

# Comments on Proposed Final Safety Culture Policy Statement

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# Overall

The Health Physics Society  
is very supportive of the  
Commission's efforts to  
develop and involve  
stakeholders in the Radiation  
Safety Culture initiative

# Issue #1 with Draft Policy

- “One Size Fits All” Approach
  - Not all licensees are the same
  - Severity of Consequences differ widely across licensees.

Suggest: *Culture should be commensurate with the safety and security significance of their organizations and functions*

# Issue #2 with Draft Policy

- Internally Driven
  - Licensees should be allowed to self-pace development of a Radiation Safety Culture
  - HPS supports the issuance of a Policy Statement, rather than an actual or implied regulatory approach.

# Question #1 in Draft Policy

- Emphasis of Safety over Competing Goals is Bothersome
  - *Taking a drastic action in the interest of safety may have consequences greater than the safety issue itself*
  - Add: *Safety over competing goals commensurate with all risks involved*

## Question #2 in Draft Policy

- Do Safety Culture Traits Require Clarification?
  - *No, but examples that demonstrate each of these traits would be helpful*
  - *How do you know these traits exist in an organization?*
  - *Possible Proofs of Presence are.....*

# Proof of Presence

- Organization Structure
- How Competing Budgetary Priorities are Resolved
- Employee Empowerment
- Ombudsmen Office
- Corrective Action Reporting System
- Root Cause Analysis Training

## Question #3 in Draft Policy

- Are NRC's Expectations on the Balance between Safety and Security Clear in the draft SOP ?
  - *Yes, but how that is accomplished is less clear. Examples would help.*
  - *The Balance between Security and Safety is not the same with different Radionuclides and Applications.*



## Question #4 in Draft Policy

- Should a Discussion Regarding Complacency be Added to SOP?
  - *Not a detailed discussion, but its importance in Safety Program Management should be mentioned*
  - *Complacency is a crosscutting management problem that is not unique to Radiation Safety Culture*

## Question #5 in Draft Policy

- Are Some or All of the Five Additional Traits Necessary?
  - *Yes, two of the five, “Questioning Attitude” and “Training Quality” are sufficiently different*
  - *“Training Quality” should be replaced by “Technical Competency,” a more comprehensive trait for developing a Safety Culture Environment*