Challenges to Regulatory Bodies’ safety culture

Pierre-Franck CHEVET
ASN Chairman
The Regulatory Body influences the operator, who is the prime responsible for safety:
- Setting relevant high safety standard in the regulation
- Favoring a questioning attitude with and within the licensees
- Sharing relevant operating experience (national and international) in order to avoid blind spots
- Challenging the operators to go deeper in their analysis and address new issues
- Being able and willing to stop an unsafe facility
- Seeking the inputs from all the stake-holders

Key points for safety culture:
- Management and leadership
- Training and competence
- Questionning attitude
- Good internal communication
Absolute « don’t »

Every RB must avoid:

- Corruption
- Laziness
- Lack of rigor
- Unfairness
- Concealment - lies to the public
- Regulatory capture
- Lack of competence
Challenges to the safety culture (from ASN’s point of view)

- Limited resources (human, budget)
  - New safety issues = more work!

- Time pressure
  - From outside (licensees, government, NGO)
  - From inside (quality insurance, workload)

- Loosing the sense of priorities and consequences on safety
  - Sticking to the letter of regulation
  - Implementing a formal approach instead of focusing on technical issues
  - Weakening the questionning attitude

- Inconsistencies in the implementation of the regulation
  - Headquarters/regional offices,
  - NPPs / fuel cycle installations…

→ In order to get the right priorities, the management should define and insist on core values
Leadership and management

- **Having strong core values**
  - e.g. ASN : Independance / Competence / Rigor / Transparency

- **Setting an example**
  - Daily actions & communication of top managers consistent with those values
  - Leaders able to stand and resist the pressure

- **How could we help our staff to be « proud of belonging » ?**
  - Having a strong national communication (with messages on the values of the RB)
  - Internal communication on the strategy and the major achievements
  - Sharing recognition of peers and stakeholders
  - Explaining the conflicts with the licensees and/or Government
    - each staff can be an ambassador
  - Training – capacity building
    - no shame compared to the licensee
  - Special events
  - Support staff when they raise a difficult point
How to foster questionning attitude?

- Rigor ➔ « Doing the job right … »

- Questionning attitude ➔ « … and going beyond ! »

Threats:
Natural tendency of any organization: over-confidence, risks assessed once and for all, processes in place, routines…

Opportunities:
- Quality management system
- Involvement of stake-holders
- International exchanges and peer-reviews
- Benchmarking with other non-nuclear regulators

➔ Help reconsidering the situation and identify potential areas of weakness
How to develop internal communication on safety issues?

**Threats:**
- Insistence on efficiency and time constraint
- Praise of the « no-problem » staff

**Organizational silence :**
- The problems are dealt with at the lowest level of the organisation
- Nothing is raised to the upper management

**Ways of developing internal active communication:**
- Frequent coordination meeting, at all levels
- Team work and transversal projects
- Helping the staff raise their safety concern and propose improvements to the RB process
- Take advantage of meetings with any staff member and internal audits to get insight on the thoughts of staff and check if they feel free to raise concerns

→ the boss is paid to deal with the difficulties!
Focus on the « culture »
Human and organizational factors

Safety culture cannot be « ordered »

In some cultures:
- It may be difficult for a staff to contradict their manager’s opinion
- Breaching a consensus by raising a safety or organizational concern may be seen as rude

Each RB should consider their own cultural « non written law »
- Human and organizational factors analysis inside the RB : very useful
- Periodically check what kind of (inevitable) adaptations are adopted by the staff