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JAN 25 2010

Mr. Samuel J. Collins  
Regional Administrator, Region I  
U. S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406-1415

**SUSQUEHANNA STEAM ELECTRIC STATION  
PPL SUSQUEHANNA LLC WORK ENVIRONMENT  
IMPROVEMENT PLAN  
PLA-6598**

**Docket Nos. 50-387  
and 50-388**

*Reference 1) PLA-6528, Mr. W. H. Spence (PPL) to Mr. S. J. Collins (USNRC),  
"PPL Susquehanna LLC Work Environment Improvement Plan,"  
dated June 23, 2009.*

The purpose of this letter is to provide an update to the Susquehanna Steam Electric Station (SSES) Work Environment Improvement Plan.

PPL remains committed to addressing our work environment issues. The plan, as described in the attachment, continues to evolve. We are committed to actively manage, monitor and support the implementation of this work environment plan to ensure the long-term sustainability of a strong safety conscious work environment and nuclear safety culture at Susquehanna.

The actions described in the Attachment to this letter do not meet the criteria of new regulatory commitments. As such, there are no regulatory commitments contained in this letter. However, PPL fully intends to implement the actions outlined in this letter.

If you have any questions or need further information, please call Mr. Michael Crowthers at (610) 774-7766.

T. S. Rausch

Attachment: Susquehanna Steam Electric Station Work Environment Improvement Plan

Copy: Mr. P. W. Finney, NRC Resident Inspector  
Mr. R. R. Janati, DEP/BRP  
Mr. A. Patel, NRC Sr. Resident Inspector  
Mr. B. K. Vaidya, NRC Project Manager

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**ATTACHMENT to PLA-6598**

**Susquehanna Steam Electric Station Work  
Environment Improvement Plan**

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# **The Susquehanna Steam Electric Station Work Environment Improvement Plan**



### **Discussion of Changes**

Editorial updates throughout the plan.

Updated the assessment of the Health of the Work Environment to reflect the assessments completed since June 2009.

Provided summaries of the work environment assessments completed since June 2009.

Updated the status of actions and added descriptions of actions identified since the June 2009 plan was issued.

## **Introduction**

PPL is committed to ensuring that Susquehanna (SSES) is a high performing organization with a healthy safety culture. We believe that sound leadership is the key to achieving these goals. This plan outlines the details of the actions we have taken and the actions we plan to continue to improve and create a sustainable strong safety conscious work environment.

In 2008, SSES and its employees celebrated 25 years of safe and reliable operation of Unit 1. Unit 2 completed a record run in April 2009 when it was taken out of service for the 2009 refueling outage after 723 consecutive days of operation, the second longest run ever by a nuclear generating unit in the United States. As a team, SSES employees safely operated and maintained Unit 2 on line at an average capacity factor of over 99.1% of its licensed power level for the entire two years. In May 2009, Unit 2 successfully returned to service after one of the more complex refueling outages in plant history. Since May 2009, approval of renewed Unit 1 and 2 operating licenses has been issued by NRC, Unit 1 has operated for over 500 days, Unit 2 has operated over 200 days and Unit 2 reached its 25 year milestone. In 2009, for the second year in a row, the station set a generation record. In January 2010, SSES employees will celebrate these most recent milestones.

SSES employees take pride in the work they perform to safely operate and maintain the plant. This is attributed to the strong work ethic of the station's skilled and dedicated workforce, a workforce that has achieved designation of the station as a "Star" site in the Occupational Safety and Health Administration's Voluntary Protection Program in recognition of their industrial safety efforts.

PPL always has and will continue to invest in the material condition of the plant. We have undertaken several major projects, including replacement of the Unit 1 and Unit 2 steam dryers and high-pressure turbines, to maintain and upgrade the plant so that it can continue to provide a safe, reliable source of electricity for our region for years to come. We will continue, in the next couple of years, to upgrade plant systems structures and components to improve the station's safety, reliability and electrical output.

