

**From:** Lising, Jason  
**Sent:** Thursday, March 10, 2011 4:16 PM  
**To:** 'Sholtis@aol.com'  
**Subject:** RE: Input for NRC Safety Culture Statement for NPRs

03 MAR 2011

Mr. Sholtis,

We appreciate your input on NRC's Safety Culture Policy Statement as it relates to NPRs. This information is extremely useful and will be considered should a formal implementation plan for NPRs be discussed. The Commission has directed the staff to continue engaging in dialogue and providing the regulated communities, including non-power reactors (i.e., Research and Test Reactors), with information about the importance of a positive safety culture so that each entity can determine how to implement safety culture for its specific activities. Because this is a policy statement and not a regulation, there is no requirement that our regulated communities do anything with the policy statement but the NRC hopes that through our outreach activities, the value of developing and maintaining a positive safety culture environment will become apparent.

For your reference the Staff Requirements Memorandum (a document containing the five Commissioner's collective decision) and their individual Commission Vote Record (with comments) are publicly available for reference at <http://www.nrc.gov/reading-rm/doc-collections/commission>. Additionally, other pertinent documents and the history on the Safety Culture Policy Statement development are contained on the NRC public website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>

Should we have any further questions regarding your input, we will contact you. Thank you for your genuine concern to improve the process and enhance safety for the American people and our environment.

Very Respectfully,

*A. Jason Lising*

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**From:** [Sholtis@aol.com](mailto:Sholtis@aol.com) [<mailto:Sholtis@aol.com>]  
**Sent:** Wednesday, March 09, 2011 4:31 PM  
**To:** Lising, Jason  
**Subject:** Input for NRC Safety Culture Statement for NPRs

9 March 2011

- Jason Lising/NRC,

As a continuing TRTR member, I received your message regarding the NRC's Winter 2010-11 NPR Explorer Newsletter. I reviewed that Newsletter on-line, and have a suggested input regarding NRC's ongoing formulation of a Safety Culture Statement for Non-Power Reactors (NPRs).

First, some background is in order. I am a retired Air Force LtCol and former (Aug1980-Feb1984) Reactor Facility Director/Officer-in-Charge (OIC) of the AFRRRI Research Reactor in Bethesda, MD (NRC License# R-84). During that time (1980-1984), we were deeply involved in a contested reactor relicensing action before the Atomic Safety & Licensing Board. The intervenors, Citizens for Nuclear Reactor Safety (CNRS), were a local group concerned about the AFRRRI Reactor Facility in their neighborhood, and saw the formal AFRRRI Reactor Relicensing Action as an opportunity to learn more (at a minimum), or have the AFRRRI Reactor Facility shutdown and decommissioned (at the extreme). The contested AFRRRI Reactor Relicensing process consumed ~3.5 years, and ended with AFRRRI agreeing to give CNRS information and access that they could have readily obtained at the outset under the Freedom of Information Act. Although, AFRRRI agreed to CNRS's terms, AFRRRI, nevertheless, filed a Motion for Summary Disposition, based in large part on Affidavits I generated and legally swore to under oath. Subsequently, on 16 March 1984, the ASLB acknowledged the AFRRRI/CNRS negotiated agreement, but also granted AFRRRI's Motion for Summary Disposition - a precedent setting ruling, I believe. The purpose of all this is to provide a sense of the setting those of us at AFRRRI were living under during that contested reactor relicensing effort. To summarize - we were living in a fishbowl - absolutely everything we did was assumed to be known to the general public and, thus, the intervenors as well as the NRC, which BTW visited us often during those years. Consequently, I developed a "personal Safety Code of Conduct" for the AFRRRI Reactor & HP staff that I think represents a sort of "Safety Culture Statement." I'd like to share it with you. It was: **"Safety is paramount, and MUST be considered--AS A NORMAL MATTER OF COURSE--in EVERYTHING that we do."** It's a simple statement, but one that challenges and demands a timely, continual, and comprehensive focus on safety with personal accountability. Although this statement appears to be limited to actions/operations, it also served to identify equipment and procedure improvements at AFRRRI during those years. In fact, once it was embraced, it became contagious in a myriad of ways. As an example, then SFC Harry Spence, who I believe is still the Operations Supervisor at the AFRRRI Reactor Facility, proposed replacing the then "push only" Emergency Stop buttons in the AFRRRI Exposure Rooms with Emergency Stop buttons that when pushed "in" would remain "in;" thus, not only triggering an automatic Reactor SCRAM, but also requiring an entry into the Exposure Room giving the alarm in order to reset it. I could relate many other examples, but the point is that our "Safety Code of Conduct" at AFRRRI served to yield very positive, tangible results. Therefore, I offer that Statement for your consideration and potential modification/incorporation/integration, as appropriate, into the NRC's Safety Culture Statement for NPRs. Let me know if you have any questions.

Respectfully submitted,



Joseph A. Sholtis, Jr., Owner & Principal Consultant

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