



# ACMUI Comments on the Proposed Safety Culture Policy

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January 24, 2011

# ACMUI's Overall Evaluation - 1

- The Advisory Committee has reviewed the NRC staff's draft Safety Culture Policy Statement and would like to commend the staff for its efforts.
- The Committee agrees that nuclear and radioactive material safety and security are important issues influenced by the traits that define a positive safety culture in the work place.

# ACMUI's Overall Evaluation - 2

- Safety culture policy can be a nebulous concept with many possible interpretations.
- However, the draft Policy Statement is well written, highly thoughtful, appropriately balanced against competing priorities in the workplace within a complex regulatory framework, and considerate of public comments.
- The ACMUI has some concerns about the policy statement.

# Completeness of the Trait List

- While good, the list of traits is not exhaustive.
- There are many other traits of organizations with safety cultures not included.
- The policy statement recognizes this.

# Necessity of the Traits

- Also, while the traits are good, an organization need not exhibit the traits to be safe.
- For example, an organization without trust or respect can, and likely would, establish procedures with layers of redundancy, possibly automatic, to prevent errors since the leaders would have no trust that the workers would execute their jobs correctly.

# Value of the Traits

- Safety is easiest and most natural in organizations that exhibit *and inherently value* such traits.
- That is why publicizing them would be a good educational enterprise.

# Forcing the Traits - 1

- A positive safety culture is in the nature of an organization and cannot be forced on an organization.
- While practices can be imposed, forcing practices that *appear* as good traits likely will not have the same effect as if the organization developed them naturally.

## Forcing the Traits - 2

- Forcing practices that *appear* as good traits can be counterproductive if it uses resources that could be devoted to actual safety practices.



## Forcing the Traits - 3

- Forcing good *behavior* can be productive and *may* change practices or eventually culture.
- For example, Time-out before procedures, forced by JC, has led to the practice becoming almost routine, without thought. This may not have worked as quickly by trying to change the culture first.

# Implementation of the Policy

Given the last points, the statement in the policy, "these traits are not necessarily inspectable and were not developed for that purpose," should be remembered into the future.