

POLICY ISSUE NOTATION VOTE

January 19, 2012

SECY-12-0008

FOR: The Commissioners

FROM: R. W. Borchardt
Executive Director for Operations

SUBJECT: IMPLEMENTATION PLAN FOR THE SAFETY CULTURE POLICY
STATEMENT

PURPOSE:

The purpose of this paper is to transmit for Commission review the staff's implementation plan for the Safety Culture Policy Statement (SCPS).

BACKGROUND:

In SECY-11-0005, "Proposed Final Safety Culture Policy Statement," dated January 5, 2011, the staff provided a draft policy statement for the Commission's consideration. The paper provided a comprehensive summary of the development of the policy statement beginning in 2008 and the extensive stakeholder outreach and support for the policy statement. On March 7, 2011, the Commission approved the proposed final SCPS. The SCPS became effective when the U.S. Nuclear Regulatory Commission (NRC) published it in the *Federal Register* (76 FR 34773) on June 14, 2011 [[Enclosure 1](#)].

In Staff Requirements Memorandum (SRM)-SECY-11-0005, "Proposed Final Safety Culture Policy Statement, dated March 7, 2011, the Commission directed the staff to "continue to engage with all stakeholders to communicate the contents of the SCPS, to educate stakeholders, and to ensure they have the necessary support to effectively employ the SCPS as they deem appropriate." In response to this direction, the staff is (1) engaging in outreach activities with stakeholders and the regulated communities and providing educational tools to enhance understanding of the definition and traits of a positive safety culture given in the SCPS,

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(2) determining whether enhanced safety culture outreach is beneficial for some licensees and considering appropriate followup actions, (3) providing presentations on the SCPS at meetings, conferences, workshops, and other forums, and (4) engaging in international efforts on safety culture to educate those in other countries on the SCPS.

Additionally, SRM-SECY-11-0005 directed the staff to “obtain Commission approval for any staff activities beyond communication and education.” At present, the staff has not engaged in any new actions that go beyond outreach and education or are not under previous Commission direction. On July 22, 2011, the Chairman issued a tasking memorandum directing the staff to submit an implementation plan, including short-term and long-term goals, before implementing any new initiatives related to the SCPS.

DISCUSSION:

In response to the Commission direction in the SRM and the Chairman’s tasking memorandum, the staff is submitting for Commission approval, this implementation plan, including a summary of activities and goals for outreach and education, as well as a detailed discussion of SCPS-related activities consistent with Commission direction. The staff has developed an implementation plan ([Enclosure 2](#)) that focuses on the engagement of stakeholders and outreach activities that are appropriate for implementing the SCPS at this time. The staff will continue to assess the effectiveness of these activities and consider whether any new activities are necessary and appropriate. If new activities are identified in the future, staff would seek Commission approval before implementing them. Several program offices are engaged in actions as appropriate, such as incorporating the SCPS when revising existing program office procedures, documents, and inspection activities. A summary of outreach activities with stakeholders is provided in [Enclosure 3](#).

SRM-SECY-11-0005 also directed the staff to seek Commission policy review of staff plans, including short-term and long-term goals, for implementation and the vision for each program office’s oversight before implementing any new initiatives based on the policy statement. The Chairman’s tasking memorandum, dated July 22, 2011, directed the staff to submit an implementation plan, including short-term and long-term goals, before beginning any new initiatives related to the SCPS. The staff is not proposing any new initiatives. The engagement of stakeholders and educational activities are succeeding to enhance understanding of the definition and traits of a positive safety culture.

COMMITMENTS:

The NRC staff will continue to seek ways to engage with stakeholders, licensees, members of the public, and the international community in order to provide outreach and education on the SCPS. In addition, program offices will incorporate the SCPS, as appropriate, in revisions to those procedures, documents, and inspection activities that fall under previous Commission direction, and seek Commission approval before initiating any new activities relating to the SCPS.

RECOMMENDATIONS:

The staff recommends that the Commission approve the planned activities and initiatives associated with the SCPS implementation plan.

RESOURCES:

The budget for FY2012 and the current draft budget for FY2013 include sufficient resources to carry out the activities in the plan.

COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection. The Office of the Chief Financial Officer has reviewed this paper for resource implications and has no objections.

/RA Michael Weber for/

R. W. Borchardt
Executive Director
for Operations

Enclosures:

1. *Federal Register Notice for the Safety Culture Policy Statement*
2. *Draft Safety Culture Policy Statement Implementation Plan*
3. *Safety Culture Outreach/Conference Dates for Industry/Groups*

household income for New York was \$55,401, while 10.5 percent of families and 13.8 percent of the state population were determined to be living below the Federal poverty threshold. Schenectady County had the same median household income average (\$55,421) and a lower percent of families (6.7 percent) and a similar percentage of individuals (10.8 percent) living below the poverty level, respectively.

Impact Analysis—Potential impacts to minority and low-income populations would mostly consist of radiological effects, however radiation doses from continued operations associated with the license renewal are expected to continue at current levels, and would be well below regulatory limits. Minority and low-income populations are subsets of the general public residing around the RCF, and all are exposed to the same health and environmental effects generated from activities at the RCF. Based on this information and the analysis of human health and environmental impacts presented in this environmental assessment, the license renewal would not have disproportionately high and adverse human health and environmental effects on minority and low-income populations residing in the vicinity of the RCF.

Environmental Impacts of the Alternatives to the Proposed Action

As an alternative to license renewal, the NRC staff considered denial of the proposed action. If the Commission denied the application for license renewal, facility operations would end and decommissioning would be required. The NRC staff notes that, even with a renewed license, the RCF will eventually be decommissioned, at which time the environmental effects of decommissioning will occur. Decommissioning would be conducted in accordance with an NRC-approved decommissioning plan, which would require a separate environmental review under 10 CFR 51.21. Cessation of reactor operations would reduce or eliminate radioactive effluents and emissions. However, as previously discussed in this environmental assessment, radioactive effluents and emissions from reactor operations constitute a small fraction of the applicable regulatory limits, and are often below detectable levels. Therefore, the environmental impacts of license renewal and the denial of the request for license renewal would be similar. In addition, denying the request for license renewal would eliminate the benefits of teaching, research, and services provided by the RCF.

Alternative Use of Resources

The proposed action does not involve the use of any different resources or significant quantities of resources beyond those previously considered in the issuance of Amendment No. 5 to Facility Operating License No. CX-22, dated December, 1983, which renewed the license for a period of twenty years, or the issuance of Amendment No. 7 dated July 7, 1987, which ordered RPI to convert the reactor to use low-enriched uranium fuel.

Agencies and Persons Consulted

In accordance with the agency's stated policy, on September 4, 2008, the NRC staff consulted with the State Liaison Officer regarding the environmental impact of the proposed action. The State official had no comments regarding the proposed action. The NRC staff also consulted with the SHPO regarding the potential impact of the proposed action on historic resources. As previously mentioned, the SHPO determined that license renewal would have no adverse effect on historic properties in the vicinity of the RCF.

Finding of No Significant Impact

On the basis of the environmental assessment, the NRC concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the NRC has determined not to prepare an environmental impact statement for the proposed action.

For further details with respect to the proposed action, see the licensee's letter dated November 19, 2002 (ML023380455 and ML072210835), as supplemented on July 21 (ML082060048), July 28 (ML082190523), and September 3, 2008 (ML101260200); June 28 (ML101820298), August 31 (ML102790045 and ML102720039), October 14 (ML103070074), and October 28, 2010 (ML103080207); and February 14 (ML110490531) and May 9, 2011 (ML11131A180). Documents may be examined, and/or copied for a fee, at the NRC's Public Document Room (PDR), located at One White Flint North, 11555 Rockville Pike (first floor), Rockville, Maryland. Publicly available records will be accessible electronically from the Agencywide Documents Access and Management System (ADAMS) Public Electronic Reading Room on the NRC Web site <http://www.nrc.gov/reading-rm/adams.html>. Persons who do not have access to ADAMS or who encounter problems in accessing the documents located in ADAMS should contact the NRC PDR Reference staff at

1-800-397-4209, or 301-415-4737, or send an e-mail to pdr.resource@nrc.gov.

Dated at Rockville, Maryland, this 3rd day of June, 2011.

For the Nuclear Regulatory Commission.

Jessie Quichocho,

Chief, Research and Test Reactors Licensing Branch, Division of Policy and Rulemaking, Office of Nuclear Reactor Regulation.

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NUCLEAR REGULATORY COMMISSION

[NRC-2010-0282]

Final Safety Culture Policy Statement

AGENCY: Nuclear Regulatory Commission.

ACTION: Issuance of final safety culture policy statement.

SUMMARY: The U.S. Nuclear Regulatory Commission (NRC or the Commission) is issuing this Statement of Policy to set forth its expectation that individuals and organizations performing or overseeing regulated activities establish and maintain a positive safety culture commensurate with the safety and security significance of their activities and the nature and complexity of their organizations and functions. The Commission 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 policy statement 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.

DATES: This policy statement becomes effective upon publication in the **Federal Register**.

ADDRESSES: You can access publicly available documents related to this document using the following methods:

- *NRC's Public Document Room (PDR):* The public may examine and have copied, for a fee, publicly available documents at the NRC's PDR, Room O1-F21, One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852.
- *NRC's Agencywide Documents Access and Management System (ADAMS):* Publicly available documents created or received at the NRC are

available online in the NRC Library at <http://www.nrc.gov/reading-rm/adams.html>. From this page, the public can gain entry into ADAMS, which provides text and image files of the NRC's public documents. If you do not have access to ADAMS or if there are problems in accessing the documents located in ADAMS, contact the NRC's PDR reference staff at 1-800-397-4209, 301-415-4737, or by e-mail to pdr.resource@nrc.gov.

