



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 7, 2011

SECRETARY

COMMISSION VOTING RECORD

DECISION ITEM: SECY-11-0005

TITLE: PROPOSED FINAL SAFETY CULTURE POLICY
STATEMENT

The Commission (with all Commissioners agreeing) approved the subject paper as recorded in the Staff Requirements Memorandum (SRM) of March 7, 2011.

This Record contains a summary of voting on this matter together with the individual vote sheets, views and comments of the Commission.

A handwritten signature in black ink, appearing to read "Annette L. Vietti-Cook", written over a horizontal line.

Annette L. Vietti-Cook
Secretary of the Commission

Attachments:

1. Voting Summary
2. Commissioner Vote Sheets

cc: Chairman Jaczko
Commissioner Svinicki
Commissioner Apostolakis
Commissioner Magwood
Commissioner Ostendorff
OGC
EDO
PDR

VOTING SUMMARY - SECY-11-0005

RECORDED VOTES

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIP	COMMENTS	DATE
CHRM. JACZKO	X				X	1/31/11
COMR. SVINICKI	X				X	2/15/11
COMR. APOSTOLAKIS	X				X	2/7/11
COMR. MAGWOOD	X				X	1/26/11
COMR. OSTENDORFF	X				X	1/28/11

COMMENT RESOLUTION

In their vote sheets, all Commissioners approved the staff's recommendation and provided some additional comments. Subsequently, the comments of the Commission were incorporated into the guidance to staff as reflected in the SRM issued on March 7, 2011.

NOTATION VOTE

RESPONSE SHEET


TO: Annette Vietti-Cook, Secretary
FROM: Chairman Gregory B. Jaczko
SUBJECT: SECY-11-0005 – PROPOSED FINAL SAFETY
CULTURE POLICY STATEMENT

Approved X Disapproved _____ Abstain _____

Not Participating _____

COMMENTS: Below X Attached ___ None ___

I approve publication of the proposed final safety culture policy statement in the *Federal Register*. This policy statement provides a definition of safety culture as well as a description of positive traits that can be applied to the broad range of individuals and organizations involved in regulated activities. As such, it represents an important first step in establishing our expectation that safety and security are prioritized over other goals such as cost or production. The staff's extensive outreach produced broad consensus on terminology and traits of a positive safety culture among a wide range of stakeholders. I believe this represents a model of successful stakeholder engagement that should be emulated in future policy-making efforts. Staff should continue to engage stakeholders during the next steps of this process.



SIGNATURE

1/31/11

DATE

Entered on "STARS" Yes x No ___

NOTATION VOTE


RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: COMMISSIONER SVINICKI
SUBJECT: SECY-11-0005 – PROPOSED FINAL SAFETY
CULTURE POLICY STATEMENT

Approved XX Disapproved _____ Abstain _____

Not Participating _____

COMMENTS: Below ___ Attached XX None ___



SIGNATURE

02/5/11

DATE

Entered on "STARS" Yes No _____

**Commissioner Svinicki's Comments on SECY-11-0005
Proposed Final Safety Culture Policy Statement**

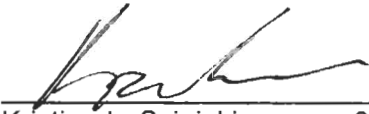
I approve the staff's recommendation to publish the Final Safety Culture Policy Statement in the *Federal Register*, subject to the comments below and edits attached. The collaborative engagement between the staff and stakeholders in developing the proposed final statement was impressive. It is important that we seek a common language and frame of reference on this important topic. I commend these efforts and make the following, specific comments.

I do not support applying the policy statement to vendors and suppliers. In addition to the concerns expressed by stakeholders at the Commission's January 24, 2011 public meeting, attempted inclusion of vendors and suppliers, many of whom are located overseas, would imply an extraterritorial reach of the statement. Should the staff conclude at a future point that it is necessary to extend the policy statement in this manner, the staff should provide, for Commission review and approval, a voting paper with options and recommendations to address these issues.

The statement on page 14 of the proposed notice that reads, "The NRC will include appropriate means to monitor safety culture in its oversight programs and internal management processes," is fundamentally inconsistent with the statement on page 16 that the safety culture traits "are not necessarily inspectable and were not developed for that purpose." The statement on page 14 was also not included in the draft notice issued for public comment in September of last year. The pedigree and purpose of its inclusion in this proposed final statement is not transparent. I do not support its inclusion.

