

From: Leanne Harrison *LE*  
To: James Wiggins  
Date: 9/10/04 8:50AM  
Subject: Re: Fwd: SRM-SECY-04-0111 is public

Jim,  
Sorry to bother you about this again, but Dave is not here and "the Salem allegor" has contacted me via email requesting I fax her the Sec'y Paper (which is denoted as DRAFT yet portrayed as final by Lisa Jarriel) - for which I remain confused. So before I do anything I needed a little guidance. I'm only bothering you about this because you seem to be the most involved in this issue.

Thanks,  
Leanne

>>> James Wiggins 09/09/04 10:48AM >>>  
thx

>>> Leanne Harrison 09/09/04 10:04AM >>>  
Jim,

Although I admit I am confused about this since the actual Sec'y paper has draft stamped on it (???), I am sending this SRM to you in case you wanted to inform the staff of SCWE inspection changes.

Thanks,  
Leanne

PS: The ADAMS accession no. for the actual Sec'y paper is  
ML041750238

CC: David Vito; Sharon Johnson


Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions *7C*  
FOIA- 2005-194

*T-218*

From: Leanne Harrison *RT*  
To: David Vito  
Date: 9/10/04 7:35AM  
Subject: Fwd: Re: SRM and Sec'y Paper

Can I send her that with it being stamped draft?

CC: Sharon Johnson

From: [REDACTED]   
To: <LMH1@nrc.gov>  
Date: 9/9/04 7:57PM  
Subject: Re: SRM and Sec'y Paper

In a message dated 9/9/2004 10:06:40 AM Eastern Daylight Time, LMH1@nrc.gov writes:

Kim,

The SRM for Sec'y Paper 04-0111 has been made available. Below is the accession numbers for the SRM and the actual Sec'y paper. You may retrieve these documents through the NRC website (nrc.gov) via ADAMS using the below accession numbers (as I am having great difficulty trying to import them to a file that I could e-mail you with) or I can fax them to you if you wish. Let me know if you would desire this. Thanks.

Leanne

for the SRM: ML042430661

for the Sec'y Paper ML041750238

Leanne,

Thank you for sending this.

Please fax the Sec'y paper. I could not find it with the number listed. My private fax number is [REDACTED]

Thank you very much.

Kymn 



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August 30, 2004

MEMORANDUM TO: Luis A. Reyes  
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary /RA/

SUBJECT: STAFF REQUIREMENTS - SECY-04-0111 - RECOMMENDED STAFF ACTIONS REGARDING A GUIDANCE IN THE AREAS OF SAFETY CONSCIOUS WORK ENVIRONMENT AND SAFETY CU

The Commission has approved Option 1A to engage stakeholders by noticing the draft document in the *Federal Register* for a brief comment period, subject to the changes noted in the attachment. Options 1B and 1C are disapproved. As a document is being issued for public comment, there should be no further discussion on whether to issue the document. The document should be clear to stakeholders that the comments should address the content of the document only. The comment notice attached to the document should explicitly reflect the connection between a Safety Conscious Work Environment and Safety Culture. At a minimum the staff should explain as it did in the paper that SCWE is an attribute of Safety Culture.

(EDO)

(SECY Suspense: 9/24/04)


The Commission has approved Option 2C to continue to monitor industry efforts to assess Safety Culture and ensure the Commission remains informed of industry efforts and progress. Of particular note was the progress made by INPO in addressing recent industry issues in this area. As industry works to develop guidance in this area, the staff should allocate resources to ensure that it has programs and procedures in place that encourage licensees to establish strong Safety Culture programs. Options 2A and 2B are disapproved.

The Commission has approved Option 3B to enhance the Reactor Oversight Process (ROP) treatment of cross-cutting issues to more fully address Safety Culture. The staff should not use surveys of licensee personnel, but rather should rely on inspector observations and other indicators already available to the NRC. Consequently, the staff should develop procedures to allow inspectors to rely on more objective findings. The staff should consider including enhanced problem identification and resolution initiatives as part of this effort. Most important, the staff should ensure that the inspectors are properly trained in the area of Safety Culture. The staff should consider developing an enhanced training program for its resident inspectors on Safety Culture that uses both insights from INPO's work in this area and insights from the international community. The staff should consider if the cross-cutting issues in the enhanced ROP treatment may be more appropriately labeled Safety Management rather than Safety Culture. In making any changes, the staff should follow established processes for revising the ROP, in particular the process for involving stakeholders.

