

EDO Principal Correspondence Control

FROM: DUE: 06/29/06

EDO CONTROL: G20060525
DOC DT: 05/16/06
FINAL REPLY:

Glenn Adler
Service Employees International Union, CLC
(SEIU)

TO:

Reyes, EDO

FOR SIGNATURE OF :

** GRN **

CRC NO:

Dyer, NRR

DESC:

2.206 - South Texas Project Electric Generating
Station - Comprehensive Cultural Assessments

ROUTING:

Reyes
Virgilio
Kane
Silber
Dean
Burns
Mallett, RIV
Cyr, OGC
Goldberg, OGC
Williams, NRR

DATE: 05/25/06

ASSIGNED TO:

NRR

CONTACT:

Dyer

SPECIAL INSTRUCTIONS OR REMARKS:

Template: EDO-001

E-RIDS: EDO-01



May 16, 2006

Mr. Luis A. Reyes
Executive Director for Operations
United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: South Texas Project Electric Generating Station – Petition Pursuant to 10 CFR 2.206 – Comprehensive Cultural Assessments

Dear Mr. Reyes:

Pursuant to §2.206 of Title 10 of the Code of Federal Regulations, the Service Employees International Union (SEIU) petitions the Nuclear Regulatory Commission (NRC) to take enforcement action against the South Texas Project Nuclear Operating Company (STPNOC), the licensee for the South Texas Project Electric Generating Station (STP).

Specifically, SEIU seeks enforcement action in the form of a Demand for Information (DFI) that would require STPNOC to provide the NRC with docketed copies of:

- any assessments of the safety conscious work environment (SCWE) at STP conducted since January 1, 2004;
- summaries of any associated action plans and the results of any efforts to remediate problems revealed by these surveys, including documents mentioned at an August 2005 meeting apparently convened to discuss the plant's SCWE: a SWOT analysis to assess the issues and actions required and follow-up on these actions to improve station alignment, an outsourcing lessons learned, and an evaluation of IT, Supply Chain, Technical Training, and Wackenhut to assess the issues and recommended actions [see below];
- summaries of any associated action plans and the results of efforts to remediate problems revealed by such surveys in 2001 and 2003.

It is necessary for the NRC to obtain and review this information to assure the maintenance of a safety conscious work environment, a vital condition for the safe operation of the nuclear plant.

ANDREW L. STERN
International President

ANNA BURGER
International Secretary-Treasurer

MARY KAY HENRY
Executive Vice President

GERRY HUDSON
Executive Vice President

ELISEO MEDINA
Executive Vice President

TOM WOODRUFF
Executive Vice President

SERVICE EMPLOYEES
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Washington, D.C. 20005

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EDO --G20060525

In 1998 STPNOC was required to conduct periodic independent surveys after the NRC found that the licensee had violated federal law by subjecting four employees to a "hostile work environment" after the employees raised safety concerns.¹

While improvements have been made in STP's safety conscious work environment, important problems continue to plague certain entities at the plant, which appear to be impervious to remediation. However, the NRC appears not to be in possession of documents concerning these problems, STPNOC's associated action plans, and the results thereof. Without such information, NRC can scarcely understand these difficulties, let alone perform an effective oversight role.

Comprehensive Cultural Assessments conducted in 2003 and in earlier years are in the NRC's possession and are publicly available; the 2003 survey was released to SEIU through a FOIA request. However, any subsequent surveys of the SCWE, including one conducted in 2005, do not appear to be in the possession of the NRC. A document released to SEIU under FOIA (2006-0052), "South Texas Safety Culture Survey with slides," describes a meeting of some 90 participants which appears to have taken place in August, 2005 at which the 2005 safety culture survey was discussed. [Attached] According to this two-page document, "The[re] were problems with security, I&C, Design Engineers, and Ebasco-Rathyon [sic]. NO SPECIFIC DETAILS."

At least two of these four entities were singled out for further attention in previous Comprehensive Cultural Assessments. In both the 2001 and 2003 CCAs, Wackenhut and I&C were named as "Priority Organizations" for whom formal action plans would be prepared.²

However, in a 2004 FOIA (2004-0308) SEIU requested from the NRC any documents related to STP's promised formal action plans for Wackenhut, whether remedial action had in fact taken place, and the results, if any, of such remedial action. [Attached] The NRC's response to that request was that no agency records subject to the request had been located.

