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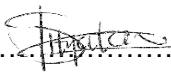
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1. Introduction

Eskom's Nuclear Management Policy (32-83) requires the promotion of a strong nuclear safety culture through the development and reinforcement of good safety attitudes and behaviour in individuals and teams associated with Level 1 nuclear supplier activities, with nuclear and occupational safety being the overriding priority. This is required through-out all phases of the nuclear installation life-cycle namely, siting; design; manufacture of components, construction and commissioning.

Eskom considers that the health and safety of the employees, supplementary personnel, suppliers and sub-suppliers, contractors, the general public, and the protection of the environment is of paramount importance when managing its activities.

Integral to achieving this is the implementation of a Safety Culture Enhancement Programme (SCEP) to develop and maintain a strong safety culture that serves to make nuclear safety the overriding priority for each individual performing Level 1 nuclear supplier activities.

The foundational traits and characteristics of a healthy nuclear safety culture have been adopted from institutions such as the Institute of Nuclear Power Operations (INPO-12-012). These traits, when thoroughly embraced, will influence values, assumptions, experiences, behaviours, beliefs, and norms that will sustain the execution and operations activities apply to all Level 1 nuclear suppliers and their sub-suppliers.

Eskom's 238-101 Specification (Quality and Safety and Quality Management Requirements for Nuclear Suppliers Level 1) requires Level 1 nuclear suppliers to implement an Integrated Management System (IMS) incorporating both quality and safety management requirements, including a Safety Culture Enhancement Programme (SCEP). This document has been developed to set out the specific SCEP requirements as described in Eskom's Specification 238-101. It is intended to ensure a consistent application and assessment, of Safety Culture, by Eskom Level 1 suppliers and their sub-suppliers.

2. Supporting Clauses

2.1 Scope

The Safety Culture Enhancement Programme (SCEP) indicated in this document is required from all suppliers of nuclear products and services (classified as Level 1- high importance to nuclear safety) to Eskom, Nuclear Operating Unit (NOU). The supplier's SCEP shall align with Eskom, NOU Safety Culture requirements.

2.1.1 Purpose

This document has been developed to provide the specific requirements for the establishment, implementation, assessment and improvement of safety culture in the supply of Safety Level 1 products and services to Eskom, NOU.

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2.1.2 Applicability

This document is applicable to all Eskom NOU approved suppliers of Safety Level 1 nuclear products and services.

This document is not applicable to Safety Level 2 and Safety Level 3 suppliers and their sub-suppliers.

2.1.3 Effective date

11 March 2024.

2.2 Normative/Informative References

Parties using this document shall apply the most recent edition of the documents listed in the following paragraphs.

The following documents contain provisions that, through reference in the text, constitute requirements of this document. These documents are subject to revision and users are responsible to ensure that the most recent revisions are used.

2.2.1 Normative

- [1] ISO 9001:2015: Quality Management Systems-Requirement
- [2] 12-012: INPO Traits of a healthy nuclear safety culture
- [3] 32–83: Eskom’s Nuclear Policy
- [4] 238-28: NOU Nuclear Safety Management Programme
- [5] 238–101: Quality and Safety Management Requirements for Nuclear Suppliers Level 1
- [6] 238–105: Nuclear Supplier Qualification and Audit Manual
- [7] RD-0034: Quality and Safety Management Requirements for Nuclear Installations

2.2.2 Informative

- [8] 32-1034: Procurement and Supply Chain Management Procedure
- [9] IAEA GSR Part 2: Leadership and Management for Safety
- [10] INSAG -4: Safety culture
- [11] INSAG-13: Management of operational safety in nuclear power plants
- [12] INPO-06-003: Human Performance Reference Manual
- [13] RG-0007: Regulatory Guide on Management of Safety
- [14] INPO-12-012 “Traits of a Healthy Safety Culture

