

Request for Information on the Proposed Implementation of REGDOC-2.1.2, *Safety Culture*

1. Preface

This document provides additional context on a proposed regulatory document. The Canadian Nuclear Safety Commission (CNSC) welcomes comments on the request for information as well as on the draft regulatory document.

Comments could include additional information on the regulatory document's implementation, potential impacts or potential alternative approaches that meet the document's safety objectives. Should stakeholders decide to submit impact estimates, the CNSC encourages them to clearly state assumptions and provide enough detail to allow an independent observer to understand how the estimate was derived.

The CNSC will consider comments received. In fulfilling its mandate as a federal regulator, the CNSC must also consider values and principles that are difficult to quantify with a dollar value. It must also give consideration to fulfilling its responsibility under the *Nuclear Safety and Control Act* to disseminate objective scientific and regulatory information. In all cases, safety is the CNSC's top priority.

All comments received will become part of the public record.

2. Background

Experience in the international nuclear industry and in other industries has demonstrated the importance of a healthy safety culture in maintaining the safety of workers, the public and the environment.

In September 2012, the CNSC issued discussion paper [DIS-12-07, *Safety Culture for Nuclear Licensees*](#), for public comment. The discussion paper presented a proposed approach for regulating safety culture in the Canadian nuclear industry. There was general support from industry to continue to foster safety culture and recognition of its impact on nuclear safety.

Specific to REGDOC-2.1.2, three key themes emerged:

1. there is a preference for using industry self-assessment tools and guidelines
2. licensees requested flexibility in choosing a safety culture framework
3. a graded approach should be adopted to implement the requirements of the regulatory document

Comments on the discussion paper were considered during the drafting of this regulatory document.

In October 2015, the CNSC was the lead agency in hosting an International Physical Protection Advisory Service (IPPAS) mission to Canada. The mission included a comprehensive review of the national nuclear security regime and included observations, suggestions and a good practice related to security culture. REGDOC-2.1.2 includes provisions that consider the IPPAS report's suggestions related to security culture.

REGDOC-2.1.2, *Safety Culture*, establishes requirements and guidance related to fostering and assessing safety culture. This regulatory document is part of the CNSC's Management System series of regulatory documents.

3. Objectives

This regulatory document aims to establish a common understanding of what constitutes a healthy safety culture and the importance of fostering safety culture in a licensee's organization. REGDOC-2.1.2 applies to all licensees: it sets requirements and guidance for licensees of Class I nuclear facilities and uranium mines and mills, and provides guidance to all other licensees. The following three requirements support this objective:

- licensees shall document their commitment to fostering safety culture in their governing documentation
- licensees shall conduct comprehensive safety culture assessments that are empirical, valid, practical and functional
- upon completion of a safety culture assessment, the licensees shall prepare a summary report for submission to the CNSC

The following supplementary objectives are supported in guidance sections and the appendices:

- provide a reference framework for safety culture to assist licensees in demonstrating a commitment to safety
- provide guidance on the characteristics of a healthy safety culture and assessment methodologies
- clarify the steps for conducting safety culture self-assessments, to help licensees conduct assessments effectively
- ensure that the organization is responsive to results of safety culture self-assessments

4. Regulatory approach

The requirement to articulate a commitment to fostering safety culture is intended for licensees of Class I nuclear facilities and uranium mines and mills. The requirements and guidance for safety culture assessments are intended for nuclear power plants.

While REGDOC-2.1.2 aims to standardize the approach to self-assessment, there is flexibility within the safety culture reference framework. Sample performance objectives are provided for each of the five characteristics. However, licensees may develop their own objectives within the safety culture reference framework.

The guidance contained in REGDOC-2.1.2, *Safety Culture*, applies to all licensees using a graded approach.

5. Potential impacts

CNSC staff anticipate little regulatory impact on applicants or licensees. Class I nuclear facilities and uranium mines and mills licensees already document their commitment to safety culture and regularly conduct safety culture self-assessments. The requirement to provide a summary report

of safety culture assessments may result in a modest administrative burden on nuclear power licensees.

6. Implementation

If approved, REGDOC-2.1.2 will become effective upon final publication. Each licensee will have a transition period from this document's publication date to when it is incorporated into their licensing basis. The CNSC will confirm the implementation time frame with each licensee.

Class I nuclear facilities and uranium mines and mills licensees meet the requirement to document their commitment to fostering safety culture, as described in REGDOC-2.1.2. Nuclear power plant licensees currently conduct safety culture self-assessments.

For new licence applicants, the requirements in REGDOC-2.1.2 will apply immediately upon the document's publication.

7. Feedback requested

Please submit comments or feedback to the CNSC by **November 28, 2016**, in one of the following ways:

- Email: cncs.consultation.ccsn@canada.ca
- Mail: Canadian Nuclear Safety Commission
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