In the 2007-2008 timeframe, many organizational and operational changes occurred that affected the SSES workforce. In some cases, the changes led to an erosion of workforce trust in the station leadership team. This became evident in 2008 with an increased number of concerns expressed to the NRC.

On February 27, 2009, PPL provided an outline of our ongoing actions to address these work environment issues (PLA-6486). On March 13, 2009, PPL issued the initial version of this plan (PLA-6489). Significant actions (root cause and work environment assessments) specified by the March plan were completed and reflected in an updated plan issued June 30, 2009. Subsequently, a significant number of the actions and assessments have been completed, warranting the plan update provided herein.

The plan has been and will be adjusted as we learn and move forward. The day-to-day active management, monitoring and support of a strong nuclear safety culture and the implementation of this plan are strategies to ensure the long-term sustainability of a strong nuclear safety culture at SSES.

Supplementing this document is a detailed action-tracking system, which identifies key milestones and accountabilities for each action. The SSES Senior Leadership Team routinely reviews the detailed action plans to assure actions are responsive to the issues and, when appropriate, can be and will be sustainable.

### **Background**

Between 2002 and the end of 2006, SSES measured an improving or consistent Safety Conscious Work Environment (SCWE). During the early part of this period, PPL invested heavily in improving the station culture by enhancing communications and engagement with the general work force. This included extensive efforts to build leadership capacity in the station management team and teamwork in the station workforce. Station leadership changes since 2004 resulted in a focus on improving core competencies, improving work force accountabilities and implementing industry best practices.

In late 2006, PPL completed a full-scope work environment survey by an independent third party that concluded SSES had a strong Nuclear Safety Culture and continued to make progress in improving the overall organizational culture, work environment and leadership team. SSES's Nuclear Safety Culture, General Culture and Work Environment, were ranked in the first quartile of the nuclear industry. Leadership, Management and Supervisory skills and practices were ranked in the second quartile. The survey indicated opportunities existed to continue the improvement through focused efforts in Maintenance and Health Physics. PPL developed action plans and implemented corrective actions through 2007 to address the identified work environment issues.

The NRC performed independent inspections throughout 2007, which indicated that the actions to address work environment issues appeared appropriate. The NRC annual allegation program trend reports noted some improvement in the work environment through 2006 and 2007. Beginning in late 2007, the management actions of some leaders negatively affected the organization.

In early 2008, some leadership decisions impacting compensation practices and work schedules were implemented with a less-than-effective change management process. This adversely affected the workforce perception of the leadership team.

Also in early 2008, communications to the work force regarding changes to the implementation of event and accountability review boards were less than adequate.

To address the decline in the general work environment and a lack of workforce trust in the leadership team, an improvement plan was created in August 2008. Initial

corrective actions were focused in three areas: change management, communications, and the relationship of senior management to the workforce.

Assessments of the work environment were completed in the months that followed. The assessments indicated that employees will raise nuclear safety concerns and do not hesitate to utilize the various avenues for raising those concerns, including allegations. However, those assessments did confirm that the changes noted above had adversely affected the work environment. Trust between the work force and leadership had eroded, leading to a decline in teamwork and effective communications.

To emphasize PPL's commitment to addressing the issues, a full-time work environment team, led by a vice president independent of the station, was formed in January 2009 reporting to the chief nuclear officer. The team consulted with industry oversight organizations to benefit from the lessons learned from prior experience with similar work environment issues and provided development and implementation support for this plan. The team members transitioned to their former roles in the fall 2009 and a full-time Work Environment Project Manager was assigned to continue to assist the Senior Leadership team with the plan. A few members of the work environment team continue to actively support plan implementation.

An Independent Organizational Effectiveness Oversight Panel also was formed, reporting to the chief nuclear officer. The Panel is independently assessing the scope, implementation, and effectiveness of actions being taken to improve the organizational effectiveness of SSES. The members are a former PPL chief nuclear officer, a former NRC regional administrator, a consultant who is chairman of the SSES Review Committee, and the PPL vice president of human resources.