- *Federal rulemaking Web site:* Public comments and supporting materials related to this document can be found at <http://www.regulations.gov> by searching on Docket ID NRC-2010-0282. Address questions about NRC dockets to Carol Gallagher, telephone: 301-492-3668; e-mail: Carol.Gallagher@nrc.gov.

FOR FURTHER INFORMATION CONTACT: Roy P. Zimmerman, Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; telephone: 301-415-2741; e-mail: Roy.Zimmerman@nrc.gov.

SUPPLEMENTARY INFORMATION:

I. Background

A. Previous Policy Statements and Events Involving Safety Culture

The NRC has long recognized the importance of a safety-first focus in nuclear work environments for public health and safety. The Commission's emphasis on a safety-first focus is reflected in two previously published NRC policy statements. The 1989, "Policy Statement on the Conduct of Nuclear Power Plant Operations" (54 FR 3424; January 24, 1989), applies to all individuals engaged in activities that affect the safety of nuclear power plants, and provides the Commission's expectations of utility management and licensed operators with respect to the conduct of operations. The 1996, "Freedom of Employees in the Nuclear Industry to Raise Safety Concerns Without Fear of Retaliation" (61 FR 24336; May 14, 1996), applies to the regulated activities of all NRC licensees and their contractors and subcontractors, and provides the Commission's expectations that licensees and other employers subject to NRC authority establish and maintain safety-conscious work environments in which employees feel free to raise safety concerns, both to their management and to the NRC, without fear of retaliation. This Safety Culture Statement of Policy, in conjunction with the previous policy statements, is intended to emphasize the importance the NRC places on the development and maintenance of a

positive safety culture for all regulated activities.

The accident at the Chernobyl nuclear power plant in 1986, brought attention to the importance of safety culture and the impact that weaknesses in safety culture can have on safety performance. Since then, the importance of a positive safety culture has been demonstrated by a number of significant, high-visibility events worldwide. In the United States, incidents involving the civilian uses of radioactive materials have not been confined to a particular type of licensee or certificate holder, as they have occurred at nuclear power plants and fuel cycle facilities and during medical and industrial activities involving regulated materials. Assessments of these incidents revealed that weaknesses in the regulated entities' safety cultures were an underlying cause of the incidents or increased the severity of the incidents. The causes of these incidents included, for example, inadequate management oversight of process changes, perceived production pressures, lack of a questioning attitude, and poor communications. One such incident indicated the need for additional NRC efforts to evaluate whether the agency should increase its attention to reactor licensees' safety cultures. This resulted in important changes to the NRC's Reactor Oversight Process (ROP). Commission paper SECY-06-0122, dated May 24, 2006, (ADAMS Accession No. ML061320282) describes the NRC's safety culture activities at that time and the outcomes of those activities.

Following the terrorist attacks of September 11, 2001, the Commission issued orders enhancing security at facilities whose operations, if attacked, could have an impact on public health and safety. During the early years of implementation of these security enhancements, several violations of the Commission's security requirements were identified in which the licensee's failure to cultivate a positive safety culture impacted the effectiveness of the licensee's security program. The most visible of these involved security officers sleeping in a "ready room" while on shift at a nuclear power plant. Most of the weaknesses involved inadequate management oversight of security, lack of a questioning attitude within the security organization, complacency, barriers to raising concerns about security issues, and inadequate training of security personnel.

B. Commission Direction

In February 2008, the Commission issued Staff Requirements

Memorandum (SRM), SRM-COMGBJ-08-0001 (ADAMS Accession No. ML080560476), directing the NRC staff to expand the Commission's policy on safety culture to address the unique aspects of security and to ensure the resulting policy is applicable to all licensees and certificate holders. The Commission directed the staff to answer several additional questions, including: (1) Whether safety culture as applied to reactors needed to be strengthened; (2) how to increase attention to safety culture in the materials area; (3) how stakeholder involvement can most effectively be used to address safety culture for all NRC and Agreement State licensees and certificate holders, including any unique aspects of security; and (4) whether publishing the NRC's expectations for safety culture and for security culture would be best accomplished in one safety/security culture statement or in two separate statements while still considering the safety and security interfaces.

In response to Commission direction, the NRC staff reviewed domestic and international safety-culture-related documents and considered NRC lessons learned. Additionally, the staff sought insights and feedback from external stakeholders. This was accomplished by providing information in a variety of forums, such as stakeholder organization meetings, newsletters, and teleconferences, and by publishing questions developed to address Commission direction in the February 9, 2009, **Federal Register** notice (FRN) (74 FR 6433) entitled "Safety Culture Policy Statement Development: Public Meeting and Request for Public Comments" (ADAMS Accession No. ML090260709).

In February 2009, the NRC held a public workshop on the "Development of a Policy Statement on Safety Culture and Security Culture" in which a broad range of stakeholders participated, including representatives from the Agreement States (Meeting Summary: ADAMS Accession No. ML090930572). The staff developed draft characteristics (subsequently referred to as "traits") of a positive safety culture and presented them at the workshop. Mindful of the increased attention to the important role of security, the staff also sought input from the workshop participants on whether there should be a single safety culture policy statement or two policy statements addressing safety and security independently while considering the interface of both. Before providing its recommendations to the Commission, the staff developed a draft definition of safety culture in which it modified a definition from the International Atomic Energy Agency's

advisory group, the International Nuclear Safety Group, to make it applicable to all NRC-regulated activities and to address security.

Based on its review and stakeholder feedback, in SECY-09-0075, "Safety Culture Policy Statement," dated May 16, 2009 (ADAMS Accession No. ML091130068), the NRC staff provided a single draft safety culture policy statement for Commission approval. The draft policy statement acknowledged the importance of safety and security, and the interface of both, within an overarching culture of safety. Additionally, in response to the Commission's questions, the staff: (1) Concluded that the NRC's oversight of safety culture as applied to reactors has been strengthened, is effective, and continues to be refined in accordance with the existing ROP self-assessment process; (2) described actions taken and planned for increasing attention to safety culture in the materials area; and (3) described actions taken and planned for most effectively obtaining stakeholder involvement to address safety culture, including any unique aspects of security, for all NRC and Agreement State licensees and certificate holders.

In SRM-SECY-09-0075 (ADAMS Accession No. ML092920099), the Commission directed the staff to: (1) Publish the draft safety culture policy statement for no fewer than 90 days; (2) continue to engage a broad range of stakeholders, including the Agreement States and other organizations with an interest in nuclear safety, to ensure the final policy statement presented to the Commission reflects a broad spectrum of views and provides the necessary foundation for safety culture applicable to the entire nuclear industry; (3) make the necessary adjustments to encompass security within the statement; (4) seek opportunities to comport NRC terminology, where possible, with that of existing standards and references maintained by those that the NRC regulates; and (5) consider incorporating suppliers and vendors of safety-related components in the safety culture policy statement.

C. Development of the Final Policy Statement

On February 2-4, 2010, the NRC held a second safety culture workshop to provide a venue for interested parties to comment on the draft safety culture policy statement. The additional goal of the workshop was for panelists representing a broad range of stakeholders to reach alignment, using common terminology, on a definition of safety culture and a high-level set of

traits that describe areas important to a positive safety culture. The workshop panelists represented a wide range of stakeholders regulated by the NRC and/or the Agreement States, including medical, industrial, and fuel cycle materials users, and nuclear power reactor licensees, as well as the Nuclear Energy Institute, the Institute of Nuclear Power Operations (INPO), and members of the public. The workshop panelists reached alignment with input from the other meeting attendees on a definition of safety culture and a high-level set of traits describing areas important to a positive safety culture.

Following the February 2010, workshop, the NRC staff evaluated the public comments that were submitted in response to the November 6, 2009, FRN (74 FR 57525). Additionally, the staff participated on panels and made presentations at various industry forums in order to provide information to stakeholders about the development of the safety culture policy statement and/or to obtain additional input and to ascertain whether the definition and traits developed at the workshop accurately reflect a broad range of stakeholders' views. These outreach activities included, for example, participation in a Special Joint Session on Safety Culture at the Health Physics Society Annual Meeting, and presentations on the development of the safety culture policy statement at the Annual Fuel Cycle Information Exchange, the Conference of Radiation Control Program Directors' Annual National Conference on Radiation Control, the Institute of Nuclear Materials Management's Annual Meeting, the Second NRC Workshop on Vendor Oversight for New Reactors, and the Organization of Agreement States Annual Meeting. In response to Commission direction in SRM-SECY-09-00075, the staff focused attention on attending meetings involving the Organization of Agreement States and other materials licensees.

In July 2010, the NRC held a public teleconference with the panelists who participated in the February 2010, workshop to discuss the status of outreach activities associated with the development of the policy statement. At the July 2010, meeting, the panelists reiterated their support for the definition and traits developed at the February 2010, workshop as a result of their outreach with their industry colleagues. This position aligns with the comments the staff received during the various outreach activities. In September 2010, the staff held an additional teleconference to provide information on the initial results of a

validation study conducted by INPO, which was conducted, in part, to see whether and to what extent the factors that came out of INPO's safety culture survey support the February 2010, workshop traits. The factors support the traits developed at the workshop.

