



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 21, 2005

SECRETARY

COMMISSION VOTING RECORD

DECISION ITEM: SECY-05-0187

TITLE: STATUS OF SAFETY CULTURE INITIATIVES AND
SCHEDULE FOR NEAR-TERM DELIVERABLES

The Commission (with Commissioners Merrifield, Jaczko, and Lyons approving and Chairman Diaz and Commissioner McGaffigan disapproving) acted on the subject paper as recorded in the Staff Requirements Memorandum (SRM) of December 21, 2005.

This Record contains a summary of voting on this matter together with the individual vote sheets, views and comments of the Commission.

A handwritten signature in black ink, appearing to read "Annette L. Vietti-Cook", written over a horizontal line.

Annette L. Vietti-Cook
Secretary of the Commission

Attachments:

1. Voting Summary
2. Commissioner Vote Sheets

cc: Chairman Diaz
Commissioner McGaffigan
Commissioner Merrifield
Commissioner Jaczko
Commissioner Lyons
OGC
EDO
PDR

VOTING SUMMARY - SECY-05-0187

RECORDED VOTES

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIP	COMMENTS	DATE
CHRM. DIAZ		X			X	11/29/05
COMR. McGAFFIGAN		X			X	12/5/05
COMR. MERRIFIELD	X				X	11/22/05
COMR. JACZKO	X				X	11/16/05
COMR. LYONS	X				X	11/23/05

COMMENT RESOLUTION

In their vote sheets, Commissioners Merrifield, Jaczko, and Lyons approved and Chairman Diaz and Commissioner McGaffigan disapproved the subject paper. Subsequently, the comments of the Commission were incorporated into the guidance to staff as reflected in the SRM issued on December 21, 2005.

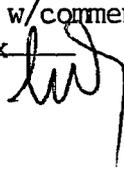
NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: CHAIRMAN DIAZ

SUBJECT: **SECY-05-0187 - STATUS OF SAFETY CULTURE
INITIATIVES AND SCHEDULE FOR NEAR-
TERM DELIVERABLES**

Approved _____ Disapproved ^{w/comments} ~~xx~~  Abstain _____
Not Participating _____

COMMENTS:

See attached comments.



SIGNATURE

Nov 29, 05

DATE

Entered on "STARS" Yes No

Chairman Diaz' Comments on SECY-05-0187

I disapprove the staff's recommendation to proceed with the two-phase approach described in SECY-05-0187 for addressing safety culture. I share Commissioner Merrifield's concern that the staff's plan does not meet the Commission's intent to implement timely enhancements to the reactor oversight process (ROP) treatment of cross-cutting issues to more fully address safety culture. Moreover, I believe that some of the actions described in the paper may diminish the effectiveness of the ROP by adding unpredictable and unnecessarily subjective elements to the process.

As noted in SECY-05-0187, the staff has already implemented several enhancements to the ROP to strengthen the treatment of safety culture. Going forward, the staff should complete the development of a process to determine if a plant in the degraded cornerstone column of the ROP Action Matrix should be subject to a specific safety culture review. In developing this process, the staff should consider the option of having a licensee obtain an independent assessment of safety culture at a plant that meets the threshold for a safety culture review. The staff should complete the development of this process by the Spring of 2006 and should consider stakeholder input through continued public interactions. The staff should keep the Commission fully and currently informed of the status of this activity and should brief the Commissioners' Technical Assistants on the key elements of the process before finalizing it.

Any further enhancements to the ROP to strengthen the treatment of safety culture should be identified through the ROP self-assessment process and by monitoring industry and international developments in this area. All necessary training to inspectors on the enhancements that address safety culture should be completed by the end of Fiscal Year 2006. The staff should ensure that modifications to the ROP are consistent with the regulatory principles that guided the development of the ROP, such that overall assessments of licensee performance remain transparent, understandable, objective, predictable, risk-informed and performance-based.

A handwritten signature in black ink, appearing to be 'LD', is written over the end of the final paragraph.

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: COMMISSIONER MCGAFFIGAN
SUBJECT: **SECY-05-0187 - STATUS OF SAFETY CULTURE
INITIATIVES AND SCHEDULE FOR NEAR-
TERM DELIVERABLES**

Approved _____ Disapproved ^{w/comment} X Abstain _____

Not Participating _____

COMMENTS:

See attached comments.



SIGNATURE
December 5, 2005

DATE

Entered on "STARS" Yes X No _____

Commissioner McGaffigan's Comments on SECY-05-0187

I join with Chairman Diaz in disapproving the staff's recommendation to proceed with the two-phase approach described in SECY-05-0187 for addressing safety culture. Similarly, I agree with Commissioner Merrifield's view that the staff's proposal is not what the Commission intended in the SRM for SECY-04-0111, "Recommended Staff Actions Regarding Agency Guidance in the Areas of Safety Conscious Work Environment and Safety Culture." I share Chairman Diaz' concern that the proposals presented in SECY-05-0187 could introduce unnecessary subjective elements to the reactor oversight program (ROP), a program that the Commission established specifically to replace the more subjective SALP program.