A root cause analysis of the work environment issue was completed and the report finalized on May 29, 2009. This effort was undertaken to provide a comprehensive understanding of the direct and underlying causes of the work environment decline and to recommend actions to restore employee trust and assure a strong nuclear safety culture at Susquehanna.

A broad-based group of Susquehanna employees and industry-recognized subject matter experts were brought together to perform this analysis. The team composition was intentionally comprehensive, providing a representative vertical and horizontal cross-section of Susquehanna personnel. The 18 member root cause analysis team included 13 Susquehanna members and 5 industry subject-matter experts. The Susquehanna members included bargaining unit members, individual contributors, supervisors and managers, new and long-term employees, all from various work groups and locations.

The assessment process was structured, detailed and comprehensive, encompassing a cross-section of all levels and disciplines in the organization. Data collection and analyses included, but were not limited to:

- Focused, structured interviews with more than 100 personnel who represented a vertical and horizontal cross-section of Susquehanna.



- Two focus group sessions with a cross-section of the workforce – one with supervisors and the other with workers.
- 2008 Independent third-party SCWE Survey statistics and comments.
- Trend data illustrating the fluctuation in the numbers of Employee Concern Program contacts.
- Susquehanna Review Committee meeting minutes.
- NRC Inspection Reports.
- ARs, CRs and allegations during the past five years.
- Independent review of Susquehanna's cultural change events since 1996.
- Organizational culture summary.

The analysis concluded that the vast majority of Susquehanna personnel are willing to raise concerns and escalate concerns, and are capable of and willing to use the existing internal processes to raise concerns.

The analysis resulted in the identification of the following root causes:

- Management actions related to implementation of certain labor and personnel decisions, as well as some performance and production issues, negatively impacted the work environment.
- Organizational structure and reporting relationships reduced independence and effectiveness of oversight groups regarding General Work Environment and Safety Conscious Work Environment (GWE/SCWE) issues.
- Management missed opportunities to detect and act on early indications of a decline in GWE/SCWE.

Corrective actions to address the root causes and causal factors were developed and have been entered into the corrective action program.

A detailed communication plan was implemented that provided all SSES employees an overview of the root cause team's activities, conclusions, actions, and an opportunity to review the report.

In September, a key set of actions was completed: a reorganization and reassignment of key management personnel was implemented.

#### **Health of the Work Environment - January 2010**

As prescribed by the plan, numerous assessment activities were completed. Anecdotal feedback has also been obtained through implementation of the less-formal interactions specified by the plan.

These assessments show that improvement has been made and that the workforce in general has sensed the improvement. These assessments validate that this plan has proven effective in improving the SSES GWE and SCWE.

We are, however, not satisfied with the progress we have made. As we look forward to continuing to improve the work environment and establish a long-term sustainable strong SCWE and overall nuclear safety culture at Susquehanna, the assessment feedback and our analysis of the assessment feedback provide insights to the areas in which we need to focus. Though improvements have been achieved, we recognize that weaknesses exist that warrant continued attention and aggressive action.

The collective analysis of the assessments is that the work environment is improved. This improvement is sensed by the workforce, and has been detected and reflected in the assessment conclusions and our work environment metrics. We have started to build momentum to a strong GWE and SCWE. The Employee Concerns Program (ECP) is improved and the workforce has an increasingly confident perspective. Communications have been improved. The workforce has shown a willingness to raise concerns using the various problem resolution processes and has expressed that they would raise safety concerns.

However, the analysis also revealed the most significant and impacting areas that need action are (1) relationships and (2) finding and fixing our problems.

The relationship issue primarily involves trust, consistently being accountable to standards, respectfully and professionally resolving personnel and standards issues, and achieving alignment of all personnel to station standards and goals.

Improving the use of the corrective action program such that employees are confident it will efficiently and effectively resolve issues and provide timely accurate feedback; and improving the utility and value of performance improvement tools (metrics, assessments) to proactively identify and resolve precursors to issues, are the key areas for improving our ability to find and fix our own problems.

