U.S.NRC
UNITED STATES NUCLEAR REGULATORY COMMISSION
Protecting People and the Environment

Incorporating Safety Culture Common Language into the Reactor Oversight Process (ROP) and Construction Reactor Oversight Process (cROP)

February 27, 2014

Contacts: Tom Kozak, NRO/DCIP
Phil O'Bryan, NRO/DCIP

Background and Recent Activities

- NRC engaged with INPO, NEI, and others to develop a common safety culture language for nuclear power reactors

- NRC issued Final Safety Culture Policy Statement in June 2011 (76 FR 34773)

- Common language finalized in early 2013 as noted in INPO 12-012 and meeting summary

- Staff issuing NUREG 2165 to formally document common language to apply to all NRC programs

- Staff revised ROP guidance to reflect the common language; revised IMC 0310 issued in December 2013, implemented on January 1, 2014, and will be used for all ROP 2014 findings

IMC 0310 Revisions

- Revised cross-cutting aspects (CCAs) to align with the safety culture common language attributes of NUREG-2165 and the Commission's safety culture policy statement

- Changes in terminology and coding; no change to policy or process

- Similar changes will be made to IMC 0613 – Appendix F

- Changes do not affect the process for applying CCAs per IMCs 0612/0613 or evaluation of substantive cross-cutting issues (SCCIs) per IMCs 0305/2505

- More substantive process changes will be considered as part of ROP enhancement project, particularly as related to the evaluation of SCCIs

Cross-Cutting Aspects

- "New" CCAs grouped by cross-cutting areas of:

  - human performance (H)
  - problem identification and resolution (P), and
  - safety conscious work environment (S)

- Supplemental CCAs to be used during supplemental inspections and when performing safety culture assessments

- Removed the component level to simplify alignment and consistency

- Included crosswalks from "old" CCAs and common language attributes to "new"

Approach

- Construction inspector training will be completed in June 2014

- Affected cROP documents identified for future change

    o IMC 0613 - Appendix F
    o IPs 90000, 90002, and 90003

- Additional ROP documents also identified for future change

    o IPs 95001, 95002, and 95003 (including 95003.02)

- Other related changes under review (training, web pages, cROP guidance, etc)

Assessment Process

- 2013 End-of-Cycle Meetings conducted per existing guidance using "old" CCAs

- 2013 Annual assessment letters will reflect "old" CCAs

- 2014 Mid-cycle meetings to be conducted per revised guidance; findings from 2nd half of 2013 will be converted to "new" CCAs

- New cROP guidance documents to be issued by June 30, 2014 and implemented July 1, 2014

- 2014 End-of-cycle meetings to be conducted per revised guidance; all 2014 findings will be converted to "new" CCAs

Communications

- February 27, 2014 Public Meeting

- Draft IMC 0613 Appendix F to be made publicly available

- Future Public Meeting for feedback, if requested

- Annual Assessment Meetings

- cROP Annual Self-Assessment SECY Paper