

## NUCLEAR SAFETY CULTURE UPDATE

August 30, 2011

### **NRC Issues SCWE Inspection Procedure**

The NRC on August 18 issued Inspection Procedure 93100, “Safety-Conscious Work Environment Issue of Concern Follow-up.”

The procedure “inspects the [SCWE] attributes of a licensee’s safety culture” and is designed to coordinate with the NRC’s Problem Identification and Resolution inspection procedure, IP 71152. “SCWE-related issues of concern identified during IP 71152 can be examined in more depth using [IP 93100] to gain additional insights.” For example, IP 71152 lists suggested questions inspectors may use in on-site discussions about SCWE with workers, and “where a potential problem with SCWE is identified in response to these questions,” IP 93100 directs inspectors to consult with regional management to determine if additional information about the work environment should be gathered pursuant to IP 93100.

IP 93100 can also be used to follow-up on a SCWE substantive cross cutting issue identified during mid-cycle and end-of-cycle assessments under the NRC’s Reactor Oversight Process (ROP).

### **Inspection Objectives**

IP 93100 clearly states the procedure’s objectives: (1) determine if indications of a chilled work environment exist; (2) determine if employees are reluctant to raise safety or regulatory issues; and (3) determine if employees are being discouraged from raising safety or regulatory issues. Inspection observations are to be characterized in a manner that addresses these objectives.

### **Inspection Guidance**

IP 93100 details the steps inspection teams and regional management should take in planning a SCWE inspection. These include developing a site-specific inspection plan, determining whether observations and/or focus group discussions will be conducted, determining whether qualified NRC safety culture assessors should assist, and gathering pertinent information from the Office of Enforcement (OE) and Office of Investigations (OI) (such as related allegations or allegation trends, SCWE-related confirmatory orders, and insights on SCWE-related OI assists).

IP 93100 provides detailed guidance for site-specific inspection plans. Inspectors are expected, for example, to consider any allegations or Employee Concern Program/Corrective Action Program (ECP/CAP) records that point to either a chilled work environment or factors that could cause employees to be reluctant to raise concerns. Such factors could include schedule or cost pressures or unresponsiveness to previously raised concerns. If inspectors identify such concerns, they are expected to review how the licensee responded and the status of any corrective actions.

Where an IP 93100 inspection team conducts interviews to follow-up on an identified SCWE concern, the procedure states that inspectors should interview the individuals involved in that concern as well as “randomly selected individuals” from the same and other work groups, key supervisors of the groups, and the ECP Manager. IP 93100 lists seven areas of inquiry for interviews, including questions to probe for indications of a possible chilled environment, to identify factors that could contribute to such an environment, and to glean worker perceptions about the ECP, CAP, and the site SCWE (such as “In what ways does your management support a SCWE?”). IP 93100 suggests that focus groups might be appropriate in some cases, such as where an apparent chilling effect involves more than one or two individuals). Inspectors are also expected to review licensee SCWE and safety culture assessments to determine “whether the results from those assessments are consistent with the interview responses.”

Concurrently with the issuance of IP 93100, the NRC issued a revised, coordinated version of IP 71152.

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