As a further enhancement to the ROP, the staff should include as part of its enhanced inspection activities for plants in the Degraded Cornerstone Column (referred to as Column Three) of the ROP Action Matrix, a determination of the specific evaluation of the licensee's Safety Culture. The staff should interact with our stakeholders to develop a methodology for making the determination and conducting the evaluation. The staff's methodology for using the treatment of cross-cutting issues to more fully address Safety Culture should require a specific determination for plants in the Degraded Cornerstone Column.

With respect to Option 3C, the staff should continue to monitor developments by foreign regulators, as directed in SECY-02-0166, but should limit the expenditure of resources in this area to previously programmed levels. Options 3D, and 3E are disapproved.

The attachment contains recommended revisions to the draft document on "Establishing and Maintaining a Safe Work Environment", but the staff should feel free to continue to improve this document.

Attachment: Changes to the *Federal Register* notice in SECY-04-0111 

cc: Chairman Diaz  
Commissioner McGaffigan  
Commissioner Merrifield  
OGC  
CFO  
OCA  
OIG  
OPA  
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)  
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### POLICY ISSUE NOTATION VOTE

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July 1, 2004

**FOR:** The Commissioners

**FROM:** Luis A. Reyes  
Executive Director for Operations /RA/

**SUBJECT:** RECOMMENDED STAFF ACTIONS REGARDING AGENCY GUIDANCE IN THE AREAS OF SAFETY CONSCIOUS WORK ENVIRONMENT AND SAFETY CULTURE

- [PURPOSE](#)
- [SUMMARY](#)
- [BACKGROUND](#)
- [DISCUSSION](#)
  - [Industry Guidance re: Safety Conscious Work Environment](#)
  - [Industry Guidance re: Safety Culture](#)
  - [NRC Inspector Guidance re: SCWE and Safety Culture](#)
- [RECOMMENDATION](#)
- [COORDINATION](#)

#### PURPOSE:

To advise the Commission of the status of the staff's effort to develop a guidance document to encourage a Safe and Sound Work Environment (SCWE) and monitor efforts by foreign regulators to measure and regulate Safety and to seek Commission direction, prior to consideration of budgeting resources, with regard to the development options for enhancing oversight of SCWE and Safety Culture.

#### SUMMARY:

In its March 26, 2003, Staff Requirements Memorandum (SRM), the Commission directed the staff to take certain actions in the areas of SCWE and Safety Culture. In response to the Commission's direction related to SCWE guidance, the staff consulted with internal and external stakeholders and drafted the attached industry guidance on establishing and maintaining a SCWE. Likewise, in response to the Commission's direction related to Safety Culture, the staff will monitor developments abroad within the international communities to regulate Safety Culture and develop objective performance indicators. The staff will keep the Commission informed of these efforts through trip reports as developments dictate.

Additionally, in response to lessons learned from the reactor vessel head degradation event at Davis-Besse, this document discusses below options to develop additional SCWE and Safety Culture assessment tools for the industry and NRC inspectors.

#### BACKGROUND:

The Agency's expectations with regard to licensee's establishing and maintaining a SCWE are outlined in a May

policy statement entitled, "Freedom of Employees in the Nuclear Industry to Raise Safety Concerns Without Fear of Retaliation." A SCWE is defined by the NRC as an environment in which, "employees feel free to raise safety concerns to their management and to the NRC, without fear of retaliation." The NRC recognizes, however, that, aside from retaliation, other matters can affect an employee's willingness to identify safety concerns, such as the effective licensee's processes for resolving concerns, and senior management's ability to detect and prevent retaliatory NRC policy statement, therefore, addresses these attributes of a SCWE, as well.