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2.3 Definitions

Definition	Explanation
Safety Level-1 Suppliers	All suppliers, sub-suppliers and designers who supply products with a high importance to nuclear safety during any nuclear installation life-cycle phase. Level 1 suppliers are required to include safety culture aspects (including establishing a safety culture enhancement programme) as part of their integrated management system, and that conforms to the requirements of this document.
Nuclear Operating Unit (NOU)	Collective business areas that are involved in all life-cycle phases of the nuclear installations within Eskom
Eskom	Eskom Holdings, State Owned Company (SOC) limited, its divisions and wholly owned subsidiaries
Employer	Eskom and its nominated representative.
Intelligent customer	The capability of the organisation to have a clear understanding and knowledge of the product or service being supplied
Safety culture	Characteristics and attitudes of organisations and individuals which ensure that, as an overriding priority, nuclear safety issues receive the attention warranted by their significance. A positive safety culture is embedded in all phases of project life cycle, from concept phase through to decommissioning, and includes service providers, contractors and suppliers and their sub-suppliers
Safety Culture Enhancement Programme (SCEP)	A documented, planned, implemented and audited demonstration of safety culture improvement comprising a safety culture procedure and a safety culture activity plan.
Safety Management System (SMS)	Comprises those arrangements made by the organisation for the management of safety, in order to promote a strong safety culture and achieve good safety performance. Nuclear, conventional and environmental safety requirements in line with national and international practice are met, by the organisation, as an overriding priority. Safety management ensures that health, environmental, security; quality, risk and economic requirements are not considered separately from safety requirements, to help preclude their possible negative impact on safety.
Supplier	Supplier means, for each of the following contracts under the NEC suite of contract conditions: • Engineering and Construction Contract (ECC) – The Contractor • Engineering and Construction Short Contract (ECSC) – The Contractor • Term Services Contract (TSC) - The Contractor • Term Services Short Contract (TSSC) - The Contractor • Professional Services Contract (PSC) - The Consultant • Professional Services Short Contract (PSSC) - The Consultant • Supply Contract (SCon) – The Supplier • Supply Short Contract (SSC) – The Supplier

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2.4 Abbreviations

Name	Designation
BA	Business Area
ECC	Engineering and Construction Contract
ECSC	Engineering and Construction Short Contract
HP	Human Performance
IMS	Integrated Management System (Quality and Nuclear Safety Management)
INSAG	International Nuclear Safety Advisory Group
L1	RD-0034 Nuclear Safety Level 1 classification
NOU	Nuclear Operating Unit
NNR	National Nuclear Regulator
PSC	Professional Services Contract
PSSC	Professional Services Short Contract
QM	Quality Management
QC	Quality Control
SHE	Safety, Health and Environment
SCEP	Safety Culture Enhancement Programme
SC	Safety Culture
SM	Safety Management
SMS	Safety Management System
SSC	Supply Short Contract (in context)
TSC	Term Services Contract
TSSC	Term Services Short Contract

2.5 Roles and Responsibilities

Roles and responsibilities are defined in the text of the specification.

2.6 Process for Monitoring

The implementation of this document will be monitored through periodic conformance reviews by Nuclear Commercial. The intention of these reviews is to ensure compliance with the NNR and Eskom nuclear quality and safety management requirements and assist with the correction of non-compliant practices.

The Nuclear Quality Assurance Department will also conduct periodic audits to ensure conformance to the IMS.

2.7 Related/Supporting Documents

Not Applicable

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3. Nuclear Safety Management System

The supplier integrated management system (IMS) integrates all elements of the nuclear safety management system by creating the necessary framework for implementing and maintaining a Safety Culture Enhancement Programme (SCEP) and promotes safety culture by:

- Ensuring common understanding of the key aspects of safety culture within the organization;
- Providing the means by which the organization supports individuals and teams in carrying out their tasks safely and successfully, taking into account the interaction between individuals, technology and the organisation;
- Providing the means by which the organization continually seeks to develop and improve its safety culture.

NOTE: Integrated Management System (IMS), = Quality Management (QM) + Safety Management (SM) that includes a formal nuclear Safety Culture Enhancement Programme (SCEP).

3.1 Requirements of a Safety Culture Enhancement Programme (SCEP)

Suppliers shall establish formal mechanism for planning and implementing their Safety Culture Enhancement Programme (SCEP).

