

From: Lizette Roldan-Otero
Sent: Tuesday, October 18, 2022 11:35 AM
To: Mary Hennings Frank
Cc: Allyce Bolger (She/Her); Jeremy Groom; John Kramer
Subject: FW: Confirmatory Order Inspection 030-39216/2021-002 Report 4-2019-007 Avera McKennan
Attachments: Radiation Oncology Final copies of Willful Misconduct and Safety Culture content; 2022 8 5 Confirmatory Order Training Letter.pdf; Willful Misconduct Education PP RML 40-16571-02.pdf; Test Questions for Safety Culture RML 40-16571-02.pdf; Safety Culture Education PP RML 40-16571-02.pdf; Evaluation Questions for Willful Misconduct RML 40-16571-01.pdf; NRC Logo.png

Follow Up Flag: Follow up

Flag Status: Flagged

Dear Ms. Hennings –

We have reviewed the enclosed documents pertaining to training and it meets the expectation of what is provided in the confirmatory order. This satisfies Item E of the confirmatory order.

Please let Ms. Allyce Bolger or myself know if you have any further questions.

Thanks,

Lizette Roldán-Otero, Ph.D., Chief

P:Y40 PQQ4B :-
E s5jn0 - ' ~ D' ~ ~ D' , " "

From: R4Enforcement <R4Enforcement.Resource@nrc.gov>
Sent: Monday, August 8, 2022 9:55 AM
To: Muessle, Mary <Mary.Muessle@nrc.gov>; Miller, Geoffrey <Geoffrey.Miller@nrc.gov>; Roldan-Otero, Lizette <Lizette.Roldan-Otero@nrc.gov>
Cc: Groom, Jeremy <Jeremy.Groom@nrc.gov>; Roberts, Austin <Austin.Roberts@nrc.gov>; Kramer, John <John.Kramer@nrc.gov>; Cylkowski, David <David.Cylkowski@nrc.gov>
Subject: FW: Confirmatory Order Inspection 030-39216/2021-002 Report 4-2019-007 Avera McKennan

Email received from Avera McKennan.

John

From: Mary Hennings Frank <Mary.HenningsFrank@avera.org>
Sent: Friday, August 05, 2022 12:27 PM
To: R4Enforcement <R4Enforcement.Resource@nrc.gov>
Cc: Traci Hollingshead <Traci.Hollingshead@avera.org>
Subject: [External_Sender] Confirmatory Order Inspection 030-39216/2021-002 Report 4-2019-007 Avera McKennan

Dear Sir or Madam,

Please find enclosed, items to support the communication and training sections, of the Confirmatory Order dated May 19, 2022, for Avera McKennan.

We look forward in hearing from you soon,

Mary Hennings-Frank | Radiation Safety Officer
Avera McKennan Hospital & University Health Center
1325 S. Cliff Ave. | Sioux Falls, SD 57105
Direct: 605-322-7155 | Cell: 605-368-4609 | Fax: 605-322-7181



**McKenna Hospital
& University Health Center**

1325 S. Cliff Ave.
P.O. Box 5045
Sioux Falls, SD 57117-5045
605-322-8000

AveraMcKenna.org

August 5, 2022

U.S. Nuclear Regulatory Commission
Region IV
1600 E. Lamar Blvd
Arlington, Texas 76011-4511

Re: Confirmatory Order Modifying License – NRC Inspection Report 030-39216/2021-002 and Investigation Report 4-2019-007, Avera McKenna

Dear Sir or Madam:

A Confirmatory Order, was issued to Avera McKenna on May 19, 2022, as a result of a successful alternative dispute resolution mediation session. Please find enclosed in this e-mail, the following documents for your review and approval.

- Communication D for approval 8 5 2022
 - Training – Section E for RML #40-16571-01
 - Training – Section E For RML # 40-16571-02

If you have any question or need additional information regarding this Confirmatory Order, please contact Mary Hennings-Frank at (605) 368-4609 or Traci Hollingshead at (605) 310-0916

Sincerely,

Mary Hennings-Frank, B.S., CNMT, RSO
Radiation Safety Officer RML #40-16571-02
Avera McKenna Hospital

Sincerely,

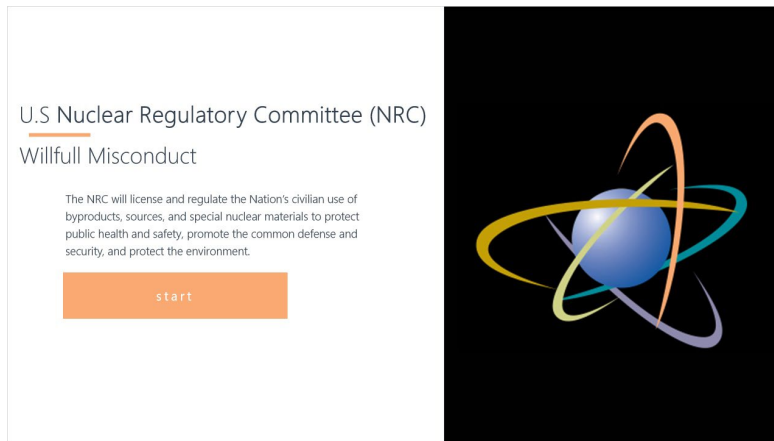
Traci Hollingshead, B.S., CNMT, RSO
Radiation Safety Officer, RML #40-16571-01
Avera McKenna Radiation Oncology

Enclosure: Supporting Documents for RML #40-16571-02 (Zip File)
Supporting Documents for RML #40-16571-01 (Outlook Item File)

Willful Misconduct

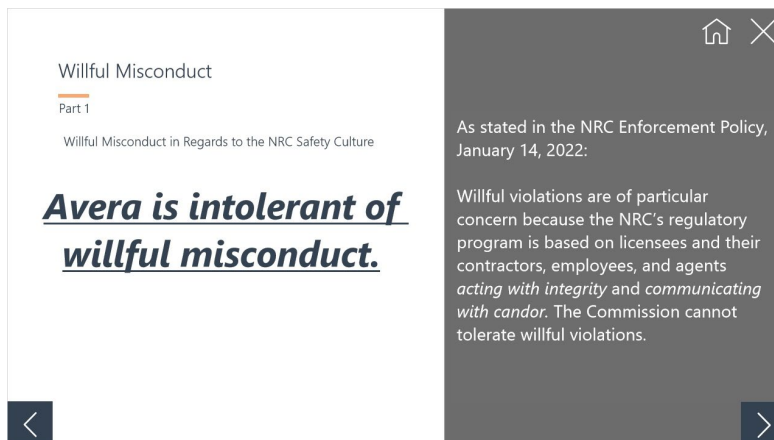
1. Self-Awareness

1.1 Title



Notes:

1.2 How do you know if you did it right?



1.3 How do you know if you did it right?

Willful Misconduct

Part 1

Willful Misconduct in Regards to the NRC Safety Culture

Avera is intolerant of willful misconduct.

The term "willfulness" as used in the NRC Enforcement Policy refers to conduct involving either a careless disregard for requirements, a deliberate violation of requirements or falsification of information.

1.4 How do you know if you did it right?


Willful Misconduct

Part 1

Willful Misconduct in Regards to the NRC Safety Culture

In determining the significance of a violation involving willfulness, the NRC will consider such factors as the:

- Position
- Training
- Experience level
- Responsibilities of the person involved in the violation (e.g., licensee official or non-supervisory employee)
- Significant of any underlying violation
- Intent of the violator (i.e., careless disregard or deliberateness)
- Economic or other advantage, if any, gained as a result of the violation



1.5 How do you know if you did it right?


Willful Misconduct

Part 1

Willful Misconduct in Regards to the NRC Safety Culture

Licenses are expected to take significant remedial action in responding to willful violations commensurate with the circumstances, such that the action reflects the seriousness of the violation, thereby creating a deterrent effect within the licensee's organization.

Civil penalty discretion should be considered for willfulness, particularly instances where the licensee made a conscious decision to be in noncompliance with NRC requirements in order to obtain an economic benefit.
(For example, a staff member knowingly altered treatment for a patient to decrease treatment times so staff member can leave earlier).



1.6 How do you know if you did it right?


Willful Misconduct

Part 1

Willful Misconduct in Regards to the NRC Safety Culture

The NRC Confirmatory Order to Avera McKennan dated May 19th, 2022 states:

"Pursuant to Section 223 of the Atomic Energy Act of 1954, as amended, any person who willfully violates, attempts to violate, or conspires to violate, any provision of the Confirmatory Order shall be subject to criminal prosecution, as set forth in that section. Violation of the Confirmatory Order may also subject the person to civil monetary penalties."



1.7 How do you know if you did it right?

Willful Misconduct


Part 1

Willful Misconduct in Regards to the NRC Safety Culture

10 CFR § 75.53 – Criminal penalties

(a) Section 223 of the Atomic Energy Act of 1954, as amended, provides for criminal sanctions or willful violation of, or conspiracy to violate, any regulation issued under sections 161b., 161i., or 161o. of the Act.

Please call the Regulatory Compliance Department at 605-322-7155 with questions.




1.8 Thank you

THANK YOU

FOR YOUR PARTICIPATION

You will now be expected to complete an evaluation regarding willful misconduct. Please select the 'X' in the upper right-hand corner of the screen to complete this portion of the course.



Notes:

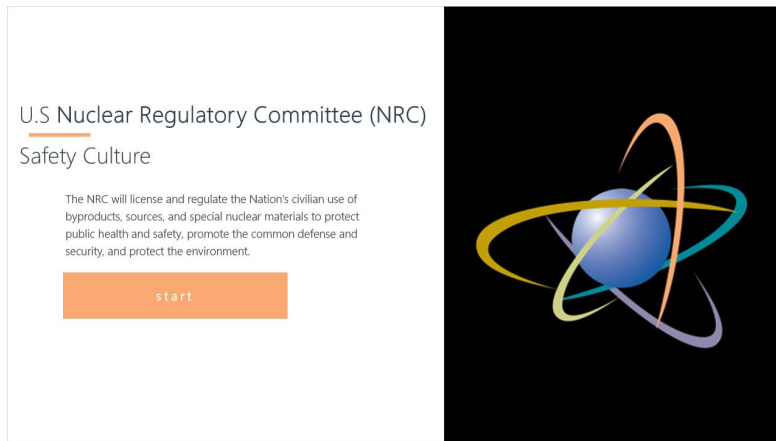
Evaluation Questions for Safety Culture and Willful Misconduct

1. Was the willful misconduct training material and content helpful to you?
 - a. Yes
 - b. No
2. Before this training, were you aware of the NRC's intolerance of deliberate misconduct?
 - a. Yes
 - b. No
3. Before this training, were you aware of the potential enforcement actions that the NRC may take against employees who engage in deliberate misconduct?
 - a. Yes
 - b. No
4. Before this training, were you aware of the associated NRC enforcement actions that may be taken against a license as a result of deliberate misconduct?
 - a. Yes
 - b. No

Safety Culture Education

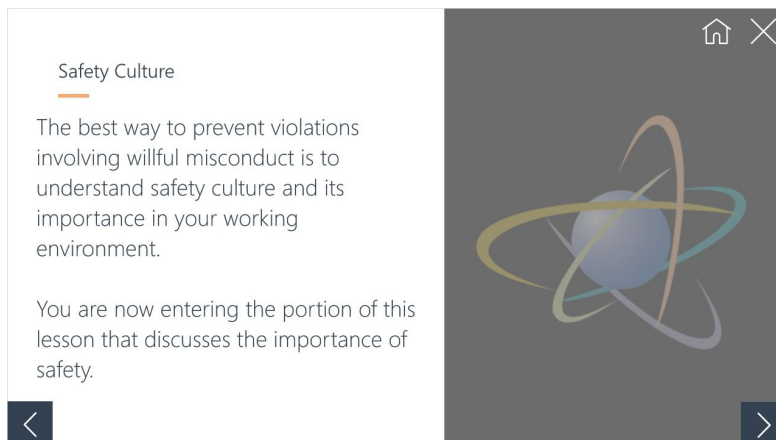
1. Self-Awareness

1.1 Title

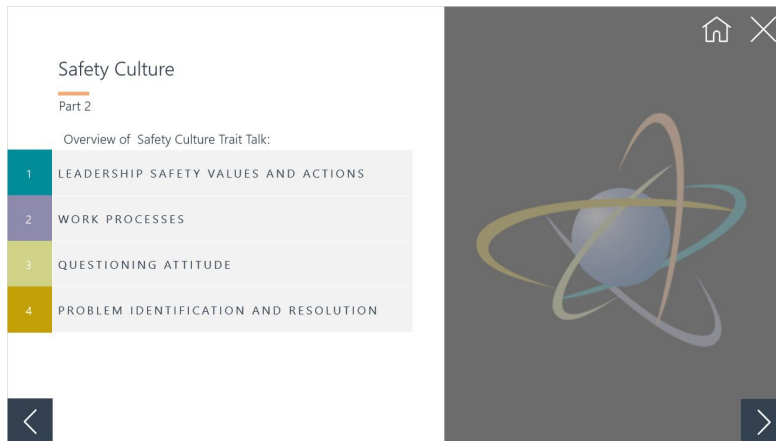


Notes:

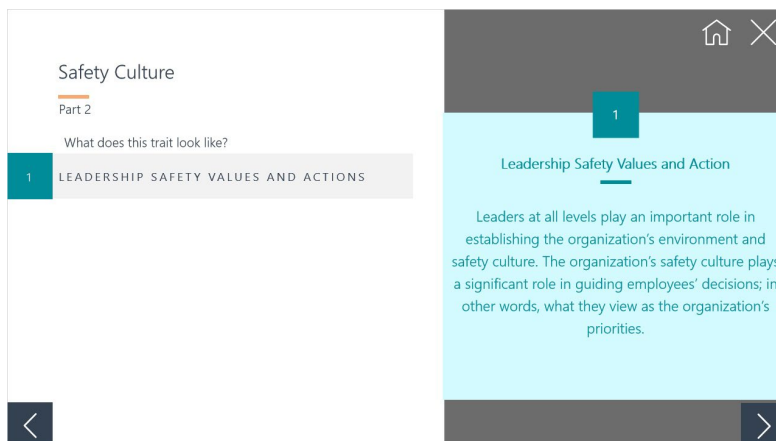
1.2 How do you know if you did it right?



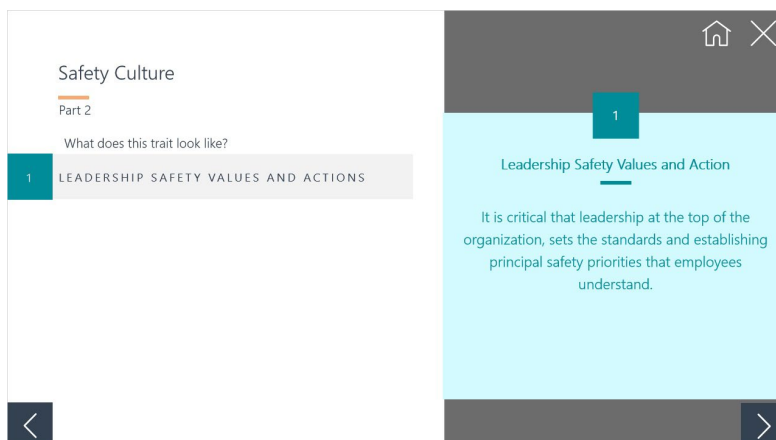
1.3 How do you know if you did it right?



