

Sample Inspection Requirements for Safety Culture Components

This attachment contains sample inspection requirements from which inspectors may select and adapt inspection requirements related to performance deficiencies, as required by section 95003.02.06.a. This attachment also identifies documents which correspond to the requirements, to assist inspectors in compiling a list of documents to request from the licensee. This attachment is thus a resource that inspectors may use to develop the assessment section of the inspection plan.

In this attachment, sample inspection requirements and corresponding documents are listed in the two-column table below: column one includes both the names of the safety components (in bold text) and inspection requirements associated with each component, while the second column describes the corresponding documents which should be requested from the licensee.

<u>Component / Requirement</u>	<u>Corresponding documents</u>
Accountability	
Review the policies and procedure which define the line of authority and responsibility for nuclear safety to verify that those lines and responsibilities are clearly identified.	Policies and procedure which define the line of authority and responsibility for nuclear safety.
If the licensee has established a system of rewards and/or sanctions related to plant performance, then verify that those rewards and/or sanctions do not conflict with nuclear safety policies and do reinforce behaviors and outcomes which reflect safety as an overriding priority.	Policies and procedures for employee rewards and/or sanctions related to plant performance.
Determine that objective measures have been taken by management to reinforce safety standards.	Evidence of objective measures taken by management to reinforce safety standards
In management meetings, observe whether the behavior of management reinforces safety standards and displays behaviors that reflect safety as an overriding priority.	Schedule of management meetings.
Continuous Learning Environment	
Observe whether personnel reinforce safety principles among themselves.	

<p>For each major work group (including but not necessarily limited to Operations, Engineering, Maintenance, Radiological Protection, Security), review the continuing-training program for the group:</p> <ul style="list-style-type: none"> ● Review the lesson plans to verify that they include features to effectively facilitate knowledge transfer to ensure technical competency. ● Review records which identify the employees who received the training and compare those records with employee rosters to verify that employee participation was consistent with management expectations. Also verify that management expectations facilitate and enable effective knowledge transfer. 	<p>Lesson plans and training records for continuing training.</p>
<p>Identify the benchmarking and reverse-benchmarking activities conducted during the previous two years.</p> <ul style="list-style-type: none"> ● Review the records of benchmarking activities to verify that they included features which could improve licensee knowledge, skills, and safety performance. ● Review the actions taken by the licensee as a result of those activities, to verify that the licensee effectively integrated lessons learned from those activities into their programs and processes. 	<p>Records of benchmarking activities for the last three years.</p>
<p>Review the procedures which establish and describe the licensee's industry operating experience program and review selected records developed using that program, to verify that the licensee effectively communicates information learned from internal and external sources about industry and plant issues</p>	<p>Examples of communications to the organization of information learned from internal and external sources about industry and plant issues.</p>

Review the method(s) or process(es) used by the licensee for planning, coordinating, and evaluating the safety impacts of decisions related to major changes in organizational structures and functions, leadership, policies, programs, procedures, and resources. Review records which describe the safety impacts of decisions evaluated using those methods/processes during the previous two years, to verify that the licensee effectively used the subject methods/processes.	Procedures and policies used for planning, coordinating, and evaluating the safety impacts of decisions related to major changes in organizational structures and functions, leadership, policies, programs, procedures, and resources. Records which describe the safety impacts of decisions evaluated using those methods/processes during the previous two years.
Review the methods used by the licensee to communicate such changes to affected personnel, to verify that the changes were effectively communicated to those personnel.	The methods used to communicate changes to affected personnel and a sample of communications.
Corrective Action Program	
Review the CAP program procedure to verify that it clearly states an expectation to identify issues at a low threshold.	Procedures for corrective action program.
Review a sample of recently-identified issues in the CAP to verify that issues had been identified at the threshold stated in the procedure.	A list of corrective action documents to select a sample from or a sample of recent CA documents.
Review a sample of recently-completed evaluations to verify for each evaluation that <ul style="list-style-type: none"> the difference between the event date/time and the reported date/time is commensurate with the safety significance of the identified issue; the event/condition description in the completed evaluation is consistent with the event/condition description in the CAP record. 	(as above) A list of corrective action documents to select a sample from or a sample of recent CA documents.