Regarding Safety Culture, there has been some confusion historically. Many use the terms "SCWE" and "Safety Culture" interchangeably. They are, in fact, two distinct, but related concepts. The Agency's expectations with regard to establishing and maintaining a strong Safety Culture are provided in a January 24, 1989, policy statement entitled "Statement on the Conduct of Nuclear Power Operations." Safety Culture in this document refers to, "the necessary attention to safety matters," and, "the personal dedication and accountability of all individuals engaged in any activity that has a bearing on the safety of nuclear power plants." A strong Safety Culture is also often described as having a "first focus." Attributes include concepts such as safety-over-production, procedural adherence, and conservative decision making. The willingness of employees to identify safety concerns, i.e., SCWE, is also an attribute of Safety Culture. The guidance provided by both of these Commission policies is very broad.

On March 26, 2003, the Commission issued an SRM for SECY-02-0166, approving the recommendations of the Discrimination Task Group, as revised by the Senior Management Review Team. Although the Commission did not rulemaking with regard to SCWE as recommended in the SECY, the Commission directed the staff to develop further guidance, in consultation with stakeholders, that would identify "best practices" to encourage a SCWE. The Commission indicated that the proposed guidance should emphasize training of management as to its obligation under the protection regulations and should provide information as to the recommended content of the training in this area. Within this SRM, the Commission also provided direction in the broader area of Safety Culture. Specifically, the Commission stated that, "[i]n light of efforts by foreign regulators to measure and regulate safety culture, the staff should monitor developments abroad so as to ensure that the Commission remains informed about these efforts and their effect. In particular, because subjectivity is a principal objection to the direct regulation of safety culture, the staff should monitor efforts to develop objective measures that serve as indicators of possible problems with safety culture."

Finally, a weak Safety Culture was identified as a root cause of the reactor vessel head degradation at the Davis-Besse nuclear power plant. The NRC's Davis-Besse Lessons Learned Task Force report recommended that the staff revise inspections and plant assessment processes to determine whether sufficient processes are in place to identify and appropriately disposition the types of problems experienced at Davis-Besse. The report also recommended more and focused inspections to assess a licensee's SCWE.

Both in response to the Commission's direction and lessons learned from the reactor vessel head degradation at Davis-Besse, the staff discusses below actions taken and recommended in the areas of SCWE and Safety Culture.

## **DISCUSSION:**

### **Industry Guidance re: Safety Conscious Work Environment**

In response to the Commission's March 26, 2003 SRM, the staff formed a working group that developed an outline for a SCWE guidance document regarding "best practices" to encourage a SCWE. The outline was based on the current 1996 Policy Statement and the experience and knowledge of the working group's members. The outline was published on the

NRC's public web site and in the Federal Register for comment and was used to facilitate discussion during a February 2004, public meeting with various stakeholders. Although most stakeholders, including representatives from both industry and whistleblower advocates, were in general agreement concerning the content of the outline, some improvements were suggested and many have been incorporated into the attached draft document. The most common comment, however, addressed whether the Agency should be producing such a document at all. Industry representatives commented that the industry, rather than the NRC, should develop the guidance. The following specific comments to this topic were received:

- The May 1996 Policy Statement clearly set the NRC staff's expectations for development of a SCWE and responsibility for establishing and maintaining a SCWE on the licensees. Therefore, it is not appropriate for staff to assume responsibility for development of a "best practices" document in the area of SCWE.

- Some "best practices" in the NRC's document may be impractical or inappropriate for some organization the 1996 policy.
- "Best practices" are not enforceable nor useful for NRC inspectors.
- The industry has developed and is using guidance from Nuclear Energy Institute (NEI) 97-05<sup>1</sup>; therefore guidance from the NRC is not necessary.
- Any guidance developed by the NRC would be defacto regulatory requirements in this area.

In addition, during the February 2004 meeting and in the public comments that followed, the industry requests should the NRC proceed in developing such guidance, it provide another opportunity for supplemental comment final issuance of the document.

