Moving forward with implementing regulatory oversight of Safety Culture a work in progress and some lesson learned

Presented to:
TM on Integration of Safety Culture into Regulatory Practices and the Regulatory Decision Making Process

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Overview of Presentation

- Canadian nuclear context and regulatory approach
- Safety culture in Canada achievements, lessons learned and actions
- CNSC’s discussion papers engaging stakeholders
- Building on consultation
- Challenges and next steps
CNSC’s Mission

- To regulate nuclear activities to protect the health, safety and security of Canadians and the environment
- To implement Canada’s international commitments on the peaceful use of nuclear energy
Nuclear in Canada

- 3,000 licences
- 2,500 licensees
- 162 NPP inspections by CNSC staff
- 14 safety and control areas evaluated to ensure safe nuclear facilities and activities
- 1 nuclear regulator
How is Safety Defined in the Canadian Nuclear Industry?

• The Nuclear Safety Control Act (NSCA) provides broad powers to the Commission to prevent unreasonable risk

• The Commission defines what is safe, for the nuclear industry

• In practice in the Canadian nuclear industry “safety” is all encompassing and includes security
Responsibility for Nuclear Safety

- CNSC is responsible to the public, through Parliament, for regulatory oversight that assures that licensees properly discharge their responsibilities

- Licensees have primary responsibility for safety through managing their regulated activities in a manner that protects health, safety, security and the environment while respecting Canada’s international obligations

- A healthy safety culture is a key factor in reducing the likelihood of nuclear events and is an ongoing process, requiring the attention of licensees and the regulator
Safety Culture: What We’ve Achieved

- Developed the “Organization Review Method” (O&M)
- Performed O&M assessments at all nuclear power licensees as well as several research and fuel cycle licensees
- Developed a “Safety Culture Self-Assessment Guide” for licensees
- Hosted a symposium & workshop on safety culture
- Involved in revision of national management system standard which includes generic requirements on safety culture (CSA N286-12 sec 4.2)
- Incorporating safety culture into Licence Condition Handbooks and REGDOCs
- Many licensees have processes in place to evaluate and improve their safety culture using regular and periodic assessments
- Participation in ongoing dialogue on safety culture with other government departments, industry stakeholders, academia and internationally
Safety Culture: What We’ve Learned

• Opportunities for improvement exist in
  • Clarifying language, definition, and framework
  • Formalizing expectations & roles and responsibilities
  • Providing clear guidance on self-assessments to promote consistency in industry’s practice
  • Engaging all Canadian licensees and public stakeholders

• Importance of Peer Groups in Support of Safety Culture
  • INPO and WANO framework, methods and assessments
  • CANDU Owners Group (COG) initiatives
  • Industrial Radiography Working Groups
Safety Culture: CNSC’s Actions

- Engaging all Canadian licensees and public stakeholders in safety culture discussions
- Published a discussion paper that
  - Provide a clear definition and characteristics so that licensees have a shared understanding of safety culture
  - Formalize safety culture self-assessment requirements for licensees
  - Solicit feedback on the application of a graded-approach to all licensees based on risk
  - Clarify regulatory oversight role in verifying licensee activities
- Engaged in international/national activities in support of safety culture
CNSC Discussion Papers

- Used to solicit early public feedback on policies or approaches
- CNSC considers feedback when determining the type and nature of requirements and guidance to issue
- Discussion Papers are sent to an extensive stakeholder distribution list and posted on the CNSC website
- Consultation period of 180 days
- Results are communicated through the publication of a “what we heard report”
Safety Culture Discussion Paper Comments

Licensees are committed to:

- Fostering a healthy safety culture
- Regular assessments of safety culture in their organizations

Licensees requested flexibility in self-assessment requirements and the CNSC’s safety culture oversight approach

Stakeholders recommended ongoing dialogue with the CNSC

Stakeholders expressed support for IAEA guidance on safety culture oversight
Outcome of the CNSC’s Safety Culture Consultation

- Publish a REGDOC on Safety Culture that will:
  - Address stakeholders’ comments
  - Apply to all licensees (with a graded approach)
  - Clarify language, definition, and framework
  - Formalize expectations & roles and responsibilities
  - Clarify guidance on self-assessments
  - Offer a degree of flexibility for licensees’ safety culture assessment and improvement methods
- Continue the development of a Safety Culture Oversight Strategy
CNSC Further Engaging in International and National Activities

- International
  - USNRC/INPO
  - IAEA
  - NEA/CNSI/WGHOF
  - WINS (Security Culture)

- National
  - COG/INPO workshop
  - Uranium Processing/Refining Facilities
  - Fuel Processing Facilities
  - Research Accelerators
  - National Energy Board
  - Transport Canada (Halifax Symposium)
Safety Culture: Ongoing Challenges

- Integration of Security and Safety Culture
- Integrating Safety Culture within the overall regulator’s oversight
- Adapting the scope of SC oversight to licensees of varying sizes and complexities
- Striking a balance
  - prescriptiveness and flexibility
  - transparency and clarity
Safety Culture: What’s Next?

- Licensees will continue to
  - Foster a healthy safety culture
  - Perform safety culture self-assessments

- CNSC will
  - Communicate its Safety Culture Oversight Strategy
  - Develop a REGDOC clarifying requirements and expectations
  - Leverage opportunities to further engage all licensees and stakeholders
  - Contribute to the advancement of safety culture on the international/national scene
Conclusions

- Open and transparent consultation is important for Canadians
- Discussion papers are key in engaging discussions with stakeholders on specific topics
- Stakeholders feedback from discussion paper is invaluable as the CNSC strengthens its regulatory framework
- Safety culture has a significant influence on nuclear safety
- Licensees are responsible for shaping their organization’s safety culture
- Regulatory oversight strategy must be providing clear role and responsibilities