Verify that a program or process exists to periodically trend and assess information from the CAP and other assessments in the aggregate to identify programmatic and common cause problems. Review a sample of results produced by that program or process to verify that it does identify such problems. Review a representative sample of those problems to verify that they were appropriately addressed.	Audit or trending plan for the CAP.
Determine to whom the licensee distributes the trending results to verify that the results apply to those personnel. Determine how the recipients responded to or otherwise used the results.	A sample of trending results in the area(s) of inspection interest.
For a sample of issues identified in the CAP, verify that the evaluations were thorough and that the resolutions of those issues appropriately addressed the causes. For each issue, verify that the licensee properly classified and prioritized the issue commensurate with its potential safety significance, and that the licensee properly addressed operability and reportability considerations.	A list of corrective action documents to select a sample from or a sample of recent CA documents.
For a sample of significant conditions adverse to quality identified in the CAP, verify that the licensee completed effectiveness reviews, and that those reviews verified that the associated conditions were resolved.	A sample of significant conditions adverse to quality identified in the CAP.
For a sample of safety issues identified in the CAP, verify that the licensee implemented corrective actions in a timely manner, commensurate with their safety significance and complexity.	A list of corrective action documents to select a sample from or a sample of recent CA documents.
For a sample of adverse trends identified in the CAP, verify that the licensee implemented corrective actions in a timely manner, commensurate with their safety significance and complexity.	A sample of trending results in the area(s) of inspection interest.

Determine whether any safety issues were identified in the alternative process within the previous two years. If so, determine how those issues were addressed, to verify that the resolutions of identified safety issues were appropriate and timely.	Safety issues that were identified in the alternative process in the past two years.
Decision-Making	
Review procedures for making decisions, immediate and longer-term; note definitions of authority and roles; verify that the procedures call for conservative assumptions (regarding equipment degradation, human performance, unfamiliar plant conditions and tasks, etc.) and consider risk impacts; verify that procedures require effectiveness reviews and communication of decisions and bases to affected personnel.	Records that describe recently-made decisions. Procedures for management decision making.
Identify methods used to communicate these roles to site personnel.	Procedures for communication and communication plans for management decisions
Review procedures for obtaining interdisciplinary reviews on decisions.	
Review records that describe recent decisions. If records don't exist or are incomplete, interview involved personnel. Observe decision making activities in work planning meetings, plan-of-the-day meetings, and other forums.	Records or minutes of planning meetings including modification and capital improvement approval meetings.
Environment for Raising Concerns	
Verify that measures have been taken by the licensee to encourage employees to raise concerns both to their management and/or the NRC without fear of retaliation.	Procedures and policies and training on raising concerns. Samples of plant communications that inform and reinforce the procedures and policies.
Observe licensee employee behaviors during meetings, etc. to determine whether behaviors promote the raising of safety concerns.	
Review the NRC records of allegations for evidence of discrimination to determine whether discrimination issues have been raised and substantiated.	NRC files.

Review the procedures and policies which establish and describe the alternative process for raising safety concerns or resolving differing professional opinions to verify that those processes are accessible, have an option to raise issues in confidence, and are independent from management who would in the normal course of activities be responsible for addressing the issue.	Procedures and policies which establish and describe the alternative process for raising safety concerns.
Verify that measures have been taken by the licensee to inform employees about the alternative process.	Samples of communication that inform and reinforce the procedures and policies for raising concerns.
Review selected issues recorded in the alternative process for raising issues to verify that those issues were evaluated and resolved as appropriate.	Access to files for the alternative process for raising safety concerns.
Operating Experience	
Verify that the licensee collected, evaluated, and communicated to affected staff in a timely manner the generic communications issued by the NRC within the previous two years that applied to power reactor licensees.	<p>A list of generic communications received and processed by the licensee within the previous two years.</p> <p>Procedures or policies for handling operating experience from the NRC.</p>
By reviewing appropriate licensee records, verify on a sampling basis that the licensee collected, evaluated, and communicated to affected staff in a timely manner communications received from INPO, vendors and other sources.	<p>A list of OE items received from INPO, vendors and other sources and processed by the licensee within the previous two years.</p> <p>Procedures or policies for handling operating experience from industry.</p>
For a representative sample of OE items communicated to affected staff, verify that the licensee identified and implemented appropriate corresponding changes to station processes, procedures, equipment, and/or training programs.	For a sample of generic communications and OE items, actions taken as a result.
Organizational Change Management	

