

# **POLICY ISSUE (Information)**

April 27, 2009

SECY-09-0068

FOR: The Commissioners

FROM: R. W. Borchardt  
Executive Director for Operations

SUBJECT: REPORT OF THE TASK FORCE ON INTERNAL SAFETY CULTURE

PURPOSE:

This paper informs the Commission of the staff's actions and commitments in response to the final report of the agency's Internal Safety Culture Task Force (ISCTF) and related Commission direction.

BACKGROUND:

The U.S. Nuclear Regulatory Commission (NRC) has continuously sought to improve its internal organizational effectiveness. For example, the Open Door Policy and Differing Professional Opinion program were first implemented in the late 1970s. In addition to ongoing improvement initiatives, significant events such as the 1979 accident at Three Mile Island and, more recently, the 2002 reactor vessel head degradation event at the Davis-Besse Nuclear Power Station caused significant changes in some of the NRC's internal organizational and regulatory processes. Since the NRC's overall mission is protection of the public health and safety, promote the common defense and security, and protection of the environment, organizational effectiveness improvements could be seen as linked to what is defined today as safety culture. The term "safety culture" initially arose from the general concept of organizational culture that was popularized in the management literature of the early 1980s. This concept initially lacked widespread acceptance by many technical managers, mainly because of its perceived subjectivity and a lack of consensus on how to apply it either to the regulatory oversight of licensees or to improve internal agency operations. As the concept received further study and

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attention, better definitions evolved, including a definition for nuclear industry use by the International Atomic Energy Agency (IAEA). The NRC referenced the IAEA definition of safety culture in a Policy Statement entitled "Conduct of Nuclear Power Plant Operations," dated January 24, 1989.

The most current international definition of the term "safety culture," as it relates to nuclear plants, appears in the International Nuclear Safety Advisory Group (INSAG) Safety Series No. 75-INSAG-4 (1991) as "that assembly of characteristics and attitudes in organizations and individuals which establishes that, as an overriding priority, nuclear plant safety issues receive the attention warranted by their significance." This was the starting point for the Task Force deliberations.

In 1997, the NRC's Office of the Inspector General (OIG) initiated the first in a continuing series of Safety Culture and Climate Surveys (SCCS) as a means to identify where additional organizational improvements could be made. The surveys are voluntary, make provisions for anonymity, and are offered to all NRC employees, supervisors, and managers. In addition, the use of a survey made it possible to compare category-level results for the NRC to other U.S. organizations that had also completed such a survey. OIG has conducted the SCCS three times and plans to implement a fourth in May 2009. In each case, the staff has responded to the results of the SCCS with various actions to maintain areas identified as strengths and to improve areas identified as challenges.

In addition to the OIG employee surveys, the agency has addressed safety culture improvements more directly in recent years, as its organizational improvement initiatives have evolved. Most notable, in response to the 2002 reactor vessel head degradation event at Davis-Besse Nuclear Power Station, the staff engaged with stakeholders in the development of changes to the agency's Reactor Oversight Process (ROP) to better address safety culture. These changes were implemented and continue to be evaluated and modified, as appropriate, through the structured self-assessment process within the ROP.

#### DISCUSSION:

In accordance with the direction provided by the Commission in its staff requirements memorandum (SRM) M080317B, "Staff Requirements—Briefing on State of NRC Technical Programs," dated April 3, 2008, the staff formed the ISCTF to look for ways to increase awareness of the agency's internal safety culture and to provide the Commission with a report outlining potential initiatives that could improve it, including best practices currently used across the agency. The ISCTF was formally chartered on October 24, 2008.

The ISCTF engaged in intensive data gathering activities from October through December 2008, including 20 facilitated employee focus groups, a Web page portal for anonymous employee inputs, management interviews, a public meeting, and external and internal benchmarking. In addition, the ISCTF held weekly discussions to develop a common and shared understanding of internal safety culture and the factors that influence it. In early 2009, the ISCTF aggregated and analyzed the data, culminating in a 3-day full-member meeting in February to formulate recommendations. Further dialogue occurred as the ISCTF drafted its written report.

In response to a separate Commission direction, the staff is also developing a draft Safety Culture Policy Statement, applicable to all licensees and certificate holders, and to include the relationship between safety and security. This is being provided to the Commission separately.

The Commission's April 2008 SRM directing the staff to look at the NRC's internal safety culture asked the ISCTF to provide its report within 3 months of the next OIG SCCS, anticipated at that time to be completed by late 2008. The actual date for conducting the survey will be May 2009, with an expected date for results in summer 2009 and a final report in fall 2009. Therefore, in SRM-COMSECY-09-0001, "Internal Safety Culture Task Force Interface with Office of the Inspector General Safety Culture and Climate Survey," dated February 6, 2009, the Commission approved the staff's recommendation that the ISCTF complete its activities, render its report as planned in April 2009, and commit to the review of the SCCS results and possible actions noted in the Commitment section below.

In forwarding the enclosed report, the staff agrees with the Task Force recommendations and is planning activities to implement them. Regarding Recommendation #5 (establish a new position - dedicated safety culture advisor or organization), the Office of the Executive Director for Operations will establish this position as either a GG-15 or Senior Level Service level position within the Office of Enforcement in order to begin the internal safety culture initiative in close coordination with external safety culture activities, the agency allegations program (including the safety conscious work environment efforts), and also with the agency internal differing views program (differing professional opinion program and non-concurrence process) and Open Collaborative Working Environment initiative.

COMMITMENT:

The staff will complete a review of the enclosed Task Force report from the perspective of the SCCS results and analysis no later than 3 months following issuance of the OIG's final SCCS report. Based on insights derived from its review of the SCCS results, the staff will, if appropriate, suggest additional actions or modifications to the recommendations in the enclosed report. In addition, the staff will provide an update on its implementation of the Task Force recommendations.

RESOURCE:

For Fiscal Year (FY) 2010 Office of Enforcement (OE) included 1.0 full-time equivalent (FTE) staff position and \$500K in the FY 2010 budget shortfall request. For FY 2011 OE will request 1.0 FTE and \$1.0 million above their base budget submission.

COORDINATION:

The Office of the General Counsel reviewed this package and has no legal objection. The Office of the Chief Financial Officer has reviewed this Commission paper for resource implications and has no objections.

*/RA Martin Virgilio for/*

R.W. Borchardt  
Executive Director  
for Operations

Enclosure:  
Internal Safety Culture Task Force Final Report

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