Additionally, the last complete sentence on page 16 of the draft notice has been substantively revised since the September 2010 public comment version. No rationale is provided in the draft notice itself, or in SECY-11-0005, for this change. I believe this sentence should be revised to read as it did in the prior version, published for comment in September 2010: "It is the Commission's expectation that all individuals and organizations, performing or overseeing regulated activities involving nuclear materials, should take the necessary steps to promote a positive safety culture by fostering these traits as they apply to their organizational environments."

Finally, I join Commissioners Apostolakis and Ostendorff in their concern regarding the lack of specificity now available, in the approach to implementing this policy statement. I support the staff's outreach efforts to communicate the contents of the policy statement and to educate stakeholders on it; however, the policy statement is not a regulation or a requirement. I withhold my support for any staff activities that go beyond such communication and education, prior to explicit Commission review and approval of such activities.



Kristine L. Svinicki 02/15/11

NUCLEAR REGULATORY COMMISSION

[NRC-2010-0282]

Final Safety Culture Policy Statement

AGENCY: Nuclear Regulatory Commission.

ACTION: Issuance of Final Safety Culture Policy Statement.

SUMMARY: The U.S. Nuclear Regulatory Commission (NRC or the Commission) is issuing this Statement of Policy to set forth its expectation that individuals and organizations performing regulated activities establish and maintain a positive safety culture commensurate with the safety and security significance of their activities and the nature and complexity of their organizations and functions. The Commission defines Nuclear Safety Culture as *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.*

This policy statement applies to all licensees, certificate holders, permit holders, authorization holders, holders of quality assurance program approvals, ~~vendors and suppliers of safety-~~
~~related components,~~ and applicants for a license, certificate, permit, authorization, or quality assurance program approval, subject to NRC authority.

X

X

DATES: This policy statement becomes effective upon publication in the Federal Register.

FOR FURTHER INFORMATION CONTACT: Roy P. Zimmerman, Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; 301-415-2741.

SUPPLEMENTARY INFORMATION:

I. BACKGROUND

A. Previous Policy Statements and Events Involving Safety Culture

INSERT STANDARD FRN LANGUAGE REGARDING ADAMS. THROUGHOUT THIS FRN, PREFACE ALL "ML" NUMBERS WITH "ADAMS Accession No."

The NRC has long recognized the importance of a safety-first focus in nuclear work environments for public health and safety. The Commission's emphasis on a safety-first focus is reflected in two previously published NRC policy statements. The 1989 "Policy Statement on the Conduct of Nuclear Power Plant Operations" (54 FR 3424, January 24, 1989), applies to all individuals engaged in activities that affect the safety of nuclear power plants, and provides the Commission's expectations of utility management and licensed operators with respect to the conduct of operations. The 1996 "Freedom of Employees in the Nuclear Industry to Raise Safety Concerns Without Fear of Retaliation" (61 FR 24336; May 14, 1996), applies to the regulated activities of all NRC licensees and their contractors and subcontractors, and provides the Commission's expectations that licensees and other employers subject to NRC authority establish and maintain safety-conscious work environments in which employees feel free to raise safety concerns, both to their management and to the NRC, without fear of retaliation. This Safety Culture Statement of Policy, in conjunction with the previous policy statements, is intended to emphasize the importance the NRC places on the development and maintenance of a positive safety culture for all regulated activities.

The accident at the Chernobyl nuclear power plant in 1986 brought attention to the importance of safety culture and the impact that weaknesses in safety culture can have on safety performance. Since then, the importance of a positive safety culture has been

demonstrated by a number of significant, high-visibility events worldwide. In the United States, incidents involving the civilian uses of radioactive materials have not been confined to a particular type of licensee or certificate holder, as they have occurred at nuclear power plants and fuel cycle facilities and during medical and industrial activities involving regulated materials. Assessments of these incidents revealed that weaknesses in the regulated entities' safety cultures were an underlying cause of the incidents or increased the severity of the incidents. The causes of these incidents included, for example, inadequate management oversight of process changes, perceived production pressures, lack of a questioning attitude, and poor communications. One such incident indicated the need for additional NRC efforts to evaluate whether the agency should increase its attention to reactor licensees' safety cultures. This resulted in important changes to the NRC's Reactor Oversight Process (ROP). Commission paper SECY-06-0122, dated May 24, 2006, (ML061320282) describes the NRC's safety culture activities at that time and the outcomes of those activities.