The Agency's reply leaves it unclear whether an action plan had in fact been developed by STPNOC, whether it had been implemented, or whether the results were satisfactory. Given that these steps had been included in STPNOC's formal response to the findings of a CCA conducted pursuant to an NRC confirmatory order, the absence of any documentation at the NRC that the recommendations had been followed is disturbing. As described above, the 2005 survey - as described in the "South Texas Safety Culture Survey with slides" - indicates that Wackenhut and I&C have continuing SCWE problems, suggesting that STPNOC's remediation efforts - if any - were ineffective.

¹ "NRC Staff Issues Confirmatory Order to South Texas Project Requiring Improvements to Employee Concerns Program," United States Nuclear Regulatory Commission, Office of Public Affairs, Washington, DC, No. 98-87 (Tuesday, June 9, 1998).

² "South Texas Project 2001 Comprehensive Cultural Assessment, December 2001," Synergy Consulting Services Corporation, pp. 9-10; "South Texas Project 2003 Comprehensive Cultural Assessment, January 2003," Synergy Consulting Services Corporation, p. 74; Letter from W.T. Cottle, President and Chief Executive Officer, STP Nuclear Operating Company to Ellis W. Merschoff, Regional Administrator, Region IV, United States Nuclear Regulatory Commission, "South Texas Project Units 1 and 2 Docket Nos. STN 50-498, 50-499 South Texas Project Comprehensive Cultural Assessment," April 7, 2003.

Moreover, handwritten notes, which appear to have been taken at the August, 2005 meeting, were released to SEIU under the same FOIA request (2006-0052). The notes describe a number of concerns focusing on safety of the licensee's staff reductions and business concerns:

- Trust of management
- Forced separations
- Outsourcing
- Resource [?]
- Adding VPs but cutting staff
- Focus on profit with questionable regard for employees
- Not appear to affect safety, Not yet.
- Safety still seen as priority, however question commitment to staff
- Many comments regarding supervisor lack of commitment to employees. Again strong [?] of more commitment to profit than to workers
- Question whether time will bring more commitment to money than to safety. Does not seem to be case currently but have how far will profit drive station?

These notes describe a potential problem in which the licensee's business concerns may trump safety. Given that STPNOC's action plans arising from previous CCAs apparently were not successful in respect of Wackenhut and I&C, it is important for the NRC to scrutinize the steps taken by STPNOC to rectify problems identified in the 2005, 2003, and 2001 cultural surveys. Some of these steps are mentioned in the "South Texas Safety Culture Survey" document from the August 2005 meeting:

- a SWOT analysis to assess the issues and actions required and follow-up on these actions to improve station alignment.
- an outsourcing lessons learned
- an evaluation of IT, Supply Chain, Technical Training, and Wackenhut to assess the issues and recommended actions.

By obtaining this information from STPNOC, the NRC will be better informed about the licensee's progress towards improving the plant's SCWE. In addition, the NRC will be able to assess the effectiveness of steps taken to redress problems with Wackenhut and I&C for whom problems persist despite STPNOC's apparently repeated remediation efforts.

SEIU further requests that the NRC:

- provide SEIU with copies of all correspondence sent to STPNOC regarding this petition and the subject of the safety conscious work environment at STP;
- provide SEIU with advance notice of all public meetings conducted by the agency with STPNOC regarding this petition and the subject of the safety conscious work environment at STP;
- provide SEIU with an opportunity to participate in all relevant calls between NRC staff and STPNOC regarding this petition and the subject of the safety conscious work environment; and

- provide SEIU with copies of all correspondence sent to Members of Congress, contractors, and/or industry organizations (e.g., the Nuclear Energy Institute) regarding this petition and the subject of the safety conscious work environment at STP.

Yours truly,



Glenn Adler
Senior Research Analyst

Ph: (202) 730-7426
Fax: (202) 350-6613
Email: adlerg@seiu.org

On March 14, 2004, I received a copy of the petition regarding the safety conscious work environment at STP. The petition was submitted to the staff of the House of Representatives, Committee on Education and the Workforce, Subcommittee on Higher Education, Training, and Vocational Education.

The petition requests the fact and the effect of the petition be reviewed and the results of the review be reported to the House of Representatives.