The supplier SCEP requires the compilation of a documented Safety Culture Procedure setting out how safety culture will be established, implemented and assessed throughout the organisation. The SCEP shall also include a Safety Culture Plan, showing schedules of the various activities required to carry out the requirements stated in the Safety Culture Procedure.

The supplier documented SCEP shall set out how the safety culture principles and associated traits shall correlate closely with the guidelines provided in the internationally accepted INPO-12-012 "Traits of a Healthy Safety Culture".

NOTE: Safety Culture Enhancement Programme (SCEP) = Safety Culture Policy + Safety Culture Procedure + Safety Culture Plan.

3.1.1 Safety Culture Policy

Suppliers shall develop a detailed nuclear safety culture policy that will promote senior management commitment to high levels of safety performance. The policy may be incorporated in the overall safety management policy, but it shall set out the goals, strategy plans and objectives for creating a robust nuclear safety culture.

The safety culture policy shall address:

- The supplier's SCEP shall establish and implement a documented Safety Culture Procedure and Safety Culture Plan;
- The supplier's Safety Culture Procedure shall describe responsibilities and set out specific safety goals;
- The supplier's Safety Culture Plan shall describe the activities, strategy plans and objectives;

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- Safety Culture performance results shall be considered as an input to the Management Review meetings.

3.1.2 Safety culture procedure

The Safety Culture Procedure shall describe responsibilities and how the following supplier traits that is important to reach an appropriate healthy and strong Nuclear Safety Culture will be promoted, implemented and maintained throughout the organisation:

- Personal accountability;
- Questioning attitude;
- Effective safety communication;
- Leadership safety values and actions;
- Decision making;
- Respectful work environment;
- Continuous learning;
- Problem identification and resolution;
- Environment for raising concerns;
- Work processes.

3.2 Safety culture procedure headings

3.2.1 Personal accountability

All individuals take personal responsibility for safety. Evidence is needed of regular guidance being shared, on what is reflected by good safety culture, according to nuclear industry information on safety issues.

- Responsibility and authority for nuclear safety shall be defined and understood, reporting relationships, positional authority, and team responsibilities emphasise the overriding importance of nuclear safety;
- Individuals must understand and demonstrate personal responsibility for the behaviours and work practices that support nuclear safety;
- Individuals and work groups shall communicate and coordinate their activities within and across organisational boundaries to ensure nuclear safety is maintained;
- Individuals understand the importance of adherence to nuclear standards. All levels of the organisation exercise accountability for shortfalls in meeting standards.

3.2.2 Questioning attitude

All employees are watchful for assumptions, anomalies, values, conditions, or activities that can have an undesirable effect on plant safety:

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- Individuals shall avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in error or inappropriate action;
- Nuclear shall be recognised as special and unique;
- Individuals must understand that complex technologies can fail in unpredictable ways;
- Individuals shall stop when faced with uncertain conditions. Risks are evaluated and managed before proceeding;
- Individuals shall challenge assumptions and offer opposing views when they think something is not correct;
- Individuals recognise and shall plan for the possibility of mistakes, latent problems, and inherent risk, even while expecting successful outcomes.

3.2.3 Effective safety communication

Communications maintain a focus on safety. Safety communication is broad and includes plant-level communication, job-related communication, worker-level communication, equipment labelling, operating experience, and documentation. Leaders shall use formal and informal communication to convey the importance of safety. The flow of information up the organisation shall be considered to be as important as the flow of information down the organisation:

- Individuals incorporate safety communications in work activities;
- Individuals communicate openly and candidly, both up, down, and across the organisation and with oversight, audit, and regulatory organization;
- Leaders ensure that the bases for operational and organisational decisions are communicated in a timely manner;
- Leaders frequently communicate and reinforce the expectation that nuclear safety is the organisation's overriding priority;
- The supplier shall specify steps towards communicating and creating awareness of the organisation's safety culture framework, with the aim of ensuring that safety culture remains an overriding consideration.