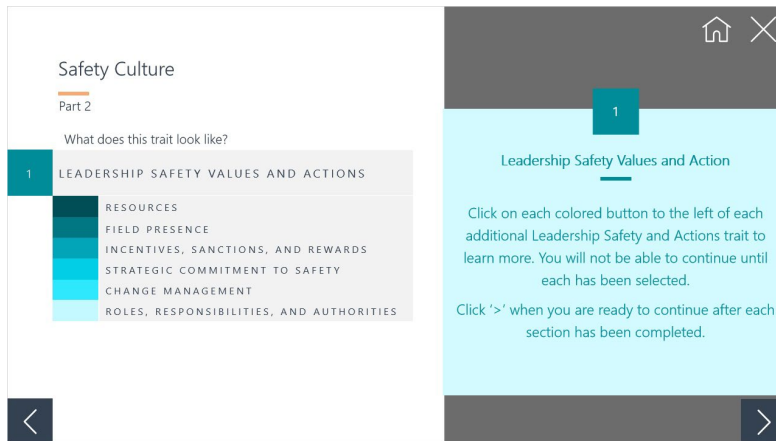
1.4 How do you know if you did it right?



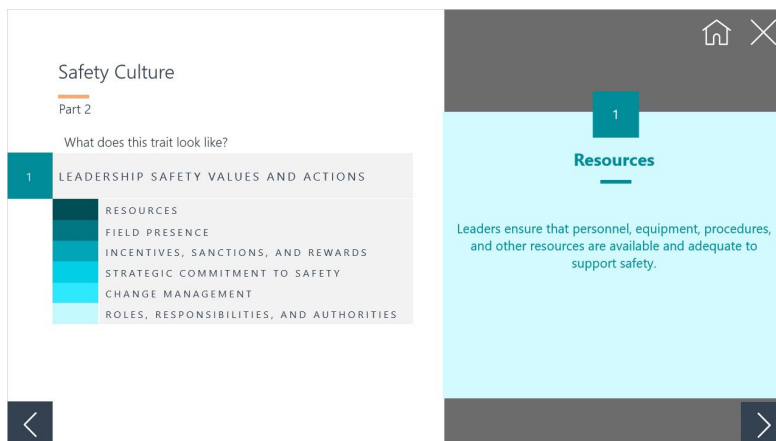
1.5 How do you know if you did it right?



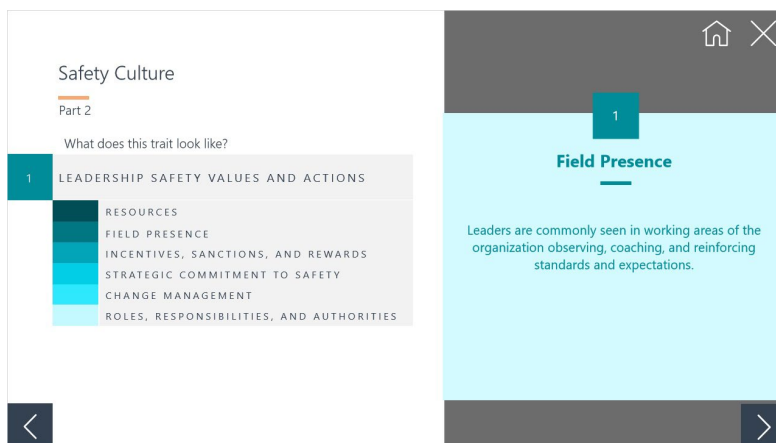
1.6 How do you know if you did it right?



Resources (Slide Layer)



Field Presence (Slide Layer)



Incentives, Sanctions, and Rewards (Slide Layer)

The screenshot displays a mobile application interface with a dark grey header and footer. The header contains a home icon and a close icon. The footer contains left and right navigation arrows. The main content area is split into two panels. The left panel, titled 'Safety Culture Part 2', asks 'What does this trait look like?' and features a vertical list of seven items: '1 LEADERSHIP SAFETY VALUES AND ACTIONS', 'RESOURCES', 'FIELD PRESENCE', 'INCENTIVES, SANCTIONS, AND REWARDS', 'STRATEGIC COMMITMENT TO SAFETY', 'CHANGE MANAGEMENT', and 'ROLES, RESPONSIBILITIES, AND AUTHORITIES'. The right panel, titled 'Incentives, Sanctions, and Rewards', shows a slide number '1' and a text box stating: 'Leaders foster an environment that promotes accountability and hold individuals accountable for their actions, by praising behaviors that reflect a positive safety culture'.

Strategic Commitment to Safety (Slide Layer)

The screenshot displays a mobile application interface with a dark grey header and footer. The header contains a home icon and a close icon. The footer contains left and right navigation arrows. The main content area is split into two panels. The left panel, titled 'Safety Culture Part 2', asks 'What does this trait look like?' and features a vertical list of seven items: '1 LEADERSHIP SAFETY VALUES AND ACTIONS', 'RESOURCES', 'FIELD PRESENCE', 'INCENTIVES, SANCTIONS, AND REWARDS', 'STRATEGIC COMMITMENT TO SAFETY', 'CHANGE MANAGEMENT', and 'ROLES, RESPONSIBILITIES, AND AUTHORITIES'. The right panel, titled 'Strategic Commitment to Safety', shows a slide number '1' and a text box stating: 'Leaders establish plans that reflect safety as the overriding priority'.

Change Management (Slide Layer)

The screenshot displays a mobile application interface with a dark grey header and footer. The header contains a home icon and a close icon. The footer contains left and right navigation arrows. The main content area is split into two panels. The left panel, titled 'Safety Culture Part 2', asks 'What does this trait look like?' and features a vertical list of seven items: '1 LEADERSHIP SAFETY VALUES AND ACTIONS', 'RESOURCES', 'FIELD PRESENCE', 'INCENTIVES, SANCTIONS, AND REWARDS', 'STRATEGIC COMMITMENT TO SAFETY', 'CHANGE MANAGEMENT', and 'ROLES, RESPONSIBILITIES, AND AUTHORITIES'. The right panel, titled 'Change Management', shows a slide number '1' and a text box stating: 'Leaders ensure safety is maintained when planning, communicating, and implementing change and ensure that unintended consequences are avoided. Individuals understand the importance of, and their role in, the change management process'.

Roles, Responsibilities, and Authorities (Slide Layer)

The screenshot shows a presentation interface. On the left, a slide titled "Safety Culture Part 2" asks "What does this trait look like?". It features a list of traits: 1. LEADERSHIP SAFETY VALUES AND ACTIONS, 2. RESOURCES, 3. FIELD PRESENCE, 4. INCENTIVES, SANCTIONS, AND REWARDS, 5. STRATEGIC COMMITMENT TO SAFETY, 6. CHANGE MANAGEMENT, and 7. ROLES, RESPONSIBILITIES, AND AUTHORITIES. The right panel displays the content for trait 7, "Roles, Responsibilities, and Authorities".

Roles, Responsibilities, and Authorities

Leaders clearly define roles, responsibilities, and authorities to ensure safety.

Leaders appropriately delegate responsibility and authority to promote ownership and accountability.

1.7 How do you know if you did it right?

The screenshot shows a presentation interface. On the left, a slide titled "Safety Culture Part 2" asks "What does this trait look like?". It features a list of traits: 1. LEADERSHIP SAFETY VALUES AND ACTIONS and 2. WORK PROCESSES. The right panel displays the content for trait 2, "Work Processes".

Work Processes

Work activities will be prioritized, coordinated across workgroups, and communicated effectively. Policies and procedures will incorporate the appropriate risk insights and be effectively planned, executed, verified, and documented. The rigorous development, management and adherence to work processes helps ensure the safe use of radiation sources and reflects a positive safety culture.

The NRC defines this trait as when the process of planning and controlling work activities is implemented so that safety is maintained.

1.8 How do you know if you did it right?

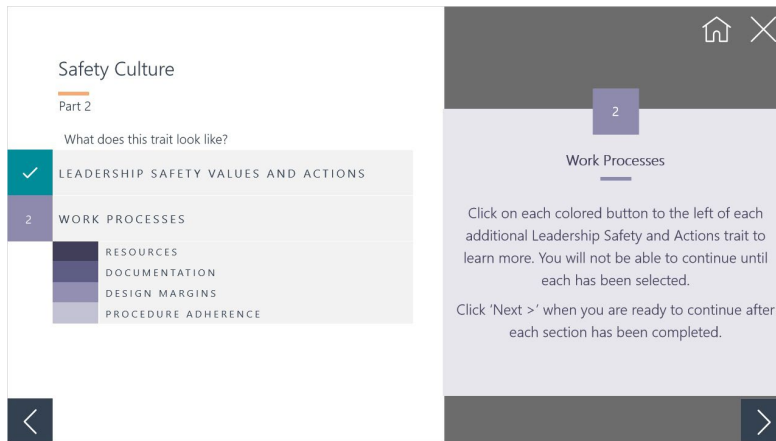
The screenshot shows a presentation interface. On the left, a slide titled "Safety Culture Part 2" asks "What does this trait look like?". It features a list of traits: 1. LEADERSHIP SAFETY VALUES AND ACTIONS (marked with a checkmark) and 2. WORK PROCESSES. The right panel displays the content for trait 2, "Work Processes".

Work Processes

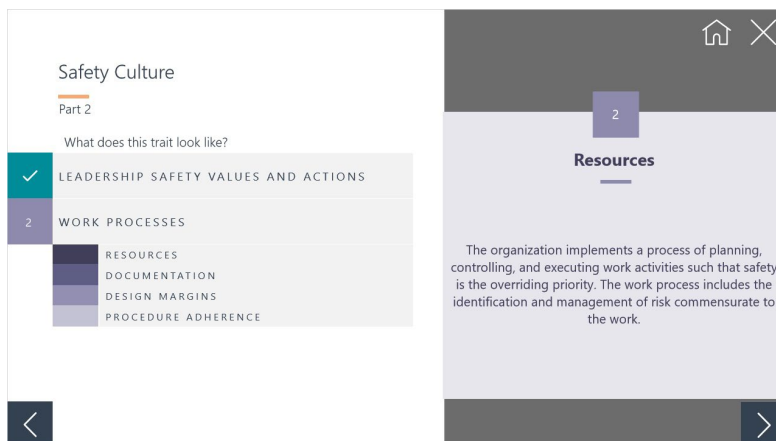
High reliability organizations, however, may base activities around individual expertise and professionalism, autonomy, and rapid team-based response, particularly during off-normal conditions, (pandemic, natural disaster, downtime, short staffing, etc).

The NRC defines this trait as when the process of planning and controlling work activities is implemented so that safety is maintained.

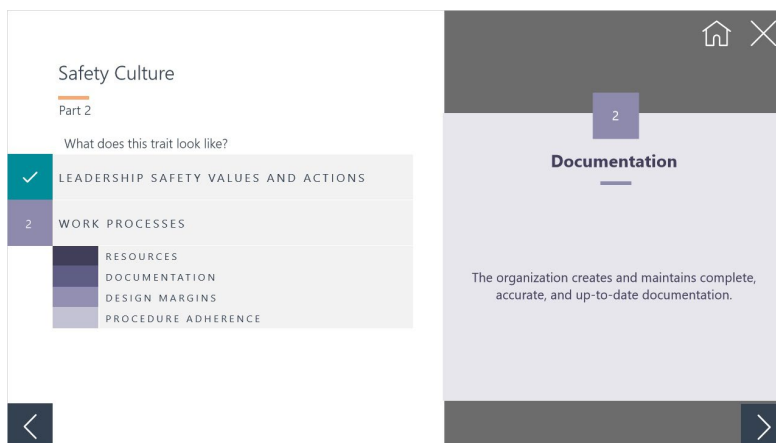
1.9 How do you know if you did it right?



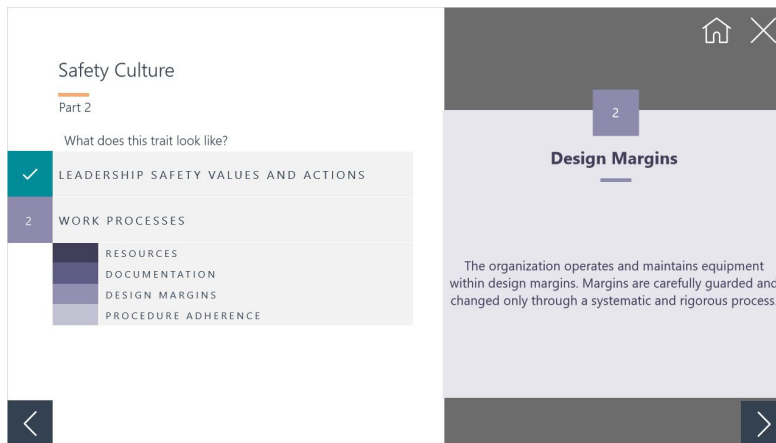
Resources (Slide Layer)



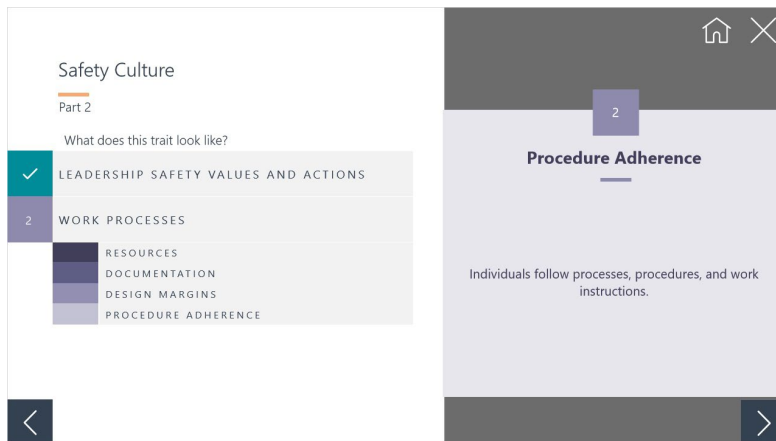
Documentation (Slide Layer)



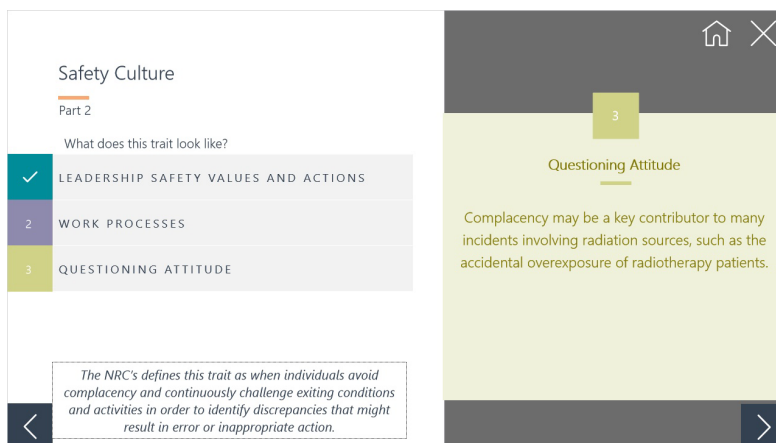
Design Margins (Slide Layer)



Procedure Adherence (Slide Layer)



1.10 How do you know if you did it right?



1.11 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture Part 2'. On the left, a sidebar menu titled 'What does this trait look like?' lists three items: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (checked), and 'QUESTIONING ATTITUDE' (selected with a green square and the number 3). Below the menu, a text box states: 'The NRC's defines this trait as when individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action.' The main content area on the right is titled 'Questioning Attitude' and contains a paragraph: 'Avoiding complacency is essential to ensuring radiation protection of workers and patients and can be achieved by instilling a questioning attitude in every employee. From the medical radiation technologist questioning an anomalous data point, to the medical radiation practitioner questioning an unexpected change in treatment parameters, having a questioning attitude is vital for the safe use of radiation sources and a positive safety culture.'

