Experience from the commercial nuclear industry, including the Institute for Nuclear Power Operations, has been reviewed for relevant lessons. An analysis of this experience and research over the past decade has identified supplemental safety culture elements that may be helpful to focus attention and action in the right areas to create the desired ISM environments. These elements also promote a shift from mere compliance toward excellence. They emphasize continuous improvement and long-term performance, and they are entirely consistent with the original intents of ISM.

DOE and the Energy Facility Contractors Group (EFCOG) have collaborated to develop guidance for achieving a strong safety culture. They identified the following three safety culture focus areas and several attributes associated with each one, that they felt offered the greatest potential for achieving excellence in both safety and production performance.

**Leadership**
- Demonstrated safety leadership
- Risk-informed, conservative decision making
- Management engagement and time in field
- Staff recruitment, selection, retention, and development
- Open communication and fostering an environment free from retribution
- Clear expectations and accountability

**Employee/Worker Engagement**
- Personal commitment to everyone’s safety
- Teamwork and mutual respect
- Participation in work planning and improvement
- Mindful of hazards and controls

**Organizational Learning**
- Credibility, trust and reporting errors and problems
- Effective resolution of reported problems
- Performance monitoring through multiple means
- Use of operational experience
- Questioning attitude

**LEADERSHIP**
Demonstrated safety leadership
Line managers (from the contractor senior manager, to the front-line employee) understand and accept their safety responsibilities as integral to mission accomplishment.
  o Line managers enhance work activities, procedures and process with safety practices and policies.
  o Leaders acknowledge and address external influences that may impose changes that could result in safety concerns.
  o Line managers clearly understand their work activities and performance objectives, and how to safely conduct their work activities to accomplish their performance objectives.
  o Line managers demonstrate their commitment to safety through their actions and behaviors, and support the organization in successfully implementing safety culture attributes, by conducting walk-throughs, personal visits, and verifying that their expectations are met.
  o The organizational mission and operational goals clearly identify that production and safety goals are intertwined, demonstrating commitments consistent with highly reliable organizations.

Risk-informed, conservative decision making
  o Line managers support and reinforce conservative decisions based on available information and risks. Managers and employees are systematic and rigorous in making informed decisions that support safe, reliable operations. Employees are expected, authorized and supported by managers to take conservative actions when faced with unexpected or uncertain conditions.
  o Managers and employees are intolerant of conditions or behaviors that have the potential to reduce operating or design margins. Anomalies are thoroughly investigated, promptly mitigated, and periodically analyzed. The bias is set on proving that work activities are safe before proceeding, rather than proving them unsafe before halting. Personnel do not proceed, and do not allow others to proceed, when safety is uncertain and management is supportive of these decisions.

Management engagement and time in field
  o Maintaining operational awareness is a priority. Line managers are in close contact with the front-line employees. Line managers listen and act on real-time operational information. Line managers identify critical performance elements and monitor them closely.
  o Line managers spend time on the floor and in employee work areas. Line managers practice visible leadership by placing —eyes on the work—, asking questions, coaching, mentoring, and reinforcing standards and positive behaviors. Deviations from expectations are corrected promptly and, when appropriate, collectively analyzed to understand why the behaviors occurred.
  o Managers set an example for safety through their personal commitment to continuous learning and by direct involvement in high-quality training that consistently reinforces expected employee behaviors.

Staff recruitment, selection, retention, and development
  o People and their professional capabilities, experiences, and values are regarded as the organization’s most valuable assets. Organizational leaders place a high personal priority and time commitment on recruiting, selecting, and retaining an excellent technical staff.
  o The organization maintains a highly knowledgeable workforce to support a broad spectrum of operational and technical decisions. Technical and safety expertise is embedded in the organization. Outside expertise is employed when necessary.
  o The organization is able to build and sustain a flexible, resilient, robust technical staff and staffing capacity. Staffing is sufficient to ensure adequate resources exist to ensure redundancy in coverage as well as cope with
and respond to unexpected changes in a timely manner.

- The organization values and practices continuous learning. Professional and technical growth is formally supported and tracked to build organizational capability. Employees are required to improve knowledge, skills, and abilities by participating in recurrent and relevant training and strongly encouraged to pursue educational opportunities.