3.2.4 Leadership safety values and actions

Senior management is responsible for the activities and behaviors necessary to foster a strong nuclear safety culture, including:

- Setting safety goals, policies and standards and ensuring that they are effectively implemented;
- Visibly demonstrating their commitment to safety;
- Recognizing and resolving production /safety conflicts;
- Encouraging involvement and challenge from staff at all levels of the organization, particularly when making decisions affecting safety.

Senior management shall demonstrate a commitment to safety in their decisions and behaviours. Safety management policies emphasize the overriding importance of nuclear safety. Senior managers shall demonstrate their commitment both in word and action. The nuclear safety message

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shall be communicated frequently and consistently. Leaders and managers throughout the nuclear organisation shall set an example for safety:

- Senior management shall ensure that personnel, equipment, procedures, and other resources are available and adequate to support nuclear safety;
- Senior management is commonly seen in working areas observing, coaching, and reinforcing standards and expectations. Deviations from standards and expectations shall be corrected promptly;
- Leaders and managers shall ensure that work priorities, incentives, sanctions, and rewards are aligned with nuclear safety policies and shall reinforce behaviours and outcomes that reflect safety as the overriding priority;
- Leaders and managers shall use a systematic process for evaluating and implementing change so that nuclear safety remains the overriding priority;
- Leaders and managers shall clearly define roles, responsibilities, and authorities to ensure nuclear safety;
- Leaders and managers shall ensure that nuclear safety is scrutinised through a variety of monitoring techniques, including assessment of nuclear safety culture. In addition, they shall exhibit behaviours that set the standard for safety;
- The supplier shall institute and maintain a rewards and recognition system that encourages good safety behaviours and discourage unsafe behaviours;
- The supplier safety culture indicators shall serve as a mechanism for awarding recognition to supplier employees who are endeavouring to improve safety by thought, action and commitment;
- The supplier shall communicate the safety performance to all its employees, to make them aware of progress and achievements;
- Policies, procedures and processes shall be in place, to ensure the appropriate rules and expectations are made known throughout the supplier's organisation. This shall include measures to deal with non-adherence to safety rules;
- The supplier shall implement proper monitoring arrangements to check that safety goals are being achieved and that progress is communicated to all its employees.

3.2.5 Decision making/ Acceptance of authority and rules

- Decisions that support or affect nuclear safety shall be systematic, rigorous, and thorough.
- Individuals shall use a consistent approach that incorporates risk insights that are appropriate to make decisions.
- Individuals vested with the authority shall understand the expectation, when faced with unexpected or uncertain conditions, and place the work in a safe condition.
- Individuals shall use decision-making practices that will emphasize careful choices over those that are simply allowable.
- A proposed action shall be determined to be safe in order to proceed, rather than unsafe in order to stop.
- Senior management shall support and reinforce conservative decisions.
- Single-point accountability is maintained for nuclear safety decisions

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3.2.6 Respectful Work Environment/ Motivation to reach goals

Trust and respect permeate the organisation. The supplier shall establish a high level of trust in the organization, fostered, in part, through timely and accurate communication. Differing professional opinions shall be encouraged, discussed, and resolved in a timely manner. Employees shall be informed of steps taken in response to their concerns.

- Individuals shall be encouraged to voice concerns, provide suggestions, and raise questions;
- Individuals at all levels of the organization shall treat each other with dignity and respect;
- Trust shall be fostered among individuals and work groups throughout the organisation;
- Fair and objective methods shall be used to resolve different opinions and conflicts;
- The supplier shall be able to indicate which of its processes are used for identifying, reporting and correcting shortcomings in safety and unsafe acts in the workplace.

3.2.7 Continuous learning / Safety conscious work environment

Detailed safety culture and awareness training shall be given to personnel, who have an impact on products of high importance to nuclear safety. Opportunities to learn about ways to ensure safety shall be sought out and implemented. Work experience shall be highly valued and the capacity to learn from experience shall be well developed. Nuclear safety shall be kept under constant scrutiny through a variety of monitoring techniques.

