

SAFETY CULTURE DRAFT POLICY COMMENTS

Fuel Cycle Facilities
R.E. Link, Manager, EHS&L
AREVA, Richland, WA
January 24, 2011

Safety Culture Policy Comments – Fuel Cycle Facilities

- Strongly supports final draft definition
 - “Commensurate with safety significance” during implementation
- Strongly supports including traits for clarity
 - Addition of “Questioning Attitude” consistent with Safety Conscious Work Environment

Safety Culture Policy Comments – Fuel Cycle Facilities – (cont.)

- Concern with explicit application to “vendors and suppliers of safety related components”
 - “Jurisdictional question → oversight/enforcement challenges

Safety Culture Policy Comments – Fuel Cycle Facilities – (cont.)

- Implementation challenges
 - Consistency yet diversity → Broad scope of licensees
 - Dual regulatory oversight due at sites subject to NRC & Agreement State
 - Research & data important & useful but caution in extrapolation to diverse types of licensees

Safety Culture Policy Comments – Fuel Cycle Facilities – (cont.)

- Greatest concern → Reconciliation of priorities & resources