



Union of
Concerned
Scientists

Citizens and Scientists for Environmental Solutions

SECY-02-0166: "Gimme Three Steps"

David Lochbaum
Nuclear Safety Engineer
December 17, 2002

UCS opposed SCWE rulemaking



1997 – UCS opposed SCWE
rulemaking

2002 – UCS opposes SCWE
rulemaking

2007 – UCS likely to still oppose
SCWE rulemaking



“Gimme three steps”

- ① **OI investigates ALL H&I prima facie H&I allegations**
- ② **If ALL parties concur, ADR can be used in lieu of OI investigation**
- ③ **When OI substantiates H&I allegation, individual(s) must be sanctioned and, as appropriate, company ordered to undertake safety culture upgrades**