

NRC Safety Culture Workshop

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Talking from the view point of Fuel Cycle Facilities

- o We are a small group of licensees

 - 4-Cat three facilities operating fuel fab plants –

 - AREVA(2), Westinghouse, GNF,

 - 2- Cat 1 facilities operating fuel fab. Plants B&W (2)

 - 1- Converter

 - 2- Operating Enrichers USEC, LES

 - 2- Enrichment Lic. Applicants AREVA, GNF

 - 1- MOX Fuel Fabricator lic. applicant

- o But also very diverse not only in function but how we perform our processes

- o And at least three different 10 CFR Parts, 40, 70,& 76

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- While we strongly **support** the formation of a Safety Culture Policy with appropriate traits or attributes for clarification we have anxiety for its inevitable “Implementation”
- The NRC Staff and Industry has spent many hours and days on this initiative, yet if the past is used to predict the future, What will the investment be to “implement” this initiative.
- The past has demonstrated that upon implementation the development of guidance, manuals and training for such an initiative does not match up to the challenge.

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- Safety Culture is not a simple outcome easily measured by objective metrics. Our discussion over this last year and many before it, has proven this.
- Therefore the importance to guidance and training for those involved in the monitoring, reporting and “judging” the health of the industries Safety Culture is imperative.

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- The discussions have also demonstrated the diversity of the industry across all types of licensees. This adds to the complexity of the “devil is in the details” aspect of implementation
- So what are the recommendations regarding “Next Steps”?
 - o Continue the open and transparent dialogue with all segments of the industry – of course this demands our continued engagement and participation
 - o Walk before we run – While the “Offices” of the NRC will be expected to have a larger roll in the Implementation there needs to be a commitment of resources to this effort actually exceeds the effort that has been demonstrated in the policy formation.

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- o There needs to be a balance in both priorities of this initiative and other perhaps more valued initiatives for other safety issues in the varied Offices' heavy agendas.
- o Continuing oversight at the Agency wide level will still be needed to retain consistency while allowing necessary flexibility do to diversity of License types.
- o Dedicate budget for the implementation that is needed for the appropriate implementation

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- o Don't assume that if it has "worked this way" in one license segment it will work in another
- o Beware of cookie cutter approaches for this complex issue
- o Apply KIS otherwise it won't work. If it's not clear and transparent to the average worker it won't work.