Summaries of the assessments completed since June 2009 are as follows:

#### Independent Third Party Assessments

Two independent third-party assessments were performed in the fall of 2009. One focused on the SSES safety culture and work environment and the other provided an assessment of overall safety performance and management systems\controls at SSES. Both resulted in identification of insights relevant to the SSES work environment and this plan.

#### SSES Safety Culture and Work Environment Assessment

This assessment characterized the current organizational culture to determine areas of relative strength and weakness, to identify individual organizations that depart from industry norms and/or general performance norms at SSES, and to identify opportunities for improvement. The assessment compared the 2009 results to the 2008 SCWE assessment and the safety culture and work environment assessment last performed in 2006.

The 2009 assessment indicates that the declining trends have been reversed and that the Nuclear Safety Culture (NSC) and SCWE have notably improved in the last year, suggesting that the recent PPL improvement initiatives are having a positive affect. The assessment concluded that the SSES NSC was 'Adequate.' The SCWE assessment noted that both the safety culture and general work environment declined notably from 2006 to 2008 but showed a reversal of the declining trends with notable improvements from 2008 to 2009 for both the safety culture and general work environment. Comparing the 2009 results to the 2008 SCWE assessment, 99% of the questions common to both surveys improved with 34% improving significantly (>10%) and 41% improving notably (>5%).

The assessment noted a nominal improving trend for the Employee Concerns Program and communications, but noted performance recognition, performance appraisal, and continuous improvement were areas of weakness. Trust, mutual respect for the management team, and trust in senior management, while showing signs of notable improvement in the last year, need attention. Confidence and trust in management, particularly senior management, declined significantly from 2006 to 2008, but has improved significantly since 2008 with the arrival of the new senior management team. Several specific SSES organizations were noted as improved and others as requiring attention.

Employee comments provided as part of the assessment were extensive and notably more positive than typically encountered, suggesting a period of greater optimism and perceptions of positive changes.

The assessment concludes that the combination of management changes and the implementation of the work environment plan has had a notable positive impact on the Nuclear Safety Culture (NSC) and provides an opportunity for further improvement. The workforce is encouraged by the changes that have occurred and the communicated standards and expectations of the new senior management team.

In response to this assessment, we plan the following activities:

1. Station meetings will be conducted to communicate the results of this assessment.
2. Each SSES functional unit identified as Priority 1, 2, or 3 is to develop a plan to address the top functional unit issues as identified in the 2009 assessment that will consider the results of the Quality Assurance (QA) assessment report (described later) and the 2008 SCWE assessment. A cross-section of each functional unit's employees will be used to develop the plan. Plan actions will be completed by October 30, 2010 unless the Chief Nuclear Officer concurs that a longer time period is warranted.
3. The Employee Concerns Oversight Team (ECOT) will review the functional unit plans and hold a challenge board to review the Priority 1 and 2 plans. Station level actions and functional unit actions will be identified.

4. The ECOT will hold a plan status challenge board meeting and a plan closure challenge board meeting in November 2010.
5. All other functional units are to review the results of the survey and determine any action the functional unit deems appropriate.
6. All actions will be coordinated with the Work Environment Project Manager and integrated with the SSES Station Excellence Plan. All plans will include actions to perform effectiveness reviews.

#### Safety Performance and Management Systems/Controls Assessment

The other independent assessment that occurred in the fall of 2009 took a broad look at SSES activities including plant safety, management systems, and management controls. This assessment was not focused on the SSES safety culture, safety conscious work environment, or general work environment. The assessment did however identify areas for improvement applicable to this plan. The areas in need of improvement, applicable to the work environment, relate to resolution of long-standing issues, lack of trust and accountability, and a lack of alignment within the management team. PPL analysis of this report and other assessment input identified the need to perform two root causes, one focused on the corrective action program not consistently resulting in performance improvement such that long-standing issues are resolved, and the other focused on ineffective use of performance monitoring to resolve long-standing performance issues.

