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NUCLEAR SAFETY ADVISORY COMMITTEE

Report on a meeting of Task Force 3 Members with ND Staff

A Paper by Bryan Edmondson on behalf of TF3

PURPOSE OF MEETING: To discuss safety culture developments with ND

BACKGROUND

1. The overall objectives of TF3 are
"To seek assurance:
 - that SLCs are committed to the institution, maintenance and continuous development of those methods, actions, and personal attitudes which are required in organizations seeking high reliability and a satisfactory safety culture, and that they are deploying the necessary resources and governance processes.
 - that NII have in place effective practices to influence SLCs to these ends."
2. Following the presentation on safety culture at the NuSAC Meeting in October 2007, the Chief Inspector suggested another opportunity be taken to pursue the matter. To take complete advantage of this proposal, on 9 January 2008, TF3 Members met ND staff with responsibility for developing the topic.
3. The purpose of the meeting was for TF3 to become better informed on the ND approach, and to respond to the ND staff request for Member's comments in a free ranging exchange.
4. The meeting was primarily a discussion with questions and answers, structured by a very helpful enlargement of the October NuSAC presentation with particular emphasis on future intentions. TF Members thought it right to report the outcome to the 10 April meeting, even though this may be a partial re-run of the October event.

GENERAL APPROACH

5. In common with a number of other regulators, ND has given much effort to determining the best approach to incorporating the safety culture concept into its

framework of practices. The presentation of the ND work to TF3 Members was comprehensive, starting from the perception of need and the four high level principles of the Leadership and Management for Safety Principles, and leading to a description of three pilot studies which ND has carried out. The latter was particularly useful and covered:

- (a) A multi-aspect (interviews, questionnaires, plant tours) review of safety culture in a “vertical slice” of a single activity at Sellafield;
- (b) A review of one SLC’s approach to safety culture at the corporate level;
- (c) A test of means for incorporating aspects of safety culture into site inspection routines.

It was noted that:

- (a) had been resource intensive, ruling it out as a practical tool except in special cases.
 - (b) had been less resource intensive and offered important advantages. The influence of officers at corporate level is in itself an important determinant of attitudes within an SLC. Further, such influence magnifies the efforts of the safety regulator. Notably the pilot study had been well received by the corporate officers concerned.
 - (c) relates to the simplest way of obtaining “front line” data, given suitable definition of the aspects to be surveyed.
6. ND expect that items (b) and (c), together with means for examining SLC’s internal processes linking the two, will be key parts of the strategy being developed for consideration by the ND Management Board.
 7. Members were supportive. Answers to questions of detail had been provided. The importance of the safety culture concept and the need to convert it into a practical tool had been reinforced by the occasion. The approach involving intervention at corporate and site inspection levels was judged by members to be the appropriate option, as it offers efficiency of ND influence together with simplicity of application within the existing framework.
 8. Members were disappointed by the apparent lack of a set of desirable attributes, the tools with which the safety culture of a SLC might be judged. ND advised that they had scanned worldwide studies to establish the features commonly held to be important in the avoidance of accidents and in the achievement of high reliability. The product was a draft compilation of attributes of the kind members sought. An acknowledged difficulty was that the elements of such a compilation must not only express the requirements of a sound safety culture, but also be capable of evaluation within the existing framework. Even so, Members urged firmer establishment of desirable attributes, of which might be required of SLCs and of ND, its inspectors and assessors.

9. Non-nuclear experience was brought to bear in the discussion, and generally ND's approach took account of the aspects raised by Members. Since in essence the queries related to the issue of desirable attributes, TF3 Members' knowledge may be additionally helpful in rounding off the ND compilation.
10. Members noted the concentration of the ND safety culture work on SLC's direct accountabilities, and commented that the increasing scope for SLC contractors' activities, in operations as well as in design and construction, would require special attention in the ND approach.

IMPLEMENTATION

11. To establish the safety culture concept as a component of the UK framework of practices, there is need first to finalise a strategy for discussion by the ND Management Board. This is necessary to confirm senior management commitment to the importance of the topic, and to agree an approach for influencing the SLCs. Further, there will be need for development of appropriate processes and for staff training and familiarisation. TF3 considers this work should be taken forward speedily.
12. In discussing the timescale for Management Board consideration, Members questioned the resources available. The overall shortfall in ND staffing is well recognised, and this will be exacerbated when new build work begins in earnest. The ND unit concerned with safety culture is small, and it has other first-priority corporate-orientated issues in its portfolio. So progress on safety culture matters is likely to be slow. In the circumstances, TF3 Members think it right to emphasise that the concept has potential for magnifying ND efforts through influence on collective performance of SLC staff. This potential should be given weight in the apportionment of ND resources and recruitment should take account of the skills needed.

CONTINUING ACTIVITY FOR TF3

13. The first of TF3's overall objectives (at the head of this document) implies an involvement with SLCs, to seek assurance that they are embracing the concept of safety culture. In discussion, the ND staff suggested TF3 might seek to test attitudes and practices at senior management and corporate level. The starting point proposed is attendance of TF3 Members at a meeting of the Industrial Safety Director's Forum, to discuss Forum member companies own approach to safety culture as well as options for obtaining the assurance implied in TF3's first objective.

SUMMARY

ROLE OF ND.

14. The exchanges reinforced TF3 Member's perceptions of the importance of the safety culture concept. Members fully supported the ND approach, and its implementation should be pursued.

15. In TF3 Members' opinion, future progress is likely to be hampered for want of resources. Importantly, there is potential for safety culture evaluation to magnify the impact of the regulator via influence on the collective behaviour of SLC staff. This feature should be given weight in ND resource apportionment, and ND recruitment should take account of the special skills needed.
16. In TF3 Members' opinion, if the safety culture concept is to be fully realised as a component of the UK framework of practices, the early fillip of ND Management Board consideration and approval is required.

FURTHER ACTIVITY.

17. NuSAC should remain informed of progress towards establishment of the safety culture concept as a practical tool, by means of periodic ND statements.
 18. TF3 should seek an exchange with the Industry Safety Director's Forum, to discuss inter alia Forum members companies' own approach to the safety culture topic.
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