Thank you

Glenn Adler
Senior Research Analyst
SEIU



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

MAR 17 2006

Mr. Glenn Adler
Senior Research Analyst
Service Employees International Union
1313 L Street, NW
Washington, DC 20005

IN RESPONSE REFER
TO FOIA/PA-2006-0052

Dear Mr. Adler:

On January 24 and March 9, 2006, I provided records responsive to your Freedom of Information Act (FOIA) request number FOIA/PA-2006-0052. Your request asked for documents related to any cultural assessment of the safety conscious work environment at the South Texas Project Nuclear Operating Company (STPNOC) since January 1, 2004.

This letter clarifies the fact that the Nuclear Regulatory Commission (NRC) is not in possession of any cultural assessments responsive to your request.

Sincerely,

A handwritten signature in cursive script that reads "Russell A. Nichols".

Russell A. Nichols
FOIA/Privacy Act Officer
Office of Information Services



FAX Transmittal Sheet

SEIU Research Department
Fax: (202) 350-6613

Date: MARCH 14, 2006

To: MR. RUSSELL NICHOLS, NRC

Fax: 301-415-5130

From: GLENN ADLER

Phone: 202-730-7426

Number of Pages (including cover): 6

Comments:

ANDREW L. STERN
International President

ANNA BURGER
International Secretary-Treasurer

MARY KAY HENRY
Executive Vice President

GERRY HUDSON
Executive Vice President

ELISEO MEDINA
Executive Vice President

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Confidentiality Notice: The information contained in this fax transmission is confidential and intended for recipient(s) only. If you have received this information in error, please immediately notify us by phone to arrange for return of all documents received.



March 14, 2006

RE: FOIA/PA APPEAL

Mr. Russell A. Nichols
FOIA/Privacy Act Officer
Office of Information Services
United States Nuclear Regulatory Commission

Fax no: (301) 415-5130

ANDREW L. STERN
International President

ANNA BURGER
International Secretary-Treasurer

MARY KAY HENRY
Executive Vice President

GERRY HUDSON
Executive Vice President

ELISEO MEDINA
Executive Vice President

TOM WOODRUFF
Executive Vice President

Dear Mr. Nichols:

On December 13, 2005 I made a request for various documents related to Comprehensive Cultural Assessments conducted at the South Texas Nuclear Operating Company in Texas (FOIA/PA 2006-0052, see Attached). Today, I received a final response from the NRC, which included the last of four short documents released under the request, related to the implementation of the Assessment, and/or slides of meetings at which the Assessment was presented.

Unfortunately the release did not include copies of the 2005 Assessment itself, which I specifically requested in my December 13, 2005 FOIA submission. This 2005 Assessment clearly must exist, since it is the subject of and is clearly referenced in the presentations described in documents that were released to me. Indeed, the response I received today does not indicate that such a document *does not* exist. Nor does the response I received today explain why this document has been withheld.

I hereby appeal the NRC's response to my FOIA submission and request that the NRC release a copy of the 2005 Comprehensive Cultural Assessment I requested on December 13, 2005.

Yours truly,

Glenn Adler
Senior Research Analyst

Ph: (202) 730-7426

Fax: (202) 350-6613

Email: adlerg@seiu.org

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**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

December 15, 2005

FOIA/PA 2006-0052

Glenn Adler
Service Employees International Union
1313 L St. NW
Washington, DC 20005

Dear Requester,

We received your Freedom of Information Act/Privacy Act (FOIA/PA) request on December 13, 2005.

Your request has been assigned the following reference number that you should use in any future communications with us about your request: **FOIA/PA 2006-0052**

To ensure the most equitable treatment possible of all requesters, the NRC processes requests on a first-in, first-out basis, using a multiple track system based upon the estimated time it will take to process the request. Based on your description of the records you are seeking, we estimate completion of your request will take 10-20 workdays (2-4 weeks). We will advise you of any change in the estimated time to complete your request.

For purposes of assessing fees in accordance with our regulations (10 CFR 9.33), we have placed your request in the following category: **Commercial**

If applicable, you will be charged appropriate fees for Search, Review, and Duplication of records.

A sheet has been enclosed that explains in detail the fee charges that may be applicable. Please do not submit any payment unless we notify you to do so.

The following person is the FOIA/PA Specialist who has been assigned responsibility for your request: **Gigi Rammling; (301) 415-7090**

If you have questions on any matters concerning your FOIA/PA request please feel free to contact the assigned FOIA/PA Specialist or me at (301) 415-7169.

