



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

Canada

REGULATORY SAFETY OVERSIGHT CULTURE ASSESSMENT

Commission Meeting
October 4, 2018
CMD 18-M40.A



e-Docs #5566390 PPTX
e-Docs #5638056 PDF

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Outline

- Background
- Research and Benchmarking
- Regulatory Safety Oversight Culture Assessment
- Recommendations and Management Responses
- Management Action Plan
- Conclusions and Next Steps



BACKGROUND



Our Regulatory Safety Oversight Culture Journey



2013

CNSC creates
Safety Culture
Working Group

2015

CNSC contributes
to NEA document
on safety culture
at the regulatory
body

2016 - 2018

CNSC conducts a
regulatory safety
oversight culture
assessment

2018- ongoing

CNSC prepares
a management
action plan

2015

CNSC integrates safety
culture within the
Management System

2015

CNSC creates the
Scientific Integrity
Working Group

2017

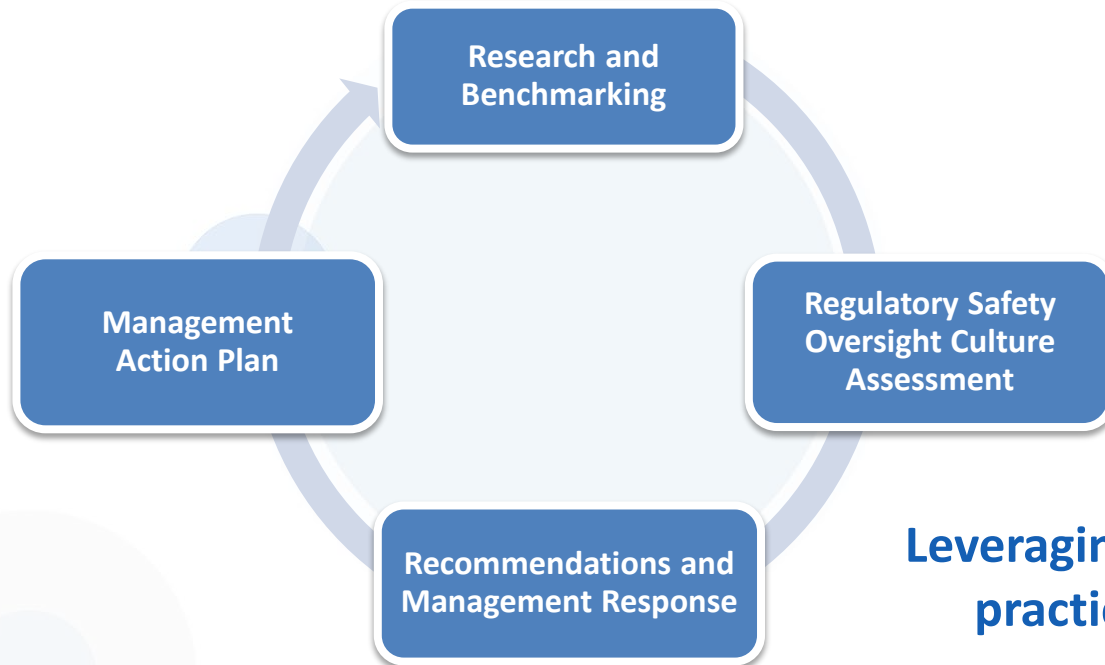
CNSC provides an
update to the
Commission



Background

- Our regulatory safety oversight culture journey began in the early 2000s
- Following the August 2016 Commission proceedings on the anonymous letter, the Commission instructed CNSC staff to *“implement a mechanism to formally assess CNSC staff safety culture”*
- CNSC staff established a systematic mechanism to assess CNSC regulatory safety oversight culture based on international best practices
- Regulatory safety oversight culture is reflected in the CNSC’s management system

Our approach




Leveraging international best practices and guidance

RESEARCH AND BENCHMARKING

What is a Regulatory Safety Oversight Culture?



