

**RIC 2011
Safety Culture**

**Fostering a Strong
Nuclear Safety Culture**

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Challenges (2009)

- Regulator and licensees do not have a common definition and terminology for safety culture
- Industry has not taken full advantage of all the possible indications of safety culture weakness
- Inspection findings, with cross-cutting aspects, are a very limited set of data
 - Value of Substantive Cross Cutting Issues is unsubstantiated
- No common methodology for independent or 3rd party safety culture assessments



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**Industry Objective: Achieve A Strong
Nuclear Safety Culture**

- A common language of nuclear safety culture
- A repeatable, holistic approach for assessing safety culture on a continuing basis
 - Integrate all data available
 - NRC provide appropriate and transparent oversight
- A common methodology for conducting surveys and snapshot assessments (independent and 3rd party)



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Industry Supports the NRC Safety Culture Policy Statement

- Definition was developed by practitioners
 - Plain English
 - Calls for collective commitment by leaders and individuals
 - Emphasizes goal of protecting people and the environment
- Traits reflect appropriate behaviors and values inherent in a healthy safety culture
- Office of Enforcement commended



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Industry Supports the Policy Statement

- Licensees have primary responsibility for ensuring a positive safety culture
- NRC has an independent oversight role
- Statement of policy is the appropriate regulatory action to address safety culture
- Common language of safety culture is essential
- Industry is ready to work with NRC and other stakeholders to complete the development of common language for operating reactors this year



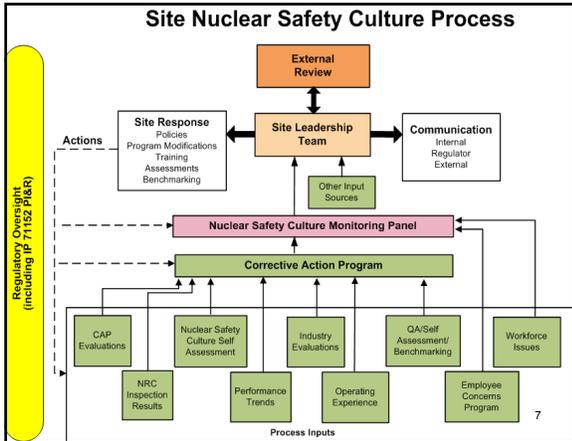
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Industry is Proactively Taking Steps to Ensure a Strong Nuclear Safety Culture

- CNOs approved industry initiative to comprehensively monitor and assess safety culture at all stations
 - Four pilots were conducted with NRC observation
- Each company will implement program described in NEI 09-07, *Fostering a Strong Nuclear Safety Culture* by October 2011
- Key to success is placing responsibility on site senior leadership



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Industry Initiative

- Multiple sources of data to identify trends that may be caused by nuclear safety culture weaknesses
- Uses INPO *Principles for a Strong Nuclear Safety Culture*
- Site leadership team directs actions to resolve weaknesses
- Outside organizations provide insights to the site leadership team
 - NRC oversight welcomed and expected

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Regulatory Footprint

- Industry believes this initiative provides significant advantages over the current NRC SCCI approach
- We welcome discussion on improving the regulatory approach for overseeing nuclear safety culture

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Why a National Nuclear Safety Culture Assessment Process?

- Concern with 95003 safety culture experience at Palo Verde
- NEI agreed to develop industry guideline applicable to independent and 3rd party assessments
- Utilities Service Alliance methodology chosen and upgraded
- For independent and 3rd party, increase team size and independence , and increase interview sample size
- Endorsed methodology will permit expeditious and effective assessments
 - NRC and licensee can focus on assessment results and findings



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Status of NSCA

- NRC observed NSCA at three pilot plants
- Public meetings to discuss NRC observations
- Developed and implemented enhancements. Most important:
 - Interviewing skills and scoring
 - Validation of survey
- Additional observed NSCA at Hope Creek in February 2011
- Will seek endorsement this year
- Receiving considerable international interest



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Initiative Reflects Industry's Commitment to a Strong Nuclear Safety

- Standardized, robust, integrated approach
- Nuclear operating company leadership responsible
- Constant reinforcement of nuclear safety culture leadership and individual behaviors
- Safety culture requires frequent evaluation
- Safety culture is a continuum – even the best plants work at it every day



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