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To: Consultation (CNSC/CCSN) **Subject:** DIS-16-05 Comments

Good day

The following inputs are on experience gained at a Nuclear Power Station affiliated to INPO and WANO peer reviews.

- It seems that HP and Nuclear Safety Culture (NSC) are run as two separate programs. These two cannot be divorced from each other. Although the NSC definitions cannot and are not inclusive of HP, the HP definition cannot be limited to behaviours and results, it needs to be inclusive of a NSC. Here we may spend some time and rethink an HP definition that is inclusive of NSC. But first we need to determine what is the role of NSC in HP? It is my belief that to make an HP program sustainable in a good way, it needs to be built on a strong NSC, and visa versa; to reinforce certain HP behaviours to become habit, it needs to become part of the culture "the way we do things around here".
- Section 4 and/or 5 should include an HP Strategy. Strategy and ownership goes hand in hand. When the line function has articulated their improvement strategies it becomes not just empty words and promises, it becomes real, provides focus and make it manageable as a project.
- Section 4 and/or 5 should include the Monitoring program. In terms of INPO 14-004 most of the learning should be from the Monitoring programs such as Observations, Trending and Self-Assessment where improvement actions are identified at the earliest, easiest, stress-free opportunities (seen as proactive) and not from the CAP program as corrective action (reactive).

Hope this helps.
Regards
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