X

Following the terrorist attacks of September 11, 2001, the Commission issued orders enhancing security at facilities whose operations, if attacked, could have an impact on public health and safety. During the early years of implementation of these security enhancements, several violations of the Commission's security requirements were identified in which the licensee's failure to cultivate a positive safety culture impacted the effectiveness of the licensee's security program. The most visible of these involved security officers sleeping in a "ready room" while on shift at a nuclear power plant. Most of the weaknesses involved inadequate management oversight of security, lack of a questioning attitude within the security organization, complacency, barriers to raising concerns about security issues, and inadequate training of security personnel.

B. Commission Direction

In February 2008, the Commission issued Staff Requirements Memorandum (SRM), SRM-COMGBJ-08-0001 (ML080560476), directing the NRC staff to expand the Commission's policy on safety culture to address the unique aspects of security and to ensure the resulting policy is applicable to all licensees and certificate holders. The Commission directed the staff to answer several additional questions, including: (1) whether safety culture as applied to reactors needed to be strengthened; (2) how to increase attention to safety culture in the materials area; (3) how stakeholder involvement can most effectively be used to address safety culture for all NRC and Agreement State licensees and certificate holders, including any unique aspects of security; and (4) whether publishing the NRC's expectations for safety culture and for security culture would be best accomplished in one safety/security culture statement or in two separate statements while still considering the safety and security interfaces. X

In response to Commission direction, the NRC staff reviewed domestic and international safety-culture-related documents and considered NRC lessons learned. Additionally, the staff sought insights and feedback from external stakeholders. This was accomplished by providing information in a variety of forums, such as stakeholder organization meetings, newsletters, and teleconferences, and by publishing questions developed to address Commission direction in the February 9, 2009, *Federal Register* notice (FRN) entitled "Safety Culture Policy Statement: Public Meeting and Request for Public Comments." (ML090260709)

In February, 2009, the NRC held a public workshop on the "Development of a Policy Statement on Safety Culture and Security Culture" in which a broad range of stakeholders participated, including representatives from the Agreement States (Meeting Summary: ML090930572). The staff developed draft characteristics (subsequently referred to as "traits") of a positive safety culture and presented them at the workshop. Mindful of the increased

encompass security within the statement; (4) seek opportunities to comport NRC terminology, where possible, with that of existing standards and references maintained by those that the NRC regulates; and (5) consider incorporating suppliers and vendors of safety-related components in the safety culture policy statement

C. Development of the Final Policy Statement

On February 2-4, 2010, the NRC held a second safety culture workshop to provide a venue for interested parties to comment on the draft safety culture policy statement. The additional goal of the workshop was for panelists representing a broad range of stakeholders to reach alignment, using common terminology, on a definition of safety culture and a high-level set of traits (~~previously referred to as "characteristics"~~) that describe areas important to a positive safety culture. The workshop panelists represented a wide range of stakeholders regulated by the NRC and/or the Agreement States, including medical, industrial, and fuel cycle materials users, and nuclear power reactor licensees, as well as the Nuclear Energy Institute, the Institute of Nuclear Power Operations (INPO), and members of the public. The workshop panelists reached alignment with input from the other meeting attendees on a definition of safety culture and a high-level set of traits describing areas important to a positive safety culture.

Following the February 2010 workshop, the NRC staff evaluated the public comments that were submitted in response to the November 2009 FRN. Additionally, the staff participated on panels and made presentations at various industry forums in order to provide information to stakeholders about the development of the safety culture policy statement and/or to obtain additional input and to ascertain whether the definition and traits developed at the workshop accurately reflect a broad range of stakeholders' views. These outreach activities included, for example, participation in a Special Joint Session on Safety Culture at the Health Physics Society Annual Meeting, and presentations on the development of the safety culture policy

Further careful consideration is needed before deciding to include

believes at this time, that developing a policy statement is a more effective way to engage stakeholders.

