Follow-up Discussion on Safety Culture

ROP Public Meeting

May 18, 2023

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Purpose

- Discuss comments on the NRC Safety Culture Program Effectiveness Review Report[1]

[1] NRC Memorandum - “Results of the Safety Culture Program Effectiveness Review”, March 20, 2023, ADAMS Accession No. ML22340A452.

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Overview

- As discussed at the April ROP public meeting, we are concerned with the basis and potential impact of the recommendations
- A letter from NEI was provided to the NRC Director, Division of Reactor Oversight on May 9, 2023, providing detailed comments

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Comments

- There is no acknowledgement in the report of the many means used by the industry to foster and maintain a healthy nuclear safety culture

  For example,
  - Safety culture assessments
  - Performance trending
  - Corrective action program (CAP) reviews
  - Root cause evaluations
  - Senior leadership reviews
  - Independent external oversight

- Institute of Nuclear Power Operations (INPO) plays a key role in driving performance excellence including examining nuclear safety culture through peer reviews and performance continuum activities

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Comments

- Recommendations 1 and 3 represent significant impactful changes in safety culture inspection and oversight

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Recommendation 1

- Inconsistent with graduated regulatory oversight via the supplemental inspection program imposing Column 3 response on Column 2 plants
- Implies that changes made from SECY-15-0108 did not consider impact on safety culture oversight
- Introduces additional subjectivity & unpredictability to the ROP

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Recommendation 3

- Inconsistent with graduated regulatory oversight by significantly expanding NRC inspection and assessment of safety culture for Column 1 plants
- Contrary to the acknowledgement in the report of cross-cutting issue program effectiveness to identify potential safety culture weaknesses
- Inconsistent with SECY-04-0111 that recognized the subjective nature of safety culture direct inspection that may detract from the goals of an objective, risk informed, and predictable ROP

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Other Recommendations

Recommendation 2

Improve training available to inspectors to better meet Commission objectives stated in SRM-SECY-04-0111

- Enhanced or additional training, if applied using a systematic approach, is an effective tool to increase knowledge and skills and to help maintain proficiency and should be considered if knowledge gaps exist or there is a recognized benefit to help inspectors meet NRC objectives

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Other Recommendations

Alternative Recommendation

Revise existing assessment guidance to prompt NRC management discussions to encourage licensee action to address safety culture aspects before significant performance degradation occurs

- Appears to be more aligned with a graded approach to oversight and the principles of good regulation but was only briefly described in the report limiting our feedback

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Summary

- We are concerned with the basis and potential impact of the recommendations from the NRC report
- Recommendations 1 & 3 represent significant impactful changes to safety culture inspection and oversight that are unwarranted
- More detailed comments can be found in the NEI letter

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