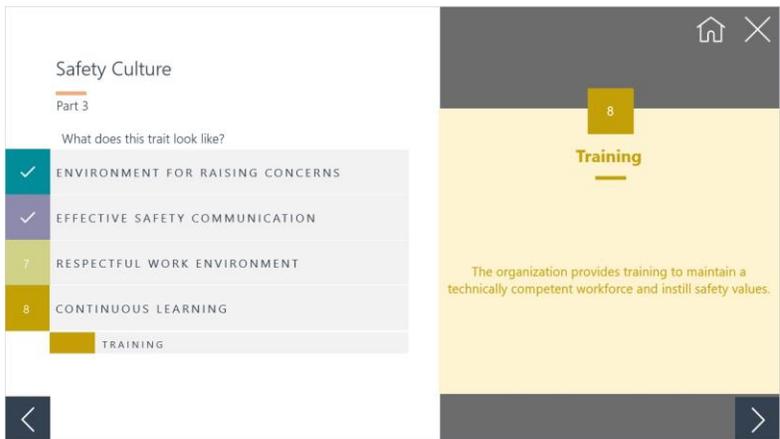
### 1.31 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture Part 3'. On the left, a list of traits is displayed with checkmarks: 'ENVIRONMENT FOR RAISING CONCERNS', 'EFFECTIVE SAFETY COMMUNICATION', 'RESPECTFUL WORK ENVIRONMENT', and 'CONTINUOUS LEARNING'. The 'CONTINUOUS LEARNING' trait is highlighted in yellow. On the right, a detailed view of 'Continuous Learning' is shown, featuring a yellow background and the text: 'Organizations committed to continuous learning reflect an organizational perspective that specifically addresses learning requirements at the individual, group, and organizational levels. Leadership at all of these levels must focus on learning, teaching, and changing an organization into a learning organization.'

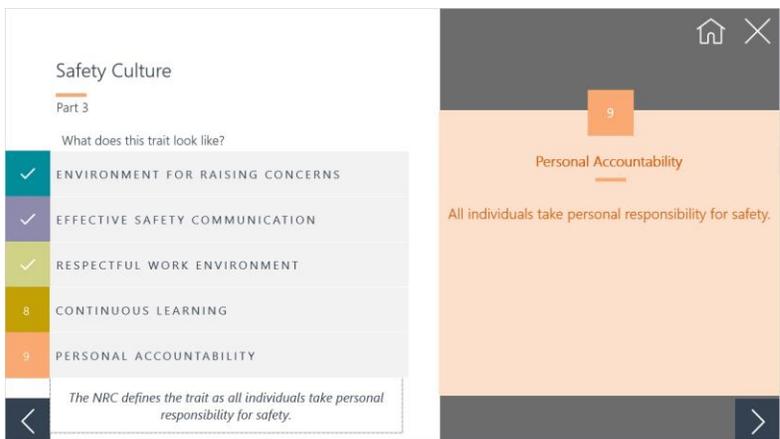
### 1.32 How do you know if you did it right?



### Training (Slide Layer)



### 1.33 How do you know if you did it right?



### 1.34 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture'. On the left, a list of traits is displayed under the heading 'What does this trait look like?'. The traits are: ENVIRONMENT FOR RAISING CONCERNS, EFFECTIVE SAFETY COMMUNICATION, RESPECTFUL WORK ENVIRONMENT, CONTINUOUS LEARNING, and PERSONAL ACCOUNTABILITY. The 'PERSONAL ACCOUNTABILITY' trait is highlighted with an orange background and a '9' icon. Below the list, a text box states: 'The NRC defines the trait as all individuals take personal responsibility for safety.' On the right, a detailed view of the 'Personal Accountability' trait is shown. It features a title 'Personal Accountability' with a '9' icon, followed by a definition: 'Personal accountability reflects the belief that both leaders and employees are individually responsible for their performance and the roles they play in radiation protection.'

### 1.35 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture'. On the left, a list of traits is displayed under the heading 'What does this trait look like?'. The traits are: ENVIRONMENT FOR RAISING CONCERNS, EFFECTIVE SAFETY COMMUNICATION, RESPECTFUL WORK ENVIRONMENT, CONTINUOUS LEARNING, and PERSONAL ACCOUNTABILITY. The 'PERSONAL ACCOUNTABILITY' trait is highlighted with an orange background and a '9' icon. Below the list, a text box states: 'The NRC defines the trait as all individuals take personal responsibility for safety.' On the right, a detailed view of the 'Personal Accountability' trait is shown. It features a title 'Personal Accountability' with a '9' icon, followed by a definition: 'Leaders can develop personal accountability within their organization by empowering employees. They must give employees the skills and training needed to communicate, explain, and do their jobs well. They must set performance objectives with specific behaviors and outcomes and evaluate performance and give timely feedback.'

