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Nuclear Regulatory Commission Safety Culture Policy Statement

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Objectives

- Provide information on:
  - Why a positive safety culture is important
  - Development of revised draft policy statement
    - Pre- 2009 Background
    - 2009 Commission Direction
    - February 2010 Workshop
    - Evaluation of public comments
    - Outreach activities since February 2010 Workshop

Importance of Safety Culture

- NRC considers safety culture in its oversight programs because weaknesses in safety culture may contribute to safety and security problems

  – Increased likelihood of such problems

  – More severe consequences when such problems occur

Prior to 2009

- Previous Policy Statements include
  - 1989: "Policy Statement on the Conduct of Nuclear Power Plant Operations
  - 1996: "Freedom of Employees in the Nuclear Industry to Raise Safety Concerns Without Fear of Retaliation"
- Events indicating importance of safety culture
- 2008: COMGBJ -08-0001
- February 2009 Safety Culture Workshop

2009 Commission Direction

- Publish the draft policy statement in the *Federal Register* for comment
- Consider incorporating suppliers and vendors
- Continue to engage broad range of stakeholders
- Seek opportunities to comport terminology with existing standards and references

NRC Draft Safety Culture Definition, November, 2009

That assembly of characteristics, attitudes and behaviors in organizations and individuals, which establishes that as an overriding priority, nuclear safety and security issues receive the attention warranted by their significance.

NRC Draft Safety Culture Traits, November, 2009

- Problem Identification and Evaluation
- Work Practices
- Work Planning and Control
- Continuous Learning Environment
- Licensee Decision Making
- Safety Conscious Work Environment
- Accountability
- Resources

Safety Culture Workshop, February, 2010

- Workshop was composed of a panel of 16 stakeholders with various affiliations (e.g., reactors, medical facilities, fuel cycle and gauge manufactures, universities, Organization of Agreement States) who worked together, and in breakout sessions with other attendees

- Panel reached alignment on a common definition and traits of a positive safety culture

Workshop Safety Culture Definition

Nuclear Safety Culture is the core values and behaviors resulting from a collective commitment by leaders and individuals to emphasize safety over competing goals to ensure protection of people and the environment.

Workshop Safety Culture Traits

- Leadership Safety Values and Actions
- Problem Identification and Resolution
- Personal Accountability
- Work Processes
- Continuous Learning
- Environment for Raising Concerns
- Effective Safety Communication
- Respectful Work Environment

NRC's Draft Safety Culture Policy Statement characteristics	February 2010 workshop safety culture traits
Problem Identification and Evaluation The organization ensures that issues potentially impacting safety or security are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.	**Problem Resolution and Metrics** The organization ensures that issues potentially impacting safety or security are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.
Work Practices Personnel demonstrate ownership for nuclear safety and security in their day-to-day activities.	**Personal Responsibilities and Attitudes** Everyone is personally responsible for nuclear safety.
Work Planning and Control Process for planning and controlling work activities are implemented such that safety and security are maintained.	**Processes and Procedures** Processes for planning and controlling work activities are implemented such that safety is maintained.
Continuous Learning Environment The organization maintains a continuous learning environment in which opportunities to improve safety and security are sought out and implemented.	**Continuous Learning** Organizational learning is embraced.
Licensee Decision Making The organization's decisions ensure that safety and security are maintained.	**Leadership Safety Behaviors** Leaders demonstrate commitment to safety.
Safety Conscious Work Environment The organization maintains a safety conscious work environment in which personnel feel free to raise safety and security concerns without fear of retaliation.	**Encouraging Report of Problems** The organization maintains a safety conscious work environment in which personnel feel free to raise concerns without fear of retaliation.
	Effective Safety Communication Effective communication is essential to maintain focus on safety.
	Respectful Work Environment Trust and respect permeate the organization.
Accountability Roles, responsibilities, and authorities for safety and security are clearly defined and reinforced.	
Resources The organization ensures that the personnel, equipment, tools, procedures, and other resources needed to ensure safety and security are available.	

Evaluation of Public Comments

- Three main issues identified:
  - Implementation of policy statement needs clarification
  - Inclusion of "security" in definition and traits may be confusing for many
  - Use of a policy statement which is not enforceable vs. a regulation

Additional Outreach

- NRC staff attended or participated in several industry forums
  - Provided information on efforts so far
  - Available to answer questions/direct comments on draft policy statement and February 2010 workshop products

NRC Revised Draft Safety Culture Policy Statement, September, 2010

- Revision to draft statement of policy, including use of 2010 workshop definition and revised workshop traits based on ongoing staff reviews, outreach activities and public comments

- The term "security" not included in revised definition or traits

Preamble Added to the
NRC Revised Safety Culture Traits

- Defines a trait as a pattern of thinking, feeling, and behaving that emphasizes safety

- Notes that although the term "security" is not expressly included in the traits, as the primary pillars of the NRC's regulatory mission, consideration of both safety and security issues, commensurate with their significance, is an underlying principle of the Statement of Policy

Additional Revisions

- Traits are included in the Statement of Policy (rather that included in the Federal Register to support the Statement of Policy)

- Is applicable to vendors and suppliers of safety – related components

- Indicates Commission's expectations that the Agreement States and other organizations interested in the safe use of nuclear materials develop and maintain a positive safety culture

We Are Interested in Your Views

- If you would like to submit comments on the revised draft safety culture definition and traits, please submit comments to the following website by October 18, 2010:

  http://www.nrc.gov/about-nrc/regulatory/enforcement/contact-oe.html.