- 6. Vendors and suppliers of safety-related components have ^{not} been included in this Statement of Policy. A few stakeholders have raised concerns about how implementation would be carried out, particularly in cases where vendors and suppliers are located outside of NRC jurisdiction. However, the Commission believes that vendors and suppliers of safety-related components should develop and maintain a positive safety culture in their organizations for the same reasons that other NRC-regulated entities should do so. *within the scope of this policy statement.*
- 7. The final Statement of Policy adds the trait "Questioning Attitude" to the traits developed at the February 2010 workshop as an appropriate vehicle for addressing complacency.

III. Statement of Policy

The purpose of this Statement of Policy is to set forth the Commission's expectation that individuals and organizations performing regulated activities establish and maintain a positive safety culture commensurate with the safety and security significance of their activities and the nature and complexity of their organizations and functions. This includes all licensees, certificate holders, permit holders, authorization holders, holders of quality assurance program approvals, ~~vendors and suppliers of safety related components~~, and applicants for a license, certificate, permit, authorization, or quality assurance program approval, subject to NRC authority. The Commission encourages the Agreement States and other organizations interested in nuclear safety to support the development and maintenance of a positive safety culture, as articulated in this Statement of Policy, within their regulated communities. ~~The NRC will include appropriate means to monitor safety culture in its oversight programs and internal management processes.~~

The Commission defines Nuclear Safety Culture as *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.* Individuals and organizations performing regulated activities bear the primary responsibility for ~~safely handling and securing these materials.~~ ^{safety} ~~The Commission, as the regulatory agency with an independent oversight role, reviews the performance of those individuals and organizations through its inspection and assessment processes, including their performance as it relates to areas important to safety culture.~~ X

Organizations should ensure that personnel in the safety and security sectors have an appreciation for the importance of each, emphasizing the need for integration and balance to achieve both safety and security in their activities. Safety and security activities are closely intertwined. While many safety and security activities complement each other, there may be instances in which safety and security interests create competing goals. It is important that consideration of these activities be integrated so as not to diminish or adversely affect either; thus, mechanisms should be established to identify and resolve these differences. A safety culture that accomplishes this would include all nuclear safety and security issues associated with NRC-regulated activities. X

Experience has shown that certain personal and organizational traits are present in a positive safety culture. A trait, in this case, is a pattern of thinking, feeling, and behaving that emphasizes safety, particularly in goal conflict situations, e.g., production, schedule, and the cost of the effort vs. safety. It should be noted that although the term "security" is not expressly included in the following traits, safety and security are the primary pillars of the NRC's regulatory mission. Consequently, consideration of both safety and security issues, commensurate with their significance, is an underlying principle of this Statement of Policy.

The following are traits of a positive safety culture:

- (1) Leadership Safety Values and Actions - Leaders demonstrate a commitment to safety in their decisions and behaviors;
- (2) Problem Identification and Resolution - Issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance;
- (3) Personal Accountability - All individuals take personal responsibility for safety;
- (4) Work Processes - The process of planning and controlling work activities is implemented so that safety is maintained;
- (5) Continuous Learning - Opportunities to learn about ways to ensure safety are sought out and implemented;
- (6) Environment for Raising Concerns - A safety conscious work environment is maintained where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination;
- (7) Effective Safety Communication - Communications maintain a focus on safety;
- (8) Respectful Work Environment - Trust and respect permeate the organization; and
- (9) Questioning Attitude - Individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action.

There may be traits not included in this Statement of Policy that are also important in a positive safety culture. It should also be noted that these traits are not necessarily inspectable and were not developed for that purpose.

It is the Commission's expectation
~~The Commission expects~~ that all individuals and organizations, performing ^{or overseeing} regulated activities ~~will~~ ^{involving nuclear materials, should} take the necessary steps to promote a positive safety culture by fostering these traits as they apply to their organizational environments. The Commission recognizes the diversity of these organizations and acknowledges that some organizations have already spent

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: George Apostolakis

SUBJECT: SECY-11-0005 – PROPOSED FINAL SAFETY
CULTURE POLICY STATEMENT

Approved X Disapproved Abstain

Not Participating

COMMENTS: Below Attached X None



SIGNATURE

2/7/11

DATE

Entered on "STARS" Yes x No

I approve the staff's recommendation to publish the proposed final safety culture policy statement. I join my fellow Commissioners in commending the staff and the stakeholders for working together to develop a proposed definition.