Based on its review and stakeholder feedback, the staff published the revised draft safety culture policy statement (ADAMS Accession No. ML102500563) on September 17, 2010 (75 FR 57081), for a 30-day public comment period. Because public comments reflected some misunderstanding regarding the Commission's use of a policy statement rather than a regulation or rule, the September 2010, FRN provided clarification, pointing out that the Commission may use a policy statement to address matters relating to activities that are within NRC jurisdiction and are of particular interest and importance to the Commission. Policy statements help to guide the activities of the NRC staff and can express the Commission's expectations of others; however, they are not regulations or rules and are not accorded the status of a regulation or rule within the meaning of the Administrative Procedure Act. The Agreement States, which are responsible for overseeing their materials licensees, cannot be required to implement the elements of a policy statement because such statements, unlike NRC regulations, are not a matter of compatibility. Additionally, policy statements cannot be considered binding upon, or enforceable against, NRC or Agreement State licensees and certificate holders.

This Statement of Policy has been developed to engage individuals and organizations performing regulated activities involving nuclear materials and share the Commission's expectations regarding the development and maintenance of a positive safety culture.

The NRC held a public meeting in September 2010, in the Las Vegas Hearing Facility, Las Vegas, Nevada, which was simultaneously broadcast in the Commission Hearing Room, Rockville, Maryland, and over the internet via Web streaming in order to allow remote participation. The goals of the September 2010, FRN and meeting were to provide additional opportunities for stakeholders to comment on the revised draft policy statement, including the definition and traits developed at the February 2010, workshop, and to discuss the information gathered from the outreach activities that had occurred since the February 2010, workshop. Additionally, a representative from INPO presented

information on the validation study INPO conducted as part of INPO's efforts to help establish a technical basis for the identification and definition of areas important to safety culture. A member of the Office of Nuclear Regulatory Research also presented findings related to the oversight of the INPO study.

II. Public Comments

The November 2009, FRN and the September 2010, FRN generated 76 comments from affected stakeholders and members of the public. The staff's evaluation concluded that many of the comments were statements of agreement on the information included in the draft and revised safety culture policy statements and did not require further action. A few of the commenters raised issues that the staff considered during the development of the policy statement, but ultimately concluded that the issues were either not applicable to the policy statement, for example, that "by virtue of its all encompassing applicability, the policy must be taken as a strategic utterance;" or either misunderstood or disregarded the concept of a policy statement in this application, for example, that a policy statement is "largely inadequate for purposes of establishing broad-reaching performance standards." The remaining comments informed the NRC staff's development of the final policy statement. These were grouped into the following themes:

1. The NRC should adopt the definition and traits developed during the February 2010, workshop. This theme encompassed additional comments indicating that retaining the term "security" in the definition and traits of a positive safety culture may be confusing to many licensees, particularly materials licensees.

2. The traits from the February 2010, workshop should be included in the Statement of Policy in order to provide additional clarity as to its intent.

3. More guidance is needed on the NRC's expectations as to how the policy statement will be implemented. This encompassed the additional theme that stakeholders would like to be actively involved in the process of developing this guidance and that the continued use of workshops with the various licensees would be helpful.

4. A discussion should be included in the policy statement that addresses the diversity of the regulated community. Additionally, the Commission should acknowledge the efforts already underway as the regulated community addresses the Statement of Policy.

5. How does the NRC plan to "enforce" adherence to the policy statement?

6. Comments on the draft policy statement were generally supportive of including vendors and suppliers of safety-related components in the Statement of Policy, but reflected concern about jurisdictional issues, as well as the impact that including vendors and suppliers in the Statement of Policy might have on licensees' ability to work with these entities.

7. During its evaluation of the public comments on the draft safety culture policy statement, the staff felt that a trait addressing complacency should be added to the February 2010, workshop traits. Several months later, the results of an INPO study indicated that the trait "Questioning Attitude" had strong support with operating nuclear plant personnel. This trait resonated with the staff as an approach for addressing complacency for all regulated activities. At the September 2010, public meeting, as part of a larger presentation providing the results of the INPO validation study, the staff added a question about whether to include this trait. Additionally, the September 2010, FRN specifically asked whether complacency should be addressed in the Statement of Policy. Although the responses to this question varied, the staff concluded it should be considered in a positive safety culture and included the concept of complacency in the Statement of Policy under the trait, "Questioning Attitude." "Questioning Attitude" is described in the final Statement of Policy as a culture "in which individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action."

This policy statement is being issued after careful consideration of the staff's evaluation of the public comments received on the November 2009, and September 2010, FRNs; the public meetings held in February 2009, and February, July, and September 2010; the views expressed by stakeholders during the Commission briefing in March 2010; and the informal dialogue with the various stakeholders during the staff's additional outreach efforts from the February 2010, workshop until the second public comment period ended on October 18, 2010.

The following paragraphs provide the specific information that was used in the development of the final policy statement, including the changes that were made to the November 2009, FRN:

1. The Statement of Policy adopts the February 2010, workshop definition and

traits of a positive safety culture. The term "security" is not included in either the definition or the traits. The Commission agrees that an overarching safety culture addresses both safety and security and does not need to single out "security" in the definition. However, to ensure that security is appropriately encompassed within the Statement of Policy, a preamble to the traits has been added and the robust discussion of security, including the importance of considering the interface of safety and security that was included in the draft Statement of Policy, has been retained in the Statement of Policy.

2. The Commission agrees that including the traits in the Statement of Policy will serve to clarify the intent of the policy. The draft policy statement published in the November 2009, FRN did not include the characteristics (now described as "traits") in the actual Statement of Policy. The staff developed the draft characteristics based on a variety of sources, including the 13 safety culture components used in the ROP. The characteristics included significantly more detail than the traits included in the Statement of Policy. The staff's basis for the original decision to include the characteristics in another section of the draft policy statement but not in the actual draft Statement of Policy was three-fold: first, it would keep the Statement of Policy brief and concise; second, it would maintain the Statement of Policy at a high level; and third, it would not invalidate the characteristics' standing as part of the draft policy statement to place them in another section of the draft policy statement. The November 6, 2009, FRN that contained the draft policy statement specifically requested comments on whether the characteristics should be included in the Statement of Policy. Some commenters indicated that they would prefer not to include the traits in the actual Statement of Policy or that they agree with the original decision to include the traits in their own section of the policy statement. However, several commenters indicated that adding the traits to the Statement of Policy itself would help to clarify the Commission's expectations. Because the traits in question were developed by the stakeholders at the February 2010, workshop to provide a high-level description of the areas important to a positive safety culture, the level of detail that was included in the draft characteristics is not present in the traits. Thus, even with inclusion of the traits, the Statement of Policy remains brief and concise; in addition, this approach provides high-level detail that

was not in the draft Statement of Policy. Including the traits in the Statement of Policy rather than as part of the policy statement visually supports their standing as part of the Commission's expectation that these are areas that members of the regulated community should consider as they develop a positive safety culture. Finally, as the Statement of Policy points out, the list of traits was not developed for inspection purposes nor does it represent an all-inclusive list of areas important to a positive safety culture.

3. Implementation is not directly addressed in this policy statement, which sets forth the overarching principles of a positive safety culture. This discussion is not included because the Commission is aware of the diversity of its regulated community (which includes, for example, industrial radiography services; hospitals, clinics and individual practitioners involved in medical uses of radioactive materials; research and test reactors; large-scale fuel fabrication facilities; as well as operating nuclear power plants and the construction of new facilities where operations will involve radioactive materials with the potential to affect public health and safety and the common defense and security) and recognizes that implementation will be more complex in some settings than others. The NRC program offices responsible for licensing and oversight of the affected entities intend to work with their constituents, who bear the primary responsibility for safely handling and securing regulated materials, to address the next steps and specific implementation issues. Nevertheless, before implementation issues are addressed, the regulated community can begin assessing their activities to identify areas for enhancement. For example, industry representatives could begin to identify tacit organizational and personal goals that, at times, may compete with a safety-first focus and develop strategies for adjusting those goals. Some monetary incentive or other rewards programs could work against making a safe decision. Current training programs may not address safety culture and its traits or how those traits apply to day-to-day work activities. Identification of both strengths and weaknesses related to safety culture in the regulated community will be helpful in understanding implementation strategies.

4. The final Statement of Policy includes a statement that the Commission recognizes the diversity of the various organizations that are included in the Statement of Policy and

the fact that some organizations have already spent significant time and resources in the development of programs and policies to support a positive safety culture. The Commission will take these efforts into consideration as the regulated community addresses the Statement of Policy.

5. Because there seemed to be some questions about the Commission's use of a policy statement rather than a regulation, the staff provided a brief discussion of the differences in the September 17, 2010, FRN, pointing out that policy statements, while not enforceable, guide the activities of the NRC staff and express the Commission's expectations. The Commission reiterates the conclusion of the discussion provided in the September 2010, FRN that while the option to consider rulemaking exists, the Commission believes at this time, that developing a policy statement is a more effective way to engage stakeholders.

6. Vendors and suppliers of safety-related components have been included in this Statement of Policy. A few stakeholders have raised concerns about how implementation would be carried out, particularly in cases where vendors and suppliers are located outside of NRC jurisdiction. However, the Commission believes that vendors and suppliers of safety-related components should develop and maintain a positive safety culture in their organizations for the same reasons that other NRC-regulated entities should do so.

7. The final Statement of Policy adds the trait "Questioning Attitude" to the traits developed at the February 2010, workshop as an appropriate vehicle for addressing complacency.

III. Statement of Policy

The purpose of this Statement of Policy is to set forth the Commission's expectation that individuals and organizations establish and maintain a positive safety culture commensurate with the safety and security significance of their activities and the nature and complexity of their organizations and functions. This includes 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 Commission encourages the Agreement States, Agreement State licensees and other organizations interested in nuclear safety to support the development and maintenance of a

positive safety culture, as articulated in this Statement of Policy.