### 1.36 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture'. On the left, a list of traits is displayed under the heading 'What does this trait look like?'. The traits are: ENVIRONMENT FOR RAISING CONCERNS, EFFECTIVE SAFETY COMMUNICATION, RESPECTFUL WORK ENVIRONMENT, CONTINUOUS LEARNING, PERSONAL ACCOUNTABILITY, and TEAMWORK. The 'PERSONAL ACCOUNTABILITY' trait is highlighted with an orange background and a '9' icon. Below the list, a text box states: 'The NRC defines the trait as all individuals take personal responsibility for safety.' On the right, a detailed view of the 'Personal Accountability' trait is shown. It features a title 'Personal Accountability' with a '9' icon, followed by a definition: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected. Click 'Next >' when you are ready to continue after each section has been completed.'

## High Standards (Slide Layer)

The screenshot shows a two-panel slide. The left panel is titled 'Safety Culture' and 'Part 3'. It asks 'What does this trait look like?' and lists six traits: 'ENVIRONMENT FOR RAISING CONCERNS', 'EFFECTIVE SAFETY COMMUNICATION', 'RESPECTFUL WORK ENVIRONMENT', 'CONTINUOUS LEARNING', 'PERSONAL ACCOUNTABILITY', and 'TEAMWORK'. The 'PERSONAL ACCOUNTABILITY' trait is highlighted with an orange bar and a '9' icon. The right panel has a dark header with a home icon and a close icon. Below the header is an orange box with a '9' icon and the title 'High Standards'. The main content area is light orange and contains the text: 'Individuals understand the importance of adherence to radiation protection standards.' The bottom of the slide has a dark bar with left and right navigation arrows.

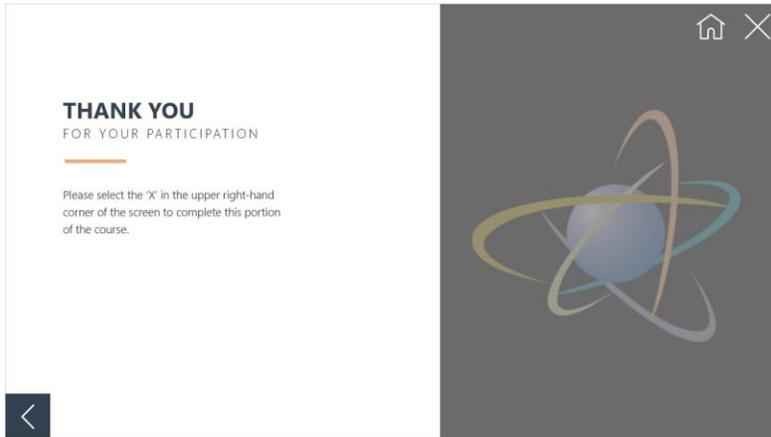
## Job Ownership (Slide Layer)

The screenshot shows a two-panel slide. The left panel is titled 'Safety Culture' and 'Part 3'. It asks 'What does this trait look like?' and lists six traits: 'ENVIRONMENT FOR RAISING CONCERNS', 'EFFECTIVE SAFETY COMMUNICATION', 'RESPECTFUL WORK ENVIRONMENT', 'CONTINUOUS LEARNING', 'PERSONAL ACCOUNTABILITY', and 'TEAMWORK'. The 'PERSONAL ACCOUNTABILITY' trait is highlighted with an orange bar and a '9' icon. The right panel has a dark header with a home icon and a close icon. Below the header is an orange box with a '9' icon and the title 'Job Ownership'. The main content area is light orange and contains the text: 'Individuals understand and demonstrate personal responsibility for the behaviors and work practices that support radiation protection.' The bottom of the slide has a dark bar with left and right navigation arrows.

## Teamwork (Slide Layer)

The screenshot shows a two-panel slide. The left panel is titled 'Safety Culture' and 'Part 3'. It asks 'What does this trait look like?' and lists six traits: 'ENVIRONMENT FOR RAISING CONCERNS', 'EFFECTIVE SAFETY COMMUNICATION', 'RESPECTFUL WORK ENVIRONMENT', 'CONTINUOUS LEARNING', 'PERSONAL ACCOUNTABILITY', and 'TEAMWORK'. The 'PERSONAL ACCOUNTABILITY' trait is highlighted with an orange bar and a '9' icon. The right panel has a dark header with a home icon and a close icon. Below the header is an orange box with a '9' icon and the title 'Teamwork'. The main content area is light orange and contains the text: 'Individuals and work groups communicate and coordinate their activities within and across organizational boundaries to ensure radiation protection is maintained.' The bottom of the slide has a dark bar with left and right navigation arrows.

## 1.37 Thank you



**Notes:**