Sincerely,

Russell A. Nichols
Russell A. Nichols
FOIA/Privacy Act Officer
Office of Information Services

Enclosures:
Incoming Request
Explanation of Fees

From: uid no body <nobody@www.nrc.gov>
To: <foia@nrc.gov>
Date: Tue, Dec 13, 2005 1:44 PM
Subject: WWW Form Submission

FOI/PA REQUEST
Case No: 2006-0052
Date Rec'd: 12-13-05
Specialist: KAMMLING
Related Case: _____

Below is the result of your feedback form. It was submitted by

() on Tuesday, December 13, 2005 at 13:44:03

FirstName: Glenn

LastName: Adler

Company/Affiliation: Service Employees International Union

Address1: 1313 L St. NW

Address2:

City: Washington

State: DC

Zip: 20005

Country: United_States

Country-Other:

Email: adlerg@seiu.org

Phone: 202-730-7426

 Desc: I request that a copy of the following documents be provided to me: "Comprehensive Cultural Assessments" or any other evaluation conducted by the STPNOC, independent contractors or by the NRC to assess the safety conscious work environment at STPNOC since January 1, 2004, as well as any correspondence, reports, presentations, or memoranda between the NRC, STPNOC, and any other entity concerning such assessments.

In order to help you determine my status for the purpose of assessing fees, you should know that I am an employee of a labor union. I am willing to pay fees for this request up to a maximum of \$50. If you estimate that the fees will exceed this limit, please inform me first.

FeeCategory: Private_Corporation

MediaType:

FeeCategory_Description:

Expedite_ImminentThreatText:

Expedite_UrgencyToInformText:

Waiver_Purpose:

Waiver_ExtentToExtractAnalyze:

Waiver_SpecificActivityQuals:

Waiver_ImpactPublicUnderstanding:

Waiver_NatureOfPublic:

Waiver_MeansOfDissemination:

Waiver_FreeToPublicOrFee:

Waiver_PrivateCommericalInterest:



RESPONSE TO FREEDOM OF INFORMATION ACT (FOIA) / PRIVACY ACT (PA) REQUEST

2006-0052

2

RESPONSE TYPE



FINAL



PARTIAL

REQUESTER

Glenn Adler

DATE

2006

PART I - INFORMATION RELEASED

- No additional agency records subject to the request have been located.
- Requested records are available through another public distribution program. See Comments section.
- APPENDICES Agency records subject to the request that are identified in the listed appendices are already available for public inspection and copying at the NRC Public Document Room.
- APPENDICES **B** Agency records subject to the request that are identified in the listed appendices are being made available for public inspection and copying at the NRC Public Document Room.
- Enclosed is information on how you may obtain access to and the charges for copying records located at the NRC Public Document Room, 11555 Rockville Pike, Rockville, MD 20852-2738.
- APPENDICES **B** Agency records subject to the request are enclosed.
- Records subject to the request that contain information originated by or of interest to another Federal agency have been referred to that agency (see comments section) for a disclosure determination and direct response to you.
- We are continuing to process your request.
- See Comments.

PART IA - FEES

AMOUNT

\$ 50.88



You will be billed by NRC for the amount listed.



None. Minimum fee threshold not met.



You will receive a refund for the amount listed.



Fees waived.

* See comments for details

PART IB - INFORMATION NOT LOCATED OR WITHHELD FROM DISCLOSURE

- Agency records subject to the request have been located.
- Certain information in the requested records is being withheld from disclosure pursuant to the exemptions described in and for the reasons stated in Part II.
- This determination may be appealed within 30 days by writing to the FOIA/PA Officer, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001. Clearly state on the envelope and in the letter that it is a "FOIA/PA Appeal."

PART IC COMMENTS (Use attached Comments continuation page if required)

Incoming FOIA/PA-2006-0052 request is located in ADAMS at ML053480087.