Nuclear Safety Culture is defined 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*. Individuals and organizations performing regulated activities bear the primary responsibility for safety and security. The performance of individuals and organizations can be monitored and trended and, therefore, may be used to determine compliance with requirements and commitments and may serve as an indicator of possible problem areas in an organization's safety culture. The NRC will not monitor or trend values. These will be the organization's responsibility as part of its safety culture program.

Organizations should ensure that personnel in the safety and security sectors have an appreciation for the importance of each, emphasizing the need for integration and balance to achieve both safety and security in their activities. Safety and security activities are closely intertwined. While many safety and security activities complement each other, there may be instances in which safety and security interests create competing goals. It is important that consideration of these activities be integrated so as not to diminish or adversely affect either; thus, mechanisms should be established to identify and resolve these differences. A safety culture that accomplishes this would include all nuclear safety and security issues associated with NRC-regulated activities.

Experience has shown that certain personal and organizational traits are present in a positive safety culture. A trait, in this case, is a pattern of thinking, feeling, and behaving that emphasizes safety, particularly in goal conflict situations, e.g., production, schedule, and the cost of the effort versus safety. It should be noted that although the term "security" is not expressly included in the following traits, safety and security are the primary pillars of the NRC's regulatory mission. Consequently, consideration of both safety and security issues, commensurate with their significance, is an underlying principle of this Statement of Policy.

The following are traits of a positive safety culture:

(1) *Leadership Safety Values and Actions*—Leaders demonstrate a commitment to safety in their decisions and behaviors;

(2) *Problem Identification and Resolution*—Issues potentially

impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance;

(3) *Personal Accountability*—All individuals take personal responsibility for safety;

(4) *Work Processes*—The process of planning and controlling work activities is implemented so that safety is maintained;

(5) *Continuous Learning*—Opportunities to learn about ways to ensure safety are sought out and implemented;

(6) *Environment for Raising Concerns*—A safety conscious work environment is maintained where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination;

(7) *Effective Safety Communication*—Communications maintain a focus on safety;

(8) *Respectful Work Environment*—Trust and respect permeate the organization; and

(9) *Questioning Attitude*—Individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action.

There may be traits not included in this Statement of Policy that are also important in a positive safety culture. It should be noted that these traits were not developed to be used for inspection purposes.

It is the Commission's expectation that all individuals and organizations, performing or overseeing regulated activities involving nuclear materials, should take the necessary steps to promote a positive safety culture by fostering these traits as they apply to their organizational environments. The Commission recognizes the diversity of these organizations and acknowledges that some organizations have already spent significant time and resources in the development of a positive safety culture. The Commission will take this into consideration as the regulated community addresses the Statement of Policy.

Dated at Rockville, Maryland, this 8th day of June 2011.

For the Nuclear Regulatory Commission,
Annette L. Vietti-Cook,
Secretary of the Commission.

[FR Doc. 2011-14656 Filed 6-13-11; 8:45 am]

BILLING CODE 7590-01-P

NUCLEAR REGULATORY COMMISSION

Advisory Committee on Reactor Safeguards (ACRS) Meeting of the ACRS Subcommittee on Fukushima; Notice of Meeting

The ACRS Subcommittee on Fukushima will hold a meeting on June 23, 2011, Room T-2B1, 11545 Rockville Pike, Rockville, Maryland.

The entire meeting will be open to public attendance.

The agenda for the subject meeting shall be as follows:

Thursday, June 23, 2011—1 p.m. until 5 p.m.

The Subcommittee will review recent events at the Fukushima site in Japan. The Subcommittee will hear presentations by and hold discussions with the NRC staff and other interested persons regarding this matter. The Subcommittee will gather information, analyze relevant issues and facts, and formulate proposed positions and actions, as appropriate, for deliberation by the Full Committee.

Members of the public desiring to provide oral statements and/or written comments should notify the Designated Federal Official (DFO), Mr. Edwin M. Hackett (Telephone 301-415-7360 or E-mail: Edwin.Hackett@nrc.gov) five days prior to the meeting, if possible, so that appropriate arrangements can be made. Thirty-five hard copies of each presentation or handout should be provided to the DFO thirty minutes before the meeting. In addition, one electronic copy of each presentation should be e-mailed to the DFO one day before the meeting. If an electronic copy cannot be provided within this timeframe, presenters should provide the DFO with a CD containing each presentation at least thirty minutes before the meeting. Electronic recordings will be permitted only during those portions of the meeting that are open to the public. Detailed procedures for the conduct of and participation in ACRS meetings were published in the **Federal Register** on October 21, 2010, (75 FR 65038-65039).

Detailed meeting agendas and meeting transcripts are available on the NRC Web site at <http://www.nrc.gov/reading-rm/doc-collections/acrs>. Information regarding topics to be discussed, changes to the agenda, whether the meeting has been canceled or rescheduled, and the time allotted to present oral statements can be obtained from the Web site cited above or by contacting the identified DFO. Moreover, in view of the possibility that

the schedule for ACRS meetings may be adjusted by the Chairman as necessary to facilitate the conduct of the meeting, persons planning to attend should check with these references if such rescheduling would result in a major inconvenience.

If attending this meeting, please contact Ms. Jessie Delgado (Telephone 301-415-7360) to be escorted to the meeting room.

Dated: June 6, 2011.

Yoira Diaz-Sanabria,
Acting Chief, Reactor Safety Branch A,
Advisory Committee on Reactor Safeguards.

[FR Doc. 2011-14656 Filed 6-13-11; 8:45 am]

BILLING CODE 7590-01-P

NUCLEAR REGULATORY COMMISSION

Advisory Committee on Reactor Safeguards (ACRS), Meeting of the ACRS Subcommittee on Materials, Metallurgy & Reactor Fuels; Notice of Meeting

The ACRS Subcommittee on Materials, Metallurgy & Reactor Fuels will hold a meeting on June 23, 2011, Room T-2B3, 11545 Rockville Pike, Rockville, Maryland.

The entire meeting will be open to public attendance.

The agenda for the subject meeting shall be as follows:

Thursday, June 23, 2011—8:30 a.m. until 12 p.m.

The Subcommittee will review the expanded technical basis for 50.46(c) and the research results of the mechanical behavior of ballooned and ruptured cladding. A draft document entitled, "Mechanical Behavior of Ballooned and Ruptured Cladding," has been made publicly available to provide awareness to the public regarding the staff's position, so they can effectively participate in the ACRS meeting. The NRC is not soliciting comments at this time. This draft document may be incomplete or in error in one or more respects and may be subject to further revision during the review process. The Adams accession number is ML111370032. The Subcommittee will hear presentations by and hold discussions with the NRC staff and other interested persons regarding this matter. The Subcommittee will gather information, analyze relevant issues and facts, and formulate proposed positions and actions, as appropriate, for deliberation by the Full Committee.

Members of the public desiring to provide oral statements and/or written comments should notify the Designated Federal Official (DFO), Christopher

Draft
Safety Culture Policy Statement
Implementation Plan

January 2012

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EXECUTIVE SUMMARY

This Implementation Plan summarizes the various activities the staff has completed and planned in response to Staff Requirements Memorandum (SRM)-SECY-11-0005, "Proposed Final Safety Culture Policy Statement," dated March 7, 2011, and the Chairman's tasking memorandum, dated July 22, 2011. The Policy Statement clearly communicates the Commission's expectations that individuals at organizations performing or overseeing regulated activities establish and monitor a positive safety culture commensurate with the safety and security significance of their activities and the nature and complexity of their organizations and functions. The education and communication activities described in this plan seek to achieve the vision that safety culture within the regulated nuclear sector will improve by the involved organizations understanding the Commission's expectations and by the NRC staff providing the necessary support to effectively employ the Safety Culture Policy Statement (SCPS).

Completed Activities:

The staff has completed activities, including:

- Developed educational tools, such as case studies, brochures, and posters.
- Provided presentations at meetings with NRC staff, licensees, and stakeholders in the regulated communities at industry and international conferences and workshops.
- Developed newsletters and a Regulatory Information Summary to share information related to the SCPS.
- Developed expectations for inspectors such as revisions to training requirements and provided guidance for communication with licensees.
- Engaged in activities relating to the SCPS that are under previous Commission direction in the Reactor Oversight Process (ROP) and in the Construction Reactor Oversight Process (cROP), and for fuel facilities and spent fuel storage and transportation.
- Participated on a number of national and international bodies that set standards, establish research agendas, or share information on topics related to safety culture.
- Interacted with a number of stakeholders, including domestic and foreign industry representatives and organizations, national trade groups, and international nuclear organizations to engage them on safety culture issues and implementation strategies.

Planned Activities:

The staff has planned activities, including:

- Continue to develop educational tools such as additional case studies.
- Provide presentations on the SCPS to industry groups and dialogue with stakeholders, NRC staff and the diverse groups of licensees.
- Revise various licensing guidance, Inspection Manual Chapters (IMC) and NUREGS to incorporate the SCPS. For example, IMC1246, "Formal Qualification Programs in the Nuclear Material Safety and Safeguards Program Area" and the NUREG-1556 series, and revise licensing guidance on uranium recovery and decommissioning.
- Draft revisions to the construction reactor oversight process (cROP), and the fuel cycle oversight process (FCOP).

