Establishment and Maintenance of a Positive Safety Culture

The purpose of this Statement of Policy is to set forth the Bureau of Radiation Control’s expectation that individuals and organizations establish and maintain a positive safety culture commensurate with the safety and security significance of their activities and the nature and complexity of their organizations and functions. This includes all licensees, certificate holders, permit holders, authorization holders, holders of quality assurance program approvals, vendors and suppliers of safety-related components, and applicants for a license, certificate, permit, authorization, or quality assurance program approval, subject to the Bureau’s authority.

The Bureau encourages licensees and other organizations interested in nuclear safety to support the development and maintenance of a positive safety culture, as articulated in this Statement of Policy. Nuclear Safety Culture is defined as the core values and behaviors resulting from a collective commitment by leaders and individuals to emphasize safety over competing goals to ensure protection of people and the environment. Individuals and organizations performing regulated activities bear the primary responsibility for safety and security.

The performance of individuals and organizations can be monitored and trended and, therefore, may be used to determine compliance with requirements and commitments and may serve as an indicator of possible problem areas in an organization’s safety culture. The Bureau will not monitor or trend values. These will be the organization’s responsibility as part of its safety culture program. Organizations should ensure that personnel in the safety and security sectors have an appreciation for the importance of each, emphasizing the need for integration and balance to achieve both safety and security in their activities. Safety and security activities are closely intertwined. While many safety and security activities complement each other, there may be instances in which safety and security interests create competing goals. It is important that consideration of these activities be integrated so as not to diminish or adversely affect either; thus, mechanisms should be established to identify and resolve these differences. A safety culture that accomplishes this would include all nuclear safety and security issues associated with Bureau of Radiation Control regulated activities.

Experience has shown that certain personal and organizational traits are present in a positive safety culture. A trait, in this case, is a pattern of thinking, feeling, and behaving that emphasizes safety, particularly in goal conflict situations, e.g., production, schedule, and the cost of the effort versus safety. It should be noted that although the term “security” is not expressly included in the following traits, safety and security are the primary pillars of the Bureau’s regulatory mission. Consequently, consideration of both safety and security issues, commensurate with their significance, is an underlying principle of this Statement of Policy.
The following are traits of a positive safety culture:

1. **Leadership Safety Values and Actions** — Leaders demonstrate a commitment to safety in their decisions and behaviors;

2. **Problem Identification and Resolution** — Issues potentially impacting safety are promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance;

3. **Personal Accountability** — All individuals take personal responsibility for safety;

4. **Work Processes** — The process of planning and controlling work activities is implemented so that safety is maintained;

5. **Continuous Learning** — Opportunities to learn about ways to ensure safety are sought out and implemented;

6. **Environment for Raising Concerns** — A safety conscious work environment is maintained where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination;

7. **Effective Safety Communication** — Communications maintain a focus on safety;

8. **Respectful Work Environment** — Trust and respect permeate the organization; and

9. **Questioning Attitude** — Individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action. There may be traits not included in this Statement of Policy that are also important in a positive safety culture. It should be noted that these traits were not developed to be used for inspection purposes. It is the Bureau’s expectation that all individuals and organizations, performing or overseeing regulated activities involving nuclear materials, should take the necessary steps to promote a positive safety culture by fostering these traits as they apply to their organizational environments. The Bureau recognizes the diversity of these organizations and acknowledges that some organizations have already spent significant time and resources in the development of a positive safety culture. The Bureau will take this into consideration as the regulated community addresses the Statement of Policy.

A positive safety culture is not required by regulations, so the bureau will not monitor or trend values. We strongly recommend that management and employees become familiar with the traits of a positive safety culture and develop and implement a safety culture program appropriate to their use of radiation or radioactive materials. If you have any questions, please contact us at (850) 245-4545.