

IP 93100 Revision SECY

Recommended Changes

Molly Keefe-Forsyth
Safety Culture Program Manager, IRAB
May 15, 2024

Purpose

This presentation is to discuss the revision of IP 93100, Safety Culture/Safety-Conscious Work Environment Issue of Concern Follow-up, and associated IPs that refer inspectors to IP 93100.

Background

- In January 2022 an effectiveness review was completed on the Safety Culture Program. [ML22340A452](#)
- Team identified three recommendations with three options for recommendation 3.
- DRO developed a memo to expand on the recommendations for management. [ML23208A187](#)
- Ultimately, DRO decided Recommendations 2 and portions of 3 were appropriate for implementation.

Recommendation 3

- Revise IP 93100 to make it a flexible tool for the inspection of safety culture issues.
 - Better define threshold for entry. This would not change the current process, just add clarity on how it is currently being used.
 - Estimated hours based on particular method being pursued (focus groups, interviews, direct observation, etc.).

IP updates

- The revisions to this IP are intended to align the procedure with how it is currently being used in the field.
- Safety Culture assessors use this IP for a variety of inspection activities:
 - Allegation inspections
 - Follow-up on SCWE issues
 - Follow-up on safety culture issues

IP updates

- Including Inspection Manual Chapters for a variety of licensees:
 - Vendors
 - Fuel Cycle Facilities
 - New Construction
 - Decommissioning
 - RTRs
 - Materials Licensees

Entry Criteria

- As an inspection listed in Inspection Manual Chapter (IMC) 2515 Appendix C, “Special and Infrequently Performed Inspections,” this IP is implemented at Regional Administrator (RA) discretion in response to events or situations described below.
- RAs should use IP 93100 Appendix A, “Safety Culture Traits,” in conjunction with the data informing the decision to use this IP to develop a charter outlining the areas of concern that the inspection team should address.

Entry Criteria A

- To follow-up on a SCWE cross cutting issue (CCI) or SCWE theme, or safety culture or SCWE concern raised during the allegation process, as recommended by an Allegations Review Board (ARB) and approved by an RA or, for non-regional ARBs, an Office Director.

Entry Criteria B

- To conduct follow-up inspections, with RA approval, of facilities with a known issue in the environment for raising concerns trait (i.e. chilling effect or chilled environment) until the issue is resolved.

Entry Criteria C

- If an inspection identifies a safety culture issue of concern during implementation of IP 71152, “Problem Identification and Resolution,” IP 93800, “Augmented Inspection Team ,” IP 93812, “Special Inspection,” or IP 95001, “Supplemental Inspection Response to Action Matrix Column 2 (Regulatory Response) Inputs,” that was not identified by the licensee, and inspectors have concerns with the licensee’s associated corrective actions. The RA may authorize use of IP 93100 to further inspect the specific safety culture traits of concern.

Entry Criteria C

- If during the performance of the following IPs a safety culture concern is identified that was not identified by the licensee, and inspectors have concerns with the licensee's associated corrective actions, the RA may authorize use of IP 93100.
 - IP 71152, "Problem Identification and Resolution"
 - IP 93800, "Augmented Inspection Team"
 - IP 93812, "Special Inspection"
 - IP 95001, "Supplemental Inspection Response to Action Matrix Column 2 (Regulatory Response) Inputs"

Charter Development

- A charter will be developed by the IP 93100 team lead specifying which safety culture traits (if any) will be inspected
- RA will approve the charter and any safety culture traits and will send a copy of the charter to the program office
- Charter may be updated and re-approved if any emergent safety culture traits are identified.

Inspection Guidance updates

- If the IP is to be used as a stand-alone IP, the Team Leader should be a qualified Safety Culture Assessor per IMC 1245 Appendix C-12
- The charter shall also identify the resource requirements for the inspection, including the number of inspectors and the length of the inspection. Factors to consider include:
 - Number of licensee staff potentially impacted by the issue(s) prompting the inspection
 - Safety scope of the issue(s) under review
 - Whether interviews or focus groups or a combination will be required.
 - Whether observations of plant activities will be needed

Resource Estimates

- Have been updated to reflect nominal inspection hours in current practice.
- As such, the resources required to complete the inspection are dependent on the circumstances involved, although it is estimated that this procedure will take 40-80 hours to complete.
- The RA shall consult with the Director of NRR before authorizing an inspection scope of 120 hours or more.

Additional Considerations

- In addition to revising IP 93100, revisions to 71152, 93800, 93812, and 95001 would be necessary. These procedures have historically led to the opening of IP 93100 and they would be revised to include additional guidance for seeking RA approval to open IP 93100.
- Revision to IMC 0305 to prompt NRC management to discuss safety culture aspects during quarterly reviews.

- Questions
- Comments