Roles and Responsibilities

The Office of Federal and State Materials and Environmental Management Programs (FSME), Office of Nuclear Reactor Regulation (NRR), Office of New Reactors (NRO), and Office of Nuclear Material Safety and Safeguards (NMSS) are directly responsible for outreach and education and for incorporating the Safety Culture Policy Statement (SCPS), as appropriate, when revising existing program office procedures, documents, and inspection activities. These offices lead the NRC's business lines as reflected in the budget for Fiscal Year 2012.

The Office of Enforcement (OE) supports the program offices by developing presentation and educational materials and has played a major role in coordinating policy-related matters and providing outreach at meetings, conferences, and workshops.

The Office of Nuclear Regulatory Research (RES) and Office of Nuclear Security and Incident Response (NSIR) support OE and the other program offices in their SCPS-related activities by providing technical expertise and support as needed.

This plan describes the activities of these offices in SCPS-related outreach and education, as well as activities performed in response to previous Commission direction.

Nuclear Materials Users and Decommissioning and Low-Level Waste Business Lines

Completed Activities

Materials Users: FSME leads the NRC's business line for Nuclear Materials Users and Decommissioning and Low-Level Waste. FSME discussed the SCPS during a teleconference at the Periodic Meeting of the Advisory Committee on the Medical Uses of Isotopes in January 2011, the 43rd Annual National Conference on Radiation Control in May 2011, the Master Material Licensee Counterpart Meeting in July 2011, the Organization of Agreement States (OAS) Annual Meeting in August 2011, the Child Health Corporation of America Radiology Directors Forum in September 2011, the 2011 National State Liaison Officers Conference in November 2011, and a meeting with Navy officials who oversee the Navy Master Material License in November 2011.

In addition to the external stakeholder, Agreement States, State, and federal counterpart meetings, the FSME staff has completed presentations to its divisions and the regions.

Regional and Agreement State inspectors are providing education and awareness of safety culture to the licensees by using key messages from the safety culture brochure and case studies during inspection entrance or exit meetings.

In addition, a Regulatory Issue Summary (RIS) has been developed to share the safety culture policy statement and related materials with the regulated communities. The RIS was originally developed for materials licensees, but has been broadened to be an agency-wide generic communication.

Decommissioning and Low-Level Waste (includes Uranium Recovery): Regional and Agreement State inspectors are providing education and awareness of safety culture to licensees by using key messages from the safety culture brochure during site visits.

Planned Activities

Materials Users: FSME will continue to dialogue with NRC licensees and Agreement States through FSME Newsletters, FSME letters, teleconferences, and annual meetings with the OAS and the Conference of Radiation Control Program Directors for awareness and education purposes.

The FSME staff will continue making presentations at conferences, internal meetings, and other opportunities to inform and educate NRC and Agreement State staff, licensees, and the industry about the SCPS. As previously discussed in SECY-11-0005, FSME will also address safety culture information sharing with the NRC staff as it relates to the licensees by introducing the safety culture policy and traits into the FSME revision to Inspection Manual Chapter (IMC) 1246, "Formal Qualification Programs in the Nuclear Material Safety and Safeguards Program Area." This document will be given a new number and will apply specifically to the Nuclear Materials Users program.

As discussed in SECY-11-0005, FSME will incorporate safety culture updates into the NUREG-1556, "Consolidated Guidance about Materials Licenses," series. Although FSME and

the Agreement States are looking for ways to introduce safety culture into these documents, addressing safety culture is not the primary reason for updating these documents. The work on these updates has begun. FSME is involving the Agreement States in these efforts so that the NRC can learn from the best practices in the Agreement States. The update of the NUREG-1556 series is anticipated to take about 3½ years. The incorporation of safety culture into the NUREG-1556 series will (1) describe the NRC's expectation and to whom it applies and (2) define "nuclear safety culture" and describe the related traits. The appendices will also include a copy of the SCPS. An announcement of the availability of draft NUREG-1556, Volume 2, Revision 1, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Industrial Radiography Licensees," for comment was published in the *Federal Register* (76 FR 72005) on November 21, 2011. Agreement States and the safety culture workshop panel members were notified of the opportunity to comment on the draft volume.

The Nuclear Materials Users program, which is run by FSME, Region I, Region III, and Region IV, will evaluate the effectiveness of safety culture education and outreach activities through discussions at inspection entrance or exit meetings. This activity will be performed under the budgeted resources in FY 2012 and FY 2013. Based on the evaluation, the materials program will determine whether additional enhanced outreach and education activities are needed. FSME has preliminarily discussed this activity with the Organization of Agreement States Board lead for safety culture and with representatives of the regions.

Decommissioning and Low-Level Waste (includes Uranium Recovery): Regional and Agreement State inspectors will continue to provide education and awareness of safety culture to licensees by using key messages from the safety culture brochure during site visits and inspections. FSME will incorporate safety culture updates into the uranium recovery and decommissioning licensing guidance documents.

Operating Reactors Business Line

NRR leads the Operating Reactors Business Line.

Completed Activities

Operating Reactors: The NRR staff gave presentations on the SCPS at the Region III Seminar in June 2011; the Human Performance, Observations/Root Cause/Corrective Action, Trending/Self-Assessment and Operating Experience Conference in June 2011; and the Corrective Action Program Owners Group in August 2011. NRR has also included an article on the SCPS in the Inspector Newsletter.

Reactor Oversight Process: Beginning in 1989, the NRC published two policy statements about safety culture at nuclear power plants. One described the Commission's expectations for the conduct of operations in control rooms; the second established the Commission's expectation for maintaining a safety-conscious work environment (SCWE) in which workers are able to raise nuclear safety concerns without fear of retaliation. The ROP's approach to addressing safety culture takes these policy statements into consideration. In 2003, the Davis-Besse Nuclear Power Station reactor vessel head degradation event led the Commission to direct the staff to monitor efforts to develop objective measures that serve as indicators of possible problems with safety culture. Subsequently, on July 1, 2004, the staff issued SECY-04-0111, "Recommended Staff Actions Regarding Agency Guidance in the Areas of Safety Conscious Work Environment and Safety Culture," which proposed possible options for enhancing oversight of SCWE and safety culture. In response to this SECY, the Commission issued SRM-SECY-04-0111 on August 30, 2004, approving several options that included (1) enhancing the ROP treatment of cross-cutting areas to more fully address safety culture, (2) ensuring that inspectors were properly trained, and (3) developing a process for determining the need for conducting safety culture evaluations of plants in the Degraded Cornerstone Column of the ROP Action Matrix. Since 2006, the NRC's oversight of safety culture for power reactors through the ROP has included guidance and procedures for inspecting and assessing aspects of licensees' safety culture. In 2008, the NRC developed several additional changes to the guidance on oversight of safety culture in the ROP as a result of lessons learned from the supplemental inspection conducted at Palo Verde Nuclear Generating Station. The NRR staff believes that the current process for monitoring and assessing safety culture is effective within the established framework of the ROP.

The staff continues to enhance ROP guidance documents, as needed, based on lessons learned and stakeholder feedback. Although the staff believes that the existing ROP already fits within the framework of this policy statement, NRR will continue to work with internal and external stakeholders through the normal processes to better align with the philosophy and language of the final policy statement and to consider insights from ongoing industry initiatives on safety culture.

One of the industry initiatives that the staff may gain insights from is the voluntary industry safety culture initiative, NEI 09-07, "Fostering a Strong Nuclear Safety Culture". Through NEI in partnership with INPO, the nuclear power industry pilot tested a broad initiative to monitor and improve its nuclear safety culture. Four nuclear power plants volunteered to participate in the industry's pilot application of the "Site Nuclear Safety Culture Process," documented in NEI 09-07. NRR agreed to observe three key elements of the safety culture initiatives

underway at the pilot plants. The NRC staff observed all four of the pilot applications as well as a revision to the NEI 09-07 process at Hope Creek Generating Station, including the nuclear safety culture assessment process (NSCA). The staff has communicated comments about the NSCA to NEI and is currently awaiting a new revision for review.

Another effort to enhance ROP guidance documents is the common language effort. Before initiation of the policy statement development, the industry asked the NRC to work with it to harmonize the language of the INPO principles of safety culture and the NRC ROP. This effort was deferred while the policy statement was being developed. With the insights gained during the policy statement development, NRR is continuing to work with NEI, INPO, and the public to develop a common language for safety culture that can be used in the ROP and the INPO principles. This effort will remain within the Commission-directed framework for enhancing the ROP treatment of cross-cutting areas to more fully address safety culture. A workshop to discuss common language was deferred to assist the agency's response to the Fukushima event and the first meeting was held in December 2011.

Research and Test Reactors: NRR provided the case studies and brochures at the annual conference for this stakeholder group held in September 2011.

Planned Activities

Operating Reactors: NRR staff will continue to provide communication and outreach efforts as opportunities are available and will continue to work with external stakeholders on the common language effort.

Research and Test Reactors: NRR staff will continue to provide information and communication as opportunities are available. The staff also plans to address safety culture by providing training to NRC inspectors so that they are better aware of how safety culture may have contributed to incidents and are, therefore, able to provide information to licensees about how a positive safety culture can impact the facility.

Vendors and Suppliers: The diverse group of vendors and suppliers presents the greatest challenge for outreach and education on the SCPS. A number of factors, such as allegations related to vendors, inspection observations at vendors, and review of vendor operating experience, affect how NRR looks at the efforts by licensees to uphold a rigorous safety culture for vendors and suppliers. This will be an ongoing effort. The office will look for opportunities to explore lessons learned that can be considered to ensure that the vendors and suppliers maintain a positive safety culture. NRR will continue to inform and educate vendors about the policy during inspections and discuss the policy at public meetings, professional meetings, and vendor conferences.