- The supplier shall systematically and effectively collect, evaluates, and implements relevant internal and external operating experience in a timely manner;
- The supplier shall learn from other organisations to continuously improve knowledge, skills, and safety performance;
- The supplier shall routinely conduct self-critical and objective assessments of its programs and practices.
- The supplier training, self-assessments, and benchmarking techniques shall be used to stimulate learning and improve performance;
- The supplier shall provide training and ensures knowledge transfer to maintain a knowledgeable, technically competent workforce and instil nuclear safety values.

3.2.8 Problem identification and resolution /Open communication

Identification and resolution of a broad spectrum of problems, including organisational issues, shall be used to strengthen safety and improve performance.

- The supplier shall implement a corrective action programme with a low threshold for identifying issues;
- The identification of issues shall be complete, accurate, and in a timely manner in accordance with the corrective action programme;
- Issues that potentially impacting safety shall be promptly identified, fully evaluated, and promptly addressed and corrected commensurate with their significance.

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- The supplier shall thoroughly evaluate problems to ensure that resolutions address causes and extents of conditions commensurate with their safety significance;
- The supplier shall take effective corrective actions to address issues in a timely manner commensurate with their safety significance;
- The supplier shall periodically analyse information from the corrective action programme and other assessments to identify programmatic and common cause issues.
- The supplier's processes shall include descriptions of corrective action and problem management systems and indicate how the associated data is evaluated, recorded and communicated, for improvement opportunities.

3.2.9 Environment for raising concerns /Monitoring of safety culture performance

A safety-conscious work environment (SCWE) shall be maintained where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination. The supplier creates, maintains, and evaluates policies and processes that allow personnel to raise concerns freely.

The requirements on suppliers are the following:

- The supplier shall implement a (SCWE) policy that supports individuals' rights and responsibilities to raise nuclear safety concerns that is independent of line management influence.
- Individuals shall have confidence and feel free to raise nuclear safety concerns without fear of retribution.
- Individuals that have been assigned to respond to nuclear safety concerns shall have the appropriate competencies.
- The supplier shall implement a process to ensure that nuclear safety concerns raised are appropriately resolved in a timely and effective manner.

3.2.10 Work processes

The process of planning and controlling work activities shall be implemented so that safety is maintained.

Work management is a measured process in which work shall be identified, selected, planned, scheduled, executed, closed, and critiqued.

The requirements on suppliers are the following:

- The supplier shall implement a process of planning, controlling, and executing work activities such that nuclear safety is the overriding priority. The work process shall include the identification and management of risk commensurate to the work.
- The supplier shall operate and maintain equipment within design margins. A systematic and rigorous process shall be used to change design margins. Special attention shall be placed on maintaining fission product barriers, defence-in-depth, and safety-related equipment.
- The supplier shall create and maintain complete, accurate, and up-to-date documentation.
- Individuals shall follow processes, procedures, and work instructions.

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3.3 Monitoring of safety culture performance

Suppliers shall implement a systematic process for assessing and monitoring safety culture, using a graded approach to nuclear safety.

- The results of assessments shall be used as the basis for preparing the supplier's safety culture enhancement plan.
- The supplier safety culture enhancement plan shall be measured so that feedback can be given to those persons accountable for the implementation and to confirm that implementation is in fact effective.
- The supplier safety performance is analysed and measured by the organisation so that changes can be made which will improve long term safety performance.
- Safety culture performance shall be measured at pre-determined intervals and the results and trends shall be communicated to all its employees. This requires the development and establishment of performance indicators, reflecting historical data, trends and predictive information on which to base future actions.
- Performance indicators shall measure progress in achieving goals, objectives, current performance and focus on problems in specific functional areas. Examples of key performance indicators (KPIs) can include:
 - Adherence to Safety Culture Plan;
 - Percentage of Actions overdue;
 - Number of Safety Events;
 - Number of Nuclear Safety Concerns Reported;
 - Number of Corrective Actions reported monthly;
 - Number of Safety Heroes nominated per month;
 - Number of Management Initiatives generated per quarter.
- The supplier shall produce a management summary which highlights trends and explains reasons for undesirable trends, including problem areas, necessary improvements and actions taken to achieve improvement.
- The supplier shall develop a process that specifies how safety culture gaps and short comings shall be identified, action plans or solutions identified implemented and results shall be evaluated.