 *Our shared **attitudes, values, and behaviours** that influence how we fulfill our regulatory responsibilities.”*

–Dr. Mark Fleming, Professor of Safety Culture at Saint Mary’s University



Ongoing Proactive Initiatives (1/2)

- Staff Pulse surveys
- Safety culture town halls (2014, 2016, 2018)
- Safety Oversight Culture Working group
- Key behavioural competencies
- Knowledge Management Initiative
- Capability for Nuclear Safety Project
- Regulatory Operations Training Program



We continue to strengthen our regulatory safety oversight culture through multiple initiatives



Ongoing Proactive Initiatives (2/2)

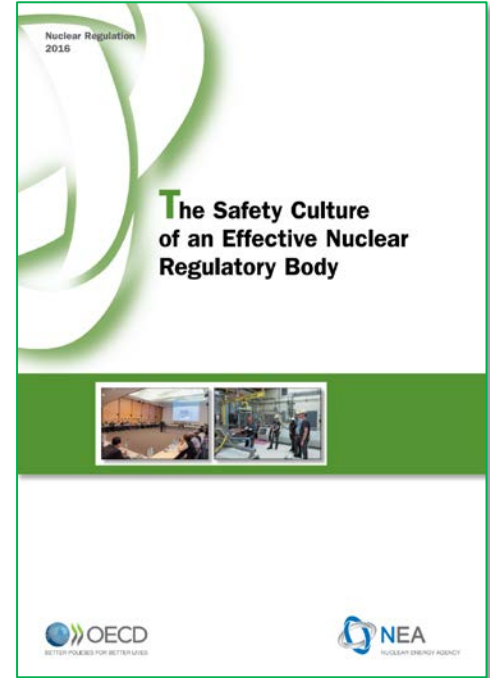
- Policy on Science in a Regulatory Environment – establishment of a Chief Science Officer
- Open Door Policy
- Non-Concurrence Process
- Differences of Professional Opinion Process
- Multi-key system

Building greater engagement and transparency into our decision-making process

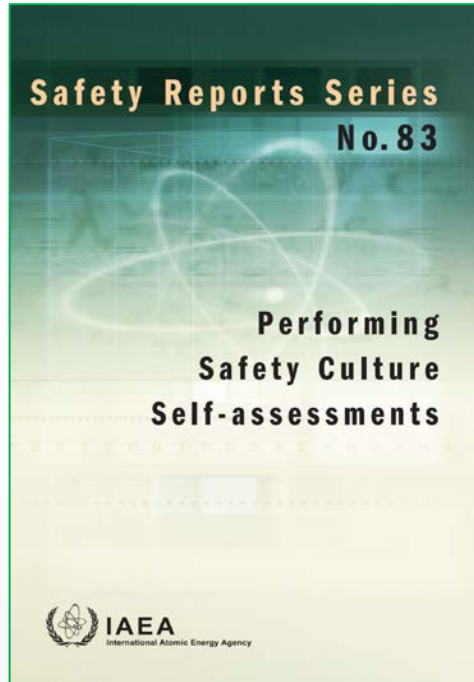
Safety Culture - Principles and Attributes



- 1 Leadership for safety is to be demonstrated at all levels
- 2 All staff of the regulatory body have individual responsibility and accountability for exhibiting behaviours that set the standard for safety
- 3 The culture of the regulatory body promotes safety, and facilitates cooperation and open communication
- 4 Implementing a holistic approach to safety is ensured by working in a systematic manner
- 5 Continuous improvement, learning, and self-assessment are encouraged at all levels



Safety Culture – Data Collection



- 1 Document Reviews
- 2 Questionnaires
- 3 Focus Groups



REGULATORY SAFETY OVERSIGHT CULTURE ASSESSMENT

Assessment – CNSC’s Methodology



- Review of results of previous CNSC staff surveys, safety culture town halls and management meetings
- Six key themes identified and explored during focus groups
- Ten focus groups held with 117 participants from across the CNSC
- Participants completed a survey, followed by a theme-by-theme discussion
- Data collected from all methods analyzed, and findings summarized in the assessment report