New Reactors Business Line

NRO leads the agency's New Reactors Business Line.

Completed Activities

New Construction: NRO developed a communication plan to enhance staff awareness of the policy and to provide guidance for the staff to discuss the policy with external stakeholders (e.g., engineering meetings, license-related public meetings, professional conferences). The Region II Center for Construction Inspection has done the same in order to communicate and inform the inspection staff of the safety culture policy and its implementation. Current inspector qualifications and the construction inspection manual chapters provide information and guidance to the inspectors on the implementation of safety culture.

The NRO staff established an internal working group in 2009 to determine how the Commission direction on safety culture (SECY-09-0113, "Update on the Development of Construction Assessment Process Policy Options and the Construction Inspection Program Information Management System," dated August 14, 2009) should be addressed in the construction inspection oversight program. Recommendations from the working group were considered and implemented in the construction inspection manual chapters and procedures. NRO developed the new construction inspection program based on past construction lessons learned (NUREG-1055, "Improving Quality and the Assurance of Quality in the Design and Construction of Nuclear Power Plants: A Report to Congress," issued May 1984), on the insights gained from NRR inspection programs and ROP lessons learned, and on the construction inspectors' experience with previous nuclear plant construction.

During the last five years, NRO has engaged its stakeholders in the development of the construction inspection program. NRO conducted a series of public meetings in 2008 and 2009 to request stakeholder feedback about the incorporation of safety culture into the construction inspection oversight program. The safety culture approach developed for construction is consistent with the ROP methodology, including the use of safety culture components, aspects, and cross-cutting issues. This approach provides the office with the means to communicate with licensees about the impact of findings about the safety culture at the construction site. IMC 0613, "Documenting 10 CFR Part 52 Construction Inspections," and IMC 2505, "Periodic Assessment of Construction Inspection Program Results" (similar to the ROP's IMC 0305, "Operating Reactor Assessment Program," and IMC 0310, "Components within the Cross-Cutting Areas"), provide the guidance to assess the safety culture of a construction site. IMC 2505 also includes references to the supplemental inspection procedures, which are used when there is a decline in safety performance at a construction site. These procedures provide inspectors with guidance on how to assess the safety culture at a construction site with escalating levels of efforts commensurate with the significance of a site's performance decline. The supplemental inspection procedures also provide inspectors with the tools to communicate safety culture issues to stakeholders.

Vendors and Suppliers: NRO has educated vendors about the policy during inspections, and discussed the policy at public meetings, professional meetings and at vendor conferences. NRO staff provided an overview of safety culture policy at the Workshop on Vendor Oversight in June 2010.

Planned Activities

New Construction: NRO staff will continue to provide communication and outreach efforts as opportunities are available.

NRO is in the process of completing a draft revision to the construction reactor oversight process (cROP) assessment process based on the ROP assessment program as directed by the Commission (SECY-10-0140, "Options for Revising the Construction Reactor Oversight Process Assessment Program," dated October 26, 2010) and has begun a pilot of the revised cROP beginning January 1, 2012. Based on the results from the pilot program, NRO will evaluate any revisions needed to improve the construction oversight process, including the oversight of safety culture as described in IMC 2505 and IMC 0613. In addition, the NRO staff continues to work with NRR on possible revisions to the oversight of how safety culture is currently implemented. Both offices are evaluating the use of common terminology between the NRC and the industry, considering the consolidation or revision of the safety culture components and aspects to reflect the safety culture traits in the policy, and will be assessing stakeholder feedback received as NRO conducts the cROP pilot program in CY 2012 at the Vogtle Electric Generating Plant and Virgil C. Summer Nuclear Station construction sites.

Vendors and Suppliers: Like NRR, NRO's oversight of the diverse group of vendors and suppliers represents the most challenging group with respect to the SCPS as it applies to the construction program. Allegations related to vendors and inspection observations at vendors affect how NRO looks at the efforts by licensees to uphold a rigorous safety culture for vendors and suppliers. The office will look for opportunities to explore lessons learned which can be considered to ensure that the vendors and suppliers maintain a positive safety culture. NRO will continue to inform and educate vendors about the policy during inspections, and discuss the policy at public meetings, professional meetings and at vendor conferences. This is an ongoing activity and a routine aspect of the vendor inspection program. The next workshop on the vendor oversight program is scheduled on June 28, 2012. NRO will take this opportunity to continue to communicate expectations to vendors and suppliers.

Fuel Facilities and Spent Fuel Storage and Transportation Business Lines

NMSS leads the NRC's Business Lines for Fuel Facilities and for Spent Fuel Storage and Transportation.

Completed Activities

Fuel Facilities: In June 2010, NMSS hosted the annual Fuel Cycle Information Exchange (FCIX), which included a workshop on safety culture at which the SCPS was discussed.

Spent Fuel Storage and Transportation: In May 2011, the NMSS Division of Spent Fuel Storage and Transportation (SFST) briefed internal and external stakeholders on the SCPS. The audience included NRC regional independent spent fuel storage installation inspectors, licensees, vendors, State representatives, and members of the public at the NEI Used Fuel Forum. In July 2011, NMSS staff held an interactive discussion with stakeholders at a licensing improvement public workshop. In November 2011, brochures, posters, and case studies were shared at NMSS's Spent Fuel Storage and Transportation Regulatory Conference.

Vendors and Suppliers: Communications to these stakeholders occur as part of routine management discussions with the Vendor Task Force.

Planned Activities

Fuel Facilities: As the NMSS Division of Fuel Cycle Safety and Safeguards develops the agenda for the next FCIX in June 2012, topics including an element of safety culture are likely. NMSS staff will continue to consider safety culture in evaluating the root cause of significant events at fuel facilities.

In SRM-M100429, "Briefing on the Fuel Cycle Oversight Process Revisions," dated May 12, 2010, and SRM-SECY-10-0031, "Revising the Fuel Cycle Oversight Process," dated August 4, 2010, the Commission directed the staff on near-term activities related to revising the fuel cycle oversight process (FCOP). Consistent with Commission direction, in February 2011, the staff provided a paper to the Commission comparing integrated safety analysis (ISA) and probabilistic risk assessment (PRA) methods in the context of fuel cycle facility oversight. In SECY-11-0140, "Enhancements to the Fuel Cycle Oversight Process," dated October 7, 2011, the staff described its development of safety cornerstones for fuel cycle facilities, its considerations for a fuel cycle significance determination process (FCSDP), and its work to provide licensees with incentives to maintain an effective corrective action program. The staff integrated the results of these activities with the insights from the ISA/PRA comparison and provided, for Commission consideration, three options for next steps to enhancing the FCOP.

The Commission approved the staff's recommended option to develop an FCOP with cornerstones, an FCSDP, a performance assessment process based on the FCSDP, a fuel cycle action matrix, and the cross-cutting areas used in the ROP and informed by the SCPS. The FCOP, as directed by the Commission, would provide the tools for inspecting and assessing licensee performance in a more risk-informed, objective, predictable, and transparent way. Additionally, this FCOP will provide a systematic way to adjust the inspection program based on licensee performance.

Spent Fuel Storage and Transportation: NMSS is planning other outreach and education opportunities as the staff progresses in licensing and oversight improvement activities for the spent fuel program. The NMSS staff is not currently considering enhancements similar to the FCOP enhancements. However, the staff is assessing the SFST inspection program for effectiveness and efficiency improvements as directed in the SRM for COMSECY-10-0007, "Project Plan for Regulatory Program Review to Support Extended Storage and Transportation of Spent Nuclear Fuel," dated December 6, 2010. As this assessment proceeds and enhancements are proposed and implemented, the staff may consider further oversight initiatives that may include something akin to the FCOP.

Vendors and Suppliers: NMSS staff will continue to provide communication and outreach efforts as opportunities are available. Communications to these stakeholders are in routine management discussions with the Vendor Task Force.

Office of Enforcement

As a support organization, OE does not have direct responsibility for implementing the SCPS. However, OE is providing tools to help communicate with interested stakeholders about the Policy Statement and safety culture in general.

Completed Activities

Because it is important for individuals and organizations to understand the role that a positive safety culture can play in the safe and secure use of nuclear materials, the staff has developed “tools” to illustrate this point. These tools include the development of safety culture case studies, which is an ongoing effort, a safety culture user guide, a brochure in both English and Spanish, and posters. The OE staff requested feedback from its stakeholders, including the stakeholder panelists from the 2010 safety culture public workshop and those at public meetings and teleconferences during the development of these educational tools. Their response was very positive. The case studies, user guide, and brochure are available for download from the U.S. Nuclear Regulatory Commission’s (NRC’s) public Web site.

Safety Culture Case Studies describe real-life events for which review of the circumstances surrounding an event and the results of the investigations by other organizations in an oversight role found clear examples of the manner in which safety culture contributed to or mitigated the causes and consequences of the event. The case studies are intended to represent a breadth of industries, including energy, medical, and transportation. The case studies use the safety culture traits from the SCPS as the basis for learning and have been well received by the industry and the NRC staff. OE has used a press release, daily notes, and presentations to inform the industry and program offices that these case studies are available on the NRC safety culture Web site. The following case studies have been issued:

1. June 2009 collision of two Washington, DC, Metropolitan Area Transit Authority Metrorail trains
2. January 2009 U.S. Airways flight 1549 forced landing on the Hudson river
3. April 1978 partial collapse of the Willow Island cooling tower

A Safety Culture Case Study User Guide helps individuals and organizations use the various case studies more effectively by providing them with a better understanding of what safety culture is and why a strong safety culture and safety-first focus are important. The user guide reinforces the learning aspects of the case studies by providing thought-provoking questions for the user to consider.