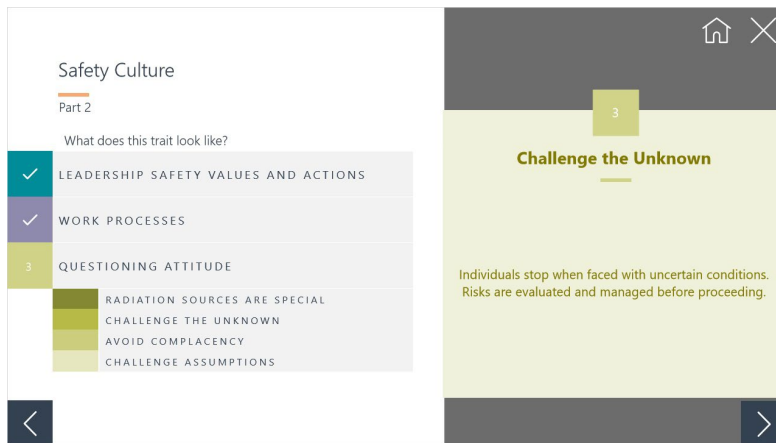
1.12 How do you know if you did it right?

The screenshot shows the same mobile application interface, but now 'Work Processes' is selected in the sidebar menu. The main content area is titled 'Work Processes' and contains a paragraph: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected. Click 'Next >' when you are ready to continue after each section has been completed.'

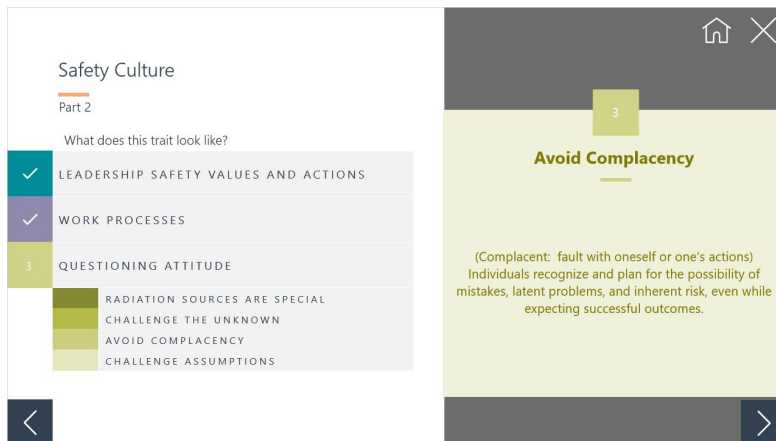
Radiation Sources are Special (Slide Layer)

The screenshot shows the mobile application interface with 'Radiation Sources are Special' selected in the sidebar menu. The main content area is titled 'Radiation Sources are Special' and contains a paragraph: 'Individuals understand that complex technologies can fail in unpredictable ways.'

Challenge the Unknown (Slide Layer)



Avoid Complacency (Slide Layer)



Challenge Assumptions (Slide Layer)



1.13 How do you know if you did it right?

Safety Culture
Part 2

What does this trait look like?

- ✓ LEADERSHIP SAFETY VALUES AND ACTIONS
- ✓ WORK PROCESSES
- 3 QUESTIONING ATTITUDE
- 4 PROBLEM IDENTIFICATION AND RESOLUTION

The NRC's defines this trait as when issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.

Problem Identification and Resolution

An effective problem identification and resolution program uses the organization's corrective action program, operating experience, and self-assessment results to ensure safe operations. The corrective action program should have a transparent process for evaluating, prioritizing, and resolving issues.

1.14 How do you know if you did it right?

Safety Culture
Part 2

What does this trait look like?

- ✓ LEADERSHIP SAFETY VALUES AND ACTIONS
- ✓ WORK PROCESSES
- ✓ QUESTIONING ATTITUDE
- 4 PROBLEM IDENTIFICATION AND RESOLUTION

The NRC's defines this trait as when issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.

Problem Identification and Resolution

Organizations can approach problem identification and resolution with different mindsets. One mindset focuses on finding existing problems and correcting weaknesses, typically through the organization's corrective action program. However, an organization with a positive safety culture also has a problem identification and resolution program that anticipates issues, reviews operating experience, and tracks emerging themes and trends.

1.15 How do you know if you did it right?

Safety Culture
Part 2

What does this trait look like?

- ✓ LEADERSHIP SAFETY VALUES AND ACTIONS
- ✓ WORK PROCESSES
- 3 QUESTIONING ATTITUDE
- 4 PROBLEM IDENTIFICATION AND RESOLUTION

The NRC's defines this trait as when issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.

Problem Identification and Resolution

Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected.

Click 'Next >' when you are ready to continue after each section has been completed.

Identification (Slide Layer)

The screenshot shows a presentation slide titled "Safety Culture" with a subtitle "Part 2". Below the title is the question "What does this trait look like?". A list of four traits is shown, each with a checkmark and a number: 1. LEADERSHIP SAFETY VALUES AND ACTIONS (green checkmark), 2. WORK PROCESSES (purple checkmark), 3. QUESTIONING ATTITUDE (green checkmark), and 4. PROBLEM IDENTIFICATION AND RESOLUTION (yellow checkmark). Below this list is a sub-menu with four options: IDENTIFICATION (dark brown), TRENDING (light brown), RESOLUTION (yellow), and EVALUATION (light yellow). The "Identification" option is selected. The main content area of the slide is yellow and contains the text: "The organization implements a corrective action program with a low threshold for identifying issues. Individuals identify issues completely, accurately, and in a timely manner in accordance with the program." The slide has a dark grey header with a home icon and a close icon, and a dark grey footer with left and right navigation arrows.

Trending (Slide Layer)

The screenshot shows a presentation slide titled "Safety Culture" with a subtitle "Part 2". Below the title is the question "What does this trait look like?". A list of four traits is shown, each with a checkmark and a number: 1. LEADERSHIP SAFETY VALUES AND ACTIONS (green checkmark), 2. WORK PROCESSES (purple checkmark), 3. QUESTIONING ATTITUDE (green checkmark), and 4. PROBLEM IDENTIFICATION AND RESOLUTION (yellow checkmark). Below this list is a sub-menu with four options: IDENTIFICATION (dark brown), TRENDING (light brown), RESOLUTION (yellow), and EVALUATION (light yellow). The "Trending" option is selected. The main content area of the slide is yellow and contains the text: "The organization periodically analyzes information from the corrective action program and other assessments in the aggregate to identify programmatic and common cause issues." The slide has a dark grey header with a home icon and a close icon, and a dark grey footer with left and right navigation arrows.

Resolution (Slide Layer)

The screenshot shows a presentation slide titled "Safety Culture" with a subtitle "Part 2". Below the title is the question "What does this trait look like?". A list of four traits is shown, each with a checkmark and a number: 1. LEADERSHIP SAFETY VALUES AND ACTIONS (green checkmark), 2. WORK PROCESSES (purple checkmark), 3. QUESTIONING ATTITUDE (green checkmark), and 4. PROBLEM IDENTIFICATION AND RESOLUTION (yellow checkmark). Below this list is a sub-menu with four options: IDENTIFICATION (dark brown), TRENDING (light brown), RESOLUTION (yellow), and EVALUATION (light yellow). The "Resolution" option is selected. The main content area of the slide is yellow and contains the text: "The organization takes effective corrective actions to address issues in a timely manner." The slide has a dark grey header with a home icon and a close icon, and a dark grey footer with left and right navigation arrows.

Evaluations (Slide Layer)

Safety Culture
Part 2

What does this trait look like?

- ✓ LEADERSHIP SAFETY VALUES AND ACTIONS
- ✓ WORK PROCESSES
- 3 QUESTIONING ATTITUDE
- 4 PROBLEM IDENTIFICATION AND RESOLUTION

IDENTIFICATION
TRENDING
RESOLUTION
EVALUATION

4
Evaluation

The organization thoroughly evaluates problems to ensure that resolutions address causes and extents of conditions commensurate with their safety significance.

1.16 How do you know if you did it right?

Safety Culture
Part 3

Overview of Safety Culture Trait Talk:

- 5 ENVIRONMENT FOR RAISING CONCERNS
- 6 EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT
- 8 CONTINUOUS LEARNING
- 9 PERSONAL ACCOUNTABILITY

Graphic of an atom with a blue nucleus and yellow, green, and blue orbits.

1.17 How do you know if you did it right?

Safety Culture
Part 3

What does this trait look like?

- 5 ENVIRONMENT FOR RAISING CONCERN

5
Environment for Raising Concerns

Employees should feel free to raise safety concerns to their management without fear of harassment, intimidation, retaliation, or discrimination.

The organization should clearly identify the process that employees may use to raise concerns, such as discussing issues with their supervisor or filing deficiency reports for problem identification and resolution.

The NRC defines this trait as maintaining a safety-conscious work environment where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination.

1.18 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture'. On the left, a sidebar menu titled 'Safety Culture' and 'Part 3' contains a question 'What does this trait look like?'. Below the question is a list of three options: '5 ENVIRONMENT FOR RAISING CONCERNS' (highlighted with a teal square), 'SAFETY CONSCIOUS WORK ENVIRONMENT', and 'ALTERNATE PROCESS FOR RAISING CONCERNS'. At the bottom of the sidebar, a quote states: 'The NRC defines this trait as maintaining a safety-conscious work environment where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination.' The main content area on the right is titled 'Environment For Raising Concerns' and contains a paragraph: 'Organizations should have a work environment where employees are encourage to raise safety concerns and where those concerns are reviewed promptly, given the proper priority based on their potential safety significance, and appropriately resolved, with timely feedback to the originator of the concerns and to other employees as appropriate.'

1.19 How do you know if you did it right?

This screenshot is similar to the previous one but includes additional instructions. The sidebar menu on the left is the same. The main content area on the right, titled 'Environment For Raising Concerns', now includes a paragraph: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected.' Below this, it says: 'Click 'Next >' when you are ready to continue after each section has been completed.'

Safety Conscious Work Environment (Slide Layer)

The screenshot shows the 'Safety Conscious Work Environment (SCWE)' slide layer. The sidebar menu on the left is the same. The main content area on the right is titled 'Safety Conscious Work Environment (SCWE)' and contains a paragraph: 'The organization supports individuals' right and responsibilities to raise safety concerns and does not tolerate harassment, intimidation, retaliation, or discrimination for doing so.'

Alternate Process for Raising Concerns (Slide Layer)

The screenshot shows a presentation interface with a left sidebar and a main content area. The sidebar, titled 'Safety Culture' and 'Part 3', lists three items: 'ENVIRONMENT FOR RAISING CONCERNS' (highlighted with a teal square and the number 5), 'SAFETY CONSCIOUS WORK ENVIRONMENT', and 'ALTERNATE PROCESS FOR RAISING CONCERNS'. The main content area displays a slide titled 'Alternate Process for Raising Concerns' with a teal header and the text: 'Safety issues may be raised in confidence and are resolved in a timely and effective manner.'

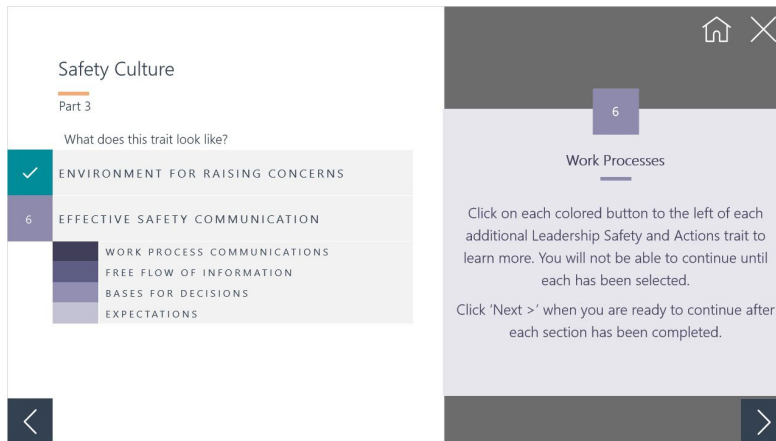
1.20 How do you know if you did it right?

The screenshot shows a presentation interface. The sidebar, titled 'Safety Culture' and 'Part 3', lists 'ENVIRONMENT FOR RAISING CONCERNS' and 'EFFECTIVE SAFETY COMMUNICATION' (highlighted with a purple square and the number 6). The main content area displays a slide titled 'Effective Safety Communication' with a purple header and the text: 'Effective safety communication is vital to maintaining a safety culture. When employees regularly communicate with each other in an open, respectful manner, they are also more willing to give and receive feedback. Effective communication also supports teamwork and coordination between groups.'

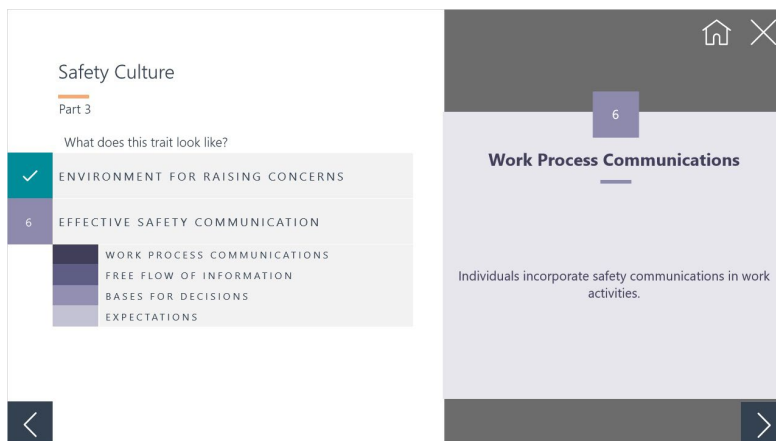
1.21 How do you know if you did it right?

The screenshot shows a presentation interface. The sidebar, titled 'Safety Culture' and 'Part 3', lists 'ENVIRONMENT FOR RAISING CONCERNS' (highlighted with a teal square and a checkmark) and 'EFFECTIVE SAFETY COMMUNICATION' (highlighted with a purple square and the number 6). The main content area displays a slide titled 'Effective Safety Communication' with a purple header and the text: 'Top-down communication is most effective when senior managers communicate directly with immediate supervisors and immediate supervisors communicate with their staff. Ensuring that supervisors are informed about organizational issues, and then allowing them to communicate these issues to their staff, helps create and reinforce the supervisor's power.'

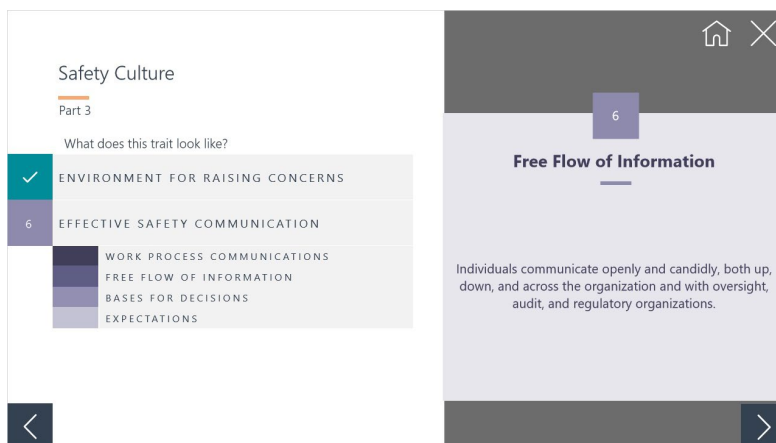
1.22 How do you know if you did it right?



