



# Utilities Service Alliance, Inc.

A Not-for-Profit, Membership Corporation  
Working Together For Mutual Success

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August 31, 2005

U.S. Nuclear Regulatory Commission  
One White Flint North  
11545 Rockville Pike  
Rockville, Maryland 20852

Attn: Mr. Michael R. Johnson, Director, Office of Enforcement,  
Chair, Safety Culture Steering Committee

Dear Mr. Johnson,

The purpose of this correspondence is to provide initial comments, as requested at a public meeting on August 17, 2005, concerning the Nuclear Regulatory Commission's (NRC's) "Safety Culture Initiative."

Utilities Service Alliance, Inc. (USA) is a non-stock, not-for-profit cooperative of nuclear utilities and is incorporated in the state of Kansas. Its full members include American Electric Power (DC Cook), DTE Energy (Fermi 2), Energy Northwest (Columbia), Nebraska Public Power District (Cooper), Omaha Public Power District (Fort Calhoun), Ontario Power Generation (Darlington & Pickering), PPL-Susquehanna (Susquehanna), Southern California Edison (San Onofre) and Wolf Creek Nuclear Operating Corp (Wolf Creek).

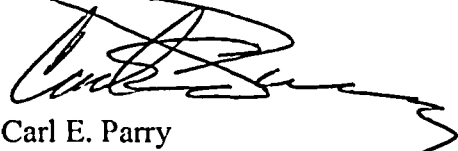
Each USA member views the unique safety culture at their plants as their sole and full responsibility. Consequently, our members have demonstrated a strong and continuing interest in the assessment and continuous improvement of their safety cultures. For nearly three years, USA has been developing and using the "USA Nuclear Safety Culture Assessment" process. The USA assessment process is based on elements from Institute for Nuclear Power Operations (INPO) documents regarding conservative and operational decision-making as well as lessons learned from events at Davis-Besse. USA is currently expanding its assessment process to include INPO's, "Principles for a Strong Nuclear Safety Culture (November 2004)." When the assessment process has been expanded, USA anticipates using the process at its member plants in 2006 and 2007. The USA process contains several systematic and proven methods of collecting and evaluating information about a safety culture. The process has provided useful and insightful information about the member plants' safety culture.

Notwithstanding the merits of its process and given its experience, USA has serious reservations about how any measures of safety culture would fit within the predictable, objective, understandable and risk-based regulatory principles of Reactor Oversight Process as proposed by the NRC.

The USA does believe that the NRC would benefit from examining its process. As significant stakeholders, USA and its member utilities are willing to offer its process and experience to the NRC.

The USA member utilities appreciate this opportunity to comment and offer assistance on this very important issue. If you have questions or would like to discuss this further please contact the Chairman of our Board of Directors, Mr. William T. O'Connor Jr., Vice President Nuclear Generation for DTE Energy at 734.586.4445, [oconnorw@dteenergy.com](mailto:oconnorw@dteenergy.com) or the undersigned.

Respectfully,



Carl E. Parry  
President & Chief Executive Officer  
Utilities Service Alliance, Inc.

cc: I. Schoenfeld, Sr. Assistant to the Director, Office of Enforcement

J. Persensky, Office of Nuclear Regulatory Research; Member, Safety Culture Working Group

J. Jacobson, Safety Culture Attributes Table Office of Nuclear Reactor Regulation; Member, Safety Culture Working Group

NRC Document Control Desk

Michael Coyle, Nuclear Energy Institute