The Brochure and Posters include a brief overview of the development of the SCPS, a discussion of the importance of safety culture in regulated entities, and the NRC’s definition and traits of a positive safety culture. To date, the NRC has distributed nearly 4,000 copies of the SCPS brochure to stakeholders, program offices, and the regions and at international forums. To extend the breadth of the outreach, the brochure and the *Federal Register* notice, including the Statement of Policy, are available in Spanish. The NRC also provided the brochure to the Agreement States in a format that would allow customization to meet their specific needs. OE also developed posters that echo the design and content of the brochure for the program offices to use at conference and meetings.

The Safety Culture Web site, Newsletters, and Blogs continue to be important resources on current activities and documents in the NRC's safety culture initiative. Links to public meeting summaries, case studies, the brochure, and the SCPS are found here. A safety culture blog, press releases, and daily notes have all been effectively used to disseminate information about the policy statement and related NRC activities.

Outreach to Workshop Panelists: Involvement with our stakeholders, including the stakeholders who served as panelists at the February 2010 safety culture workshop, continues to be an important aspect of the agency's safety culture activities. Public meeting teleconferences were held in July and September 2010 to provide an update on the SCPS and Commission expectations and discuss next steps, such as the case studies and brochure initiatives. Since then, the NRC staff has continued dialogue with the panelists through e-mails and a public meeting teleconference in June 2011 to elicit feedback on agency initiatives and licensee activities, as well as to stay informed of stakeholder workshops and conferences that include or specifically address safety culture.

Presentations (Enclosure 3): Since March 2011, the staff has had many opportunities to discuss the SCPS at meetings and conferences. The OE staff has worked with the program offices to provide presentations to NRC staff on the SCPS at counterpart meetings in the regions and division meetings at Headquarters. The purpose of this information sharing is to ensure that the inspection staff is aware of the SCPS and the NRC's expectations that licensees are responsible for the development and maintenance of a positive safety culture at their own facilities, as well as to provide an awareness of the educational tools available for licensees.

The OE staff has given presentations about the SCPS at numerous conferences and workshops, such as the International Radiation Protection Association Workshop on Radiation Protection Culture in February 2011, the Regulatory Information Conference in March 2011, the Health Physics Annual Meeting in June 2011, the National Association of Employee Concerns Professionals (NAECP) and the Agency Allegation Coordinators workshop in September 2011, a vendor-sponsored Continuous Improvement Conference for Operators of Nuclear Power Plants in September 2011, and a safety culture workshop sponsored by the Institute of Nuclear Power Operations (INPO) and Duke Engineering in November 2011.

International Efforts (Enclosure 3): There has been significant interest in the NRC's SCPS in the international community. The first request from the international community to learn about the U.S. efforts to develop an SCPS was through the U.S. Department of State; the NRC gave a presentation on safety and security in nuclear power plants to the regulator and licensees in Egypt in October 2010. Continuing efforts included participation in an IAEA Technical Meeting in Vienna, Austria, in February 2011, which included (1) providing U.S. input for a technical document related to the regulator's oversight of safety culture, and (2) a staff presentation on the SCPS at the Technical Meeting. After the Technical Meeting, the NRC staff participated in two IAEA Consultancy Meetings, both of which were held for the purpose of developing the technical document, "Regulatory Oversight of Safety Culture at Nuclear Installations." As a result, the SCPS appears in an Appendix to this IAEA document. In addition to the efforts surrounding the development of the IAEA technical document, the staff gave presentations related to the SCPS to the regulator and licensees in Russia in June 2011 and Jordan in September 2011. In addition, Argonne National Labs and IAEA sponsored an SCPS presentation for South Africa and European nations in August 2011. This audience consisted of members from many nations who will be embarking on a new nuclear program.

The staff has also been involved in an IAEA Consultancy Meeting for the development of an IAEA Report Series document, "How to Continuously Improve Safety Culture," designed primarily for use by licensees but also appropriate for regulators. The education tools developed for the SCPS, such as case studies and a safety culture blog, have been incorporated into this IAEA Report Series document. Finally, staff members from OE and NRR attended an IAEA Technical Meeting in Vienna, Austria, in October 2011, to provide further input into the IAEA Report Series document, "How to Continuously Improve Safety Culture," as well as the IAEA Report Series document, "How to Perform Safety Culture Self-Assessments."

These activities potentially affect the development of common language in the international community and have validated the process used and results achieved in the development of an SCPS.

Planned Activities

As requested by the U.S. Department of State, the staff will give an SCPS presentation to the Nuclear Safety and Security Group in Washington, DC, on March 7-8 and April 18-19, 2012. In addition, OE staff will give an SCPS presentation at the NAECP in New Orleans on February 28, 2012. In addition, OE staff will provide outreach on the SCPS to reactor licensees at the 2012 Regulatory Information Conference (RIC).

OE staff will continue to coordinate policy related matters and provide outreach at meetings, conferences, and workshops to support the program offices in their outreach and education efforts. OE also anticipates additional outreach in the international arena.

OE staff will continue to develop case studies, with plans for a case study related to the Big Branch mining accident, as well as the BP oil spill.

OE staff is also supporting NRR on the Safety Culture Implementation Team (SCIT) and in their common language efforts.

Office of Nuclear Regulatory Research

As a support organization, RES does not have direct responsibility for implementing the SCPS. However, the RES staff has continued to support OE and the program offices in their SCPS-related activities by providing technical expertise and consultation, as requested, primarily through the user needs process. In addition, the RES staff participates, on an ongoing basis, on a number of national and international bodies that set standards, establish research agendas, or share information on topics related to safety culture.

Planned Activities

Technical Support to OE and Program Offices

RES currently provides technical expertise and support to OE and the program offices under two user needs. The RES staff is continuing to support OE by participating in the OE-led SCPS working group and conducting exploratory data analyses to evaluate the possible relationship of the SCPS traits to safety performance. The RES staff is also assisting NRR in the evaluation of NEI's proposed nuclear safety culture assessment process and the development of a common terminology with industry for the ROP. No new user needs to provide additional support are anticipated.

Information Sharing

The RES staff participates in a number of national and international bodies that set standards, conduct research, or share information related to the technical bases for the NRC's safety culture activities. The RES staff also maintains liaisons with representatives of other Federal agencies who are similarly conducting research and implementing programs to enhance safety culture in their organizations and regulated entities. Participation in these activities avoids duplication of effort among disparate groups and ensures that NRC views on safety culture are incorporated into collaborative research agendas, "good practices" documents, and standards on related topics. Disseminating information internally from these activities provides agency staff with the opportunity to learn from research results and operational experience related to safety culture that are developed internationally and in other domains.

For example, the RES staff represents the NRC on the Organisation for Economic Co-operation and Development, Nuclear Energy Agency, Committee on the Safety of Nuclear Installations, Working Group on Human and Organisational Factors. The IAEA and the Working Group on Human and Organisational Factors sponsored an international workshop on safety culture, held September 26–28, 2011, in Chester, United Kingdom, as a followup to a similar workshop held in 2006. The purpose of the workshop was to discuss lessons learned by regulators and licensees in the enhancement and oversight of safety culture since the previous workshop, when most Member nations had not yet initiated safety culture activities. The RES staff presented a paper on the methodology used to develop the SCPS definition and traits, "Continuing the Conversation: Development of the U.S. NRC's Definition of Safety Culture and its Traits." Outcomes of the workshop, including gaps in fundamental knowledge about safety culture, will be documented in the proceedings and shared internally.

Office of Nuclear Security and Incident Response

As a support organization, NSIR does not have direct responsibility for implementing the SCPS. However, the NSIR staff has continued to support OE and the program offices in SCPS-related endeavors. On a recurring basis, the NSIR staff interacts with a number of nuclear constituents—domestic and foreign industry representatives and organizations, national trade groups, and international nuclear organizations—and engages them on safety culture issues and implementation strategies.

Planned Activities

Technical Support to OE and Program Offices

NSIR currently provides technical expertise and support to OE and the program offices. NSIR will continue to support SCPS working group activities led by OE. NSIR will also continue to support FSME's, NRO's, NRR's and NMSS' SCPS outreach and educational initiatives.

Information Sharing

NSIR management meets periodically with industry representatives at the Nuclear Security Working Group and the Emergency Preparedness Working Group in Washington, DC. Through these venues, NSIR maintains a dialogue on safety culture issues and shares lessons learned. NSIR's interaction with these working groups and associated industry forums is an effective conduit for dissemination of safety culture awareness and initiatives in the areas of security and emergency preparedness.

On January 26, 2012, NSIR will conduct an Information Security workshop for classified fuel cycle licensees at NRC headquarters. The focus of the workshop will be on recent information security events involving classified matters at fuel cycle facilities, the impact on facility operations, and preventative measures. NSIR will also pursue the safety culture aspects of the events.

Further, NSIR supports several bilateral initiatives per year with the U.S. Department of Energy (DOE) and a foreign entity. Through this effort, safety culture awareness is elevated with a Federal partner and the host country. Also, NSIR has participated in IAEA-hosted conferences with safety culture as a focal point. Through support of DOE's bilateral program and IAEA initiatives, NSIR will take every opportunity to keep safety culture in the forefront of the international nuclear community.

