

**U.S.NRC**

UNITED STATES NUCLEAR REGULATORY COMMISSION

*Protecting People and the Environment*

**NRC Susquehanna  
Safety Conscious Work Environment  
(SCWE ) Public Meeting**

**July 6, 2009**

**Susquehanna Energy Information Center**

**634 Salem Boulevard**

**Berwick, PA 18603**



## Purpose of this Meeting

- Based on several work environment issues during 2008, the NRC issued a potential Chilling Effect Letter (CEL) to PPL on January 29, 2009. The NRC requested a public meeting with PPL to publicly discuss:
  - The status of the safety conscious work environment (SCWE) at the site;
  - A description of PPL's plans to preclude a chilled work environment going forward;
  - PPL plans for further evaluating the health of the SCWE;
  - SCWE metrics and;
  - An assessment of the effectiveness of actions taken to date;
  - The NRC's actions to date and planned actions to monitor the SCWE at Susquehanna;
  - Inform PPL and the public how the potential chilling effect letter is considered in the plant assessment process



## Agenda

- Define and describe SCWE
- Discuss Timeline
- Describe Potential Chilling Effect Letter
- PPL presents their assessment of SCWE, their root cause analysis, corrective action plan, and progress to date
- NRC questions and dialogue with PPL
- Describe the NRC's process and next steps to monitor and evaluate work environment issues.
- Short Break
- Public Question and Answer session



# Introduction

- NRC
  - Samuel Collins, Regional Administrator
  - Paul Krohn, Chief, Division of Reactor Projects, Branch 4
  - Fredrick Jaxheimer, Senior Resident Inspector
  - Patrick Finney, Resident Inspector
  - Andrew Rosebrook, Senior Project Engineer
- Susquehanna
  - William Spence, Chief Operating Officer
  - Neil Gannon, Vice President, Nuclear Operations
  - Richard Pagodin, General Manager, Nuclear Engineering
  - Robert Paley, General Manager, Plant Support
  - Robert Smith, General Manager, Site Preparedness and Services



# Opening Remarks

Samuel Collins,  
Regional Administrator



## **What is Safety Conscious Work Environment (SCWE)**

A work environment where employees are encouraged to raise safety concerns and where concerns are promptly reviewed, given the proper priority based on their potential safety significance, and appropriately resolved with timely feedback to the originator of the concerns and to other employees.



## Background: 2006 - 2007

- Late 2006 – PPL performs site-wide culture survey
  - Some work groups warranted additional attention
  - Action plans and corrective actions developed to address identified work environment issues
  - Implementation continued throughout 2007
- 2007 – NRC performs independent inspections of work environment
  - NRC determines PPL's actions to address work environment issue are appropriate
  - NRC allegation trend reports show some improvement in general work environment



## Timeline: Jan - May 2008

- Early 2008 – NRC receives significantly increased number of allegations
  - Several concerns specifically addressed work environment issues
- March 2008 – NRC issues a Request for Information (RFI) to PPL related to multiple allegations with similar work environment concerns
- May 2008 – PPL responds to NRC RFI
  - NRC determined that PPL's response did not provide sufficient detail to support their assessment of the safety conscious work environment



## Timeline: June - July 2008

- June 2008- NRC issues PPL a second RFI in June 2008 requesting additional details and bases for their SCWE assessment
- June 2008 – PPL responds to second RFI
  - PPL concludes that the work environment at Susquehanna had declined
  - Decline attributed to:
    - Ineffective change management of personnel and work policies just prior to Spring 2008 Outage
    - Selected events involving station management which were negatively perceived by some station personnel



## Timeline: August – October 2008

- August 2008 – PPL develops Work Environment Improvement Plan
  - Plan was rolled out September 2008
  - Plan includes independent, third party SCWE survey conducted in October 2008.



## NRC Inspections: June - Oct 2008

- NRC conducts multiple work environment inspections during 2008
  - June: NRC inspects action plan from 2006 survey
    - Survey was developed and conducted with an appropriate plan
    - Some corrective actions were not completed
    - Some follow-up activities identified issues for which corrective actions had not been developed
- NRC conducts independent interviews of cross-section of Susquehanna employees
  - Several individuals expressed negative perceptions of SCWE and of the Employee Concerns Program



## **NRC Inspections: Nov - Dec 2008**

- NRC reviews results of October 2008 survey
  - Declining SCWE trends with broader organizational impacts as compared to 2006 survey
  - Small number of workers included negative write-in comments regarding willingness to raise safety issues
  - During on-site inspections, NRC observed that first-line supervisors and mid-level managers were not fully supportive of the specific method or direction to improve the work environment



## Key Event: January 28, 2009

- NRC issues Potential Chilling Effect Letter due to concerns with the progress and effectiveness of PPL actions during 2008 to address indications of a declining SCWE and negative employee perceptions, as it may impact employee willingness to raise safety concerns and lead to a chilling effect at the site.
- At the time, the NRC did not know of any personnel at Susquehanna who would not raise a nuclear safety concern
- The NRC requested PPL to provide:
  - An action plan to address SCWE concerns and preclude a chilled work environment at Susquehanna
  - Plans to further evaluate the SCWE at Susquehanna
  - Plans to develop metrics to monitor effectiveness of actions taken



## Purpose of a Chilling Effect Letter

- Publicly notify the licensee of NRC's concern.
- Request information on corrective actions be made available to the public.
- Input to the plant assessment process allowing the NRC to consider a Substantive Cross Cutting Issue in the area of SCWE.