Review procedures for making decisions, immediate and longer-term; note definitions of authority and roles; verify that the procedures call for conservative assumptions (regarding equipment degradation, human performance, unfamiliar plant conditions and tasks, etc.) and consider risk impacts; verify that procedures require effectiveness reviews and communication of decisions and bases to affected personnel.	Records that describe recently-made decisions. Procedures for management decision making.
Identify methods used to communicate these roles to site personnel.	Procedures for communication and communication plans for management decisions
Review procedures for obtaining interdisciplinary reviews on decisions.	
Review records that describe recent decisions. If records don't exist or are incomplete, interview involved personnel. Observe decision making activities in work planning meetings, plan-of-the-day meetings, and other forums.	Records or minutes of meetings
Preventing, Detecting, and Mitigating Perceptions of Retaliation	
Verify that employees have received training that harassment and retaliation for raising safety concerns is a violation of law and policy and will not be tolerated.	Training plans on prohibitions of harassment and intimidation.
Review any investigations performed by the licensee of claims of discrimination to verify that those investigations were conducted consistent with the content of the regulations regarding employee protection and any necessary corrective actions are taken in a timely manner, including actions to mitigate any potential chilling effect on others due to the personnel action under investigation.	Records of investigations performed by the licensee of claims of discrimination.
Review the NRC records of allegations for evidence of discrimination to determine whether discrimination issues have been raised and substantiated.	NRC records.

Review the disciplinary actions taken against employees within the previous two years, and verify that compensatory actions were taken as appropriate by the licensee to address potential chilling effects of those actions.	Disciplinary actions taken against employees within the previous two years.
Resources	
Determine the history of reductions-in-force or other draw-downs of the workforce at the site. Establish the reasons for these reductions and quantify the numbers of employees for the associated organizational areas to determine the impact of the reductions on the available personnel resources. Determine the bases for staffing level determinations.	<p>Reports of internal or third-party staffing studies</p> <p>Reports of re-engineering efforts completed within the past two years</p> <p>Peer group comparisons</p> <p>Resource assessments in the previous two business plans</p>
Verify that long standing equipment issues and deferring preventive maintenance are minimized to the extent practical	
Verify that the licensee knows what design margins exist. Determine how design margins are considered in design control, and are updated as required to be current with how the plant is configured and operated.	Procedures for design control and design modifications, and design basis documents.
Review the engineering backlogs (including design mods, temp mods, drawing updates, equipment database updates, mod proposals, CAP evaluations) to determine trends.	Tracking records for engineering work assignments and requests.
Review the trend in the non-outage work-order and work-package backlogs.	Tracking system status and trends in work orders and work packages.
Review the licensee's procedures for authorizing overtime, including exceptions to overtime guidelines. Review the trends in the overtime for selected work groups.	Procedures for control of overtime and meeting overtime guidelines

For selected work groups, review the programs and procedures for qualifying personnel. For a sample of personnel in those work groups, verify that personnel qualifications are current and in accordance with those procedures.	Procedures for qualifying working level and first line supervisors in all work groups.
Review the trend in update backlogs of procedures, calculations and drawings.	Tracking records for trends in document updates. (Engineering is listed above)
Determine how the licensee records reflect the quality of work packages; consider rework designations in the maintenance database and cause codes in the CAP that could indicate work package quality. Determine whether the trend in work package quality is being tracked.	Record of work package deficiencies and trend information.
Identify the procedure(s) used to maintain simulator fidelity, and evaluate results developed through that procedure.	Procedures for simulator fidelity and identification and resolution of simulator issues.
Review the trend in the simulator work order backlog.	The trend in simulator work orders.
Identify the procedure(s) used to maintain emergency facilities and equipment, and evaluate results developed through that procedure.	Procedures for meeting requirements for emergency preparedness.
Review the trend in the emergency facility maintenance and/or upgrade backlog.	Trend information on work orders for emergency planning.
Safety Policies	
Review the policies and training plans which establish and reinforce that nuclear safety is an overriding priority, to verify that those policies and plans require and reinforce that individuals have the right and responsibility to raise nuclear safety issues through available means, including avenues outside their organizational chain of command and to external agencies, and participate in the resolution of such issues.	The policies and training plans which establish and reinforce that nuclear safety is an overriding priority. Policies and plans that reinforce that individuals have the right and responsibility to raise nuclear safety issues through available means.

