

NRC Safety Culture Workshop

Lynne Fairobent

Manager of Legislative and Regulatory Affairs

American Association of Physicists in Medicine

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AAPM

- Is the premier organization in medical physics; a broadly-based scientific and professional discipline encompassing physics principles and applications in biology and medicine whose mission is to advance the science, education and professional practice of medical physics.
- Represents over 7,300 medical physicists.

Apparent Agreement on the Basic Definition of Safety Culture

- “Nuclear Safety Culture is the core values and behaviors resulting from a collective commitment by leaders and individuals to emphasize safety over competing goals to ensure protection of people and the environment.”

Background

- The basic definition and traits developed during the February workshop and contained in the September 17th Federal Register are appropriate for the NRC, its licensees and certificate holders, and all of the other NRC stakeholders.

One Size Does Not Fit All!

- Although it is laudable to try and have a single definition that can apply to all categories of licensees, **it is equally important to note that implementation of the traits and behaviors as they apply to the specific licensee categories may differ.**

Differences to Specific Application of Use

- In medical uses, nuclear safety does not preempt or override patient safety especially in emergency situations. For example, life saving measures should always pre-empt the need to decontaminate a patient in the emergency room.

Path Forward

- NRC must define:
 - the characteristics that, in the agency's view, define a positive safety culture, and
 - the metrics for assessing a licensee's program against those characteristics.
- Without specific definition, the interpretation of a positive safety culture remains subjective.

Next Steps

- AAPM believes the next critical step is to develop specific actionable characteristics and behaviors **specific to each license category.**
- This next level or “third tier,” once developed will provide more meaning in the individual licensee category and relate the general characteristics to specific behaviors and indications of a strong safety culture in that particular field.

AAPM Recommendations

- NRC must work closely with the Agreement States to prioritize this effort relative to other regulatory issues.
- In the absence of adequate Agreement State support for this initiative, the safety culture concept would potentially only be applied to approximately twenty percent of the byproduct materials users nationwide.

AAPM Recommendations

- NRC should conduct workshops, in coordination with the Agreement States, specific to each category of licensee to clarify NRC's approach to safety culture and ensure that its expectations are clearly understood.
- These should be specific roundtable discussions and not simply presentations at professional society conferences.

AAPM Recommendations

- Guidelines explaining NRC expectations regarding adoption of Safety Culture values must be promulgated.
- If stakeholders do not understand how to implement Safety Culture, and have metrics to use internally to determine the effectiveness of their efforts, attention will be minimal.

AAPM Recommendations

- NRC should refrain from including safety culture issues in inspection reports and assessments until such time that the final policy has been issued, relevant coordination with the regulated community and Agreement States has occurred, and implementing guidance is issued to ensure that NRC's expectations are clear.

AAPM Recommendations

- That the NRC's safety culture scheme be clarified that if medical licensees can demonstrate the extent to which current requirements and practice meet the "intent of the NRC safety culture policy", they should not have to use methods and terminology developed by NRC staff who might have limited understanding of methods and requirements currently used by healthcare organizations.

Questions?