

Safety Culture & Palo Verde Lessons Learned Recommendations

1. CI-2 Revise IMC 0612 to provide additional guidance and examples for assigning and documenting crosscutting aspects.

Comments – The guidance provided to the inspectors should require them to provide the basis for the item in question being classified as a “significant contributor” to the finding.

The inspectors should not have to explain why a cross cutting aspect was not assigned. Rather, a statement should be included in the finding to state a cross cutting aspect was not assigned.

2. CI-4 Clarify that a crosscutting theme needs to involve two or more inspection findings with the same crosscutting aspect (should not look for sub-cross-cutting aspects). (IMC0305 In-progress)

Comments - The concept of a sub-cross-cutting aspect is not defined in Manual Chapter 0305 and should not be addressed in guidance or included in inspection reports or the annual and semi-annual reviews.

3. PV-1 Consideration should be given to considering all 13 safety culture components during implementation of the baseline program. Additional criteria should be established for when to consider a cross-cutting theme for the safety culture components of accountability, continuous learning environment, organizational change management, and safety policies. (IMC 0305 In progress, working to incorporate the other safety culture components as crosscutting components.)

Comments – The other safety culture components are very subjective in nature and were excluded from the cross cutting aspects due to the difficulty to evaluate during the inspection program. The original decision is still valid and there should not be changed unless there is compelling evidence to show why the addition of the other components is required to monitor the safety culture.

4. PV-2 Consider revising IMCs 0305 and 0612 to allow inspectors to assign multiple cross-cutting aspects for each safety culture related cause associated with a performance deficiency. If the result is an increase in the number of cross-cutting aspects, then MC 0305 should be revised to raise the criteria to satisfy the requirements for a substantive cross-cutting issue. In addition, for sites with multiple units, consideration should be given to raising the criteria to satisfy the requirements for a substantive cross-cutting issue. (IMC 0612, IMC 0305 Not

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adopting this recommendation. Reinforcing existing flexibility to only assign multiple crosscutting aspects for unusual or complex issues.)

Comments – Multiple cross-cutting aspects should not be assigned to a single finding. Such an action would contradict the concept of assigning the cross-cutting aspect to the item that is the significant contributor to the finding. When multiple cross-cutting aspects are assigned the significance is lost and the system loses any value to be gained from the assignment of a cross-cutting aspect.

5. PV-11 Consider revising IP 95003 to include an assessment of outage activities. IP 95003 (In progress, plan to amplify outage coverage and sensitivity of the outage inspection burden on licensee.)

Comments - The conduct of outage related inspection activities should only be implemented when the conduct of an outage is the reason for the initiation of the 95003 inspection. The 95003 inspection procedure should be revised to establish clear criteria for the inspection scope based upon the problems that lead to the movement to column 4.

6. PV-12. Consider revising IP 95003 to treat the activity as a fact finding to understand the depth and breadth of performance concerns. This includes the potential for greater use of unresolved items. IP 95003 (In-progress, working to amend inspection approach.)

Comments – The 95003 inspection process should be revised to define clear criteria to be inspected based upon the problems that caused the licensee to move to column 4. The use of the inspection as a fact finding has the potential to delay the licensee's ability to resolve deficiencies in a timely manner and move back to column 1.

7. PV-13 Consideration should be given to establishing and assessing precursors as part of the baseline inspection program. These precursors should be assessed as part of the IMC 0305 assessment process. (IMC 0305 In-progress, looking at correlation of safety culture components with qualitative precursors.)

Comments – The NRC should not pursue the concept of adding precursors to the ROP. The safety culture process is still not mature and the addition of subjective new elements such as precursors will dilute any intelligence to be gained from the cross-cutting aspects.

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8. PV-16 Consideration should be given to providing additional guidance to supervisory and management personnel for the conduct of management site visits at facilities where only a few findings have been identified. IMC 0102 (Under consideration.)

Comments – The NRC should clearly define the purpose of this recommendation. As written, it implies that the inspectors have not identified enough findings versus the licensee having good performance and that there are a minimum number of findings that should be issued. Such a suggestion contradicts the principles of the ROP and predictable regulation and introduces another level of inspection based upon subjectivity.

9. PV-18. Consider revising IP 95003 to require implementation of the EP attachment and having an EP inspector from another regional office perform the attachment. IP 95003 (Under consideration.)

Comments – The EP attachment should only be implemented when emergency preparedness is part of the problem that lead to the initiation of the 95003 inspection. If the NRC has a concern about the licensee's emergency preparedness program, there are existing inspection procedures that can be utilized separate from a 95003 inspection.

Manual Chapter 0305

1. Page 2, Section 04.17 The NRC needs to define how an individual is qualified (through experience and formal education) to perform a safety culture assessment.

2. Page 42, Section d. The inclusion of the 4"Other" components should not be pursued as the inspection program does not provide an objective method for their evaluation.

IP 95003

1. Page 17, General Guidance, 4th paragraph – The inspection during an outage window should only be performed when outage related activities are significant contributor to the event(s) that caused the plant to move to column r.
Recommendation – delete this paragraph.

2. Page 20, Inspection Planning and Logistics, 3rd paragraph – The guidance in this paragraph assumes that there are site issues and implies that a broad 95003 inspection is required. The staff should evaluate the 95003 process and develop a focused inspection that will address the events that lead to the column 4

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assignment and expand as required versus starting with the broad brush inspection.

3. Page 65, Introduction, 2nd, 3rd and 4th paragraphs – There is significant discussion about attitudes and additional guidance related to perceptions and values. These attributes are not finite or measurable and are very subjective and to a great extent are based upon the attitudes, perceptions and values of the inspector. However, behaviors are observable and not as subjective as attitudes, perceptions and values. It is recommended that the inspection focus on observed behaviors as they relate to the licensee's expectations, standards and requirements and eliminate the focus on attitudes, perceptions and values.