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From: A. Randolph Blough *AB*
To: S/HC SCWE Ctrpts
Date: 7/16/04 11:27AM
Subject: Fwd: Congressional Q&As- Voinovich - - S/HC

the NRC reply to voinovichQ9 is important to our situation, and it stills takes credit for what we are doing at Salem and hope creek.

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From: Roy Mathew */NRR*
To: Brian Sheron; Jim Dyer
Date: 7/15/04 8:49AM
Subject: Congressional Q&As- Voinovich

He

see attached

CC: Bruce Boger; Edwin Hackett; KDJ; Stuart Richards; Tad Marsh

QUESTION 9. Why specifically do you disagree with GAO's recommendation that you develop a methodology to assess early indications of deteriorating safety at nuclear power plants?

ANSWER.

GAO's specific recommendation was to develop a methodology to assess licensees' safety culture that includes indicators of and inspection information on patterns of licensee performance as well as on licensees' organization and processes. GAO recommended that NRC should collect and analyze this data, either during the course of the agency's routine inspection program or during separate targeted assessments, or during both routine and targeted inspections and assessments. The GAO maintained this would provide an early warning of deteriorating or declining performance and future safety problems.

The Commission has taken action to encourage the early identification of declining performance and safety problems. The NRC is committed to licensees developing and maintaining a strong safety culture, including commitment to safety, technical expertise, and good management. Through the years, the Commission has taken a number of actions in the area of safety culture, including the issuance of the Policy Statement entitled "Conduct of Nuclear Power Operations" (54 FR 3424, 01/24/89). The Commission issued the policy statement to help foster the development and maintenance of a safety culture at every facility licensed by the NRC. It also stated that "...management has the duty and obligation to foster the development of a 'safety culture' at each facility and to provide a professional working

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environment, in the control room and throughout the facility, that assures safe operations. Management must provide the leadership that nurtures and perpetuates the safety culture."

In a 1996 Policy Statement, entitled "Freedom of Employees in the Nuclear Industry to Raise Safety Concerns Without Fear of Retaliation," the Commission stated "...licensees and other employers subject to NRC authority will establish and maintain safety-conscious environments in which employees feel free to raise safety concerns, both to their management and to the NRC without fear of retaliation."

The Commission recognizes the difficulty in objectively assessing certain aspects of safety culture. As noted in the Commission comments on the draft GAO report, NRC programs currently assess some underlying elements of safety culture such as identification and resolution of problems. NRC will continue to assess, based on objective parameters and direct observations of performance, how effectively licensees are managing safety at each facility. NRC's assessments and actions include:

- direct, daily observation of licensee operation of the facilities.
- problem identification and resolution (PI&R) inspections.
- followup of individual allegations and trending.
- enforcement of employee protection regulations.
- safety-conscious work environment assessments.

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- early and aggressive action where safety performance or safety culture issues are confirmed (e.g., recent actions taken to address safety culture issues at the Salem and Hope Creek plants).

The existing regulatory infrastructure previously outlined provides a framework for monitoring the impact of licensee safety culture on performance. Nevertheless, the NRC is committed to enhancing its oversight of safety culture over the next two years by:

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- increasing the focus on safety-conscious work environment within the PI&R inspections.
- taking follow-up actions in response to the Davis-Besse Lessons Learned Task Force recommendations.
- developing enhanced guidance to our licensees by identifying best practices to encourage a safety-conscious work environment and to promote the NRC's expectations.
- closely monitoring efforts by foreign regulators to measure and regulate safety culture.

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