Review records which identify the personnel who have received training on those policies within the last two years. Compare those records with employee rosters.	Training records on policies and plans that require and reinforce that individuals have the right and responsibility to raise nuclear safety issues through available means.
Review the methods used by the licensee to communicate production, cost, and schedule goals to employees, to verify that those methods reinforces the primary importance of nuclear safety.	The documented methods used by the licensee to communicate production, cost, and schedule goals to employees
Review the methods used by senior managers and corporate personnel to periodically communicate and reinforce nuclear safety such that personnel understand that safety is of the highest priority.	The documented methods used by senior managers and corporate personnel to periodically communicate and reinforce nuclear safety as the highest priority.
Self- and Independent Assessments	
Verify that the periodic self- and independent assessments conducted by the licensee have been conducted at an appropriate frequency.	The station self-assessment program and schedule.
For a representative sample of those assessments, verify that the assessments were of sufficient depth, are comprehensive, are appropriately objective, and are self-critical.	A representative sample of self-assessments.
Verify that the licensee periodically assesses the effectiveness of oversight groups and the CAP. For a sample of reports that document such assessments, verify that the assessments are of sufficient depth, are comprehensive, are appropriately objective, and are self-critical.	An assessment plan and schedule of effectiveness assessments of oversight groups and the CAP. A sample of assessments and the corrective actions taken.
Review the safety indicators tracked by the licensee to verify that those indicators provide an accurate representation of performance.	Performance indicator data for activities important to nuclear safety.
For a sample of reports that document assessments, verify that the issues identified in those reports were subsequently classified, prioritized, evaluated and addressed as appropriate.	A representative sample of self assessment results and performance indicator data for activities important to nuclear safety.

Work Control	
Review the procedures used to manage risk or control work to verify that the procedure requires risk considerations to be incorporated into work scheduling.	Work control procedures for risk.
Review the procedures used to prepare for work to verify that they require <ul style="list-style-type: none"> • consideration of risk insights • addressing job site conditions • the impact of changes on the plant and human performance; • the impact of the work on different job activities; and • the need for planned contingencies, compensatory actions, and abort criteria. 	Work package preparation procedures
Review the procedure(s) used to schedule and control work to verify that it includes features which appropriately limit temporary modifications, operator work-arounds, safety systems unavailability, and reliance on manual actions	Procedures for scheduling work. Procedures for control of temporary modifications, operator work-arounds, safety systems unavailability or degradation, and reliance on manual actions.
Review the procedure under which the licensee conducts pre-job and shift briefings to verify that it requires communication of the operational impact of work activities and plant conditions that may affect work activities.	Procedures for pre-job briefs and shift turnover and briefings.
Observe selected pre-job and shift briefings to verify that those communications occur.	Schedule of shift turnover meetings in all departments
Observe selected meetings used to plan and coordinates work activities to verify that work groups communicate, coordinate, and cooperate with each other.	Schedules of work planning and coordination meetings.
Review the documents that include protocols between on-site and selected off-site work groups (like work groups who perform switchyard maintenance and coolant channel dredging) to verify that the protocols provide adequate communication, coordination, and cooperation.	Procedures for interfacing with non-nuclear support groups providing engineering and maintenance of nuclear plant related structures systems or components.

Interview the on-site personnel who administer selected interfaces with off-site organizations to verify that the associated protocols are being followed.	Organization charts and contacts for staff administering non-nuclear support groups.
Work Practices	
Review job preparation procedures and observe selected jobs to verify that human error prevention techniques are used such as pre-job review of tasks, and drawings, pre-job briefings, contingency planning, peer verifications, etc., as appropriate to the work being performed.	Procedures and training plans for working level work practices in all departments.
Verify that employees receive training on fitness-for-duty policies and practices, and review those policies and practices, including behavior observation.	Training records on FFD for plant staff. Policies and procedures on fitness-for-duty.
Review related records developed during the preceding 12 months to verify implementation of those policies and practices.	Records of administrative actions taken related to fitness for duty. Employee identification may be omitted.
Review policies or procedures which address proceeding in the face of uncertainty or unexpected circumstances to verify that related guidance is adequate. Verify that appropriate site personnel receive training on this topic.	Policies, procedures and training records addressing resolution of issues impacting completion of work.
Review policies or procedures which address procedural compliance to verify that related guidance is adequate. Verify that appropriate site personnel receive training on this topic. Verify procedures are followed during observation of work.	Policies or procedures on procedural compliance. Training plans and records on procedural compliance.
Review policies or procedures which address supervisory and management oversight of work activities to verify that related guidance is adequate.	Policies or procedures for supervisory and management oversight of work activities
Review audits or performance metrics for supervisory functions (e.g., access records which indicate time in the plant for managers, supervisory reports of observations of worker performance, etc.) to verify that those managers and supervisors spend time in the plant.	Procedures or policies and audits or performance metrics for supervisory functions.