Work Process Communications (Slide Layer)



Free Flow of Information (Slide Layer)



Bases for Decisions (Slide Layer)

The screenshot displays a mobile application interface with a dark grey header and footer. The header contains a home icon and a close icon. The main content area is divided into two panels. The left panel, titled 'Safety Culture' and 'Part 3', asks 'What does this trait look like?' and lists five traits: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (selected with a purple square), 'WORK PROCESS COMMUNICATIONS', 'FREE FLOW OF INFORMATION', and 'BASES FOR DECISIONS' (highlighted in light grey). The right panel, titled 'Basis for Decisions' with a purple square icon '6', contains the text: 'Leaders ensure that the bases for operational and organizational decisions are communicated in a timely manner.'

Expectations (Slide Layer)

The screenshot displays a mobile application interface with a dark grey header and footer. The header contains a home icon and a close icon. The main content area is divided into two panels. The left panel, titled 'Safety Culture' and 'Part 3', asks 'What does this trait look like?' and lists five traits: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (selected with a purple square), 'WORK PROCESS COMMUNICATIONS', 'FREE FLOW OF INFORMATION', and 'BASES FOR DECISIONS' (highlighted in light grey). The right panel, titled 'Expectations' with a purple square icon '6', contains the text: 'Leaders frequently communicate and reinforce the expectation that radiation safety is the organization's overriding priority.'

1.23 How do you know if you did it right?

The screenshot displays a mobile application interface with a dark grey header and footer. The header contains a home icon and a close icon. The main content area is divided into two panels. The left panel, titled 'Safety Culture' and 'Part 3', asks 'What does this trait look like?' and lists five traits: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (selected with a purple square), and 'RESPECTFUL WORK ENVIRONMENT' (selected with a green square). The right panel, titled 'Respectful Work Environment' with a green square icon '7', contains the text: 'Trust and respect are among the most frequently discussed concepts in studies of organizational and safety culture. Trust and respect are fundamental to positive interpersonal relationships and central components of effective working relationships.'

The NRC defines the trait as when trust and respect permeates the organization.

1.24 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture'. On the left, a sidebar menu titled 'Safety Culture' and 'Part 3' lists three items: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), and 'RESPECTFUL WORK ENVIRONMENT' (highlighted with a green bar and the number 7). Below the menu, a text box states: 'The NRC defines the trait as when trust and respect permeates the organization.' On the right, the main content area is titled 'Respectful Work Environment' with a green bar and the number 7. It contains a paragraph: 'At an individual level, trust involves the willingness of one person to depend on another person, with a relative sense of security. The perception that an individual is competent, has integrity, and is predictable increases the likelihood that he is trusted and respected.' The interface includes a home icon and a close icon at the top right, and navigation arrows at the bottom.

1.25 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture'. On the left, a sidebar menu titled 'Safety Culture' and 'Part 3' lists three items: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), and 'RESPECTFUL WORK ENVIRONMENT' (highlighted with a green bar and the number 7). Below the menu, a text box states: 'The NRC defines the trait as when trust and respect permeates the organization.' On the right, the main content area is titled 'Respectful Work Environment' with a green bar and the number 7. It contains a paragraph: 'At an organizational level, trust and respect instill confidence that the organization is just and fair, which promotes open communication and accurate reporting, enhances organizational learning, and promotes the development of shared perceptions and norms. In studies of safety culture, higher levels of trust and respect are associated with positive safety attitudes, reduced risky behavior, and increased personal responsibility for safety.' The interface includes a home icon and a close icon at the top right, and navigation arrows at the bottom.

1.26 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture'. On the left, a sidebar menu titled 'Safety Culture' and 'Part 3' lists three items: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), and 'RESPECTFUL WORK ENVIRONMENT' (highlighted with a green bar and the number 7). Below the menu, a list of sub-points is shown: 'RESPECT IS EVIDENT', 'HIGH LEVEL OF TRUST', 'OPINIONS ARE VALUED', and 'CONFLICT RESOLUTION'. On the right, the main content area is titled 'Respectful Work Environment' with a green bar and the number 7. It contains two paragraphs: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected.' and 'Click 'Next >' when you are ready to continue after each section has been completed.' The interface includes a home icon and a close icon at the top right, and navigation arrows at the bottom.

Respect is Evident (Slide Layer)

The screenshot shows a two-panel interface. The left panel, titled 'Safety Culture Part 3', asks 'What does this trait look like?' and lists four traits with progress indicators: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), 'RESPECTFUL WORK ENVIRONMENT' (7), and a sub-section for 'RESPECT IS EVIDENT' which includes 'HIGH LEVEL OF TRUST', 'OPINIONS ARE VALUED', and 'CONFLICT RESOLUTION'. The right panel features a dark header with a home icon and a close button, a green box with the number '7', the title 'Respect is Evident', and the text 'Everyone is treated with dignity and respect.' at the bottom. Navigation arrows are present at the bottom of both panels.

High Level of Trust (Slide Layer)

The screenshot shows a two-panel interface. The left panel, titled 'Safety Culture Part 3', asks 'What does this trait look like?' and lists four traits with progress indicators: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), 'RESPECTFUL WORK ENVIRONMENT' (7), and a sub-section for 'RESPECT IS EVIDENT' which includes 'HIGH LEVEL OF TRUST', 'OPINIONS ARE VALUED', and 'CONFLICT RESOLUTION'. The right panel features a dark header with a home icon and a close button, a green box with the number '7', the title 'High Level of Trust', and the text 'Trust is fostered among individuals and work groups throughout the organization.' at the bottom. Navigation arrows are present at the bottom of both panels.

Opinions are Valued (Slide Layer)

The screenshot shows a two-panel interface. The left panel, titled 'Safety Culture Part 3', asks 'What does this trait look like?' and lists four traits with progress indicators: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), 'RESPECTFUL WORK ENVIRONMENT' (7), and a sub-section for 'RESPECT IS EVIDENT' which includes 'HIGH LEVEL OF TRUST', 'OPINIONS ARE VALUED', and 'CONFLICT RESOLUTION'. The right panel features a dark header with a home icon and a close button, a green box with the number '7', the title 'Opinions are Valued', and the text 'Individuals are encouraged to voice concerns, provide suggestions, and raise questions. Differing opinions are respected.' at the bottom. Navigation arrows are present at the bottom of both panels.

Conflict Resolution (Slide Layer)

The slide is titled "Conflict Resolution" and is part of a "Safety Culture" presentation. It features a sidebar on the left with a list of traits: "ENVIRONMENT FOR RAISING CONCERNS", "EFFECTIVE SAFETY COMMUNICATION", "RESPECTFUL WORK ENVIRONMENT", and "CONTINUOUS LEARNING". The "RESPECTFUL WORK ENVIRONMENT" trait is highlighted with a green checkmark and the number 7. The main content area on the right has a green background and contains the text "Fair and objective methods are used to resolve conflicts." The slide is numbered 7 in the top right corner.

1.27 How do you know if you did it right?

The slide is titled "Continuous Learning" and is part of a "Safety Culture" presentation. It features a sidebar on the left with a list of traits: "ENVIRONMENT FOR RAISING CONCERNS", "EFFECTIVE SAFETY COMMUNICATION", "RESPECTFUL WORK ENVIRONMENT", and "CONTINUOUS LEARNING". The "CONTINUOUS LEARNING" trait is highlighted with a green checkmark and the number 8. The main content area on the right has a green background and contains the text "At the individual and team level, continuous learning includes obtaining knowledge, determining how that knowledge applies to the work of the individual and the team, as well as sharing that knowledge and ensuring that it is retained in the organization." The slide is numbered 8 in the top right corner.

1.28 How do you know if you did it right?

The slide is titled "Continuous Learning" and is part of a "Safety Culture" presentation. It features a sidebar on the left with a list of traits: "ENVIRONMENT FOR RAISING CONCERNS", "EFFECTIVE SAFETY COMMUNICATION", "RESPECTFUL WORK ENVIRONMENT", and "CONTINUOUS LEARNING". The "CONTINUOUS LEARNING" trait is highlighted with a green checkmark and the number 8. The main content area on the right has a green background and contains the text "Leadership at all of these levels must focus on learning, teaching, and changing an organization into a learning organization." The slide is numbered 8 in the top right corner.

1.29 How do you know if you did it right?

The screenshot shows a mobile application interface. On the left, a sidebar titled 'Safety Culture' contains a list of traits. The first four traits are checked: 'ENVIRONMENT FOR RAISING CONCERNS', 'EFFECTIVE SAFETY COMMUNICATION', 'RESPECTFUL WORK ENVIRONMENT', and 'CONTINUOUS LEARNING'. The last four are unchecked: 'OPERATING EXPERIENCE', 'TRAINING', 'SELF-ASSESSMENT', and 'BENCHMARKING'. The 'CONTINUOUS LEARNING' trait is highlighted with a yellow background. On the right, the main content area is titled 'Continuous Learning' and contains the text: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected. Click 'Next >' when you are ready to continue after each section has been completed.'

Operating Experience (Slide Layer)

The screenshot shows the same mobile application interface, but the 'Operating Experience' trait is now highlighted in the sidebar. The main content area is titled 'Operating Experience' and contains the text: 'The organization systematically and effectively collects, evaluates, and implements, relevant internal and external operating experience in a timely manner.'

Training (Slide Layer)

The screenshot shows the same mobile application interface, but the 'TRAINING' trait is now highlighted in the sidebar. The main content area is titled 'Training' and contains the text: 'The organization provides training and ensures knowledge transfer to maintain a knowledgeable, technically competent workforce and instill radiation safety values.'

Self-Assessment (Slide Layer)

Safety Culture
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT
- 8 CONTINUOUS LEARNING
- OPERATING EXPERIENCE
- TRAINING
- SELF-ASSESSMENT
- BENCHMARKING

Self-Assessment

The organization routinely conducts self-critical and objective assessment of its programs and practices.

This is conducted by the Radiation Safety Officer.

Benchmarking (Slide Layer)

Safety Culture
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT
- 8 CONTINUOUS LEARNING
- OPERATING EXPERIENCE
- TRAINING
- SELF-ASSESSMENT
- BENCHMARKING

Benchmarking

The organization learns from other organizations to continuously improve knowledge, skills, and safety performance.

1.30 How do you know if you did it right?

Safety Culture
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- ✓ RESPECTFUL WORK ENVIRONMENT
- 8 CONTINUOUS LEARNING
- 9 PERSONAL ACCOUNTABILITY

The NRC defines the trait as all individuals take personal responsibility for safety.

Personal Accountability

Personal accountability reflects the belief that both leaders and employees are individually responsible for their performance and the roles they play in radiation protection. Personal accountability means taking radiation protection values seriously and taking responsibility for upholding radiation protection standards.

1.31 How do you know if you did it right?

Safety Culture
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- ✓ QUESTIONING ATTITUDE
- ✓ CONTINUOUS LEARNING
- 9 PERSONAL ACCOUNTABILITY

The NRC defines the trait as all individuals take personal responsibility for safety.

Personal Accountability

Leaders can develop personal accountability within their organization by empowering employees. They give employees the skills and training needed to communicate, explain, and do their jobs well. They set performance objectives with specific behaviors and outcomes and evaluate performance and give timely feedback.

1.32 How do you know if you did it right?

Safety Culture
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- ✓ RESPECTFUL WORK ENVIRONMENT
- CONTINUOUS LEARNING
- 9 PERSONAL ACCOUNTABILITY
- TEAMWORK

Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected.

Click 'Next >' when you are ready to continue after each section has been completed.

High Standards (Slide Layer)

Safety Culture
Part 3

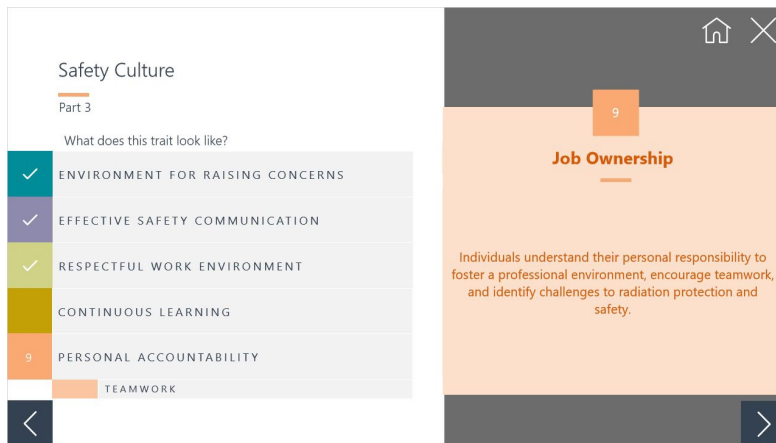
What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- ✓ RESPECTFUL WORK ENVIRONMENT
- CONTINUOUS LEARNING
- 9 PERSONAL ACCOUNTABILITY
- TEAMWORK

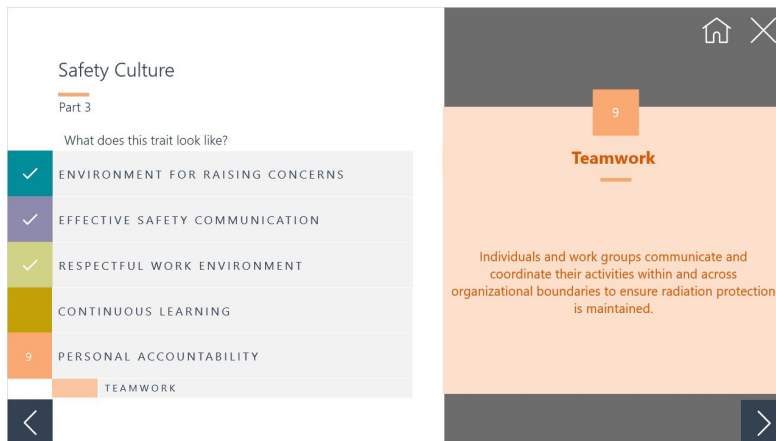
High Standards

Individuals encourage each other to adhere to high standards. They demonstrate a proper focus on radiation protection and reinforce this focus through peer coaching and discussions.

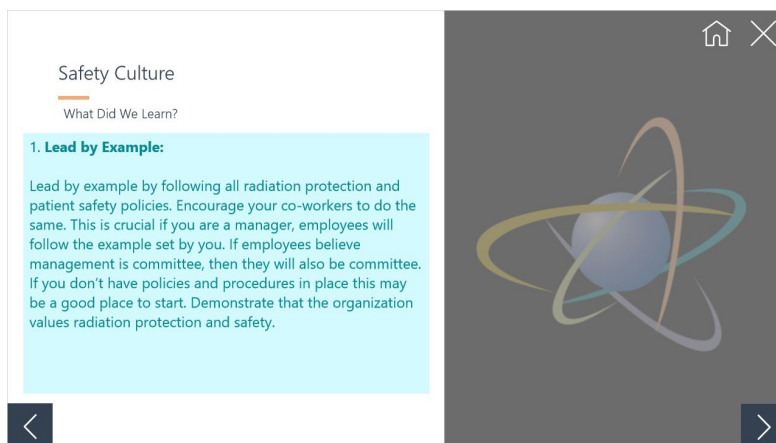
Job Ownership (Slide Layer)



Teamwork (Slide Layer)



1.33 How do you know if you did it right?




1.34 How do you know if you did it right?

Safety Culture

What Did We Learn?