The definition refers to "core values and behaviors." I accept the reference to values only for the purpose of fostering a common understanding of the concept of safety culture among all stakeholders. However, I believe the definition is too broad for use by the NRC. I feel strongly that this Agency should judge licensees on their performance and that the proposed safety culture definition, if adopted without further clarification, will ultimately direct our regulatory programs towards evaluating licensee values. Therefore, I have added text to Section III of the attached *Federal Register* notice to emphasize that the Commission's focus continues to be on behaviors and not values. Staff may need to make corresponding changes to other sections of the *Federal Register* to ensure consistency of message. I also support Commissioner Ostendorff's proposed deletion of the following sentence in Section III of the *Federal Register*: "The NRC will include appropriate means to monitor safety culture in its oversight programs and internal management processes".

I am concerned about the lack of clarity regarding an approach to implementing this policy statement for all NRC and Agreement State licensees, as well as vendors and suppliers. Before staff publishes the policy statement, it should seek Commission review of its plan, with short-term and long-term goals, for implementing this process and the vision for each program office's oversight. I am also concerned about the use of the concept of safety culture by non-reactor licensees throughout the United States, particularly for those licensees that work in other jurisdictions under reciprocity. I believe that many of the non-reactor licensees would benefit from the formal implementation of a safety culture program.

III Statement of Policy

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Nuclear Safety Culture is defined as 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. Individuals and organizations performing regulated activities bear the primary responsibility for safely handling and securing these materials. The Commission, as the regulatory agency with an independent oversight role, reviews the performance of those individuals and organizations through its inspection and assessment processes.

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Deleted: The NRC will include appropriate means to monitor safety culture in its oversight programs and internal management processes.

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The performance of individuals and organizations can be monitored and trended and, therefore, may be used to determine compliance with requirements and commitments and may serve as an indicator of possible problem areas in the organization's safety culture. NRC will not monitor or trend values and traits. These will be the organization's responsibility as part of its safety culture program.

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Organizations should ensure that personnel in the safety and security sectors have an appreciation for the importance of each, emphasizing the need for integration and balance to achieve both safety and security in their activities. Safety and security activities are closely intertwined. While many safety and security activities complement each other, there may be instances in which safety and security interests create competing goals. It is important that consideration of these activities be integrated so as not to diminish or adversely affect either; thus, mechanisms should be established to identify and resolve these differences. A safety culture that accomplishes this would include all nuclear safety and security issues associated with NRC-regulated activities.

Experience has shown that certain personal and organizational traits are present in a positive safety culture. A trait, in this case, is a pattern of thinking, feeling, and behaving that emphasizes safety, particularly in goal conflict situations, e.g., production, schedule, and the cost of the effort vs. safety. It should be noted that although the term "security" is not expressly included in the following traits, safety and security are the primary pillars of the NRC's regulatory mission. Consequently, consideration of both safety and security issues, commensurate with their significance, is an underlying principle of this Statement of Policy.

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- (4) Work Processes - The process of planning and controlling work activities is implemented so that safety is maintained;

(5) Continuous Learning - Opportunities to learn about ways to ensure safety are sought out and implemented;

(6) Environment for Raising Concerns - A safety conscious work environment is maintained where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination;

(7) Effective Safety Communication - Communications maintain a focus on safety;

(8) Respectful Work Environment - Trust and respect permeate the organization; and

(9) Questioning Attitude - Individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action.

There may be traits not included in this Statement of Policy that are also important in a positive safety culture. It should also be noted that these traits are not inspectable and were not developed for that purpose.

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The Commission expects that all individuals and organizations performing regulated activities ~~or which supply components or services to any facility or activity that is regulated by the NRC~~ will take the necessary steps to promote a positive safety culture by fostering these traits as they apply to their organizational environments. The Commission recognizes the diversity of these organizations and acknowledges that some organizations have already spent significant time and resources in the development of a positive safety culture. The Commission will take this into consideration as the regulated community addresses the Statement of Policy.

