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Comments for the NRC's Internal Safety Culture Task Force

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Kudos

The NRC deserves credit for taking the fine work it has done in recent years regarding safety culture at operating reactor sites and bringing it in-house.

The NRC also deserves credit for engaging external stakeholders as part of its internal safety culture task force efforts.

Things are on track to a win-win-win outcome.



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Roadmap

- **Corrective action program**
- **Credible Differing Professional Opinion process**
- **“Protecting People and the Environment” – NRC staff are people, too, and must be protected**
- **Non-Concurrence workaround**
- **Periodic surveys made publicly available**
- **Formal continuous improvement component**
- **Communication, communication, communication**



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Corrective Action Program Straw Man

- **Each NRC program office (e.g., NRR, RES, NSIR, NMSS, NRO, NIRS, Region 1, ..., Region IV, etc.) should have maintain its own corrective action process for problems within its area of responsibility**
- **An overall sponsor, perhaps at the EDO office level, should monitor the implementation of the various corrective action processes**
- **Each corrective action process should provide the proper context for each problem identified, answering questions like “could this problem have been found sooner?”, “are there related problems to be fixed?”, etc.**



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DPO Straw Man

- **DPO program today is reminiscent of SALP/Watch List yesterday – effort going into determinations is not matched by effort acting upon the determinations**
- **“Accepted” recommendations from DPO program should be entered into corrective action process and tracked to expeditious completion**
- **ACRS should periodically, at least annually, review the technical adequacy of a sampling of DPO decisions and recommendation resolutions**



Protecting NRC People

- **NRC revised 10 CFR Part 26 to, among other things, protect workers at nuclear power plants from impairment from fatigue by (a) limiting their working hours, and/or (b) guaranteeing their right to self-declare feeling fatigued**
- **Anecdotally, it seems that NRC staff lack comparable protections and must put in sustained long work weeks to meet schedules**
- **“Do as I say, not as I do” must be done away with**
- **NRC must manage organizational growth and the inherent “musical chairs” without compelling staff to work under sustained stress.**



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Non-Concurrence Elimination

- **Non-Concurrence process is a work-around that facilitates non-resolution of nuclear safety issues**
- **There's something fundamentally flawed when a process allows subject matter experts to go on record opposing something that management then green lights – it smacks of the Challenger o-ring concern non-resolution and other examples of safety questions going unanswered**
- **The non-concurrence process must be eliminated or revamped to achieve rather than avoid resolutions**



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Periodic Work Force Surveys

- **Many of NRC's licensees periodically survey the work force – not just as part of the recovery from well-documented safety culture problems but proactively for the purpose of avoiding significant safety culture problems**
- **NRC would reap equal benefits from periodic surveys of its work force**
- **Absolute quantification of safety culture at any given time is difficult, whereas relative measures are easier**
- **Making survey results public would be consistent with NRC's transparency goals**



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Formal Continuous Improvement

- **By procedure, the charter of every augmented inspection team and special inspection team should include a formal, documented evaluation of the event against the reactor oversight process to determine if the scope, method and frequency of baseline inspections needs tweaking.**
- **By procedure, the agency's actions in response to GAO, OIG, etc. recommendations should include a formal, documented evaluation if process changes are warranted so as to have staff find and fix such issues instead of GAO or OIG.**



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Communication³

- **Failures to communicate form vacuums often filled by rumors, innuendoes, and superstitions**
- **Rumors et al can create safety culture problems when no foundation exists and can turn small safety culture problems into epidemics**
- **Proper communication is essential to narrow the gap between perception and reality and to avoid the frustrating, non-productive effort mitigating phantom problems**