



AN INDUSTRY GOVERNANCE FRAMEWORK TO DEMONSTRATE NUCLEAR SECURITY

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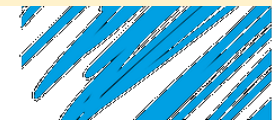
IAEA INTERNATIONAL CONFERENCE ON THE PHYSICAL PROTECTION OF NUCLEAR MATERIAL

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A THOUGHT EXERCISE

Given there is no definitive set of nuclear security standards that all countries must meet and maintain, **is it possible to achieve some level of uniformity such that countries can hold each other accountable to an agreed baseline standard of security?**

The CPPNM – specifically the addition of the **Fundamental Principles** – balances what States should implement to strengthen their physical protection regimes, while recognizing that the responsibility for security “rests entirely with the State.”



CPPNM FUNDAMENTAL PRINCIPLES

STATE (PRINCIPLE A)

COMPETENT AUTHORITY (PRINCIPLE D)

LICENSEE (PRINCIPLE E)

PRINCIPLE G	Assessing the threat level
PRINCIPLE I	Determining a graded approach
PRINCIPLE F	Establish an effective security culture
PRINCIPLE J	Establish policies and programs to achieve consistent and efficient quality assurance processes

Performance-based regulations

UK, France, etc...

CORPORATE LEADERSHIP

People seeing who succeeds and fails in the company defines culture. The people who succeed become role models for what's valued in the organization, and that defines culture.

-Tae Hea Nahm, NY Times Interview 2017

The greatest influence on individual performance are the expectations of leaders. Nuclear security is most effective when managers and supervisors of the organization continually demonstrate their commitment to security through words and actions.

- IAEA NSS 7 – Security Culture

GOVERNANCE LEADERSHIP

to create



**MANAGEMENT
SYSTEMS**

DEMONSTRATING SECURITY GOVERNANCE



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2016 ASSESSMENT OF COMPETENT AUTHORITIES
(REGULATORS) AND LICENSEE (OPERATOR) ANNUAL
REPORTS

- 3x** Safety is emphasized than security by facility operators
(2038 times vs 601 times)
- 80%** Governance is discussed by facility operators
- 9%** Nuclear security policy mentioned by facility operators

Analyzed 44 operator reports published in English



PROPOSED NUCLEAR SECURITY GOVERNANCE TEMPLATE

The template promotes transparency by enabling individuals outside the organization to understand how the company *demonstrates reasonable precaution and duty of care.*



LEADERSHIP AND OVERSIGHT (To gain insight into decision-making processes)

NUCLEAR SECURITY RISK ASSESSMENT (To gain insight into how an organization assesses the threat and adopts a risk informed approach)

SHARED UNDERSTANDING OF NUCLEAR SECURITY (To gain insight into how leadership communicate and encourage security practices in every level of workforce)

EVALUATION AND CONTINUOUS LEARNING (To gain insight into how all staff members are evaluated in their security proficiency, and the opportunities provided for improvement)

EXAMPLE TEMPLATE QUESTIONS

A WORK IN PROGRESS
A NEED FOR CRITICAL FEEDBACK

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WHAT ARE THE BENEFITS?

- **Aligns** with existing IAEA guidelines, as well as WINS, WANO, INPO
- **Reviewed** by industry stakeholders (eventually “industry-led”)
- **Opportunities** to engage competent authorities

OVERARCHING GOALS

Develop confidence-building mechanisms

Set new norms and expectations for transparency

Liability implications in demonstrating due care

CHALLENGES

- Demonstrates reasonable precaution, but does not necessarily demonstrate due diligence (i.e., answers might not reflect true action)
- Open question format potentially problematic in a situation where there are no existing mandatory standards
- Practice is subject to cultural context – it might not suit all





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THANK YOU
AND
LET'S DISCUSS

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