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Dated at Rockville, Maryland this ___ day of _____

For the Nuclear Regulatory Commission.

Annette L. Vietti-Cook
Secretary of the Commission

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: COMMISSIONER MAGWOOD
SUBJECT: SECY-11-0005 – PROPOSED FINAL SAFETY
CULTURE POLICY STATEMENT

Approved X Disapproved _____ Abstain _____

Not Participating _____

COMMENTS: Below X Attached _____ None _____

I approve the publication of the staff's proposed Final Safety Culture Policy Statement in the *Federal Register*. I applaud the cooperative effort between the staff and stakeholder groups that led to the development of the final statement. From the paper itself and from the January 24, 2011 Commission meeting, it is clear that the parties involved were committed to both the process of developing the policy statement and to the policy statement itself. Although questions remain regarding the next steps for this process, I believe that the efforts to date have laid important groundwork with regard to communication with and among licensees and Agreement States as well as their intellectual engagement in the issue. I believe this will prove beneficial in the future. I encourage the staff to continue to engage with all stakeholders to ensure that they have the necessary support to move to Tier 3 implementation as they deem appropriate.



SIGNATURE

26 January 2011

DATE

Entered on "STARS" Yes X No _____

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: COMMISSIONER OSTENDORFF
SUBJECT: SECY-11-0005 – PROPOSED FINAL SAFETY
CULTURE POLICY STATEMENT

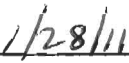
Approved Disapproved Abstain

Not Participating

COMMENTS: Below Attached None



SIGNATURE



DATE

Entered on "STARS" Yes No

**Commissioner Ostendorff's Comments on SECY-11-0005
Proposed Final Safety Culture Policy Statement**

I approve the staff's recommendation to publish the Final Safety Culture Policy Statement, as modified in the attached, in the *Federal Register*. I commend the staff for their tremendous collaborative efforts, working together with the regulated community, the public, and other stakeholders, to develop this policy statement. This policy statement is an important step for establishing a common foundation for a positive safety culture.

As a result of numerous years of experience in the Navy Nuclear Power Program, I have a strong appreciation for the importance of the core values and behaviors that contribute to having a positive safety culture. The core values and behaviors associated with nuclear safety culture should be what individuals and organizations strive for to ensure that safety is the highest priority.

While I support the concept of a safety culture policy statement and the associated traits, I do have concerns that improper implementation of the policy statement could result in de-facto requirements. As I understand from briefings by the NRC staff, my review of SECY-11-0005, and the Commission meeting held on January 24, 2011, the staff's next step following publication of the safety culture policy statement will be to continue outreach efforts, using steering committees and workshops, to help the regulated community effectively apply the policy statement as they deem appropriate. I support the staff's additional outreach efforts to communicate the contents of the safety culture policy statement and educate stakeholders on safety culture principles. However, since the policy statement is not a requirement, the staff's efforts should be limited to these activities. I do not support staff activities, such as elements of the proposed implementation activities detailed in Enclosure 6, that go beyond stakeholder communication and education related to the policy statement without coming before the Commission for further review and approval. With this in mind, I approve publication of the policy statement in the *Federal Register* subject to the attached changes.

believes at this time, that developing a policy statement is a more effective way to engage stakeholders.

6. Vendors and suppliers of safety-related components have been included in this Statement of Policy. A few stakeholders have raised concerns about how implementation would be carried out, particularly in cases where vendors and suppliers are located outside of NRC jurisdiction. However, the Commission believes that vendors and suppliers of safety-related components should develop and maintain a positive safety culture in their organizations for the same reasons that other NRC-regulated entities should do so.
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- (1) Leadership Safety Values and Actions - Leaders demonstrate a commitment to safety in their decisions and behaviors;
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There may be traits not included in this Statement of Policy that are also important in a positive safety culture. It should also be noted that these traits are not necessarily inspectable and were not developed for that purpose.

The Commission expects that all individuals and organizations performing regulated activities ~~will~~ ^{should} take the necessary steps to promote a positive safety culture by fostering these traits as they apply to their organizational environments. The Commission recognizes the diversity of these organizations and acknowledges that some organizations have already spent