Safety Culture Outreach/Conference Dates for Industry/Groups (12/21/2011)

NRC Responsible Office	Conference Dates	Conference	Conference Location	NRC-Regulated Industry/Groups
NRO	1. 5/13, 7/1, 8/19/10 2. 6/17/10 3. 6/14/11 4. 6/16/11 5. 8/15/11 6. 9/26/11 7. 10/25/11	1. Cat III Public Meetings on Construction Inspection 2. NRC Workshop on Vendor Oversight 3. 2nd Annual Nuclear Supply Chain Conference 4. NUPIC Annual Vendor Meeting 5. ANS Conference 6. American Society of Quality Conference 7. Nuclear Construction Summit	1. At/near NRC HQ 2. New Orleans, LA 3. Charlotte, NC 4. Oak Brook, IL 5. Hollywood, FL 6. Las Vegas, NV 7. Charlotte, NC	New Construction, Suppliers/Vendors
NRR	1. 6/7–10/10 2. 6/21–25/10 3. 7/25–28/10 4. 9/19–24/10 5. 6/8/11 6. 6/14–17/11	1. Mid-Atlantic Nuclear Training Group 2. Human Performance, Root Cause and Trending 3. NEI Health Physics Forum 4. National Organization of Test, Research, & Training Reactors 5. Region III Seminar 6. Human Performance, Observations/Root Cause/Corrective Action, Trending/Self-Assessment and Operating Experience Conference	1. Gettysburg, PA 2. Baltimore, MD 3. Clearwater Beach, FL 4. Knoxville, TN 5. Lisle, IL 6. Delray, FL	Power Reactors, Research and Test Reactors

NRC Responsible Office	Conference Dates	Conference	Conference Location	NRC-Regulated Industry/Groups
	7. 8/11	7. Corrective Action Program Owners Group	7. Toronto, Canada	
	8. 9/11	8. National Organization of Test, Research, & Training Reactors	8. Idaho Falls, ID	
	9. 11/29–30/11	9. NEI Licensing Forum	9. Washington, DC	
NMSS	1. 5/4–6/10	1. NEI Dry Storage Forum (SFST, cask suppliers/vendor/cert holder/licensee)	1. Baltimore, MD	Fuel Cycle, SFST, Cask Suppliers/Vendors
	2. 6/23–24/10	2. SFST Licensing Conference	2. Rockville, MD	
	3. 6/29–7/1/10	3. Fuel Cycle Info. Exchange	3. Bethesda, MD	
	4. 7/12–15/10	4. Institute of Nuclear Materials Management Annual Meeting	4. Baltimore, MD	
	5. 5/10/10	5. Spent Fuel Storage Inspector Regional Counterpart Meeting	5. Rockville, MD	
	6. 6/7–8/11	6. Fuel Cycle Info Exchange	6. Rockville, MD	
	7. 7/27/11	7. Spent Fuel Storage & Transportation—Public Meeting on Enhancements to Licensing and Inspection Programs	7. Rockville, MD	
	8. 11/2–3/11	8. NMSS 2011 Spent Fuel Storage and Transportation Regulatory Conference	8. Rockville, MD	

NRC Responsible Office	Conference Dates	Conference	Conference Location	NRC-Regulated Industry/Groups
FSME	1. 4/22/10	1. 42nd Annual National Conference on Radiation Control: Opportunities and Innovations in Radiation Protection	1. Newport, RI	1. Conference of Radiation Control Program Directors
	2. 5/24–25/10	2. Advisory Committee on the Medical Uses of Isotopes	2. Rockville, MD	2. Medical
	3. 5/24/10	3. American College of Medical Physics Annual Meeting	3. San Antonio, TX	3. Medical Physicists
	4. 7/24–25/10	4. Safety in Radiation Therapy: A Call to Action	4. Miami, FL	4. Medical, Medical Physicists, Diagnostic, Therapeutic, and Radio Pharmacy
	5. 7/18–22/10	5. American Association of Physicists in Medicine	5. Philadelphia, PA	5. American Association of Physicists in Medicine
	6. 8/23–26/10	6. Organization of Agreement States	6. Portland, OR	6. Organization of Agreement States
	7. 10/21/10	7. Advisory Committee on the Medical Uses of Isotopes	7. Rockville, MD	7. Medical
	8. 11/15/10	8. Mid-Atlantic States Radiation Control Conference	8. Newark, DE	8. States and Federal staff and radiation protection staff
	9. 12/13/10	9. Advisory Committee on the Medical Uses of Isotopes	9. Teleconference	9. Advisory Committee on the Medical Uses of Isotopes
	10. 1/5/11	10. Periodic Meeting of the Advisory Committee on the Medical Uses of Isotopes	10. Teleconference	10. Medical Physicists, Diagnostic, Therapeutic, and Radio Pharmacy

NRC Responsible Office	Conference Dates	Conference	Conference Location	NRC-Regulated Industry/Groups
	11. 5/17/11	11. 43rd Annual National Conference on Radiation Control: Synergy of Strategic Alliances in Radiation Protection	11. Austin, TX	11. Conference of Radiation Control Program Directors
	12. 7/19/11	12. Master Material Licensee Counterpart Meeting	12. Rockville, MD	12. Master Material Licensee Program Managers
	13. 8/25/11	13. Organization of Agreement States Annual Meeting	13. Richmond, VA	13. Agreement States
	14. 9/23/11	14. Child Health Corporation of America Radiology Directors Forum	14. Dallas, TX	14. Directors of Radiology and Patient Imaging Departments
	15. 11/2/11	15. 2011 National State Liaison Officers Conference	15. Rockville, MD	15. Governor-Appointed State Liaison Officers
	16. 11/14/11	16. Drop-in visit with Navy Master Materials License Navy officials	16. Rockville, MD	16. Navy officials who oversee the Navy Master Material License
NSIR	1. Periodic meetings	1. Industry Working Group Meetings	1. Washington, DC	1. Nuclear Security and Emergency Preparedness Groups
	2. 6/21–24/10	2. National Nuclear Security Conference	2. Charlotte, NC	2. Security
	3. 1/26/12	3. Information Security Workshop	3. Rockville, MD	3. classified fuel cycle licensees

NRC Responsible Office	Conference Dates	Conference	Conference Location	NRC-Regulated Industry/Groups
OE	1. 7/11–15/10	1. Institute of Nuclear Materials Management	1. Baltimore, MD	1. Safeguards, Physical Protection, Waste, Packaging and Transportation
	2. 9/20–24/10	2. National Association of Employee Concerns Professionals	2. Annapolis, MD	2. Employee Concerns Issues
	3. 6/27–7/1/10	3. 55th Annual Health Physics Society and 22nd Biennial Campus Radiation Safety Officers Meeting	3. Salt Lake City, UT	3. Academic, Government, Medical, Research and Development, Analytical Services, Consulting, Industrial
	4. 10/10	4. Egyptian Regulators	4. Egypt	4. Egyptian regulators
	5. 2/10–11/11	5. International Radiation Protection Association Workshop on Radiation Protection Culture	5. Charleston, SC	5. International Medical and Industrial Practitioners
	6. 2/11	6. IAEA Consultancy meeting	6. Vienna	6. IAEA- input from US
	7. 3/11	7. Regulatory Information Conference	7. Rockville, MD	7. All Licensees
	8. 6/26–30/11	8. Health Physics Annual Meeting (Mike Weber, DEDO, making keynote speech on safety culture at this meeting and also at the American Nuclear Society Meeting)	8. West Palm Beach, FL	8. Academic, Government, Medical, Research and Development, Analytical Services, Consulting, Industrial
	9. 6/27–30/11	9. IAEA/Rosatom	9. Russia	9. International Community
	10. 7/4–8/11	10. IAEA Consultancy Meeting for Oversight of SC	10. Vienna, Austria	010. IAEA—Input from U.S.

NRC Responsible Office	Conference Dates	Conference	Conference Location	NRC-Regulated Industry/Groups
	11. 8/4/11	11. Bi-Lateral Meeting with Consejo de Seguridad	11. Rockville, MD	11. Bi-lateral Exchange of Safety Culture Best Practices
	12. 8/11	12. IAEA Consultancy Meeting for Continuously Improving SC	12. Sweden	12. IAEA—Input from U.S.
	13. 8/22/11	13. Argonne National Labs and IAEA Training Course	13. Bolingbrook, IL	13. South Africa and European Nations
	14. 9/5/11	14. IAEA Consultancy Meeting for Oversight of SC	14. Vienna, Austria	14. IAEA—Input from U.S.
	15. 9/5–9/11	15. U.S. Dept. of State Mission	15. Jordan	15. Representative of the Jordanian Gov.
	16. 9/13/11	16. DevonWay Continuous Improvement Conference	16. San Francisco, CA	16. Nuclear Power Plants
	17. 9/11	17. National Association of Employee Concerns Professionals (NAECP)	17. Annapolis, MD	17. Employee concerns issues
	18. 11/1/11 (w/ NRR)	18. INPO and Duke Engineering Safety Culture Workshop	18. Charlotte, NC	18. Nuclear Power Plants
	19. 11/2–3/11	19. Poster presentation at the NMSS 2011 Spent Fuel Storage and Transportation Regulatory Conference	19. Rockville, MD	19. Fuel Cycle, SFST, Cask Suppliers/Vendors
RES	1. 4/1–5/11 and 9/29–30/11	1. Biannual OECD/NEA/CSNI Working Group on Human and Organizational Factors (WGHOFF) meetings	1. Paris, France, and Chester, UK	1. WGHOFF Member Countries
	2. 9/26–28/11	2. WGHOFF-sponsored Workshop on Safety Culture	2. Chester, UK	2. WGHOFF Members and Other Invited Participants