3.4 Oversight of sub-suppliers

In cases where activities that are of importance to nuclear safety are outsourced by the supplier to other suppliers / sub-suppliers, the former (delegating organisation) shall implement oversight measures for these activities to retain intelligent customer capabilities."

- The supplier shall confirm by means of direct evaluation of the sub-supplier, that the safety management system and safety culture have been adequately addressed and effectively implemented by the sub-supplier.

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- Where the Safety Culture performance of a sub-supplier falls short of the requirements, the supplier shall demonstrate that immediate and effective steps have been taken and will continue to be taken to bring the situation back into conformance.
- The supplier shall be able to demonstrate that, through a combination of technical competence, understanding of the work, management arrangements, relationship with the sub-supplier and assurance of the sub-supplier's management arrangements, that it shall retain adequate and sustainable control of the nuclear safety risks, by being an 'intelligent customer' for work carried out by a sub-supplier on its behalf.
- The supplier shall retain oversight and co-ordination of all outsourced activities and arrangements made to ensure that the technical and safety requirements have been carried out as contracted and in conformance to the safety culture programme of the supplier.

3.5 Operational experience feedback

- The supplier shall ensure that systems are in place to continuously improve the supplier's systems and processes. The supplier shall have processes and procedures in place and implemented for operational feedback of organisational learning, external experience and lessons learned.
- The supplier shall provide evidence that effective processes and procedures have been implemented. The supplier shall also have mechanisms in place, as part of its integrated management system to ensure that documented information of events has been retained.

3.6 Safety culture committee

- The supplier shall convene a Safety Culture Committee (SCC), comprising formally appointed staff from across all levels of the supplier organisation, to facilitate control of the SCEP and to encourage staff participation in safety culture activities.
- The committee shall meet at least monthly to discuss the status of the SCEP activities, according to the agreed SCEP plan. The committee shall monitor progress and update the SCEP plan accordingly, taking into account the results of assessments and performance monitoring.
- The agendas, action lists, appointment letters and minutes of the committee's activities shall be documented and recorded to provide evidence for any audits.

3.7 Safety culture enhancement plan

- A SCEP Plan shall be drawn up and regularly reviewed by the supplier to schedule specific safety culture activities, events and interventions and to address among other things awareness, monitoring, assessment, training, audits, reviews and employee engagement.
- The supplier's SCEP Plan must allocate practical activity schedules to cover each heading shown in the SCEP procedure document indicating specific dates, responsible persons and descriptions of each activity or intervention.
- The supplier's SCEP Plan is a living document and shall be kept updated to reflect the current levels of progress in managing the Safety Culture Programme. The SCEP Plan shall be used as a key discussion and decision driver, at Safety Culture Committee meetings, to direct the supplier's SCEP in the desired direction.

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- The supplier's SCEP Plan activities and interventions shall also be reflected in the supplier's business and project plans, to ensure the appropriate resourcing and the availability of staff is taken into account for the accomplishment of the SCEP.

3.8 Measurement

Eskom shall perform the following oversight measurements of the Level 1 supplier and Supplier capability assessments as part of measuring functionality and supplier conformance audits during the performance of contract work in terms of:

- 238–101 – Nuclear Supplier Safety and Quality Management Requirements.

4. Acceptance

This document has been seen and accepted by:

Name	Designation
Helga Hall	Senior Advisor- Nuclear Commercial

5. Revisions

Date	Rev.	Compiler	Remarks
March 2024	2	P Xotyeni	Full Review
January 2021	1	S Brown	Full Review
January 2014	0	A C Hall	To establish safety culture requirements for inclusion in Eskom contracts for Level 1 Suppliers.

6. Development Team

The following people were involved in the development of this document:

M Edmonds: Procurement Quality Engineering
P Zwane: Procurement Quality Engineering

7. Acknowledgements

None

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