2. Communicate

Start communicating with your co-workers and management. Strong communication will reduce errors and misunderstandings. This can lead to a better more effective radiation protection program. Developed policies and procedures need to be communicated to assure that these are understood and what expectations are expected of both employees and management. Employees should feel comfortable raising awareness to undesirable situations. A great way to improve communication is the hold weekly or monthly talks. Increase worker interest by letting them lead the talks. Policies and procedures should be easily accessible to all staff. Implement pathways for both the formal and informal communication. Consider electronic communication with and between staff.




1.35 How do you know if you did it right?

Safety Culture

What Did We Learn?

3. Prioritize a few critical activities

It is easily to be overwhelmed and achieve nothing. It is better to begin with small achievable steps. Formalizing through procedures and communication how to assure that the correct patient is imaged or treated. Develop or participate in an incident learning system. Establish technique charts that will be used for the purpose of optimization of radiation exposure in diagnostic imaging. Assure employees have the correct tools. Don't take short cuts, such as not optimizing when performing digital imaging examinations.




1.36 How do you know if you did it right?

Safety Culture

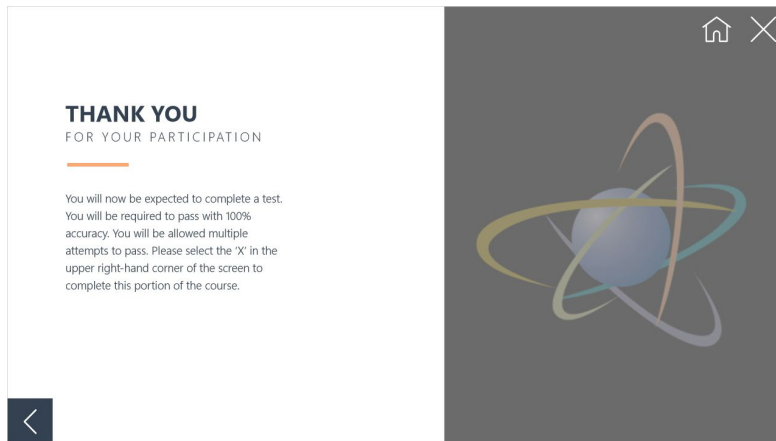
What Did We Learn?

4. Involve employees

To build a strong radiation safety culture, it must start from the ground up. Employees must be included in the improvement project, they should identify challenges and solutions. Have employees participate in meetings where they can identify ways to improve radiation safety culture. Employees should demand a radiation safe environment. Employees should receive comprehensive training to assure a strong radiation safety culture is in place. Employees should have access to complete all the training for their positions.



1.37 Thank you



Notes:

Test Questions for Safety Culture and Willful Misconduct

1. Open communication, fairness, and management accountability are the most frequently identified mechanisms that build _____ in an organization.
 - a. **Trust and Respect**
 - b. Decision and Support
 - c. Roles and Authorities
 - d. Expectations and Rewards
2. What trait encourages employees to raise safety concerns to their management without fear of harassment, intimidation, retaliation, or discrimination?
 - a. Effective Safety Communication
 - b. Leadership Responsibility
 - c. Problem Identification and Resolution
 - d. **Environment for Raising Concerns**
3. The organization ensures that activities that could affect radiation protection or safety are conducted with particular care, caution, and oversight. Individuals recognize the special characteristics and unique hazards of radiation and radiation sources, and the importance of features designed to maintain nuclear safety.
 - a. **True**
 - b. False
4. What trait were individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action. All employees are watchful for assumptions, anomalies, values, conditions, or activities that can have an undesirable effect on facility safety.
 - a. Work Processes
 - b. **Questioning Attitude**
 - c. Continuous Learning
5. What trait allows leaders should ensure that they and the rest of the organization fully understand safety-related issues. Without full understanding, the organization cannot appropriately prioritize and resolve these tissues so that they do not occur again.
 - a. Individual Responsibility
 - b. Questioning Attitude
 - c. Leadership Responsibility
 - d. **None of the above**
6. In organizations with positive safety cultures, individuals have a strong sense of accountability for the safe operation of the facility, their own safety, and for the safety of their coworkers and the public. In medical settings, this includes accountability at all levels for the safety of the patients, and their family members.
 - a. **True**
 - b. False

7. Work Process Trait can be defined as: Individuals demonstrate a strong sense of collaboration and cooperation in connection with projects and operational activities. They work as a team to provide peer-checks, verify certifications and training, ensure detailed safety practices, actively peer coach new personnel, and share tools and publications. Individuals strive to meet commitments.
 - a. True
 - b. **False**
8. SCWE is a policy that stands for what?
 - a. **Safety Conscious Work Environment**
 - b. Safety Concern Work Environment
 - c. Safety Cause Work Environment
 - d. Safety Conscience Work Environment
9. Operating experience is highly valued, and the capacity to learn from experience is well developed. Safety is kept constant scrutiny through a variety of monitoring techniques, some of which provide an independent “fresh look” is considered what trait?
 - a. Problem Identification and Resolution
 - b. Respectful Work Environment
 - c. Individual Responsibility
 - d. **Continuous Learning**
10. Every morning, the nuclear medicine department receives delivery of all the radiopharmaceutical dosages they will be using on that day. These dosages are delivered in packages that each contain multiple dosages for different types of scans.

The individual dosages are labeled with the name of the radiopharmaceutical. Procedures require the medical radiation technologist receiving the material to review the day’s schedule, to ensure they have received the correct dosages, then to sort the dosages into drawers by type, according to the label (cardiac scan, bone scan, lung scan, etc.) in the nuclear medicine laboratory.

When a patient arrives, a medical radiation technologist takes a dosage from the appropriate drawer, checks the label, then removes the syringe, and checks the syringe label, before injecting the patient.

One morning, a package arrived, containing six individual dosages. There were five bone scan dosages and one dosage for a resting cardiac scan.

There were two medical radiation technologists on duty that morning. The technologist who arrived first, opened the package and distributed the dosages into the drawers without first reviewing the schedule. After she saw that the first three were all bone scan dosages, she stopped reading the labels and placed them all in the bone scan dosage drawer.

When the second patient of the morning arrived for a bone scan, the second technologist, who had arrived late, was in a hurry. He opened the drawer labeled bone scan and took out one of the shielded syringes. He did not read the label on the syringe shield, or on the syringe itself. He

injected the patient with the dosage, placed the used syringe in the syringe shield, and told the patient to return in three hours for the scan.

The first technologist then looked at the schedule, noting the next patient was scheduled for a resting cardiac scan. She did not recall seeing a cardiac scan dosage in the morning delivery, and searched through the bone scan drawer, where only four bone scan dosages remained. She contacted the second technologist, who checked the label on the dosage he had just injected to find out it was actually a cardiac scan dosage.

The second technologist notified the medical radiation practitioner and the radiation safety officer. The second patient was notified and counseled by the medical radiation practitioner and re-scheduled for the bone scan. The third patient was asked to re-schedule for later in the day.

Using the new tra(s) tools you have learned, what went wrong during this Nuclear Medicine case study?

- a. Individual Responsibility
- b. Effective Safety Communication
- c. Leadership Responsibility
- d. Only A&B
- e. **All of the above**

11. Which of the following would not be considered a NRC Willful misconduct act?

- A. Economic or other advantages, gained as a result of a violation
- B. Negligence or inadvertent clerical errors**
- C. Careless Disregard or deliberateness
- D. Overexposure to a patient, in-order to leave work earlier

12. What would falsification of documents be considered?

- A. Negligence
- B. Carelessness
- C. Willful**
- D. None of the above

13. Such factors as; Experience Level, Training, Careless disregard, and Licensee official are considered when determining the significance of a violation involving willfulness.

- A. True**
- B. False

14. An example of "Civil Penalty" when talking about a deliberate willful misconduct, according to the NRC, would be:

- A. Removal from work for a few days

B. Criminal prosecution

- C. Reporting to your supervisor
- D. Enforcing actions

15. Which governing body provides for criminal sanctions or willful violation of, or conspiracy to violate, any that are issued.

- A. Atomic Emission Acquisition
- B. Atomic Emission Act
- C. Atomic Energy Acquisition
- D. Atomic Energy Act**

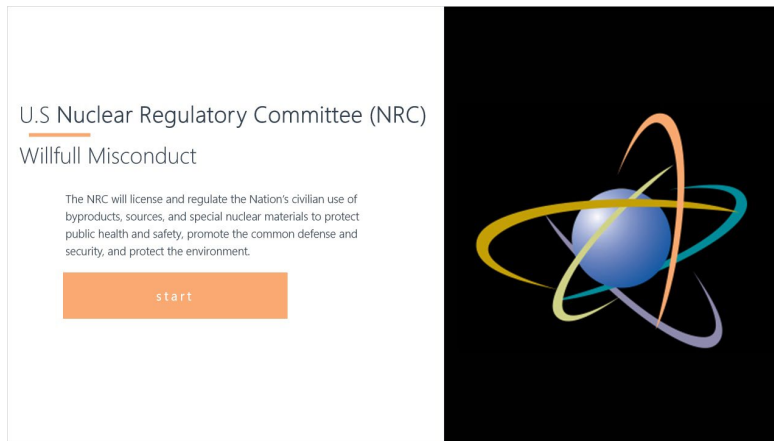
16. The term “willfulness” as used in the NRC Enforcement Policy, refers to conduct involving either a careless disregard for requirements.

- A. True**
- B. False

Willful Misconduct

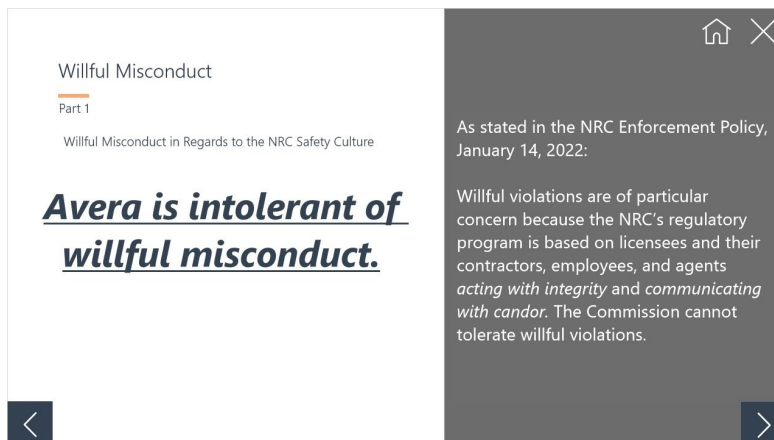
1. Self-Awareness

1.1 Title



Notes:

1.2 How do you know if you did it right?



1.3 How do you know if you did it right?

Willful Misconduct

Part 1

Willful Misconduct in Regards to the NRC Safety Culture

Avera is intolerant of willful misconduct.

The term "willfulness" as used in the NRC Enforcement Policy refers to conduct involving either a careless disregard for requirements, a deliberate violation of requirements or falsification of information.

1.4 How do you know if you did it right?


Willful Misconduct

Part 1

Willful Misconduct in Regards to the NRC Safety Culture

In determining the significance of a violation involving willfulness, the NRC will consider such factors as the:

- Position
- Training
- Experience level
- Responsibilities of the person involved in the violation (e.g., licensee official or non-supervisory employee)
- Significance of any underlying violation
- Intent of the violator (i.e., careless disregard or deliberateness)
- Economic or other advantage, if any, gained as a result of the violation



1.5 How do you know if you did it right?


Willful Misconduct

Part 1

Willful Misconduct in Regards to the NRC Safety Culture

Licenses are expected to take significant remedial action in responding to willful violations commensurate with the circumstances, such that the action reflects the seriousness of the violation, thereby creating a deterrent effect within the licensee's organization.

Civil penalty discretion should be considered for willfulness, particularly instances where the licensee made a conscious decision to be in noncompliance with NRC requirements in order to obtain an economic benefit.
(For example, a staff member knowingly altered treatment for a patient to decrease treatment times so staff member can leave earlier).



1.6 How do you know if you did it right?


Willful Misconduct

Part 1

Willful Misconduct in Regards to the NRC Safety Culture

The NRC Confirmatory Order to Avera McKennan dated May 19th, 2022 states:

"Pursuant to Section 223 of the Atomic Energy Act of 1954, as amended, any person who willfully violates, attempts to violate, or conspires to violate, any provision of the Confirmatory Order shall be subject to criminal prosecution, as set forth in that section. Violation of the Confirmatory Order may also subject the person to civil monetary penalties."



1.7 How do you know if you did it right?

Willful Misconduct


Part 1

Willful Misconduct in Regards to the NRC Safety Culture

10 CFR § 75.53 – Criminal penalties

(a) Section 223 of the Atomic Energy Act of 1954, as amended, provides for criminal sanctions or willful violation of, or conspiracy to violate, any regulation issued under sections 161b., 161i., or 161o. of the Act.

Please contact your Radiation Safety Officer or Supervisor if you have any questions.




1.8 Thank you

THANK YOU

FOR YOUR PARTICIPATION

You will now be expected to provide feedback regarding willful misconduct. Please select the 'X' in the upper right-hand corner of the screen to complete this portion of the course.



Notes:

Evaluation Questions for Safety Culture and Willful Misconduct

1. Was the willful misconduct training material and content helpful to you?
 - a. Yes
 - b. No
2. Before this training, were you aware of the NRC's intolerance of deliberate misconduct?
 - a. Yes
 - b. No
3. Before this training, were you aware of the potential enforcement actions that the NRC may take against employees who engage in deliberate misconduct?
 - a. Yes
 - b. No
4. Before this training, were you aware of the associated NRC enforcement actions that may be taken against a license as a result of deliberate misconduct?
 - a. Yes
 - b. No

Test Questions for Safety Culture and Willful Misconduct

1. Open communication, fairness, and management accountability are the most frequently identified mechanisms that build _____ in an organization.
 - a. **Trust and Respect**
 - b. Decision and Support
 - c. Roles and Authorities
 - d. Expectations and Rewards
2. What trait encourages employees to raise safety concerns to their management without fear of harassment, intimidation, retaliation, or discrimination?
 - a. Effective Safety Communication
 - b. Leadership Responsibility
 - c. Problem Identification and Resolution
 - d. **Environment for Raising Concerns**
3. The organization ensures that activities that could affect radiation protection or safety are conducted with particular care, caution, and oversight. Individuals recognize the special characteristics and unique hazards of radiation and radiation sources, and the importance of features designed to maintain nuclear safety.
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 - b. False
4. What trait were individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action. All employees are watchful for assumptions, anomalies, values, conditions, or activities that can have an undesirable effect on facility safety.
 - a. Work Processes
 - b. **Questioning Attitude**
 - c. Continuous Learning
5. What trait allows leaders should ensure that they and the rest of the organization fully understand safety-related issues. Without full understanding, the organization cannot appropriately prioritize and resolve these tissues so that they do not occur again.
 - a. Individual Responsibility
 - b. Questioning Attitude
 - c. Leadership Responsibility
 - d. **None of the above**
6. In organizations with positive safety cultures, individuals have a strong sense of accountability for the safe operation of the facility, their own safety, and for the safety of their coworkers and the public. In medical settings, this includes accountability at all levels for the safety of the patients, and their family members.
 - a. **True**
 - b. False

7. Work Process Trait can be defined as: Individuals demonstrate a strong sense of collaboration and cooperation in connection with projects and operational activities. They work as a team to provide peer-checks, verify certifications and training, ensure detailed safety practices, actively peer coach new personnel, and share tools and publications. Individuals strive to meet commitments.
 - a. True
 - b. **False**
8. Operating experience is highly valued, and the capacity to learn from experience is well developed. Safety is kept constant scrutiny through a variety of monitoring techniques, some of which provide an independent “fresh look” is considered what trait?
 - a. Problem Identification and Resolution
 - b. Respectful Work Environment
 - c. Individual Responsibility
 - d. **Continuous Learning**
9. Which of the following would not be considered a NRC Willful misconduct act?
 - A. Economic or other advantages, gained as a result of a violation
 - B. Negligence or inadvertent clerical errors**
 - C. Careless Disregard or deliberateness
 - D. Overexposure to a patient, in-order to leave work earlier
10. What would falsification of documents be considered?
 - A. Negligence
 - B. Carelessness
 - C. Willful**
 - D. None of the above
11. Such factors as; Experience Level, Training, Careless disregard, and Licensee official are considered when determining the significance of a violation involving willfulness.
 - A. True**
 - B. False
12. An example of “Civil Penalty” when talking about a deliberate willful misconduct, according to the NRC, would be:
 - A. Removal from work for a few days
 - B. Criminal prosecution**
 - C. Reporting to your supervisor
 - D. Enforcing actions
13. Which governing body provides for criminal sanctions or willful violation of, or conspiracy to violate, any that are issued.