Breakdown of processing fees:

\$24.24 [30 minutes search @\$48.49/hr.]
 24.24 [30 minutes review @\$48.49/hr.]
 2.40 [12 pages duplication @\$0.20/page]
\$50.88 TOTAL

SIGNATURE - FREEDOM OF INFORMATION ACT AND PRIVACY ACT OFFICER

Russell A. Nichols

*** TX REPORT ***

TRANSMISSION OK

TX/RX NO	0135
CONNECTION TEL	13014165130
SUBADDRESS	
CONNECTION ID	
ST. TIME	03/14 10:46
USAGE T	02'31
PGS. SENT	6
RESULT	OK



FAX Transmittal Sheet

SEIU Research Department
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Date: MARCH 14, 2006

To: MR. RUSSELL MICHELS, NRC

Fax: 301-415-5130

From: GLENN ADLER

Phone: 202-730-7426

Number of Pages (including cover): 6

Comments:

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International President
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Executive Vice President



RESPONSE TO FREEDOM OF INFORMATION ACT (FOIA) / PRIVACY ACT (PA) REQUEST

2006-0052

2

RESPONSE TYPE FINAL PARTIAL

REQUESTER

Glenn Adler

DATE

MAR - 9 - 2006

PART I - INFORMATION RELEASED

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- We are continuing to process your request.
- See Comments.

PART IA - FEES

AMOUNT *
\$ 50.88

- You will be billed by NRC for the amount listed. None. Minimum fee threshold not met.
- You will receive a refund for the amount listed. Fees waived.

* See comments for details

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Russell A. Nichols *Russell A. Nichols*

**APPENDIX B
RELEASED IN ENTIRETY**

No.	Date	Description, page count
1.	8/16/05	2005 Culture Assessment Action Plan. Region IV requests that the licensee review this document as we feel there is proprietary information (2 pages)
2.	05/2005	Site Wide Culture Assessment Slides (4 pages)

Draft

①

**2005 Culture Assessment
Action Plan
August 15, 2005**

1. Continue to emphasize nuclear safety as the essential element toward our goal of Operational and Financial Excellence – SMT
2. Continue to invest in our culture and the facilitative environment by rolling out Crucial Conversations to all managers and supervisors - Ed
3. Revise the SMT communication process for the remainder of the year such that discussions occur between the responsible SMT member and their organization as opposed to all SMT members collectively involved in a communication cycle. Talking points would be agreed upon and each SMT member would set up group discussions within their organization over a 6-week cycle. Re-evaluate the strategic communication plan at the end of the year - Ed
4. Engage the SLT to communicate the details of each significant strategy on a regular basis to various departments - Ed
5. Conduct regular supervisory workshops with management and supervisors to review case studies and lessons learned. The objective would be to mentor the supervisory staff from a management point of view to provide better alignment – SMT
6. SMT should conduct a SWOT analysis in order to assess issues and actions required and follow-up on these actions to improve station alignment – Mike/SMT – September 9th
Strengths, Weaknesses, Opportunities, Threats
7. Conduct an outsourcing lessons learned – Frank/Mike – September 30th
8. Conduct an evaluation of IT, Supply Chain, Technical Training, and Wackenhut in order to assess the issues and recommended actions – Ed/Frank/Mike with assistance from Watt/Management Insights – November 15th

B-1

9. Institute the "Coach the Coach" process as a part of our observation program to provide feedback on a regular basis to our supervisors - Ed - December 15th

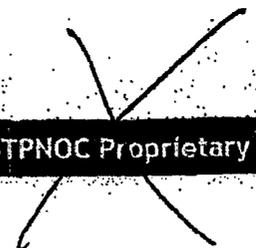
10. Evaluate the decision-making process to ensure that we are making decisions at the right level - Mike - December 15th

2

Implementation and Response

- Field implementation occurred from May 9th - May 27th
- 1237 completed questionnaires were received:
 - General population 444
 - Oversight 239
 - Station Support 105
 - Financial Support 92
 - Engineering & Technical Support 168
 - Maintenance 270
 - Operations 144
 - Outage & Work Control 91
 - Wackenhut 120
- Overall completion rate was 94%
 - Past rates; 2003 92%, 2001 94%, 2000 89%, 1998 81%
- Received nearly 4200 comments and written data

B-2



Netting it Out: Top Level Insights

- STP continues to maintain an effective Safety Conscious Work Environment and effective Nuclear Safety Culture
- Although the station strategy of Operational Excellence and Financial Excellence not yet strongly engrained in the day to day culture of the organization, the vast majority of workers agree that the strategy is needed and most appear willing to support it
- Trust and people-related issues are the top work environment improvement priorities
- Worker commitment to STP, job satisfaction, and overall perception of the work environment remain an organizational asset
- The recent work force management activities (e.g., reductions and outsourcing reviews) have had a negative cultural impact, including an impact on perceptions SMT credibility
- The workforce is eager for substantial process improvements, especially in the ar of work planning and execution, and desire an active role in the planning and implementation of the improvements



Netting it Out: Top Level +/-

+

- Overall participation rate is 94% - results are statistically valid and very representative of the plant community's view and perceptions
 - this participation rate equals the highest rate achieved under the previous employee survey
- A large majority (90%) of station community believe the strategic of Operational Excellence and Financial Excellence is needed
 - solid foundation on which to build
- The plant is maintaining an effective Safety Conscious Work Environment (SCWE) and an effective Nuclear Safety Culture
 - Placing Nuclear Safety First, Questioning Attitude, and Ability to Raise Safety Concerns are the top rated work environment attribute
 - core Nuclear Safety Culture attributes are highly rated
 - Safety is the highest rated Core Value
- Plant workers appear engaged and want change - provided they're an active part of it
- Overall, workers express:
 - that the STP work environment is better than a 'typical' plant
 - good job sat and moderate to high commitment to STP
- Core Value supportive behaviors observed with a good frequency
- Minimal 'inside/outside' sentiment observed

Δ

- Trust and people issues are the top desired work environment improvements
- The workforce is seeking tangible process and work prioritization improvements
 - many feel this is how to achieve financial excellence
 - they seek an active role in the efforts
- While displaying strong agreement with the need for the strategic direction, the workforce at present:
 - has cautious perceptions of commitment to the strategy
 - has cautious perceptions of achievability, if it really places Nuc Safety first, and how they contribute to it
 - does not clearly understand the tactics through which it's going to be achieved
- Differences in perceptions exist based on role:
 - SMT and Group Mgrs display differences at times that seem to indicate the need for closer alignment
 - Supvs are very close to workers in their perceptions
- Adverse work environment impact of reductions/outsourcing
 - trust, mgt credibility, and dedication to Nuclear Safety impacted
- Facilitative leadership behaviors observed with just moderate frequency
- Worker perceptions of the implementation of the new strategic direction and reductions/potential outsourcing indicate opportunities for improvement in communications and change management practices

Netting it Out: Key Assessment-wide Themes

Management Effectiveness, Credibility and Trust

- Based on comments received throughout the questionnaire, reductions and outsourcing have had a negative impact on the perceptions of SMT. While such actions routinely impact worker perceptions of top management, they can have the effect of reducing the influence of SMT at a time where their influence, individually and as a group, is critical to achieving workforce buy-in and commitment to the new strategic direction, and the tactical ramifications of it. Some key items for SMT to consider in planning and executing future actions:
 - The reductions, outsourcing and process improvements have been viewed by some as not being consistent with SMT's descriptions of how these actions would occur
 - Reductions and outsourcing are viewed by some as self-protecting of mgt at the expense of the workforce; some workers feel a sense of detachment from the SMT
 - Apparent changes in direction impact worker perceptions of SMT thoughtfulness and credibility (e.g., Goodnight Report, Outsourcing and SAIC, and Performance Partnership)

Process Improvement and Prioritization of Work

- Reducing the amount of work to be performed and making it more efficient to perform are seen as key components of achieving financial excellence
- The success of these efforts directly impact perceptions of SMT effectiveness and commitment to the workforce



RESPONSE TO FREEDOM OF INFORMATION ACT (FOIA) / PRIVACY ACT (PA) REQUEST

2006-0052

1

RESPONSE TYPE FINAL PARTIAL

REQUESTER

Glenn Adler

DATE

JAN 24 2006

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- See Comments.

PART IA - FEES

- AMOUNT * You will be billed by NRC for the amount listed. None. Minimum fee threshold not met.
- \$ You will receive a refund for the amount listed. Fees waived.

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SIGNATURE - FREEDOM OF INFORMATION ACT AND PRIVACY ACT OFFICER

Russell A. Nichols

**APPENDIX A
RELEASED IN ENTIRETY**

No.	Date	Description, page count
1	Undated	South Texas Safety Culture Survey with slides (2 pages)
2	Undated	Notes titled South TX Safety Culture (4 pages)

SOUTH TEXAS SAFETY CULTURE SURVEY

Background

The STP safety culture survey came about because of a Confirmatory Order, dated June 9, 2005. There were problems with security, I&C, Design Engineers, and Ebasco-Rathyon. **NO SPECIFIC DETAILS**

Objective

The objective was to accurately measure workforce perception and improvement priorities for the following areas of the STP culture:

- Strategy and goals
- Work environment
- Nuclear safety and safety conscious work environment
- Employee concerns program effectiveness
- Leadership effectiveness
- Program and process effectiveness, and
- Organizational interface effectiveness.

Purpose

This survey would provide the Senior Management Team with concise recommended leadership actions with the greatest likelihood of sustaining progress to date and moving organizational performance to higher levels.

Methodology

The methodology was to customize a study for STP's specific information needs. Senior managers/managers were interviewed to identify and understand key issues and desired scope of the study. Past survey data and past interviews were conducted by a Contractor (Management Insight).

Questionnaires were created covering various areas/organizations: General population, Engineering and Technical Support, Operations, Outage and Work Control, and Security (Wackenhut). The questionnaires were designed to focus toward soliciting detailed perceptions and desired improvement priorities from the STP community.

Implementation and Response

- Show Chart/data

Insights

- **STP continues to maintain an effective Safety Conscious Work Environment and effective Nuclear Safety Culture**
- **Although the station strategy of Operational Excellence and Financial Excellence is not strongly ingrained in the day to day culture of the organization, the majority of workers agree that the strategy is needed and most appear willing to support it.**
- **Trust and people-related issues are the top work environment improvement priorities**
- **Work commitment to STP, job satisfaction, and overall perception of the work environment remain an organizational asset**
- **The recent work force management activities (e.g., reductions and outsourcing reviews) have had a negative cultural impact, including an impact on perceptions of Senior Management Team credibility**
- **The workforce is eager for substantial process improvements, especially in the areas of work planning and execution, and desire an active role in the planning and implementation of the improvements.**
- **One item that the Senior Management Team noted from the survey was that 1st line supervisors were more aligned with the workforce than with management. 1st line supervisors were not part of the decision making process but had to implement the decisions.**

Notes

- **Involuntary layouts have ceased.**
 - **Management is working on a voluntary package that is not complete yet.**
 - **2005 DRAFT Culture Assessment Action Plan**
-

South TX Safety Culture

Survey May 2005
Management weight: contractor
~90 participation

Results 8/2005

Questionnaire type survey

Key Big Theme

Trust of management
Forced reorganizations
outsourcing
"Resource slavery"
Adding VPs but cutting
staff
Focus on profit with
questionable regard for
employees.

Not appear to affect safety
Not yet
Safety still seem on
priority however
question commitment to
staff

Reduction:

Planning seen as poor and then
executed different than explained
to staff.
With accelerated schedule knowledge
transfer not properly conducted.
Also although staff decreased,
workload not adjusted to
compensate.

Site Management response:

No further reduction unless
attrition/retirements.
No outsourcing
No shared staff resources
Continued monitoring of workload

Overtime policy changes here also upset many of staff, especially require a number of voluntary overtime hours prior to compensated hours.

Staff seems to feel isolated from executive management and would appreciate greater interaction with executives in plant.

Many comments regarding supervision lack of commitment to employees. Again strong theme of more commitment to profit than to workers. Question whether time will bring more commitment to money than to safety. Dept. not seen to be especially but how far will profit drive station.

Employees open, comfortable
with approaching NRC.

90% of reporters indicated that
they would have no problems
addressing issues with NRC.

Additional comments on good
access to NRC and confidence
in NRC ability to resolve
issues.



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

July 22, 2004

FOIA/PA 2004-0308

1313 L street, NW
Washington, DC 20814

Dear Requester:

We received your Freedom of Information Act/Privacy Act (FOIA/PA) request on July 21, 2004.

Your request has been assigned the following reference number that you should use in any future communications with us about your request: **FOIA/PA 2004-0308**

To ensure the most equitable treatment possible of all requesters, the NRC processes requests on a first-in, first-out basis, using a multiple track system based upon the estimated time it will take to process the request. Based on your description of the records you are seeking, we estimate completion of your request will take 10-20 workdays (2-4 weeks). We will advise you of any change in the estimated time to complete your request.

For purposes of assessing fees in accordance with our regulations (10 CFR 9.33), we have placed your request in the following category: **Commercial**

If applicable, you will be charged appropriate fees for Search, Review, and Duplication of records.

A sheet has been enclosed that explains in detail the fee charges that may be applicable. Please do not submit any payment unless we notify you to do so.