- Line managers encourage and make training available to broaden individual skills and improve organizational performance. Training should include the ability to appreciate the potential for unexpected conditions; to recognize and respond to a variety of problems and anomalies; to understand complex technologies and capabilities to respond to complex events; to develop flexibility at applying existing knowledge and skills in new situations; to improve communications; and to learn from significant industry and DOE events.

Open communication and fostering an environment free from retribution

- A high level of trust is established in the organization.

- Reporting individual errors is encouraged and valued. Individuals feel safe from reprisal when reporting errors and incidents.

- Individuals at all levels of the organization promptly report errors and incidents and offer suggestions for improvements.

- A variety of methods are available for personnel to raise safety issues and line managers promptly and effectively respond to personnel who raise safety issues.

- Leaders proactively detect situations that could result in retaliation and take effective action to prevent a chilling effect.

- The organization addresses disciplinary actions in a consistent manner; disciplinary actions are reviewed to ensure fair and consistent treatment of employees at all levels of the organization.

Clear expectations and accountability

- Line managers provide ongoing performance reviews of assigned roles and responsibilities reinforcing expectations and ensuring key safety responsibilities and expectations are being met.

- Personnel at all organizational levels are held accountable for standards and expectations. Accountability is demonstrated both by recognizing excellent performance as well as identifying less-than-adequate performance. Accountability considers intent and organizational factors that may contribute to undesirable outcomes.

- Attachment 10 DOE G 450.4-1C 4 9-29-11

- Willful violations of requirements and performance norms are rare. Individuals and organizations are held accountable in the context of a just culture. Unintended failures to follow requirements are promptly reported, and personnel and organizations are acknowledged for self-identification and reporting errors.

**EMPLOYEE/WORKER ENGAGEMENT**

**Personal commitment to everyone’s safety**

- Responsibility and authority for safety are well defined and clearly understood as an integral part of performing
work.

- The line of authority and responsibility for safety is defined from the Secretary and contractor senior manager to the individual contributor. Roles and responsibilities, authorities and accountabilities are clearly defined in writing and are understood by each individual.

- Individuals understand and demonstrate responsibility for safety. Safety and its ownership are apparent in everyone's actions and deeds.

- Individuals outside of the organization (including subcontractors, temporary employees, visiting researchers, vendor representatives, etc.) understand their safety responsibilities.

- The organization knows the expertise of its personnel. Line managers defer to qualified individuals with relevant expertise during operational upset conditions. Qualified and capable people closest to operational upsets are empowered to make important decisions, and are held accountable justly.

Teamwork and mutual respect

- Open communications and teamwork are the norm.

- Individuals at all levels of the organization listen to each other and effectively engage in crucial conversations to ensure meaning, intent and viewpoints are understood; and that differing points of view are acknowledged.

- Discussion on issues focus on problem solving rather than on individuals.

- Good news and bad news are both valued and shared.

Participation in work planning and improvement

- Individuals are actively involved in identification, planning, and improvement of work and work practices.

- Individuals follow approved work practices and procedures.

- Individuals at all levels can stop unsafe work or work during unexpected conditions.

- Design, analysis and continuous improvement of work practices and processes are valued as core organizational competencies; expertise in these competencies is evaluated and rewarded.

Mindful of hazards and controls

- Organizational safety responsibilities are sufficiently comprehensive to address the work activities and hazards involved.

- Work hazards are identified and controlled to prevent or mitigate accidents, with particular attention to high consequence events with unacceptable consequences.

- Individuals understand and proactively identify hazards and controls before beginning work activities.

- Individuals are mindful of the potential impact of equipment and process failures, demonstrate constructive skepticism and are sensitive to the potential of faulty assumptions and errors. They appreciate that mindfulness requires effort.

