

2011 Final Safety Culture Policy Statement

*25 Years Is Long Enough To
Build A Policy Statement!*

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January 24, 2011

Chernobyl - 1986

A QUESTIONING ATTITUDE

plus

A RIGOROUS AND PRUDENT
APPROACH

plus

COMMUNICATION

*The result will be a major contribution
to:*

SAFETY

Millstone - 1996

“The NRC expects that licensees will establish and maintain a safety conscious work environment in which employees feel free to raise concerns both to their own management and the NRC without fear of retaliation.”

May 1996 SCWE Policy Statement

October 2004 SCWE Policy Update

Davis-Besse 2002 Incident

NRC Requirements: Safety Culture

“The Davis-Besse event re-emphasized the importance of safety culture and demonstrated that significant problems can occur as a direct result of safety culture weaknesses that are not recognized and addressed early.”

May 24, 2006 SAFETY CULTURE INITIATIVE ACTIVITIES TO ENHANCE THE REACTOR OVERSIGHT PROCESS AND OUTCOMES OF THE INITIATIVES.

NRC Final Action Needed

- Industry and Agency Need Final Decision so that work can begin to implement new policy expectations;
- NRC Policy will become a benchmark for other industries, hopefully preventing other disasters – Oil & Gas, Mining, Transportation, DOE complex, and others;
- Resources can be spent on addressing Safety Culture issues, not justifying policy.

"In the aftermath of the *Deepwater Horizon* spill, could the oil and gas industry similarly improve its safety culture by creating a self-policing entity like INPO as a supplement to government oversight?..."

Deepwater Horizon Report,
Chapter 8, p. 239

Comments on Process of Development of Safety Culture Policy

- Policy Statement developed through exhaustive collaboration and inclusion activities, meeting the Commission's direction and expectations.
- Wide variety of activities to identify and include all stakeholders
 - Meaningful participation opportunities
 - Significant interaction between stakeholders
 - Transparency and collaboration
 - Robust debates and discussions

Position of the Final Safety Culture Policy Statement

- Agree and satisfied with final definition as presented in the Final Policy Statement;
- Agree with the exclusion of the word “security” from the definition, and inclusion of the explanation regarding the importance of “security” in the Final Policy Statement;
- Agree with the Traits, as included and defined;

Position of the Final Safety Culture Policy Statement (cont'd)

- Agree that the trait “Environment for Raising Concerns”, as defined, addresses my concerns about incorporating Safety Conscious Work Environment issues;
- Agree with the addition of the “Questioning Attitude” trait added by the Staff;
- Agree with the expansion of the Commission expectations to ALL those entities that form the basis for nuclear safety, security and environmental protection.

Maintain Belief That Regulation Will Be Necessary Instead of Policy Statement

- Believe that regulation is necessary and prudent in this area
 - Adopt and restate my position from March, 2002 that regulation will provide consistent, reliable, and repeatable expectations;
 - Urge reconsideration of the position of the Commission that we can get there without regulation;
 - Recommendation based on philosophical view that we understand and work to what is measured, and for which we are held accountable.

Concerns About Barriers to Successful Implementation

- Applicability to Agreement States Needs to Be Clearly Established - licensees must be accountable to follow policy;
- Industry (NEI and INPO) needs to adopt the Policy Statement and Traits, refresh its program materials, and implement with rigor;
- Agency needs to demonstrate a bias for action in integrating Policy Statement into Agency program materials.

Thank you for the
opportunity to participate
in this important topic.

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