Safety Culture: 2010

Making Safety the Overriding Priority

March 30, 2010

Billie Pirner Garde, Attorney
Clifford & Garde, LLP

Safety Culture Workshop

- **Congratulations and Recognition!**
- **Extraordinary success as a facilitated workshop involving all stakeholders**
  - **Meaningful participation by all**
  - **Wide range of views at the policy level**
  - **Significant interaction between impacted groups**
  - **Transparency and collaboration**

Draft Safety Culture Policy Statement

- **Definition of Draft Safety Culture Policy Statement a good exercise**
  - **Compromises all had sound basis**
  - **Removal of special reference to "security culture" appropriate in draft statement**
  - **Agree with draft statement, with following exception:**
    - **"Safety as the overriding priority........"**

Fostering A Strong
Safety Culture

- **Next steps critical to ensure that the policy statement is comprehensive:**
  - **Personal concerns about the attention to Safety Conscious Work Environment (SCWE) issues;**
  - **Personal concerns about ensuring that policy expectations drive improvements in anti-retaliation behaviors and respectful work environment accountabilities**

Assessing Safety Culture

- **Believe that regulation is necessary and prudent in this area**
  - **Adopt and restate my position from March, 2002 that regulation will provide consistent, reliable, and repeatable expectations;**
  - **Urge reconsideration of the position of the Commission that we can get there without regulation.**
  - **Recommendation based on philosophical view that we understand and work to what is measured, and for which we are held accountable.**

Implementation of Safety Culture Policy Across Industries

- More workshops appropriate to address a comprehensive implementation plan;
- Critical that this issue be finalized before new construction begins
  - New construction should all have training, infrastructure, and employee concerns programs that reflect NRC's Safety Culture policy.
  - New construction and international corporations must be accountable to demonstrate proactively that each meets and incorporates new Safety Culture policy expectations.

Internal NRC Safety Culture Work

- **Substantial progress from the days when intimidation was a significant factor in how the Agency was managed;**

- **Strong recognition that the freedom to raise concerns and express differing professional opinions is the foundation for good decision-making process;**

- **Generally, a healthy respect for diversity of opinions and collaboration.**

Internal NRC Safety Culture Work (cont'd)

- However, Commission should be vigilant in this area and seek to ensure Staff understands:

- No tolerance for intimidating behaviors by managerial staff;

- Commitment to respectful dialogue on differences of opinion for all staff;

- Develop a better internal alternative avenue for NRC employees to obtain timely and effective intervention on their concerns.

Internal NRC Safety Culture Work (cont'd)

- Support placement of the Safety Culture Program Manager position;
- Support issuance of behavioral expectations and Agency training and accountabilities;
- Support Office-Specific Action plans in those areas in which problematic behaviors have been identified by employees;
- Transparency with respect to those plans and actions;
- Important that these programs reach all NRC employees – in the Regions and at the facilities, where much of the day to day pressures impact staff.

Thank you for opportunity to participate in this important topic.

Billie Pirner Garde

Clifford & Garde, LLP

1707 L Street, NW Ste 500

Washington, D.C. 20036

(202) 280-6116