The staff has reviewed the above general comments which suggested that the industry, rather than the NRC is responsible for developing guidance related to "best practices" for establishing and maintaining a SCWE. Regarding comment that the 1996 Policy Statement clearly set the NRC's expectations for development of a SCWE and the responsibility for establishing and maintaining a SCWE on the licensees, the staff notes that, in response to the the Discrimination Task Force, the Commission more recently (March 26, 2003) issued a staff requirements memo that specifically requested that the staff develop more guidance regarding "best practices" to encourage a SCW agrees with the comment that some practices in the proposed document may not be appropriate for every NRC contractor, and has clarified this point in the attached document's title and content. Nonetheless, the staff continues to believe that the guidance can be helpful to licensees and their contractors developing or trying to enhance a SCWE. Regarding the comment that "best practices" are not enforceable, the NRC staff plans to issue the attached guidance in the form of a Regulatory Issue Summary (RIS), which does not create a regulatory requirement but is an establishment providing guidance to the industry. Regarding the comment that additional guidance beyond NEI 97-05 is not needed, the staff has reviewed NEI 97-05, Revision 1 and a draft of Revision 2, and concurs that both revisions contain information that are important to establishing and maintaining a SCWE. However, the staff noted the following important differences comparing the NEI document to the proposed NRC guidance on establishing and maintaining a SCWE:

- NEI 97-05 provides tools for use in the establishment of an Employee Concerns Program (ECP), an alternative process for reporting safety concerns, and resolving those concerns brought to its attention. As such, the NEI document is on the effectiveness of the ECP Program. While the NEI document includes information of the same topics as the NRC's guidance document on SCWE, the NRC's document more broadly addresses SCWE as it applies to all problem identification and resolution processes. For example, while both documents discuss the need for accessibility to problem identification and resolution processes, the NEI document emphasizes accessibility of the ECP Program, while the NRC document emphasizes accessibility of all site-wide problem identification and resolution processes.
- The NRC guidance document contains more detail than the NEI document on several practices which may impact SCWE, including how to conduct exit interviews with individuals who raise concerns, management behavior that contribute to a SCWE, feedback to individuals who raise safety concerns, techniques for conducting surveillance oversight of contractor activities which may impact the SCWE at licensed facilities.
- The NRC guidance document provides more detail than the NEI document on the content of SCWE training. The Commission specifically directed in the March 26, 2003, SRM that the proposed guidance emphasize training management as to its obligations under the employee protection regulations and provide information as recommended content of the training.
- The NRC guidance document includes information on several important and complex issues that may affect SCWE which are not included in the NEI document. These issues include: the effect of incentive programs on the 360 degree appraisal programs, and balancing personal accountability with maintaining a SCWE.
- NEI 97-05 does not provide guidance with respect to processes to help detect and prevent discrimination. Such processes have been valuable both in preventing discriminatory acts and providing continuous training to licensee management when used at licensed facilities, such as the Millstone Davis-Besse nuclear power plants.



**Option 1A - Continue to engage stakeholders by noticing the attached draft document in the Federal Register for a brief comment period.** The outline previously noticed in the Federal Register and commented on by various stakeholders was fairly detailed and comments received indicated that most were in general agreement concerning the content of the document. Nonetheless, this option allows for public comment on the complete document, is responsive to the industry's request for further comment, and reflects the staff's expectations to provide for further comment as during the February 2004 public meeting.

**Option 1B - Issue the attached document as a RIS without further public comment.** This option reflects that most stakeholders that provided comments on the detailed outline of the document published earlier this year were in general agreement with its contents. Published as a RIS, it does not impose regulatory requirements, but merely provides guidance for use by licensees hoping to improve their SCWE. The RIS process can take anywhere from one to five years; however, this option is expected to be the most timely. It is not, however, responsive to the industry's request for involvement and is contrary to the staff's stated expectations during the February 2004 public meeting.

**Option 1C - Notice in the Federal Register the NRC's decision not to pursue further development of guidance.** This option is a response to the above industry comments. However, as detailed above, the NRC staff believes the existing industry guidance is comprehensive enough to provide sufficient direction in this important area.

#### **Industry Guidance re: Safety Culture:**

The Commission stated in its 1989 Policy Statement that it was issued to, "foster the development and maintenance of a safety culture at every facility licensed by the NRC." It notes that, "management has the duty and obligation to develop and maintain a 'safety culture' at each facility and to provide a professional working environment, in the conduct of operations throughout the facility, that assures safe operations. Management must provide the leadership that nurtures and perpetuates the safety culture." The proposed options in this area focus on enhancing NRC guidance to encourage and assist the industry in taking the initiative to monitor and maintain a strong Safety Culture.