## Basis for SQ's Potential Chilling Effect Letter

- In 2008, Susquehanna had the most allegations received of any plant in the country (36)
- The allegations were from a wide cross-section of site departments
- Many allegations shared a common theme and involved negative perceptions of the SCWE, personnel and work policies, double standards, and the ECP.
- The NRC informed Susquehanna of many of these concerns via the allegation process (RFIs)
- During 2008, PPL's corrective actions were determined to have limited effectiveness.



## NRC Inspections: Jan – June 2009

- March: Semi Annual Trend Review
  - Inspectors conducted individual and focus group interviews to assess SCWE
  - Documented in NRC Inspection report 50-387 & 50-388 2009002
- June: Review of Susquehanna's Root Cause Analysis
  - Inspectors conducted interviews with members of the RCE Team, and other individual interviews
  - Will be documented in the NRC Inspection Report 50-387 & 50-388 2009003



## Licensee Response and Remarks

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**William Spence**  
**Chief Operating Officer**  
**Pennsylvania Power & Light**



## NRC Observations of Progress

- SCWE metrics – 2 months data available. Too early to determine sustainable trends.
- Allegations related to work environment issues decreased as compared to 2008.
- Reasonable RCE corrective actions have been established.
- Management execution and implementation of the actions are key to success and will be one of the NRC's focus areas going forward.



# Plant Assessment Process

- The Potential Chilling Effect Letter is an input into the plant assessment process.
- The letter represents a cross cutting theme in the area of SCWE and will be documented in the Annual and mid cycle assessment letters for the next 18 months.
- During the Mid cycle and Annual assessment meetings through August 2010, the NRC will evaluate this theme and determine if there is a concern about the progress or scope of Susquehanna's corrective actions. If so, a Substantive Cross Cutting Issue (SCCI) in the area of SCWE could be issued.
- If after 18 months, a SCCI is not issued, the potential chilling effect letter is considered closed and is no longer considered in the assessment process



## NRC Next Steps

- Continued focus on SCWE issues using the baseline inspection program to inform our plant assessment.
  - Monthly review of SCWE metrics
  - Quarterly inspection samples
  - Enhanced PI&R biennial inspection (Spring 2010)
  - Increased management visits and oversight



## Resources

- NRC Website re: Allegations/SCWE <http://www.nrc.gov/about-nrc/regulatory/allegations/safety-concern.html>
  - FAQs
  - Statistics
  - Annual Report
  - SCWE Guidance
- SCWE Regulations
  - 10 CFR 50.7 – Employee Protection
  - 1996 Commission SCWE Policy Statement – “Freedom of Employees in the Nuclear Industry to Raise Safety Concerns Without Fear of Retaliation”
  - Regulatory Issue Summary 2005-18, “Guidance for Establishing and Maintaining a Safety Conscious Work Environment”



## Resources

- Susquehanna Chilling Effect Letter
  - ML090280115 dated January 28, 2009
- Susquehanna Responses
  - ML090620124 dated February 27, 2009
  - ML090760146 dated March 13, 2009
  - ML091800460 dated June 23, 2009



## Contacting the NRC

- **Diane Screnci, Public Affairs Officer**
  - **610-337-5330**
- **Neil Sheehan, Public Affairs Officer**
  - **610-337-5331**
- **Paul G. Krohn, Branch Chief**
  - **610-337-5120**
- **NRC Resident Office Susquehanna**
  - **570-542-2134**



## Reference Sources

- Reactor Oversight Process

<http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/index.html>

- Public Electronic Reading Room

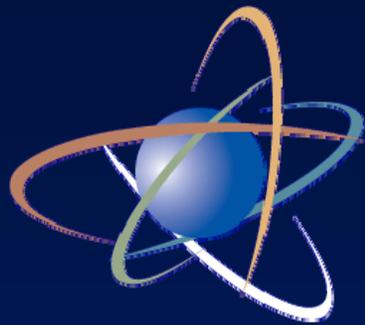
<http://www.nrc.gov/reading-rm.html>

- ADAMS Website

<http://www.nrc.gov/reading-rm/adams.html>

- Public Document Room

1-800-397-4209



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**End of the Presentation**

**Nuclear Regulatory Commission**

**Region I**

**King of Prussia, Pennsylvania**

**July 6, 2009**