Nonetheless, I am greatly heartened by the results of the NRC staff's very recent public meetings with external stakeholders on the topic of safety culture. I commend the staff both for their hard work in preparing for the meetings and also for the conduct of the meetings themselves. In particular, during the course of those meetings, a new approach ("Option G") emerged (after the rejection of options "A" through "F") which appears to me to far more closely approximate what I - and I believe the Commission - had intended in the SRM for SECY-04-0111. For example, it more clearly reflects the graded approach that I believe to be important as it limits actions for plants in the degraded cornerstone column to inspection elements aimed at determining if safety culture problems were drivers of performance problems. I recognize that "Option G" may well not be the final product, and I urge all stakeholders to remain engaged and to work their way through as much of the alphabet as might be necessary in their efforts to achieve a consensus approach.

The staff should continue to interact with external stakeholders, including potentially sharing draft inspection and other implementing procedures, and provide status or make recommendations to the Commission by May 15, 2006.

EMG 12/5/05

NOTATION VOTE
RESPONSE SHEET

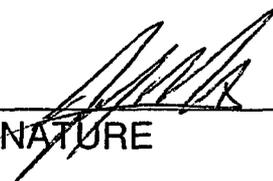
TO: Annette Vietti-Cook, Secretary
FROM: COMMISSIONER MERRIFIELD
SUBJECT: **SECY-05-0187 - STATUS OF SAFETY CULTURE
INITIATIVES AND SCHEDULE FOR NEAR-
TERM DELIVERABLES**

Approved Disapproved Abstain

Not Participating

COMMENTS:

See attached comments.



SIGNATURE

DATE *4/22/05*

Entered on "STARS" Yes No

Commissioner Merrifield's Vote on SECY-05-0187

Status of Safety Culture Initiatives and Schedule for Near-Term Deliverables

I appreciate that the staff has expended considerable effort to develop a plan to address safety culture issues in accordance with SRM-SECY-04-0111, "Recommended Staff Actions Regarding Agency Guidance in the Areas of Safety Conscious Work Environment and Safety Culture." In response to the SRM, the staff issued the guidance document on safety conscious work environment (RIS-2005-18), and continues to monitor industry and international developments in the area of safety culture. However, I am concerned that the proposed two-phase response plan laid out in SECY-05-0187 does not meet the Commission's intent to enhance the reactor oversight process (ROP) treatment of cross-cutting issues to more fully address safety culture in a timely manner.

SRM-SECY-04-0111 states in part:

The staff should consider including enhanced problem identification and resolution initiatives as part of this effort. Most important, the staff should ensure that the inspectors are properly trained in the area of Safety Culture. The staff should consider developing an enhanced training program for its inspectors and resident inspectors on Safety Culture that uses both insights from INPO's work in this area and insights from the international community. The staff should consider if the cross-cutting issues in the enhanced ROP treatment may be more appropriately labeled Safety Management rather than Safety Culture. In making any changes, the staff should follow the established processes for revising the ROP, in particular the process for involving stakeholders.

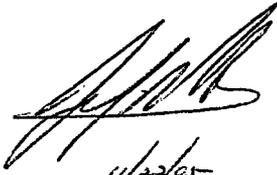
As a further enhancement to the ROP, the staff should include as part of its enhanced inspection activities for plants in the Degraded Cornerstone Column (referred to as Column Three) of the ROP Action Matrix, a determination of the need for a specific evaluation of the licensees Safety Culture. The staff should interact with our stakeholders to develop a process for making the determination and conducting the evaluation. The staff's methodology for using the treatment of cross-cutting issues to more fully address Safety Culture should require a specific determination for plants in the Degraded Cornerstone Column.

When the SRM was issued on August 30, 2004, it was not the Commission's intent to embark on a multi-year project to introduce safety culture attributes into the ROP. I believed then, as I do now, that incremental improvements can be made to the treatment of cross-cutting issues in the already successful ROP which can help the staff identify signs of degrading licensee performance before a significant operational event occurs. In fact, the staff has already made several enhancements to the ROP in response to the Davis Besse Lessons Learned Task Force, as noted in Attachment 1 of SECY-05-0187, that take us well down the road toward addressing this issue. The staff should build on those accomplishments by continuing to engage stakeholders to identify if further improvements are necessary to more fully address licensee safety culture.

I understand the staff has been meeting with stakeholders on a monthly basis to discuss attributes of a strong safety culture, and how the NRC can best monitor licensee safety culture

through the ROP. I encourage such stakeholder involvement, and hope that these efforts can create convergence on a useful approach to address this issue. The staff plans on holding a two-day meeting on November 29-30, 2005, to discuss potential changes to the ROP and hear proposals from the industry and public interest groups. I commend the staff for these interactions and I believe this is exactly what the Commission had in mind when directing the staff to involve stakeholders in the process. The staff should interact with stakeholders to develop a process for determining if an evaluation of licensee Safety Culture is warranted when a plant falls into the Degraded Cornerstone Column (Column 3) of the ROP Action Matrix, and how such an evaluation should be conducted.