**Option 2A - Revise the 1989 Policy Statement, "Policy Statement on the Conduct of Nuclear Power Operations," to:** a) broaden its focus beyond the control room and licensed operators to encompass all areas of plant operations and; b) update the definition and attributes of Safety Culture referenced to improve alignment with current international standards. Option 2A would broaden the scope of the policy statement to increase its applicability to all aspects of plant operations. In addition, the reference to the document International Nuclear Safety Advisory Group (INSAG)-3, *Basic Safety Principles for Nuclear Power Plants*, would be updated to reflect the current guidance used internationally. Updating the policy statement would also provide the Commission the opportunity to clarify expectations in the area of Safety Culture and to provide guidance and encouragement for the industry to progress in the preferred direction. The disadvantage to implementing this option is that resource expenditures would be required, with the practical effect on the industry being determinable, since it would not be a regulatory requirement.

**Option 2B - Emphasize the 1989 Policy Statement, "Policy Statement on Conduct of Nuclear Power Operations," by encouraging licensee self-assessment of Safety Culture through the development of a document on Safety Culture similar to that being developed for SCWE.** Option 2B would provide the industry with practical methods for implementing the 1989 Policy Statement. Providing explicit and detailed guidance would increase the likelihood of licensees taking the initiative to implement the suggested practices and to do so successfully. The disadvantage to this option is similar to that of the previous option: resources would be required to develop the document, but its actual effects on industry practices would not be known.

**Option 2C - Monitor developments by the industry to assess Safety Culture to ensure the Commission is informed on such efforts, but without providing additional guidance.** Under this option the Commission would be able to fully express its views or make explicit its expectations for the area of Safety Culture. Without such guidance and encouragement from the Commission, industry initiatives and progress may be limited or move in directions that are not in accordance with Commission preference and/or internationally accepted standards.

#### **NRC Inspector Guidance re: SCWE and Safety Culture:**

A weak Safety Culture was identified as a root cause of the reactor head degradation at the Davis-Besse nuclear plant. Because the NRC staff was limited in its ability to find this problem prior to the incident, the staff believe that implementation of assessment processes which facilitate identification of negative trends in the area of Safety Culture should be explored. Item 3.3.4(5) of the Davis-Besse Lessons Learned Task Force states that the staff will "review a range of NRC baseline inspections and plant assessment processes, as well as other NRC programs, to determine the effectiveness of these processes in identifying and preventing safety culture weaknesses."

sufficient programs and processes are in place to identify and appropriately disposition the types of problems at DBNPS (Davis-Besse Nuclear Power Station). Additionally, the NRC should provide more structured and focus inspections to assess licensee employee concern programs and safety conscious work environment."

The staff is developing a response to a General Accounting Office (GAO) Report entitled, "Nuclear Regulation - to More Aggressively and Comprehensively Resolve Issues Related to the Davis-Besse Nuclear Power Plant's Shutdown May 2004. Among the responses the NRC staff is considering is enhancing its oversight of Safety Culture over years by increasing its focus on SCWE inspection and assessment efforts.

Regarding NRC assessment of the broader area of Safety Culture, a subset of underlying elements of Safety Culture as identification and resolution of problems, currently is assessed to some extent by elements of the Reactor Operating Process (ROP). However, there has been no attempt to move beyond the current implementation philosophy with emphasis on objectivity and predictability by supplementing these elements with the subjective aspects inherent in assessment of Safety Culture.

**Option 3A - Develop an inspection process that would provide instruction on systematically assessing Safety Culture and result in additional agency actions if Safety Culture issues were identified. Develop training for inspectors on this methodology.** This option would allow the staff to assess the willingness of the licensee to document safety issues, adhere to written procedures, make conservative decisions, and conduct probing self-inspections. The present inspection program and its associated action matrix would not support this approach, because the on assessing performance deficiencies in an objective manner through the significance determination process. Agency action under the ROP is driven by the Action Matrix, which integrates inspection findings after their significance is determined. The nature of assessing Safety Culture by direct inspection requires some measure of subjective judgment. Under this option, the staff would develop an inspection process and an assessment tool to drive additional agency actions that would be separate from the existing ROP Action Matrix, and unique to the area of Safety Culture. Presently, the ROP is to be objective, risk-informed, and predictable. The subjective nature of assessing Safety Culture by inspection may detract from meeting these goals.