- A. Atomic Emission Acquisition
- B. Atomic Emission Act
- C. Atomic Energy Acquisition
- D. Atomic Energy Act**

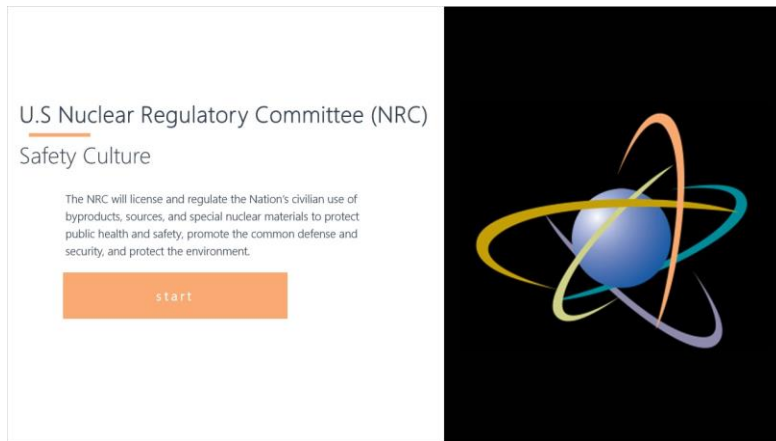
14. The term “willfulness” as used in the NRC Enforcement Policy, refers to conduct involving either a careless disregard for requirements.

- A. True**
- B. False

Safety Culture Education

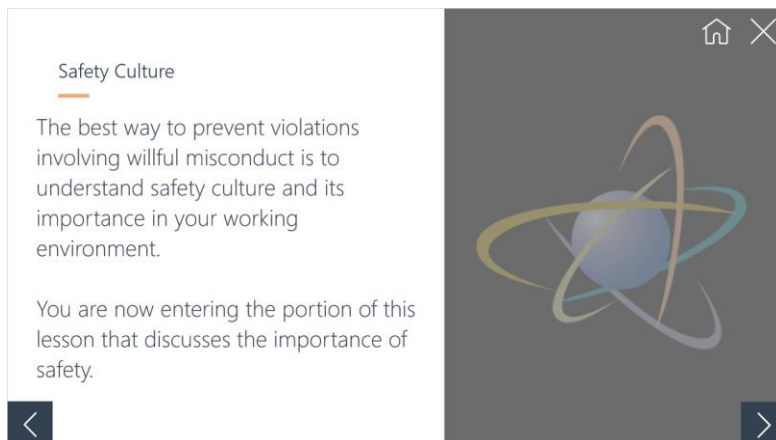
1. Self-Awareness

1.1 Title



Notes:

1.2 How do you know if you did it right?



1.3 How do you know if you did it right?

The screenshot shows a mobile application interface for 'Safety Culture'. On the left, a sidebar menu titled 'Safety Culture' and 'Part 2' lists 'NRC Traits of Positive Safety Culture' with four items: 1. LEADERSHIP SAFETY VALUES AND ACTIONS (highlighted in teal), 2. WORK PROCESSES (purple), 3. QUESTIONING ATTITUDE (green), and 4. PROBLEM IDENTIFICATION AND RESOLUTION (yellow). The main content area on the right has a dark grey background and contains the text: 'The Safety Culture Policy Statement includes a list of nine traits further defining a positive safety culture. These traits describe patterns of thinking, feeling, and behaving that emphasize safety, particularly in goal conflict situations, such as when safety goals conflict with production, schedule or cost goals. The traits listed to the left are not all-inclusive. Some organizations may find that one or more of the traits are particularly relevant to their activities. There may also be traits not included in the Safety Culture Policy Statement that are important in a positive safety culture.' Navigation icons for home, close, back, and forward are visible.

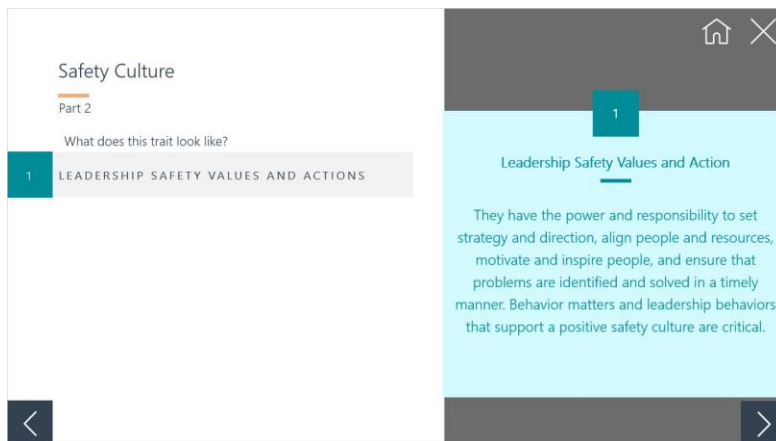
1.4 How do you know if you did it right?

This screenshot is similar to the previous one, showing the 'Safety Culture' sidebar menu. The main content area on the right has a dark grey background and contains the text: 'The NRC defines nuclear safety culture as the core values and behaviors resulting from a collective commitment by leaders and individuals to emphasize safety over competing goals to ensure protection and the environment.' Navigation icons for home, close, back, and forward are visible.

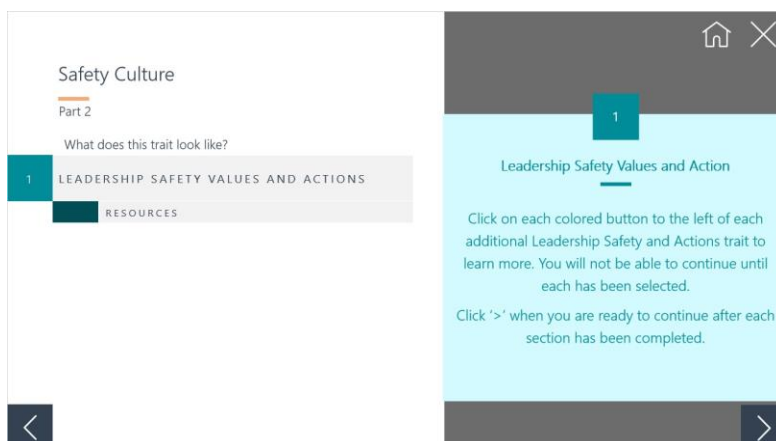
1.5 How do you know if you did it right?

This screenshot shows a detailed view of the first trait, 'Leadership Safety Values and Action'. The sidebar menu on the left is the same, but the main content area on the right is light blue and features a teal header with the number '1'. The text in the main area reads: 'Leaders demonstrate a commitment to safety in their decisions and behaviors. Leaders have significant power to affect an organization's safety culture through the priorities they establish, the behaviors and values they model, the reward systems they administer, the trust they create, and the context and expectations they establish for interpersonal relationships, communication, and accountability. Leaders also exert significant influence on change initiatives.' Navigation icons for home, close, back, and forward are visible.

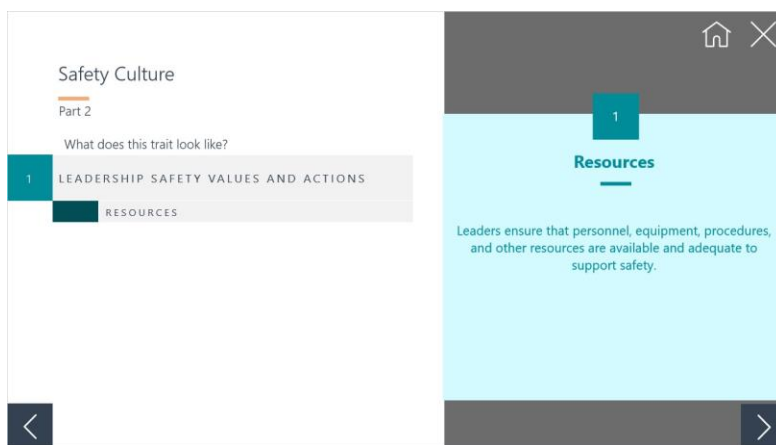
1.6 How do you know if you did it right?



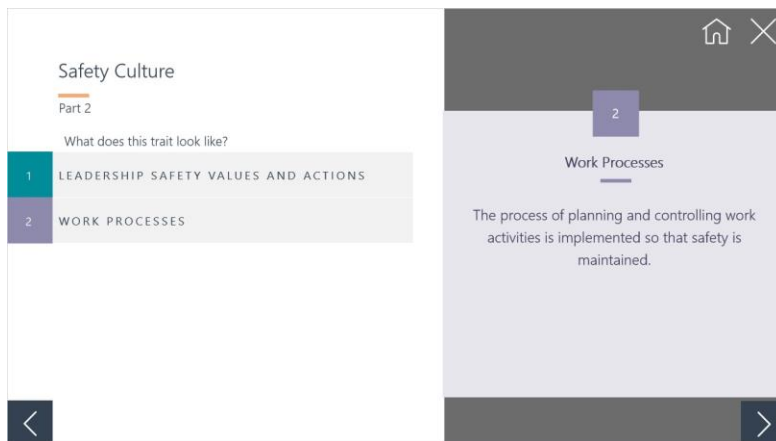
1.7 How do you know if you did it right?



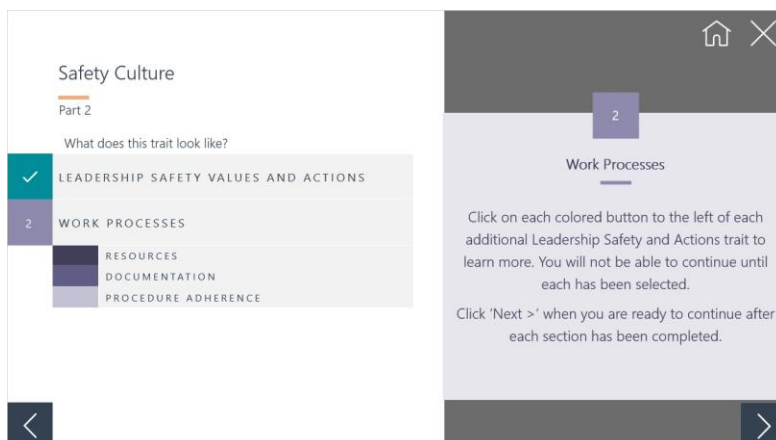
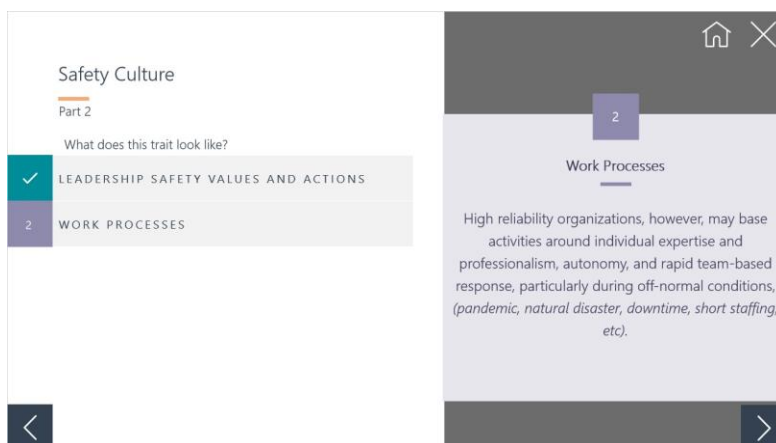
Resources (Slide Layer)



1.8 How do you know if you did it right?



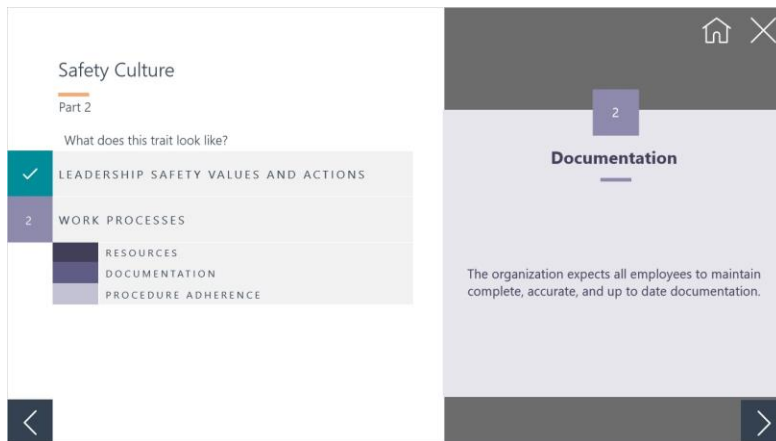
1.9 How do you know if you did it right?



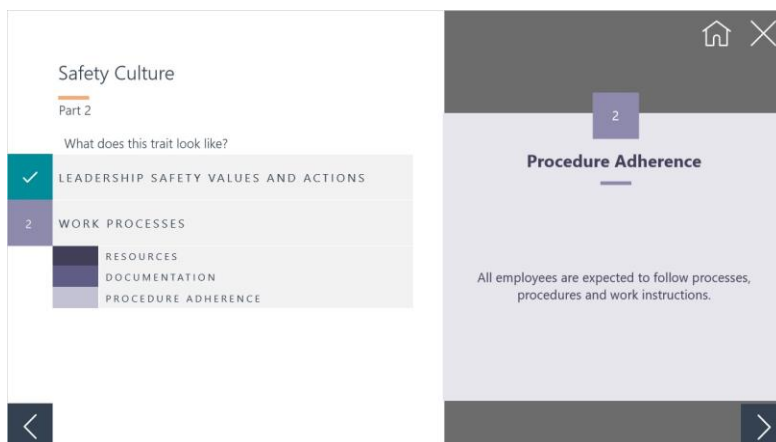
Resources (Slide Layer)



Documentation (Slide Layer)



Procedure Adherence (Slide Layer)



1.11 How do you know if you did it right?

Safety Culture
Part 2

What does this trait look like?

