



Extension of Safety Culture to the Supply Chain

NUPIC Auditor Conference

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Overview

- NRC Safety Culture Policy Statement
 - Safety Conscience Work Environment (SCWE)
 - NRC Vendor Inspections of Supplier Safety Culture and SCWE
 - NRC Enforcement Related to Supplier Safety Culture and SCWE
 - NRC Outreach Activities to Suppliers
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US NRC Safety Culture Policy Statement

- NRC Safety Culture Policy Statement issued on June 14, 2011 applies to all those subject to NRC authority
- NRC Safety Culture Policy Statement is not a regulation and does not impose requirements
- NRC Safety Culture Policy Statement complements the NRC's regulations and guidance
- Regulatory Information Summary (RIS) 2012-01, "Availability of Safety Culture Policy Statement"
- In the US, licensees are responsible for the safety culture of their suppliers

Safety Conscience Work Environment (SCWE)

- Licensees and other employers subject to NRC authority are expected to establish and maintain safety-conscious work environments (SCWEs)
- Safety culture and SCWE are distinct but related concepts
- Regulatory Information Summary (RIS) 2005-18, “Guidance For Establishing and Maintaining a Safety Conscience Work Environment”
- Employees’ willingness to identify safety concerns, i.e., SCWE, is one important attribute of a strong safety culture and is expected of all licensees and their contractors



NRC Vendor Inspection Reinforces Safety Culture Message

- Safety Culture importance discussed at vendor inspection entrance and exit meetings
- Inspectors verify the vendor has implemented a Part 21 program and the vendor staff are aware that they can report problems to the NRC
- Revision of IP 43003, “Reactive Inspections of Nuclear Vendors” dated December 14, 2015 includes guidance to qualified safety culture assessors and references IP 71152, “Problem Identification and Resolution” Appendix A, when dealing with SCWE and/or safety culture issues.

Inspection of SCWE for Reactive Vendor Inspections

- IP 71152 Appendix A includes guidance for questioning the vendor staff on their ability to report problems and how vendor management reacts to problems.
- Suggested Questions include:
 - Are you willing to raise a safety concern?
 - Are you aware of situations where any employee or contractor may be hesitant to raise concerns, internally or externally?
 - Where would you go to raise a safety issue?
 - Are you aware of any actions taken by your management to prevent and detect retaliation and/or chilling effect?
 - Would you say that your management is supportive of the SCWE policy?

Initiators for Reactive Vendor Inspections Evaluating SCWE

- Allegations from concerned individuals
- Insights from NRC vendor inspections
- Information from US licensees via NUPIC



NRC Can Take Action on Poor Safety Culture and SCWE

- Issue Notice of Violation and / or Notice of Nonconformance
- Perform additional inspections
- Issue a “Chilling Effect Letter” to a supplier



NRC Can Take Action on Poor Safety Culture

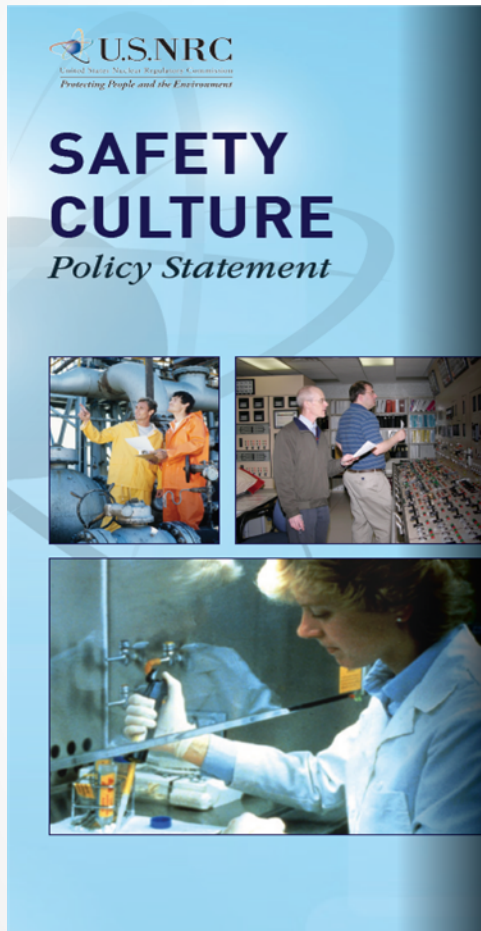
- Issue a “Confirmatory Order” to a supplier
- Issue a “Confirmatory Order” to an individual
- Take Enforcement Action against individual



NRC Has Taken Action on Poor Safety Culture

- Chicago Bridge & Iron (CB&I) , NOV & Civil Penalty and Chilling Effects letter on April, 18, 2013
 - ADAMS Accession No. ML13050A597 & ML13092A077
- Confirmatory Order to CB& I, to take actions to improve Nuclear Safety Culture and SCWE issued on September 16, 2013
 - ADAMS Accession No. ML13231A271
- 2ND Confirmatory Order to CB& I, to enhance actions CB&I had agreed to take to further address issues related to Nuclear Safety Culture and SCWE issued on September 25, 2014
 - ADAMS Accession No. ML14248A445
- Additional NRC Inspections at CB&I facilities

NRC Outreach Activities on Safety Culture to Suppliers



- Importance of safety culture and SCWE discussed at supplier facilities
- Presentation at NRC Workshop on Vendor Oversight for New Reactor Construction
- Presentations at NUPIC

Questions



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