**Option 3B - Enhance the ROP treatment of cross-cutting issues to more fully address Safety Culture issues and allow for more agency action as the result of the identification of a cross-cutting issue. Develop training for inspectors on this methodology.** Again, this option would allow the staff to assess the willingness of the licensee to document safety issues, adhere to written procedures, make conservative decisions, and conduct probing self-assessments. Presently, cross-cutting issues can be identified as the result of inspection findings of sufficient number in multiple areas, although the individual findings may be of low safety significance. Agency action in response to issues is presently generally limited to requested oral or written responses from licensees as part of the annual ROP process. Under this option, the staff would develop a Safety Culture cross-cutting issue, and define specific agency actions as a result of the identification of a Safety Culture cross-cutting issue. To support this, the inspection program would be modified to allow for observation and documentation of Safety Culture issues. The staff would develop guidance for inspectors to use in making observations, such as a survey tool, and documenting such observations in a form suitable for trending. The documentation of these observations are expected to be a challenge in terms of their risk potential for trending. Negative survey results would be followed up by NRC staff and additional agency actions would be determined by NRC senior management on a case by case basis. This option provides an avenue for the NRC to actively assess Safety Culture within a framework which provides for some subjective assessment.

**Option 3C - While continuing to monitor efforts by foreign regulators on Safety Culture, pro-actively engage the international communities to develop objective performance indicators of possible problems with safety cultures of our licensees.** This option would help to assure consistency among the international community's applicability to US facilities.

**Option 3D - Engage the industry to develop an industry process to assess the Safety Culture at individual facilities, with NRC oversight of this process.** This option would be along the lines of the industry efforts in this area, where the INPO has set up standards for training, and there is an industry process to periodically assess each facility and to react to weak performance in this area. This option would allow the industry the flexibility to achieve the goal in the most efficient manner to achieve the goal, yet provide the NRC with some oversight capability. The NRC would have the option of directly intervening at a facility if circumstances warrant. Under this option, public access to specific Safety Culture assessments would be limited, and therefore public confidence could be negatively impacted. In the absence of direct involvement of the NRC there is a higher probability that the industry's actions in this area may not meet NRC expectations.

**Option 3E - Develop criteria for and possible intervention strategies for the NRC to take when down**

trends in the area of SCWE and/or Safety Culture already exist and the licensee has failed to take a action. This option is different from all of the other options in that it is re-active rather than pro-active. This w situation as at Davis-Besse where the licensee identified Safety Culture as a root cause and the NRC had to rel expertise and documents from the IAEA to develop an ad hoc inspection protocol.

**RECOMMENDATION:**

The staff recommends approval of Options 1B and 2B, and authorization to explore the feasibility of Options 3B and 3E.

**COORDINATION:**

The development of this paper has been coordinated with the Offices of Nuclear Regulatory Research and Nucle Regulation. The Office of General Counsel advises that actions to address Safety Culture are limited in the abse regulation. Without such regulation, the NRC cannot require licensees to meet an agency standard for Safety C most, the NRC may suggest that licensees take actions to improve Safety Culture even if serious shortcomings through inspection. The development of an NRC standard for Safety Culture which can be assessed and addres substantive NRC action would require the development of a Safety Culture regulation. Developing this type of r would pose the same difficulties as a regulation on SCWE, which the Commission previously decided not to pur Therefore, the adoption of the options discussed earlier, to the extent that they call for more active NRC oversi Culture, may require reconsideration of the Commission's determination not to initiate rulemaking in this subje

/RA/

Luis A. Reyes  
Executive Director for Operations

Attachment: Guidance Document, "Establishing and Maintaining a Safety Conscious Work Environment".

CONTACT: Lisamarie Jarriel, OE  
301-415-8529

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1. NEI 97-05, "Nuclear Power Plant Personnel-Employee Concerns Program-Process Tools In A Safety Consciou Environment," Rev. 1, January 2002.

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