- ✓ LEADERSHIP SAFETY VALUES AND ACTIONS
- ✓ WORK PROCESSES
- 3 QUESTIONING ATTITUDE

Questioning Attitude

Individuals avoid complacency and continually challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate actions.

1.12 How do you know if you did it right?

Safety Culture
Part 2

What does this trait look like?

- ✓ LEADERSHIP SAFETY VALUES AND ACTIONS
- ✓ WORK PROCESSES
- 3 QUESTIONING ATTITUDE

Questioning Attitude

Complacency may be a key contributor to many incidents involving radiation sources, such as the accidental overexposure of radiotherapy patients.

1.13 How do you know if you did it right?

Safety Culture
Part 2

What does this trait look like?

- ✓ LEADERSHIP SAFETY VALUES AND ACTIONS
- ✓ WORK PROCESSES
- 3 QUESTIONING ATTITUDE

Questioning Attitude

Avoiding complacency is essential to ensuring radiation protection of work and patients and can be achieved by instilling a questioning attitude in every employee.

1.14 How do you know if you did it right?

The screenshot displays a two-panel interface. The left panel, titled 'Safety Culture Part 2', asks 'What does this trait look like?' and lists four traits: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (checked), 'QUESTIONING ATTITUDE' (highlighted with a green bar and the number 3), and 'RADIATION SOURCES ARE SPECIAL' (not checked). The right panel, titled 'Questioning Attitude' with a green bar and the number 3, contains instructions: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected.' and 'Click 'Next >' when you are ready to continue after each section has been completed.'

Stop Work (Slide Layer)

The screenshot displays a two-panel interface. The left panel is identical to the previous one, with 'QUESTIONING ATTITUDE' highlighted. The right panel, titled 'Stop Work' with a green bar and the number 3, contains the text: 'All employees are given the responsibility and authority to stop work when employees believe that a situation exists that places them, their coworker(s), or the patient at risk or in danger; that could reasonably be expected to cause adverse effects including death or serious injury, a medication or treatment delivery error or cause damage to the facility or environmental harm. Maintaining a diligent questioning attitude is vital to safe execution of work. This procedure extends the authority to stop work to situations where an employee believes there is a need to clarify work instructions; or to propose additional controls or changes.'

1.15 How do you know if you did it right?

The screenshot displays a two-panel interface. The left panel now shows 'PROBLEM IDENTIFICATION AND RESOLUTION' highlighted with a yellow bar and the number 4. The right panel, titled 'Problem Identification and Resolution' with a yellow bar and the number 4, contains the text: 'Issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.'

1.16 How do you know if you did it right?

The screenshot displays the 'Safety Culture' Part 2 interface. On the left, a list of traits is shown with checkboxes: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (checked), 'QUESTIONING ATTITUDE' (checked), and 'PROBLEM IDENTIFICATION AND RESOLUTION' (selected with a yellow square and the number 4). The main content area on the right is titled 'Problem Identification and Resolution' and contains the text: 'An effective problem identification and resolution program uses the organization's corrective action program, operating experience, and self-assessment results to ensure safe operations. The corrective action program should have a transparent process for evaluating, prioritizing, and resolving issues.'

1.17 How do you know if you did it right?

The screenshot displays the 'Safety Culture' Part 2 interface. On the left, a list of traits is shown with checkboxes: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (checked), 'QUESTIONING ATTITUDE' (checked), and 'PROBLEM IDENTIFICATION AND RESOLUTION' (selected with a yellow square and the number 4). The main content area on the right is titled 'Problem Identification and Resolution' and contains the text: 'Organizations can approach problem identification and resolution with different mindsets. One mindset focuses on finding existing problems and correcting weaknesses, typically through the organization's corrective action program. However, an organization with a positive safety culture also has a problem identification and resolution program that anticipates issues, reviews operating experience, and tracks emerging themes and trends.'

1.18 How do you know if you did it right?

The screenshot displays the 'Safety Culture' Part 2 interface. On the left, a list of traits is shown with checkboxes: 'LEADERSHIP SAFETY VALUES AND ACTIONS' (checked), 'WORK PROCESSES' (checked), 'QUESTIONING ATTITUDE' (checked), and 'PROBLEM IDENTIFICATION AND RESOLUTION' (selected with a yellow square and the number 4). The main content area on the right is titled 'Problem Identification and Resolution' and contains the text: 'Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected. Click 'Next >' when you are ready to continue after each section has been completed.'

Identification (Slide Layer)

The screenshot shows a presentation slide titled "Safety Culture" with a subtitle "Part 2". Below the title is the question "What does this trait look like?". A list of five traits is shown, each with a colored checkmark and a number: 1. LEADERSHIP SAFETY VALUES AND ACTIONS (green checkmark), 2. WORK PROCESSES (purple checkmark), 3. QUESTIONING ATTITUDE (green checkmark), 4. PROBLEM IDENTIFICATION AND RESOLUTION (yellow checkmark), and 5. IDENTIFICATION TRENDING RESOLUTION (yellow checkmark). The fourth trait, "PROBLEM IDENTIFICATION AND RESOLUTION", is highlighted with a yellow background. The right side of the slide features a yellow background with a dark grey header containing a home icon and a close icon. Below the header is a yellow box with the number "4" and the title "Identification". The main content area is yellow and contains the text: "The organization implements a corrective action program with a low threshold for identifying issues. Individuals identify issues completely, accurately, and in a timely manner in accordance with the program."

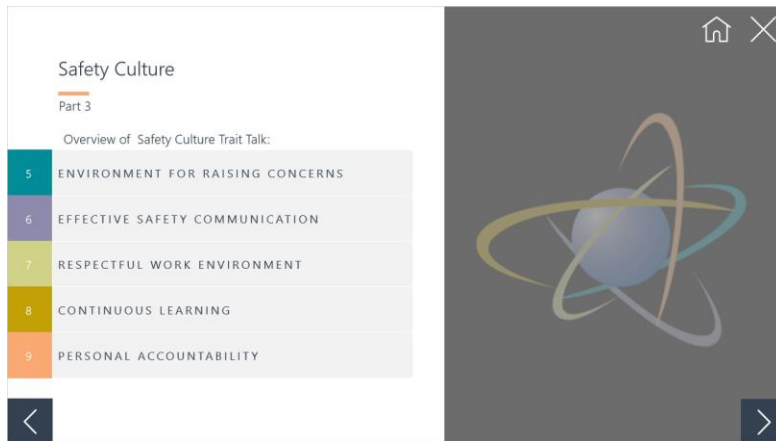
Trending (Slide Layer)

The screenshot shows a presentation slide titled "Safety Culture" with a subtitle "Part 2". Below the title is the question "What does this trait look like?". A list of five traits is shown, each with a colored checkmark and a number: 1. LEADERSHIP SAFETY VALUES AND ACTIONS (green checkmark), 2. WORK PROCESSES (purple checkmark), 3. QUESTIONING ATTITUDE (green checkmark), 4. PROBLEM IDENTIFICATION AND RESOLUTION (yellow checkmark), and 5. IDENTIFICATION TRENDING RESOLUTION (yellow checkmark). The fourth trait, "PROBLEM IDENTIFICATION AND RESOLUTION", is highlighted with a yellow background. The right side of the slide features a yellow background with a dark grey header containing a home icon and a close icon. Below the header is a yellow box with the number "4" and the title "Trending". The main content area is yellow and contains the text: "Problem identification and resolution is an important element of safety culture. Leaders are responsible for identifying and diagnosing organizational or technical deficiencies, taking corrective action, and anticipating emerging issues."

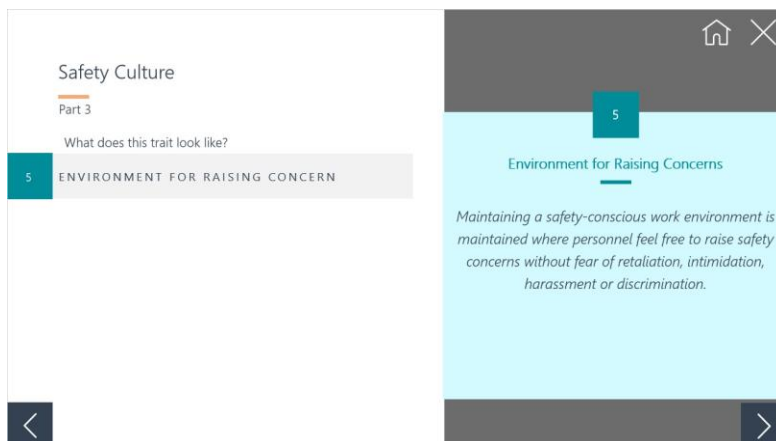
Resolution (Slide Layer)

The screenshot shows a presentation slide titled "Safety Culture" with a subtitle "Part 2". Below the title is the question "What does this trait look like?". A list of five traits is shown, each with a colored checkmark and a number: 1. LEADERSHIP SAFETY VALUES AND ACTIONS (green checkmark), 2. WORK PROCESSES (purple checkmark), 3. QUESTIONING ATTITUDE (green checkmark), 4. PROBLEM IDENTIFICATION AND RESOLUTION (yellow checkmark), and 5. IDENTIFICATION TRENDING RESOLUTION (yellow checkmark). The fourth trait, "PROBLEM IDENTIFICATION AND RESOLUTION", is highlighted with a yellow background. The right side of the slide features a yellow background with a dark grey header containing a home icon and a close icon. Below the header is a yellow box with the number "4" and the title "Resolution". The main content area is yellow and contains the text: "The leaders of the organization are expected to take effective corrective actions to address issues in a timely manner."

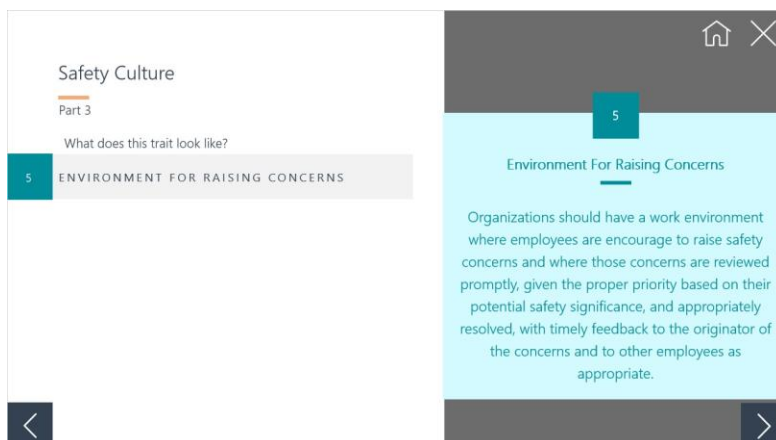
1.19 How do you know if you did it right?



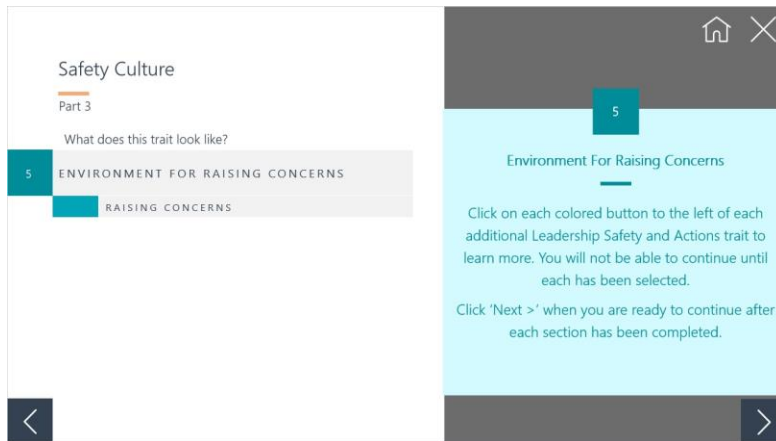
1.20 How do you know if you did it right?



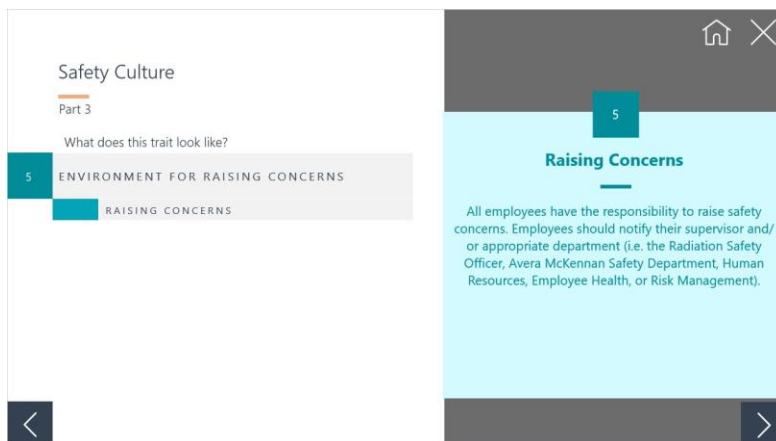
1.21 How do you know if you did it right?



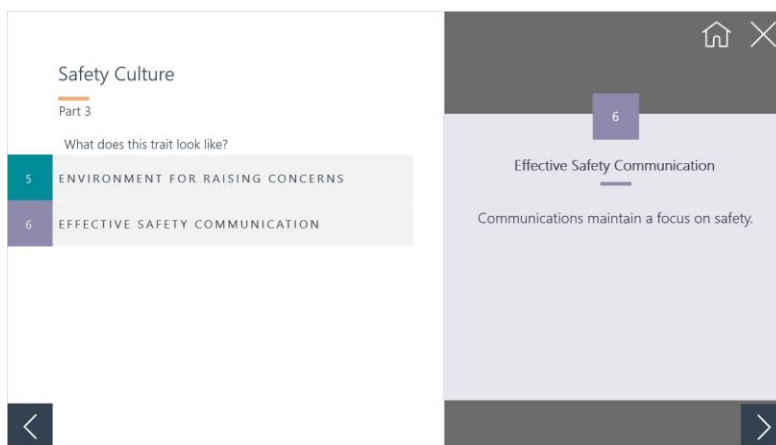
1.22 How do you know if you did it right?



Raising Concerns (Slide Layer)



1.23 How do you know if you did it right?



1.24 How do you know if you did it right?

The screenshot shows a mobile application interface. On the left, a sidebar titled 'Safety Culture' indicates 'Part 3' and asks 'What does this trait look like?'. It lists three items: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (selected with a purple icon and number 6), and 'RESPECTFUL WORK ENVIRONMENT'. The main content area on the right has a dark header with a home icon and a close button. Below the header, a purple box with the number '6' is above the title 'Effective Safety Communication'. The text below reads: 'Top-down communication is most effective when senior managers communicate directly with immediate supervisors and immediate supervisors communicate with their staff.' Navigation arrows are at the bottom.

1.25 How do you know if you did it right?

The screenshot shows the same mobile application interface. The sidebar on the left now has 'RESPECTFUL WORK ENVIRONMENT' selected with a green icon and number 7. The main content area on the right has a dark header with a home icon and a close button. Below the header, a green box with the number '7' is above the title 'Respectful Work Environment'. The text below reads: 'Trust and respect permeate the organization.' Navigation arrows are at the bottom.