ORGANIZATIONAL LEARNING
Credibility, trust and reporting errors and problems

- Credibility and trust are present and continuously nurtured so that a high level of trust is established in the
DOE Requirements Document (DRD)

Organization.
- Organizations, managers and line supervisors provide accurate, relevant and timely information to employees. Line managers are skilled in responding to employee questions in an open, honest manner.
- Reporting individual errors is encouraged and valued. Individuals are recognized and rewarded for self-identification of errors.
- Line managers encourage and appreciate safety issue and error reporting.
- Managers and line supervisors demonstrate integrity and adhere to ethical values and practices to foster trust.
- Managers and line supervisors demonstrate consistency in approach and a commitment to the vision, mission, values and success of the organization as well as the individuals (people).
- Mistakes are used for opportunities to learn rather than blame.
- Individuals are recognized and rewarded for demonstrating behaviors consistent with the safety culture principles.

Effective resolution of reported problems
- Vigorous corrective and improvement action programs are established and effectively implemented, providing both transparency and traceability of all corrective actions. Corrective action programs effectively prioritize issues, enabling rapid response to imminent problems while closing minor issues in a timely manner to prevent them from escalating into major issues.
- Results from performance assurance activities are effectively integrated into the performance improvement processes, such that they receive adequate and timely attention. Linkages with other performance monitoring inputs are examined, high-quality causal analyses are conducted, as needed, and corrective actions are tracked to closure with effectiveness verified to prevent future occurrences.
- Processes identify, examine and communicate latent organizational weaknesses that can aggravate relatively minor events if not corrected. Organizational trends are examined and communicated.
- Organizational systems and processes are designed to provide layers of defenses, recognizing that people are fallible. Lessons learned are shared frequently; prevention and mitigation measures are used to preclude errors from occurring or propagating. Error-likely situations are sought out and corrected, and recurrent errors are carefully examined as indicators of latent organizational weaknesses.
- Incident reviews are conducted promptly after an incident to ensure data quality and to identify improvement opportunities. Causal analysis expertise is applied effectively to examine events and improve safe work performance. High-quality causal analysis using multi-discipline analytical perspectives is the norm. Causal analysis is performed on a graded approach for major and minor incidents, and near-misses, to identify causes and follow-up actions. Even small failures are viewed as windows into the system that can spur learning.
- Performance improvement processes require direct worker participation. Individuals are encouraged, recognized and rewarded for offering innovative ideas to improve performance and to solve problems.

Performance monitoring through multiple means
- Line managers maintain a strong focus on the safe conduct of work activities. Line managers maintain awareness of key performance indicators related to safe work accomplishment, watch carefully for adverse trends or indications, and take prompt action to understand adverse trends and anomalies. Management employs processes and special expertise to be vigilant for organizational drift.
- Performance assurance consists of robust, frequent, and independent oversight conducted at all levels of the organization. Performance assurance includes independent evaluation of performance indicators and trend analysis.
o Line managers throughout the organization set an example for safety through their direct involvement in oversight activities and associated performance improvement.

o The organization actively and systematically monitors performance through multiple means, including leader walkarounds, issue reporting, performance indicators, trend analysis, benchmarking, industry experience reviews, self-assessments, peer reviews, and performance assessments.

o The organization demonstrates continuous improvement by integrating the information obtained from performance monitoring to improve systems, structures, processes, and procedures.

o Line managers are actively involved in all phases of performance monitoring, problem analysis, solution planning, and solution implementation to resolve safety issues.

o The organization maintains an awareness of its safety culture maturity. It actively and formally monitors and assesses its safety culture on a periodic basis.

Use of operational experience

o Operating experience is highly valued and the capacity to learn from experience is well developed. The organization regularly examines and learns from operating experiences, both internal and in related industries.

o Organization members convene to swiftly uncover lessons and learn from mistakes and successes.

o The organization embraces feedback from peer reviews, independent oversight, and other external sources.

o The organization documents and shares operating experiences (lessons learned and best practices) within the organization and with industry.

Questioning attitude

o Line managers encourage a vigorous questioning attitude toward safety, and foster constructive dialogues and discussions on safety matters.

o Individuals cultivate a constructive, questioning attitude and healthy skepticism when it comes to safety. Individuals question deviations, and avoid complacency or arrogance based on past successes. Team members support one another through both awareness of each other’s actions and constructive feedback when necessary.

o Individuals pay keen attention to current operations and focus on identifying situations where conditions and/or actions are diverging from what was assumed, expected, or planned. Individuals and leaders act to resolve these deviations early before issues escalate and consequences become large.

Implementation Impacts: None.