#### Susquehanna Review Committee (SRC)

The SRC visited SSES and formally met twice since June 2009. During each visit, several of the SRC external members pulsed various portions of the work force, reviewed the QA safety culture assessment results (discussed later), and discussed collectively their SCWE perspectives. The results are documented in committee reports. Common themes identified were; the employee concerns program appears to be stronger and receiving better employee acceptance than the previous combination of site ombudsman and corporate ECP; improvement opportunities regarding alignment with the first line supervisors were identified; GWE continues to show gradual improvement; and no indications of a SCWE concern were identified.

#### Quality Assurance (QA) Safety Culture and SCWE Assessment

The quality assurance organization (QA) has assessed nuclear safety culture and SCWE since the start of the 2009 refueling outage. QA utilized the 2009 version of the Nuclear Safety Culture Assessment Survey Questions from the INPO/USA Assessment plan to pulse the workforce (468 workers) and spur discussion. Two reports were issued in 2009. The first, issued June 2009 pulsed various personnel face-to-face during the spring refueling outage. The second issued December 2009, pulsed groups via written survey as part of QA audit and assessment activities. The ECOT and the Susquehanna Review Committee reviewed the results. The ECOT made recommendations to management as a result.

The December report identified INPO Principle 5 – “Nuclear technology is recognized as special and unique” and Principle 6 – “A questioning attitude is cultivated” as the highest of the principles. Principle 2 - “Leaders demonstrate commitment to safety” and Principle 3 - “Trust permeates the organization” results were the lowest in the survey. None of the employee comments indicated an unwillingness to raise issues or identified specific concerns or issues regarding harassment, intimidation, retaliation or discrimination.

A specific common theme was that communications could be improved if supervisors and managers were more available to the work force.

#### The ECOT Assessment of the Work Environment Metrics

The SSES ECOT reviews monthly the work environment metrics. The metrics, along with input from the employee concerns program, QA assessments, NRC allegation data, grievance information, and anecdotal information obtained by the ECOT members, are “rolled-up” into assessments of each of the four pillars of a SCWE and the general work environment. An assessment of the overall health of the work environment is then developed, any recommended actions identified, and the results communicated to the management team.

Improvements can be seen when comparing the metrics and pillar assessments from April to November 2009 (December data is not collected or analyzed at the time this report was written). A direct comparison is not possible for all metrics because of changes implemented to the metrics (some have been deleted, others added). From a big picture perspective, two of the pillar ratings reflect improvement: “Willingness to Raise Concerns Using the Normal Problem Resolution Process” and “Management Effectiveness at Resolving Concerns Using the Normal Processes.” One pillar, “General Work Environment,” has a lower rating. From September to November, two have improved: “Willingness to Raise Concerns Using the Normal Problem Resolution Process” and “Management Effectiveness at Detecting and Preventing Retaliation.”

The ECOT review of the November 2009 data concluded that the health of the work environment is improved, but is not where we believe it needs to be. The workforce is consistently raising concerns via the normal and alternate problem identification and resolution processes. However, the management and resolution of the concerns raised through these processes is not being accomplished as effectively and as timely as desired. Also, the general work environment pillar is not deemed acceptable due primarily to two metrics (industrial safety work orders and operator aggregate index). A good example of a metric that indicates improvement, but is not deemed satisfactory, is the number of allegations NRC has received. In 2008, NRC received 35 allegations; through the end of November 2009, 15 were received. At 15, PPL has the highest number of allegations in NRC's Region I and is in the top 5 in the country. Thus, more work is needed to improve the willingness of the workforce to use the PPL processes to resolve concerns.

Numerous actions have been identified by the ECOT as a result of the monthly metric reviews. These actions were entered into the action request process and are being tracked to closure by the ECOT.