Using the input provided by the stakeholders, I believe it is possible for the staff to determine what, if any, additional ROP enhancements are warranted, revise the ROP accordingly, and provide a schedule for training the inspectors on Safety Culture by Spring 2006. Inspector training should be completed as soon as practicable, but no later than the end of FY 2006.



11/27/05

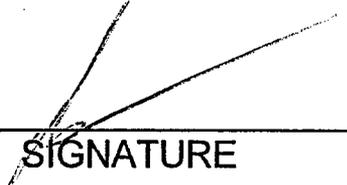
NOTATION VOTE
RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: **COMMISSIONER JACZKO**
SUBJECT: **SECY-05-0187 - STATUS OF SAFETY CULTURE
INITIATIVES AND SCHEDULE FOR NEAR-
TERM DELIVERABLES**

Approved X Disapproved _____ Abstain _____

Not Participating _____

COMMENTS: See attached comments.



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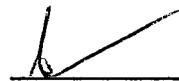
DATE 11/16/05

Entered on "STARS" Yes X No _____

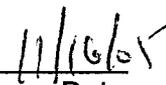
Commissioner Jaczko Comments on SECY-05-0187
Status of Safety Culture Initiatives and Schedule for Near-Term Deliverables

I support the effort the staff is taking to develop a formal safety culture program and find it responsive to the direction provided to the staff in the August 30, 2004 SRM in response to SECY-04-0111, "Recommended Staff Action Regarding Agency Guidance in the Areas of Safety Conscious Work Environment and Safety Culture." The staff should continue its efforts to provide the required program elements identified as Phase 1 in SECY-05-0187 by March 2006.

Assessing safety culture is a crucial and complicated undertaking. The staff should proceed with the November 29, 2005 public meeting with stakeholders and be receptive to stakeholder recommendations as they continue to develop an effective safety culture program. The staff's approach to date should be viewed as one of many options to be considered in staff meetings with stakeholders. Given the looming deadlines, I believe these stakeholder discussions will be more productive if the staff presents its current proposals as they appear consistent with Commission guidance in this area.



Gregory B. Jaczko



Date

NOTATION VOTE
RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: COMMISSIONER LYONS
SUBJECT: **SECY-05-0187 - STATUS OF SAFETY CULTURE
INITIATIVES AND SCHEDULE FOR NEAR-
TERM DELIVERABLES**

Approved with comment X Disapproved Abstain
Not Participating

COMMENTS:



SIGNATURE

11/23/05

DATE

Entered on "STARS" Yes X No

Commissioner Lyons' Comments on SECY-05-0187

Status of Safety Culture Initiatives

I appreciate the systematic approach taken by the staff in developing their current recommendations, as guided by the previous Commission direction in SRM-SECY-04-0111.

I join Commissioner Merrifield in acknowledging the work done by the staff to-date, including Reactor Oversight Process (ROP) program changes and inspector training, that have already improved ROP sensitivity to adverse licensee performance trends which may suggest a potential weakening of safety culture, and in encouraging the continued stakeholder involvement planned by the staff.

At this stage in the staff's progress, I would offer the following guidance:

1. Staff should ensure that any further changes considered for the ROP are consistent with the regulatory principles that guided its development, such that the overall assessments of licensee performance remain transparent and understandable, objective and predictable, and risk-informed and performance-based. I understand this is the staff's intent.
2. All of the changes to the ROP that address aspects of safety culture, both past and any future changes, should be documented in the ROP program guidance and/or basis documentation in a manner that clearly identifies their nexus to each other and to the attributes of safety culture. The objective is to ensure that, over time as future ROP changes are made, those program elements designed to address safety culture continue to remain an effective and collectively coherent component of the ROP.
3. Staff should define decision criteria to determine the need for a specific evaluation of a licensee's safety culture. Such an evaluation should be required for licensees in the degraded cornerstone column of the ROP Action Matrix, or higher, who meet other safety culture attribute criteria to be defined through the staff's present initiative with stakeholders. Such an evaluation, when indicated, should be accomplished on a graded basis, with options ranging from licensee self-assessment with staff oversight, to fully independent NRC assessments. Any independent NRC assessments should be led only by headquarters staff experienced in such evaluations, in order to ensure a consistent methodology for different licensees and to capture resulting insights at the NRC corporate level.
4. The added value of INPO's role in adding a safety culture component to its assessment process should be publically acknowledged by the staff by engaging INPO in seeking to formalize, in a Memorandum of Agreement or other suitable public mechanism, that INPO will continue to include this component in their assessment process and make its results available to on-site NRC inspectors and managers. This approach should continue the current practice of making proprietary INPO assessments available to the staff, but should also acknowledge and emphasize the advantage of a periodic third-party safety culture assessment for all licensees, based on INPO's standard of excellence.


Peter B. Lyons

11/23/05
11/23/2005