1.26 How do you know if you did it right?

The screenshot shows the same mobile application interface. The sidebar on the left now has 'EFFECTIVE SAFETY COMMUNICATION' checked and 'RESPECTFUL WORK ENVIRONMENT' selected with a green icon and number 7. The main content area on the right has a dark header with a home icon and a close button. Below the header, a green box with the number '7' is above the title 'Respectful Work Environment'. The text below reads: 'At an individual level, trust involves the willingness of one person to depend on another person, with a relative sense of security. The perception that an individual is competent, has integrity, and is predictable increases the likelihood that he/she is trusted and respected.' Navigation arrows are at the bottom.

1.27 How do you know if you did it right?

Safety Culture
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT

Respectful Work Environment

At an organizational level, trust and respect instill confidence that the organization is just and fair, which promotes open communication and accurate reporting, enhances organizational learning, and promotes the development of shared perceptions and norms. In studies of safety culture, higher levels of trust and respect are associated with positive safety attitudes, reduced risky behavior, and increased personal responsibility for safety.

1.28 How do you know if you did it right?

Safety Culture
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT
 - RESPECT IS EVIDENT
 - HIGH LEVEL OF TRUST
 - OPINIONS ARE VALUED
 - CONFLICT RESOLUTION

Respectful Work Environment

Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected.

Click 'Next >' when you are ready to continue after each section has been completed.

Respect is Evident (Slide Layer)

Safety Culture
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- 7 RESPECTFUL WORK ENVIRONMENT
 - RESPECT IS EVIDENT
 - HIGH LEVEL OF TRUST
 - OPINIONS ARE VALUED
 - CONFLICT RESOLUTION

Respect is Evident

Everyone is treated with dignity and respect.

High Level of Trust (Slide Layer)

The screenshot shows a two-panel interface. The left panel, titled 'Safety Culture Part 3', asks 'What does this trait look like?' and lists four traits with progress indicators: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), 'RESPECTFUL WORK ENVIRONMENT' (7/10), and a sub-section with 'RESPECT IS EVIDENT' (dark green), 'HIGH LEVEL OF TRUST' (medium green), 'OPINIONS ARE VALUED' (light green), and 'CONFLICT RESOLUTION' (very light green). The right panel features a dark header with a home icon and a close button, a green box with the number '7', the title 'High Level of Trust', and the text 'Trust is fostered among individuals and work groups throughout the organization.' Navigation arrows are at the bottom.

Opinions are Valued (Slide Layer)

The screenshot shows a two-panel interface. The left panel, titled 'Safety Culture Part 3', asks 'What does this trait look like?' and lists four traits with progress indicators: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), 'RESPECTFUL WORK ENVIRONMENT' (7/10), and a sub-section with 'RESPECT IS EVIDENT' (dark green), 'HIGH LEVEL OF TRUST' (medium green), 'OPINIONS ARE VALUED' (light green), and 'CONFLICT RESOLUTION' (very light green). The right panel features a dark header with a home icon and a close button, a green box with the number '7', the title 'Opinions are Valued', and the text 'Individuals are encouraged to voice concerns, provide suggestions, and raise questions. Differing opinions are respected.' Navigation arrows are at the bottom.

Conflict Resolution (Slide Layer)

The screenshot shows a two-panel interface. The left panel, titled 'Safety Culture Part 3', asks 'What does this trait look like?' and lists four traits with progress indicators: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), 'RESPECTFUL WORK ENVIRONMENT' (7/10), and a sub-section with 'RESPECT IS EVIDENT' (dark green), 'HIGH LEVEL OF TRUST' (medium green), 'OPINIONS ARE VALUED' (light green), and 'CONFLICT RESOLUTION' (very light green). The right panel features a dark header with a home icon and a close button, a green box with the number '7', the title 'Conflict Resolution', and the text 'Fair and objective methods should be used to resolve conflicts.' Navigation arrows are at the bottom.

1.29 How do you know if you did it right?

The screenshot shows a mobile application interface. On the left, a panel titled 'Safety Culture' and 'Part 3' asks 'What does this trait look like?'. It lists four traits: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), 'RESPECTFUL WORK ENVIRONMENT' (checked), and 'CONTINUOUS LEARNING' (highlighted with a yellow background and the number 8). On the right, a detailed view of 'Continuous Learning' is shown, featuring a yellow background with the title 'Continuous Learning' and a subtitle '8'. The text reads: 'Opportunities to learn about ways to ensure safety are sought out and implemented.'

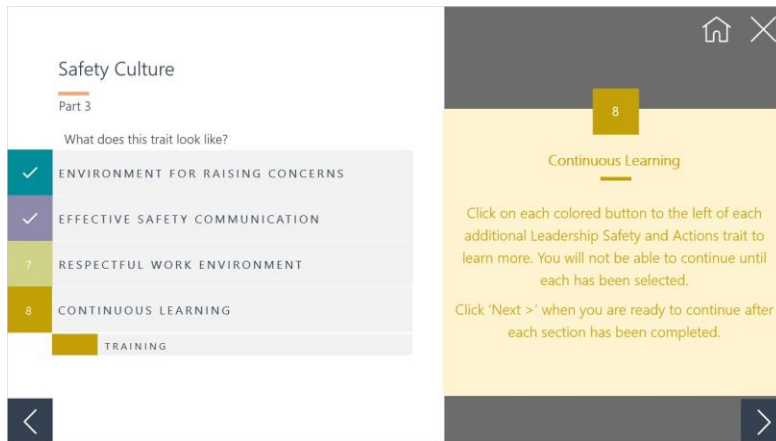
1.30 How do you know if you did it right?

The screenshot shows a mobile application interface. On the left, a panel titled 'Safety Culture' and 'Part 3' asks 'What does this trait look like?'. It lists four traits: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), 'RESPECTFUL WORK ENVIRONMENT' (checked), and 'CONTINUOUS LEARNING' (highlighted with a yellow background and the number 8). On the right, a detailed view of 'Continuous Learning' is shown, featuring a yellow background with the title 'Continuous Learning' and a subtitle '8'. The text reads: 'At the individual and team level, continuous learning includes obtaining knowledge, determining how that knowledge applies to the work of the individual and the team, as well as sharing that knowledge and ensuring that it is retained in the organization.'

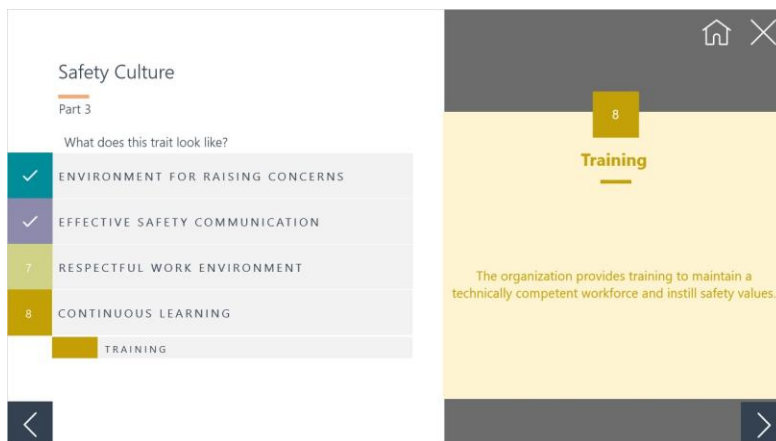
1.31 How do you know if you did it right?

The screenshot shows a mobile application interface. On the left, a panel titled 'Safety Culture' and 'Part 3' asks 'What does this trait look like?'. It lists four traits: 'ENVIRONMENT FOR RAISING CONCERNS' (checked), 'EFFECTIVE SAFETY COMMUNICATION' (checked), 'RESPECTFUL WORK ENVIRONMENT' (checked), and 'CONTINUOUS LEARNING' (highlighted with a yellow background and the number 8). On the right, a detailed view of 'Continuous Learning' is shown, featuring a yellow background with the title 'Continuous Learning' and a subtitle '8'. The text reads: 'Organizations committed to continuous learning reflect an organizational perspective that specifically addresses learning requirements at the individual, group, and organizational levels. Leadership at all of these levels must focus on learning, teaching, and changing an organization into a learning organization.'

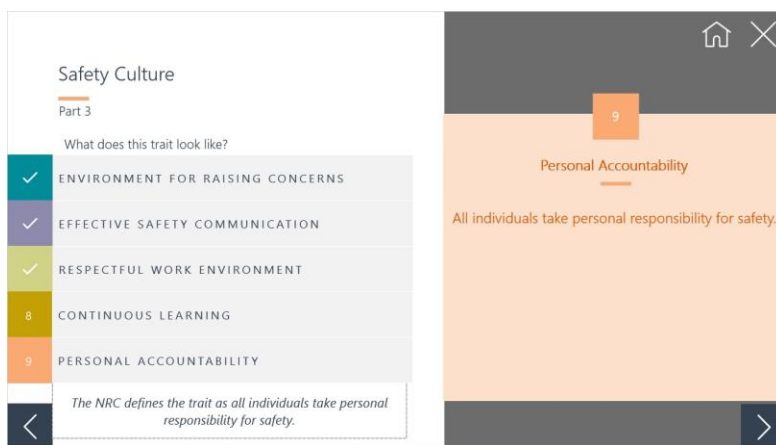
1.32 How do you know if you did it right?



Training (Slide Layer)



1.33 How do you know if you did it right?



1.34 How do you know if you did it right?

Safety Culture
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- ✓ RESPECTFUL WORK ENVIRONMENT
- ✓ CONTINUOUS LEARNING
- 9 PERSONAL ACCOUNTABILITY

The NRC defines the trait as all individuals take personal responsibility for safety.

Personal Accountability

Personal accountability reflects the belief that both leaders and employees are individually responsible for their performance and the roles they play in radiation protection.

1.35 How do you know if you did it right?

Safety Culture
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- ✓ RESPECTFUL WORK ENVIRONMENT
- ✓ CONTINUOUS LEARNING
- 9 PERSONAL ACCOUNTABILITY

The NRC defines the trait as all individuals take personal responsibility for safety.

Personal Accountability

Leaders can develop personal accountability within their organization by empowering employees. They must give employees the skills and training needed to communicate, explain, and do their jobs well. They must set performance objectives with specific behaviors and outcomes and evaluate performance and give timely feedback.

1.36 How do you know if you did it right?

Safety Culture
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- ✓ RESPECTFUL WORK ENVIRONMENT
- ✓ CONTINUOUS LEARNING
- 9 PERSONAL ACCOUNTABILITY
- TEAMWORK

Personal Accountability

Click on each colored button to the left of each additional Leadership Safety and Actions trait to learn more. You will not be able to continue until each has been selected.

Click 'Next >' when you are ready to continue after each section has been completed.

High Standards (Slide Layer)

The screenshot shows a presentation slide titled "Safety Culture" with a subtitle "Part 3". Below the title, it asks "What does this trait look like?". A list of six traits is shown, each with a colored square and a checkmark: "ENVIRONMENT FOR RAISING CONCERNS" (teal), "EFFECTIVE SAFETY COMMUNICATION" (purple), "RESPECTFUL WORK ENVIRONMENT" (green), "CONTINUOUS LEARNING" (yellow), "PERSONAL ACCOUNTABILITY" (orange), and "TEAMWORK" (light orange). The "PERSONAL ACCOUNTABILITY" trait is highlighted with a small orange square containing the number "9". To the right, a large orange box contains the text "High Standards" in bold, followed by a horizontal line and the description: "Individuals understand the importance of adherence to radiation protection standards." The slide has a dark grey header with a home icon and a close icon, and a dark grey footer with left and right navigation arrows.

Safety Culture
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- ✓ RESPECTFUL WORK ENVIRONMENT
- CONTINUOUS LEARNING
- 9 PERSONAL ACCOUNTABILITY
- TEAMWORK

High Standards

Individuals understand the importance of adherence to radiation protection standards.

Job Ownership (Slide Layer)

The screenshot shows a presentation slide titled "Safety Culture" with a subtitle "Part 3". Below the title, it asks "What does this trait look like?". A list of six traits is shown, each with a colored square and a checkmark: "ENVIRONMENT FOR RAISING CONCERNS" (teal), "EFFECTIVE SAFETY COMMUNICATION" (purple), "RESPECTFUL WORK ENVIRONMENT" (green), "CONTINUOUS LEARNING" (yellow), "PERSONAL ACCOUNTABILITY" (orange), and "TEAMWORK" (light orange). The "PERSONAL ACCOUNTABILITY" trait is highlighted with a small orange square containing the number "9". To the right, a large orange box contains the text "Job Ownership" in bold, followed by a horizontal line and the description: "Individuals understand and demonstrate personal responsibility for the behaviors and work practices that support radiation protection." The slide has a dark grey header with a home icon and a close icon, and a dark grey footer with left and right navigation arrows.

Safety Culture
Part 3

What does this trait look like?

- ✓ ENVIRONMENT FOR RAISING CONCERNS
- ✓ EFFECTIVE SAFETY COMMUNICATION
- ✓ RESPECTFUL WORK ENVIRONMENT
- CONTINUOUS LEARNING
- 9 PERSONAL ACCOUNTABILITY
- TEAMWORK

Job Ownership

Individuals understand and demonstrate personal responsibility for the behaviors and work practices that support radiation protection.

Teamwork (Slide Layer)

The screenshot shows a presentation slide titled "Safety Culture" with a subtitle "Part 3". Below the title, it asks "What does this trait look like?". A list of six traits is shown, each with a colored square and a checkmark: "ENVIRONMENT FOR RAISING CONCERNS" (teal), "EFFECTIVE SAFETY COMMUNICATION" (purple), "RESPECTFUL WORK ENVIRONMENT" (green), "CONTINUOUS LEARNING" (yellow), "PERSONAL ACCOUNTABILITY" (orange), and "TEAMWORK" (light orange). The "PERSONAL ACCOUNTABILITY" trait is highlighted with a small orange square containing the number "9". To the right, a large orange box contains the text "Teamwork" in bold, followed by a horizontal line and the description: "Individuals and work groups communicate and coordinate their activities within and across organizational boundaries to ensure radiation protection is maintained." The slide has a dark grey header with a home icon and a close icon, and a dark grey footer with left and right navigation arrows.

Safety Culture
Part 3

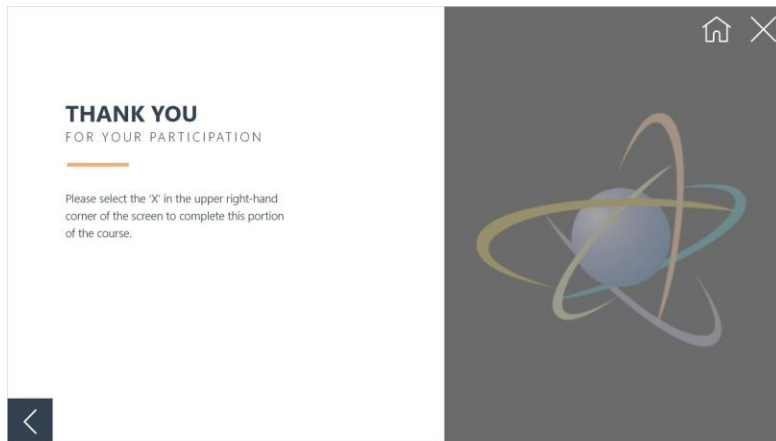
What does this trait look like?

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Teamwork

Individuals and work groups communicate and coordinate their activities within and across organizational boundaries to ensure radiation protection is maintained.

1.37 Thank you



Notes: