



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

May 27, 2008

Mr. Charles G. Pardee
Chief Nuclear Officer (CNO) and Senior Vice President
Exelon Generation Company, LLC
Chief Nuclear Officer (CNO)
AmerGen Energy Company, LLC
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION
SAFETY CONSCIOUS WORK ENVIRONMENT INSPECTION REPORT
NOS. 05000277/2008405 and 05000278/2008405

Dear Mr. Pardee:

On March 28, 2008, the U. S. Nuclear Regulatory Commission (NRC) completed a team inspection at the Peach Bottom Atomic Power Station (PBAPS). The enclosed inspection report documents the inspection results, which were discussed at a public exit meeting on April 15, 2008, with Mr. Joseph Grimes, Peach Bottom Site Vice President, and other members of your staff.

On November 28, 2007, the NRC established enhanced oversight of the station in accordance with a Deviation Memorandum (ML073320344) from the NRC's Reactor Oversight Process Action Matrix. This enhanced oversight provided for additional inspections of Exelon's actions to resolve work environment issues related to inattentive security officers at PBAPS identified in September 2007. The Deviation Memorandum provided for additional inspections of your efforts to address safety conscious work environment (SCWE) issues, including a review of the results of SCWE surveys. A SCWE is, in part, a work environment where employees are encouraged to raise safety concerns and where concerns are promptly reviewed, given proper priority, and resolved with timely feedback to the originator. This report documents an additional inspection completed in accordance with our Deviation Memorandum.

This team inspection evaluated the results of SCWE surveys and the PBAPS SCWE self-assessment completed by your staff in March 2008. Additionally, the inspection team independently evaluated the SCWE through a series of focus group meetings and individual interviews. Approximately 150 employees were involved in these discussions.

Overall, the inspectors concluded that your self-assessment resulted in a reasonably complete understanding of the SCWE at PBAPS. The results indicated the PBAPS SCWE was effective. The results of the inspector led focus group meetings and individual interviews were generally consistent with the survey results and indicated an effective SCWE.

Through our independent focus group and document reviews, the inspectors developed the additional conclusions. There has been improvement in the SCWE within the security work group, and consistently positive results in other organizations. However, continued oversight and close monitoring by Exelon is warranted to ensure these improvements continue and are sustained. Additionally, the inspectors determined that increased rigor was warranted for some Employee Concerns Program investigations to more fully explore the underlying conditions and the potential for negative SCWE perceptions.

The NRC plans to continue to review your efforts to address SCWE issues. Specifically, we plan to conduct an inspection during the week of June 2, 2008, to assess, in part, your progress in implementing actions with regard to the work environment.

The NRC did not assign a substantive cross-cutting issue in the area of SCWE during the 2007 Reactor Oversight Process Annual Assessment. Based on the results of our inspections and enhanced oversight activities, the NRC will review this topic during our next Mid-Cycle Performance Assessment in August 2008 and determine whether a substantive cross-cutting issue in SCWE is warranted. We will document this decision in a publicly available Mid-Cycle Assessment letter to be issued in September 2008.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Paul G. Krohn, Chief
Projects Branch 4
Division of Reactor Projects

Docket Nos. 50-277, 50-278
License Nos. DPR-44, DPR-56

Enclosure: Inspection Report Nos. 05000277/2008405, 05000278/2008405
w/Attachment: Supplemental Information

cc w/encl:

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R. French, Dir, PA Emergency Management Agency
D. Lockbaum, Union of Concerned Scientists

Through our independent focus group and document reviews, the inspectors developed the additional conclusions. There has been improvement in the SCWE within the security work group, and consistently positive results in other organizations. However, continued oversight and close monitoring by Exelon is warranted to ensure these improvements continue and are sustained. Additionally, the inspectors determined that increased rigor was warranted for some Employee Concerns Program investigations to more fully explore the underlying conditions and the potential for negative SCWE perceptions.

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Sincerely,
 Paul G. Krohn, Chief
 Projects Branch 4
 Division of Reactor Projects

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U.S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket No: 50-277, 50-278

License No: DPR-44, DPR-56

Report No: 05000277/2008405, 05000278/2008405

Licensee: Exelon Generation Company, LLC

Facility: Peach Bottom Atomic Power Station

Location: Delta, Pennsylvania

Dates: March 24 – April 15, 2008

Team Leader: Mel Gray, Branch Chief
Division of Reactor Projects (DRP)

Inspectors: Scott Barber, Assistant Team Leader
Dana Caron, Senior Physical Security Inspector
David Everhart, Physical Security Inspector
Thomas Setzer, Reactor Inspector
David Silk, Senior Reactor Inspector

Approved by: Paul Krohn, Chief
Reactor Projects Branch 4
Division of Reactor Projects

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SUMMARY OF FINDINGS

IR 05000277/2008405 and 05000278/2008405; 03/24/2008 – 04/15/2008; Peach Bottom Atomic Power Station Safety Conscious Work Environment Deviation Memorandum Inspection.

Identification of Resolution of Problems – Self-Assessment and Safety Conscious Work Environment

The inspectors concluded that the safety conscious work environment (SCWE) survey results and Exelon's self-assessment of the work environment provided a reasonably complete understanding of the SCWE at the Peach Bottom Atomic Power Station (PBAPS). The results indicated that the PBAPS SCWE was effective. The inspectors determined that Exelon identified work environment issues, areas for improvement, and corrective actions with appropriate schedules.

The inspectors conducted a series of focus group meetings, individual interviews, and informal discussions with PBAPS staff to independently evaluate the SCWE survey results and overall conclusions of Exelon's self-assessment. The results of these discussions were generally consistent with the survey results and indicated the PBAPS SCWE was effective. Based on the results of these focus groups and document reviews, the inspectors concluded that there has been improvement in the SCWE within the security work group and consistently positive results in other organizations. However, continued oversight and close monitoring by Exelon is warranted to ensure these improvements continue and are sustained. Additionally, the inspectors determined that increased rigor was warranted for some ECP investigations to fully explore the underlying conditions and potential for negative SCWE perceptions.

a. NRC Identified and Self Revealing Finding

None

b. Licensee Identified Findings

None

REPORT DETAILS

4. OTHER ACTIVITIES (OA)

4OA2 Problem Identification and Resolution – Self-Assessments and SCWE (IP 71152)

Background

On September 10, 2007, representatives of WCBS-TV (New York City) contacted the NRC stating that they possessed videotapes of inattentive security officers at the Peach Bottom Atomic Power Station (PBAPS). Based upon this information, the NRC Region I Regional Administrator directed implementation of enhanced inspection oversight of security activities by the resident inspectors at PBAPS, and verbally informed Exelon management of the information received. Exelon commenced an internal investigation based upon this information. On September 19, 2007, WCBS-TV shared the videotapes with the NRC staff, which viewed the videos and determined that the situation warranted an Augmented Inspection.

An Augmented Inspection Team (AIT) completed an inspection at PBAPS from September 21 through 28, 2007. The team concluded that Exelon's prompt compensatory measures and corrective actions in response to the videotaped inattentive security officers at PBAPS were appropriate and ensured the station's ability to satisfy the Security Plan. However, the team determined that the security officer inattentiveness affected the defense-in-depth strategy, and that security force supervisors were not effective in ensuring unacceptable behavior was promptly identified and corrected. The AIT inspection results were published on November 5, 2007 in NRC Inspection Report 2007404 (ADAMS accession number ML073090061).

On October 4, 2007, Exelon sent a letter to the NRC Region I Regional Administrator (ML072850708) which described their completed actions and initiatives to address the issues identified by the AIT. These initiatives included terminating the current security contract with their contractor and transitioning to a proprietary security force. Exelon also described plans to complete a root cause analysis of the security officer inattentiveness, identify corrective actions, and perform safety conscious work environment (SCWE) surveys of the Peach Bottom Security organization. On October 19, 2007, the NRC issued a Confirmatory Action Letter (CAL) to confirm Exelon's commitments to assure that security officers remain attentive at all times while on duty (ML072920283).

Exelon completed their root cause analysis in October 2007 and identified several causal factors related to the security officer inattentiveness issues and specific corrective actions to address the causal factors. One of the corrective actions was to perform a systematic SCWE assessment of all work groups at PBAPS (including the Security work group) based on an integrated review of information from the PBAPS Corrective Action Program (CAP), Employee Concerns Program (ECP), publicly available NRC allegation statistics, and SCWE surveys.

The NRC conducted an AIT follow-up inspection from November 5 through 9, 2007, to review Exelon's root cause analysis report and their planned corrective actions. The inspectors concluded the corrective actions were appropriate. With regard to the security officer inattentiveness issue, the AIT follow-up inspection identified a finding regarding Exelon's failure to maintain the minimum required number of available security officer responders and an associated failure to implement an effective behavior observation program. The AIT follow-up inspection determined that the finding was related to SCWE because it involved security

supervisors who did not encourage the free flow of information related to raising safety concerns, and who did not respond to security officer safety concerns in an open, honest, and non-defensive manner. The NRC determined the finding was of low to moderate safety significance (White). This was documented in a subsequent letter to Exelon dated February 12, 2008 (ML080440012). The AIT follow-up inspection results were issued in NRC Inspection Report 2007405 (ML073550590) dated December 21, 2007.

Region I determined that Exelon's actions to address the PBAPS inattentive security officer issues and their plans to transition to a proprietary security force warranted additional inspection and oversight beyond that specified in the Reactor Oversight Process (ROP) baseline inspection program. On November 28, 2007, the Regional Administrator recommended, through a Deviation Memorandum to the NRC's Executive Director for Operations (EDO), that PBAPS warranted additional inspection resources (ML073320344). One additional inspection activity was to conduct inspections of Exelon's efforts to address SCWE issues, including a review of the results of SCWE surveys conducted at the site. The EDO approved this request on November 28, 2007.

Consistent with the planned corrective actions from their root cause evaluation, Exelon arranged for a third party to conduct a survey of the SCWE at PBAPS. The survey was in the form of a series of questions provided to the staff in January 2008. The survey was completed and the results provided to Exelon in February 2008. A separate SCWE survey of the security organization was also conducted during November 2007. Exelon utilized the survey results to complete a self-assessment of the SCWE at PBAPS.

In accordance with the NRC Action Matrix Deviation Memorandum, this inspection was conducted onsite from March 24 through 28, 2008, to review Exelon's self-assessment of the PBAPS SCWE, including a review of the results of their SCWE survey.

Other completed Deviation Memorandum activities included a security organization performance monitoring inspection (ML080720038) and a root cause corrective action evaluation (ML081090161).

.1 Assessment of Self Assessments and Audits (IP 71152)

Inspection Scope

The inspectors reviewed the PBAPS SCWE survey results and Exelon's self-assessment of the work environment to determine whether Exelon developed a reasonably complete understanding of the SCWE and identified work environment issues in a timely manner commensurate with the safety significance. The inspectors also reviewed Exelon's plans to address deficiencies or areas for improvement identified in the self-assessment. In completing this review, the inspectors considered the performance attributes described in NRC Inspection Procedure 71152, "Problem Identification and Resolution," Section 03.03, to evaluate the results of Exelon's SCWE survey, self-assessment, and planned actions for improvement.

The inspectors considered whether the survey process was appropriately administered to provide insights into the SCWE. Specifically, the inspectors considered whether the surveys were conducted in a manner that encouraged candid and honest feedback from staff regarding their views of the SCWE. The surveys were reviewed to determine whether all work groups had the opportunity to participate in the survey and whether adequate number of staff responded to the survey. The inspectors reviewed the survey questions and structure to assess whether the

questions addressed the four major SCWE principles: (1) employee willingness to raise issues; (2) effective processes for problem identification and resolution; (3) effective alternate means for raising and addressing concerns; and (4) effective methods to detect and prevent retaliation for raising safety issues. The surveys were also reviewed to determine whether they provided adequate opportunities for the staff to write-in comments to further explain their views.

Although a site-wide survey that included the security organization was conducted by Exelon in 2008, the inspectors determined that an additional SCWE survey was administered to the security organization earlier, in November 2007. The inspectors also reviewed these results to gain insights into the security organization's SCWE.

The inspectors reviewed Exelon's self-assessment to determine whether it was of appropriate scope, depth, and detail to identify SCWE issues and whether it developed recommendations for further improvement. In evaluating the self-assessment, the inspectors considered whether Exelon developed information from other processes to inform the survey results and provide an integrated view of the SCWE. Processes the inspectors considered included the CAP, ECP, and audits by the Exelon Nuclear Oversight Group. (Exelon's ECP is intended to provide staff an alternate means to raise issues in a confidential manner that is diverse from other available processes)

Exelon's self-assessment identified a deficiency regarding the ECP and several areas for improvement of the SCWE. The inspectors reviewed these issues and the associated planned corrective actions to determine whether the planned actions addressed the likely causes of the issues, and that the prioritization of actions was appropriate for the potential safety significance of the issues.

Findings and Observations

No findings of significance were identified.

Overall, the inspectors concluded that the SCWE survey results and Exelon's self-assessment of the work environment provided a reasonably complete understanding of the SCWE at PBAPS. The self-assessment identified work environment issues and areas for improvement. Proposed corrective actions to address these issues were focused on the causes and appropriately scheduled.

The inspectors determined the SCWE survey was conducted in a manner that encouraged candid and honest responses to the survey questions. The survey was developed and administered by a third party organization not affiliated with Exelon. The survey process was a recognized tool used in the nuclear industry to assess SCWE. The organization that developed and administered the survey had prior experience in administering the survey such that the survey results were compared to industry norms for responses to the questions. The inspectors determined the survey was provided to available plant staff and managers such that each major workgroup was covered by the survey. Additionally, supplemental work force personnel onsite at the time of the survey were provided an opportunity to participate. Through a review of the survey process, the inspectors determined that staff participation was voluntary, and that staff had been informed their confidentiality would be maintained. Consistent with this, the inspectors determined that the survey results were sent directly to the third party organization with proper controls to ensure individuals who completed the survey questionnaire were not identified.

Approximately 87 percent of the PBAPS staff, managers, and supplemental work force personnel responded to the survey. In reviewing information provided by the third party who administered the survey, the inspectors determined this response rate was above industry norms, and that each work group responded in sufficient numbers to provide an adequate sample to assess work group and overall perceptions of the SCWE. Of those responding, approximately 22 percent provided write-in comments to elaborate on their views. A review of the scope of the survey questions indicated that the survey reasonably covered the four major SCWE principles.

The inspectors determined the survey results indicated that the PBAPS SCWE was effective. Survey results compared favorably with industry norms developed by the third party responsible for the survey. The inspectors determined the results indicated that personnel were willing to raise safety issues utilizing the various methods available. The results also indicated the staff was knowledgeable of these methods, which included raising issues to their supervisor, entering the issue into the CAP, ECP, or raising the issue directly to the NRC. The survey results further indicated that most of the staff and contractors were willing to pursue an issue if they were not satisfied with the initial response.

The inspectors determined the survey results also measured whether there were indicators or precursors of a potentially “chilled work environment” (an environment where employees are hesitant to raise issues based on perceptions of the potential for retaliation). The survey questions assessed staff experiences with the general environment at PBAPS, their personal experience with coworkers and supervisors in work assignments, and their experiences resolving plant equipment issues. The survey results compared favorably with industry norms and indicated there were not precursor indications of a chilled work environment at PBAPS.

The inspectors evaluated Exelon’s self-assessment and determined it was of appropriate scope and detail to identify work environment issues and develop recommendations for further improvement. The self-assessment appropriately considered the survey results by work group and worker levels within the organization to develop a sufficiently detailed understanding of the SCWE at PBAPS. The survey and self-assessment also evaluated write-in comments in sufficient detail to identify common perceptions or themes. Exelon staff who performed the self-assessment appropriately evaluated information from the ECP and CAP to help understand references made to issues in some of the write-in comments and identify areas for improvement.

The inspectors determined that Exelon’s self-assessment identified that there were some negative perceptions of the ECP within the Operations and Maintenance work groups regarding the confidentiality and effectiveness of the program. Exelon’s self-assessment process identified this as a deficiency and the issue was entered into the CAP for resolution (IR752794). The inspectors were aware of shorter term actions in-progress during the inspection where ECP representatives were meeting with members of these work groups to address these issues.

Exelon’s self-assessment further identified seven issues described as performance improvement recommendations in accordance with their self-assessment process. These areas for improvement involved the following:

- Address perceptions by some staff of inconsistent standards and direction during refueling outages and better communicate outage scope decisions;

- Address perceptions by some staff of an imbalance between resources and the plant material condition through enhanced communications regarding long term budget and plant material condition improvements;
- Address perceptions by some staff that some had experienced, or had heard about, an adverse reaction for raising issues;
- Address overall job satisfaction and morale and communications issues tailored to the work group level issues based on the survey results;
- Enhance staff confidence in the CAP, especially in addressing lower level issues;
- Enhance communication and activities to celebrate successes, rewards, and recognition of staff; and
- Develop and implement a standard protocol/methodology for line manager's response to potential harassment issues to ensure more consistency in response to issues.

The inspectors determined actions to address these issues were tracked by Exelon as Areas to Improve (ATI) items (AR00732205) with assignments and due dates to appropriate work group managers.

.2 Assessment of Safety Conscious Work Environment

Inspection Scope

The inspectors conducted a series of focus group meetings, individual interviews, and informal discussions with plant staff to independently assess the SCWE at the station. Focus group discussions were conducted with each major work group to ensure that a reasonably complete and independent understanding of the SCWE was developed. A total of ten focus groups were conducted with staff from Security, Operations, Maintenance, Engineering, Chemistry, and Health Physics. Eight to ten staff members attended each focus group. Four of the focus groups were held with security officers so that the inspectors could meet with as many officers as possible that were scheduled to work during the week of the inspection.

The inspectors generally used questions from NRC Inspection Procedure 71152, Attachment 1, which covers the four SCWE principles and are intended to provide insights into whether there are impediments to an effective SCWE. The inspectors discussed responses to these questions during the focus groups to gain insights into the SCWE. Some staff were contacted after the focus groups discussions on an individual basis to gain clarification on some of the issues discussed.

Provisions were made by the inspectors to encourage open and honest feedback during the meetings. This included announcing prior to the inspection the NRC's intention to meet with work groups, and that individuals would not be identified to Exelon managers or in the inspection report. The NRC also requested that supervisors and peers not ask staff about the discussions held in their meetings. The focus groups were developed by choosing staff at random, considering availability during the onsite inspection week. Finally, no supervisors, managers, or other representatives were present during the focus group discussions with staff.

In preparation for the focus groups, the inspectors sampled ECP files issued since January 2007 to understand the context of issues that might be brought up during discussions. The inspectors further reviewed a subset of ECP files in detail to understand issues that were specific to certain work groups. The inspectors also reviewed CAP metrics tracked by Exelon regarding the usage of the CAP by work group to determine whether work group usage factors were typical prior to the discussions.

The inspectors met with approximately twenty-four staff and supervisors on an individual basis and employed the same or similar questions to corroborate perspectives identified in the focus groups. The inspectors interacted with personnel in the plant and at their work location on a random basis to gain further insights regarding the SCWE. The inspectors estimated they interacted with approximately 150 staff through focus groups and individual interviews.

The inspectors consolidated the results of focus group and individual interviews to identify insights or common perceptions within and among work groups. The inspectors considered the SCWE survey and self-assessment results completed by Exelon to determine whether the insights gained through the inspector's independent reviews were consistent with Exelon's conclusions regarding the SCWE.

Findings and Observations

No findings of significance were identified. One unresolved item (URI) was identified requiring further NRC review.

The results of the individual interview and focus group discussions were consistent with Exelon survey results and indicated the PBAPS SCWE was effective. The results of the inspector led focus groups, individual interviews, and interaction with staff are described in the following.

SCWE Principle (1) - Employee Willingness to Raise Issues

Based on the results of the interviews and focus group questions, the inspectors determined there was a consistent willingness by PBAPS staff in all work groups to raise safety issues. The inspectors determined that the vast majority of staff members indicated they would raise safety issues under all circumstances at PBAPS. Furthermore, the vast majority of staff indicated they were not aware of other staff members who would be hesitant to raise safety issues.

The exceptions to the above responses involved one or two individuals from the security work group who expressed some questions regarding the threshold for raising issues specific to weapons control or reporting early signs of fatigue. These questions resulted from previous experiences when the security force was a contract organization. The inspectors followed up on these specific issues with the individuals and gained clarification that although there were questions, the individuals would raise issues in these areas. The inspectors noted that the security organization had changed significantly within the previous six months in response to the security officer inattentiveness issue. Exelon transitioned the security force from a contract organization to a proprietary organization within Exelon. Furthermore, approximately 30 percent of the officers were new in position and the shift complements had been changed.

Considering these recent organization changes and the overall results of the focus groups and interviews, the inspectors concluded that there has been improvement in the SCWE within the security organization. However, continued oversight and close monitoring by Exelon is warranted to ensure these improvements in the security organization's SCWE continue and are

sustained. The inspectors reviewed Nuclear Oversight Group plans for continued enhanced oversight by Exelon in 2008 of the security organization.

SCWE Principle (2) - Effective Problem Identification and Resolution Process

Based on the results of the focus groups, individual interviews and reviews of CAP metrics, the inspectors concluded the CAP was an effective process for identifying and resolving issues at the site. Plant staff indicated they would enter issues into the CAP at a low threshold.

SCWE Principle (3) - Effective Alternate Means for Raising and Addressing Concerns

The inspectors determined that staff had knowledge and familiarity with the processes for raising issues. Staff consistently described that they could enter issues into the CAP, raise issues to their supervisor, or use alternate means such as bringing the issue to the ECP or to the NRC. The staff further indicated that they were encouraged to consider the ECP if they felt that confidentiality was needed in raising an issue, and that the process was generally effective.

Consistent with Exelon's self-assessment results, the inspectors determined there were questions regarding the effectiveness and confidentiality of the ECP amongst some Operations staff. The inspectors determined the concerns resulted from the handling of an issue in 2007 where follow-up by ECP staff with individuals should have been conducted in a more discrete manner. The inspectors concluded that Exelon ECP staff members were aware of the perceptions, and had appropriate corrective actions in-progress to improve ECP implementation and address these perceptions, including outreach to affected workgroups. Additionally, the issue was identified as a deficiency in the self-assessment and further actions were planned and tracked in the CAP (IR752794). Based on the results of the security focus group, the inspectors identified that reinforcement of ECP confidentiality with the security organization would be beneficial to the SCWE.

In reviewing a sample of ECP files and discussing the process with ECP staff, the inspectors concluded that increased rigor was warranted for some ECP investigations to more fully explore the conditions and potential for negative SCWE perceptions. Specifically, the inspectors noted the scope of three investigations of issues within the operations workgroup involved follow-up limited to those immediately involved in the interactions. In the inspector's view, it was appropriate for these investigations to have included some who witnessed, or heard of the interaction, so the ECP staff could more fully determine perceptions within the broader workgroup. The inspector's views were corroborated by the results of focus group discussions with Operations staff where some questions were raised by a few individuals regarding the handling of issues. The inspectors also concluded there were some instances where the documentation in the ECP files could have been more complete to better document how issues were followed up and the results shared with line managers to ensure that actions were taken as appropriate. Exelon entered these issues into the CAP (IR760287).

In reviewing a sample of ECP files, the inspectors became aware of an issue regarding a reactor operator who was identified in July 2007, reading non-technical material in the control room. This did not meet Exelon's watch standing procedure requirements for an operator in the control room. An aspect of this issue came to the ECP regarding the discipline process. The inspectors had questions regarding the extent of this issue, the actions taken to address the issue, and whether this issue should have been addressed in the CAP.

The inspectors learned that at the time this performance issue was identified, Operations supervisors addressed the individual performance, and further reinforced watch standards with all PBAPS operators. The team also determined that the Operations supervisor made an assessment of the individual's performance at that time and determined the individual remained attentive to their watch standing duties as demonstrated by completing their assigned responsibilities. Based on these reviews, the inspectors concluded the issue was not an ongoing problem. This item is unresolved pending the review of additional information on this issue. (Extent of Condition and Corrective Action Program Usage for Operator Watch Standing Issue **URI 05000277/2008405-01**)

SCWE Principle (4) - Effective Methods to Detect and Prevent Retaliation for Raising Safety Issues

During the focus group meetings and individual interviews, the inspectors did not identify instances where retaliation had occurred for raising safety issues. In interviews with managers, the inspectors determined that managers had received SCWE training, were knowledgeable in identifying potential signs of a chilled environment, and maintained sensitivity and receptiveness to safety issues.

In the review of ECP files, the inspectors observed that issues involving the potential retaliation were appropriately evaluated and actions taken to address the issues. In one instance involving a maintenance work group in 2007, senior managers took actions that included reinforcing site-wide that retaliation taken against any individual for raising a safety concern was prohibited.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Personnel Contacted:

Joe Grimes, Site Vice President
Mark Massaro, Plant Manager
Jim Armstrong, Manager, Regulatory Assurance
Kim Hobbs, Regulatory Assurance Specialist
Bob Franssen, Shift Operations Superintendent
Jim Kovalchick, Manager Site Security
Shelly Craig, Manager, Site Security Operations
Darrell Morgan, ECP Representative
Kirk Pedersen, Corporate ECP Investigator
Joan Glunt, NOS Manager
Inspector met with approximately 150 staff members in various workgroups.

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

URI 05000277/2008405-01	Extent of Condition and Corrective Action Program Usage for Operator Watch Standing Issues. (Section 4OA2.2)
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LIST OF DOCUMENTS REVIEWED

Procedures:

“Exelon Nuclear Employee Standards of Conduct”, Revision 1, January 2008
Fundamental Management System (FMS) User Instructions, Revision 3
Station CAP Performance, January 2008
SY-AA-1016, Watch Standing Practices and Communication, Revision 6
EI-AA-101-1001, Employee Concerns Program, Revision 4
LS-AA-125, Corrective Action Program (CAP) Procedure, Revision 11
LS-AA-120, Issue Identification and Screening Process, Revision 7
HU-AA-1081, Fundamentals Tool Kit, Revision 1
LS-AA-126, Self-Assessment Program, Revision 6
LS-AA-126-1001, Focused Area Self-Assessments, Revision 5

Focused Area Self-Assessment Reports

FASA #701766-03, “PB Security Safety Conscience Work environment (SCWE),
December 14, 2007
FASA #732205-03, PB Safety Conscious Work Environment (SCWE), March 2008

ECP Folders:

PB-2008-003	PB-2007-10
PB-2007-14	PB-2007-9
PB-2007-13	PB-2007-8
PB-2007-12	PB-2007-7
PB-2007-11	PB-2007-6

Activity Reports

AR 673505-18	AR 701766-16
AR 701766-08	AR 701766-17
AR 701766-09	AR 705166
AR 701766-10	AR 723205
AR 701766-11	AR 732205
AR 701766-12	AR 734697
AR 701766-13	AR 752794
AR 701766-14	AR 760287
AR 701766-15	AR 760525

Other:

List of Nuclear Oversight Group Planned Audits of Security

LIST OF ACRONYMS

ADAMS	Agency-wide Documents Access and Management System
AIT	Augumented Inspection Team
AR	Activity Report
CAL	Confirmatory Action Letter
CAP	Corrective Action Program
CARB	Corrective Action Review Board
CFR	Code of Federal Regulations
CNO	Chief Nuclear Officer
CR	Condition Report
DRP	Division of Reactor Projects
ECP	Employee Concerns Program
EDO	Executive Director for Operations
NRC	Nuclear Regulatory Commission
PARS	Publicly Available Records
PBAPS	Peach Bottom Atomic Power Station
SCWE	Safety Conscious Work Environment
ROP	Reactor Oversight Process