Report findings include strengths and areas for improvement

Assessment – Report and Communication



- The CNSC's first regulatory safety oversight culture assessment was completed in February 2018
- The final report was communicated to staff by the President and further discussed at:
 - Managers forum held in March 2018
 - Town hall meeting held in April 2018
 - Divisional meetings



The regulatory safety oversight culture champion will continue to be accountable to foster a healthy safety culture



Identified Strengths

CNSC Staff:

- Perceive safety as the overarching priority in decision making
- Are comfortable using existing mechanisms to raise issues and concerns
- Display a willingness to collaborate and share expertise across the organization
- Believe they receive the required training, and possess the appropriate competencies to fulfill their duties



Identified Areas for Improvement

CNSC Staff:

- Feel there is a need for improvement in communicating the rationale behind line management decisions
- Perceive that at times managers do not solicit challenges to their own assumptions or seek varied perspectives
- Feel that the timeliness of management decisions could be improved and that the decision making process should be more open
- Believe that there is a need to have a common understanding of regulatory safety oversight culture
- Believe that there is a need to transfer the knowledge of long-standing employees



RECOMMENDATIONS AND MANAGEMENT RESPONSES

Recommendation 1 – Ongoing Coaching



The CNSC should provide supervisors, managers and executives with ongoing coaching and mentoring in the leadership characteristics necessary for maintaining a healthy regulatory safety oversight culture.

Key progress to date:

- ✓ Updated Performance Management Contracts for executives
- ✓ Key leadership competencies embedded in all executive selection, development and performance management processes
- ✓ All new managers to attend New Director's program and participate in new Director's Community of Practice

Recommendation 2 – Communicating Issues



The CNSC should develop a problem identification, resolution, reporting and communication tool to further increase the transparency around the communication of safety issues.

Key progress to date:

- ✓ Conducted benchmarking of best practices from other regulators and major licensees
- ✓ Drafted a proposed process to manage opportunities for improvement identified by staff
- ✓ Held preliminary discussions to conduct a pilot of the proposed tool within the Power Reactor Regulatory Program directorate



Recommendation 3 - Policy

The CNSC should develop an overarching safety culture vision or policy statement outlining the desired culture that the CNSC is striving to achieve.

Key progress to date:

- ✓ Conducted benchmarking of safety culture policies from other regulators and licensees
- ✓ Drafted proposed regulatory safety oversight culture policy
- ✓ Circulated proposed policy to all CNSC staff for internal review

Recommendation 4 – Knowledge Management



The CNSC should develop strategies to ensure that critical technical and regulatory knowledge, including knowledge of past experience is actively managed as a resource and is readily available to staff.

Key progress to date:

- ✓ Identified critical knowledge roles and successors
- ✓ Added knowledge management objectives in Performance Management Contracts
- ✓ Drafted knowledge management policy – currently under review
- ✓ Created a catalogue that captures required scientific and technical expertise



Recommendation 5 – Follow-up

The CNSC should conduct a follow-up safety oversight culture assessment in three to five years.

Key progress to date:

- ✓ Reviewed and documented lessons learned in a report for future assessments
- ✓ Participated in Nuclear Energy Agency safety culture working group meetings
- ✓ Continuing to evaluate progress through employee surveys



MANAGEMENT ACTION PLAN



Management Action Plan

- CNSC staff have prepared a detailed Management Action Plan (MAP) to respond to the assessment recommendations
- The MAP establishes CNSC staff leads and identifies deliverables and due dates for completing the work
- The MAP is currently being monitored and tracked to completion through the CNSC's Harmonized Plan Program



Responsibility and Accountability



- The Executive Vice-President and Chief Regulatory Operations Officer as the executive champion is accountable to foster a healthy safety culture
- Management at all levels must take every opportunity to promote safety consideration as an over-riding priority
- All CNSC staff have individual responsibility and accountability for exhibiting behaviours that set the standard for safety



Conclusions and Next Steps

- CNSC staff conclude that the completed assessment and the initiatives put in place address the direction received from the Commission
- CNSC will continue to foster an on-going dialogue through regular safety culture town hall meetings as well as monitoring progress through surveys
- The CNSC is committed to conducting a follow-up assessment in 2022

Thank You !



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