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Workshop on « Challenges and Enhancements  
to the Safety Culture of the Regulatory Body »

# Challenges to Regulatory Bodies' safety culture

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## Safety culture inside the RB is key to the overall safety

### 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
- Questioning 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





## « Grey zone » :


### 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, gouvernement, 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 questioning 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 questioning attitude ?

- **Rigor** → « Doing the job right ... »
- **Questioning 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 developping 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





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