

ISSUE 4: ESTABLISHING A POSITIVE SAFETY CULTURE FOR 10 CFR PARTS 71 AND 72

BACKGROUND

On June 14, 2011, the Commission published the “Final Safety Culture Policy Statement” (SCPS) in the Federal Register (76 FR 34773). This policy statement, and two other policy statements, “Freedom of Employees in the Nuclear Industry to Raise Safety Concerns Without Fear of Retaliation; Policy Statement” (61 FR 24336; May 14, 1996) and “Policy Statement on the Conduct of Nuclear Power Plant Operations” (54 FR 3424; January 24, 1989), describes the Commission’s expectations regarding safety culture and emphasizes the importance that the NRC places on the development and maintenance of a positive safety culture for all NRC-regulated activities. In addition to approving the SCPS, the Commission directed the NRC staff to ensure that the individuals and organizations performing regulated activities have the necessary support to effectively employ the policy statement as they deem appropriate. The June 2011 SCPS applies to all licensees, certificate holders, permit holders, authorization holders, holders of quality assurance program approvals, vendors and suppliers of safety-related components, and applicants for a license, certificate, permit, authorization, or quality assurance program approval, subject to NRC authority.

The policy statement defines nuclear safety culture as the core values and behaviors resulting from a collective commitment by leaders and individuals to emphasize safety over competing goals to ensure protection of people and the environment. This definition includes safety and security issues. The policy statement also includes a set of traits that describe important areas of a positive safety culture, while acknowledging that other traits may also be important in a positive safety culture. The SCPS traits are: (1) Leadership Safety Values and Actions, (2) Problem Identification and Resolution, (3) Personal Accountability, (4) Work Processes, (5) Continuous Learning, (6) Environment for Raising Concerns, (7) Effective Safety Communication, (8) Respectful Work Environment, and (9) Questioning Attitude. The Commission’s expectation is that all individuals and organizations performing or overseeing regulated activities should take the necessary steps to promote a positive safety culture by fostering these traits as they apply to their organizational environments.

ISSUE DESCRIPTION

The Office of Nuclear Materials Safety and Safeguards (NMSS) will evaluate the oversight programs for independent spent fuel storage installations (ISFSI), and cask vendors to identify appropriate means to incorporate safety culture into these programs. This evaluation will include outreach to the affected licensees and certificate holders to understand the safety culture measures already in place and to determine how best to consider these activities in the oversight programs to develop and maintain a positive safety culture.

In addition, the staff will determine appropriate follow-up activities for all spent fuel storage and transportation certificate holders and licensees to ensure effective implementation of a corrective action process that identifies, follows, and corrects conditions adverse to quality. The staff is considering modifying inspection areas (or components) to review licensee and certificate holders’ implementation of an effective safety culture program (ensuring a safety/quality conscious work environment).

The purpose of this effort is (1) to gather information on how these SCPS characteristics can be applied at regulated facilities, and (2) identify potential inspection areas to assess whether a positive safety culture exists.

CONSIDERATIONS

As part of efforts to increase awareness of safety culture and to address safety culture in Part 71 and Part 72 licensing and inspection programs, the staff is considering:

1. Discussing the SCPS with licensee/certificate holder senior management and workers
2. Evaluating the effective use of corrective action programs through the quality assurance program reviews
3. Developing an inspection program to include additional areas to examine whether a positive safety culture exists.
4. Considering frequency of inspections based on level of safety culture at sites
5. Evaluating how safety culture can be included in NRC staff guidance such as standard review plans