The following person is the FOIA/PA Specialist who has been assigned responsibility for your request: **Mary Jean Pool, 301-415-7097**

If you have questions on any matters concerning your FOIA/PA request please feel free to contact the assigned FOIA/PA Specialist or me at (301) 415-7169.

Sincerely,

A handwritten signature in cursive script that reads "Carol Ann Reed".

Carol Ann Reed
FOIA/Privacy Act Officer
Office of the Chief Information Officer

Enclosures:
Incoming Request
Explanation of Fees



RESPONSE TO FREEDOM OF INFORMATION ACT (FOIA) / PRIVACY ACT (PA) REQUEST

2004-0308

1

RESPONSE TYPE FINAL PARTIAL

REQUESTER

DATE

JUL 30 2004

PART I - INFORMATION RELEASED

- No additional agency records subject to the request have been located.
Requested records are available through another public distribution program. See Comments section.
APPENDICES Agency records subject to the request that are identified in the listed appendices are already available for public inspection and copying at the NRC Public Document Room.
APPENDICES Agency records subject to the request that are identified in the listed appendices are being made available for public inspection and copying at the NRC Public Document Room.
Enclosed is information on how you may obtain access to and the charges for copying records located at the NRC Public Document Room, 2120 L Street, NW, Washington, DC.
APPENDICES Agency records subject to the request are enclosed.
Records subject to the request that contain information originated by or of interest to another Federal agency have been referred to that agency (see comments section) for a disclosure determination and direct response to you.
We are continuing to process your request.
See Comments.

PART IA - FEES

AMOUNT \$

- You will be billed by NRC for the amount listed.
None. Minimum fee threshold not met.
You will receive a refund for the amount listed.
Fees waived.

* See comments for details

PART IB - INFORMATION NOT LOCATED OR WITHHELD FROM DISCLOSURE

- No agency records subject to the request have been located.
Certain information in the requested records is being withheld from disclosure pursuant to the exemptions described in and for the reasons stated in Part II.
This determination may be appealed within 30 days by writing to the FOIA/PA Officer, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001. Clearly state on the envelope and in the letter that it is a "FOIA/PA Appeal."

PART IC COMMENTS (Use attached Comments continuation page if required)

SIGNATURE - FREEDOM OF INFORMATION ACT AND PRIVACY ACT OFFICER

Carol Ann Reed

Handwritten signature of Carol Ann Reed

FOI/PA REQUEST

Case No.: 2004-0308
Date Rec'd: 7-27-04
Specialist: Paef
Related Case: _____

From: uid no body <nobody@nrc.gov>
To: <foia@nrc.gov>
Date: Wed, Jul 21, 2004 4:34 PM
Subject: WWW Form Submission

Below is the result of your feedback form. It was submitted by
() on Wednesday, July 21, 2004 at 16:33:18

FirstName:

LastName:

Company/Affiliation:

Address1: 1313 L Street, N.W.

Address2:

City: Washington

State: DC

Zip: 20814

Country: United_States

Country-Other:

Email:

Phone:

Desc: Through FOIA I obtained a Comprehensive Cultural Assessment conducted at the South Texas Project in 2003. This is now posted in ADAMS: Letter from W. T. Cottle to Ellis Merschoff re: Final Report from Synergy Consulting Services for Comprehensive Cultural Assessment for South Texas Project January 2003. ML041380347

In the assessment the Wackenhut Corporation was identified as a "priority organization" and the South Texas Project Nuclear Operating Company President stated that Wackenhut and two other organizations "will have formal action plans prepared to address the survey results." Later in the attached Comprehensive Cultural Assessment (p. 74), it is noted that "Evaluation and remedial action is suggested in the immediate future."

Please provide any documents (letters, notes, email, reports, memoranda) indicating that such "formal action plans" have been prepared in respect of Wackenhut's performance as assessed in the 2003 Comprehensive Cultural Assessment at STPNOC, or indicating that the evaluation or remedial action referred to has in fact been taken.

FeeCategory: Private_Corporation

MediaType:

FeeCategory_Description:

Expedite_ImminentThreatText:

Expedite_UrgencyToInformText:

Waiver_Purpose:

Waiver_ExtentToExtractAnalyze:

Waiver_SpecificActivityQuals:

Waiver_ImpactPublicUnderstanding:

Waiver_NatureOfPublic:

Waiver_MeansOfDissemination:

Waiver_FreeToPublicOrFee:

Waiver_PrivateCommericalInterest:
