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Scientists

Citizens and Scientists for Environmental Solutions



SECY-02-0166: “Gimme Three Steps”

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SMRT's SCWE rulemaking recommendation wrong because:

Crafted outside public process

**Resurrected bad idea buried in
1997**

**“Clearly defined attributes” for
SCWE unavailable**



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EDO directed Discrimination Task Force to “*promote active and frequent involvement of internal and external stakeholders in the development of recommendations for changes to the process*” and then allowed SMRT to circumvent the public process. **WHY?**



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UCS

opposed SCWE rulemaking

**1997 – UCS opposed SCWE
rulemaking**

**2002 – UCS opposes SCWE
rulemaking**

**2007 – UCS likely to still oppose
SCWE rulemaking**



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“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**