#### NRC Feedback

In the first quarter of 2009, NRC performed an inspection that reviewed the adequacy of the action plan's progress in addressing SCWE issues to preclude a chilled work environment at Susquehanna through the first quarter of 2009. The inspectors conducted focus group interviews and individual interviews of managers and senior managers, and observed plant activity meetings and small group interviews. No findings of significance were identified. No individuals indicated to the inspectors that they would not raise a nuclear safety concern nor did any individuals indicate that they were aware of anyone that would not raise nuclear safety concerns. However, the inspectors determined that several negative perceptions about the safety conscious work environment continue to exist among a significant portion of the workforce.

On August 11, 2009, NRC's integrated inspection report indicated that PPL has developed a quality plan for addressing the safety culture issues and that a key factor in addressing the SCWE issues at Susquehanna will be the implementation and execution of both the root cause analysis corrective actions and the long-term action plans. It will be important to adjust the plan as additional information becomes available.

On September 1, 2009, NRC's Mid-Cycle Performance assessment letter indicated that we have made reasonable progress in understanding the underlying causes and developing an action plan for addressing the SCWE issues at Susquehanna. An appropriate root cause evaluation that identified reasonable causes for the SCWE issues was performed and corrective actions scheduled to address each of these causes.

In the NRC's integrated inspection report (2009004) issued November 13, 2009, NRC did a detailed review of PPL corrective actions and performed plant personnel interviews. NRC concluded that PPL made reasonable progress in implementing the action plan and that workers were cautiously optimistic that changes were being implemented.

#### Independent Organizational Effectiveness Oversight Panel

Representatives of this panel have periodically visited SSES, attended meetings, conducted interviews, reviewed reports, and have provided the chief nuclear officer with feedback. In a report issued July 2009, the panel provided the following insights:

- many actions and significant accomplishments have improved the work environment.
- in general, employees and supervisors believe the station is headed in the right direction.
- employees will raise issues important to safety and regulatory compliance and current management and processes encourage employees to raise concerns.

- some employees believe the pace of change is slow.
- the work environment plan implementation warrants additional formality and rigor (note: actions to increase leadership team review of closed actions were taken).
- key positions such as CNO and QA Manager need to be filled (note: these have been filled).
- the plan needs to be integrated into the other station improvement initiatives (note: this is being done for 2010 and 2011).
- pockets of employees continued to express concerns with the work environment, (note: the plan has included actions to address the specific organization issues).
- some employees lack confidence in the employee concerns program (note: actions have been taken to improve program confidence).
- current staffing levels is a concern for a employees throughout the organization (note: staffing plans have been updated and are being implemented).

The panel, though not through formal reports, will continue to provide oversight and feedback to the leadership team.

### **Plan Overview**

The goal of this plan is to create a high-performing organization characterized by sound leadership, healthy accountability, and a healthy safety culture. This plan organizes the actions into key attributes for improvement and describes the actions and milestone dates. This plan is an integral part of the SSES Station Excellence Plan.

This work environment plan provides specific focus on resolution of the SSES work environment issue. It is not intended to live beyond the end of 2010. In the first half of 2011, we will assess our progress to determine if this plan has sufficiently achieved its success criteria in a sustainable manner such that specific focus beyond the focus provided to our station excellence plan is no longer warranted.

The success criteria are:

- A high level of trust evident at all levels.
- Teamwork, ownership, alignment - evident at all levels.
- A strong employee concerns program.
- Strong problem resolution processes that have the confidence of SSES employees.
- Proactive comprehensive performance improvement processes and tools that are used to monitor the work environment and aggressively pursue corrective actions to any challenges to the work environment.
- Routine Independent oversight of the work environment and assessment processes to assure effectiveness.
- Comprehensive, timely and consistent communications.
- The change management process is being utilized routinely to achieve meaningful change effectively and efficiently.
- A training program is established that routinely reinforces the importance and elements of a healthy work environment.



These criteria will be addressed in the station excellence plan.

Since significant progress has been made since 2008 and the previous plan effectively addressed the short term, the plan described below is focused on the actions needed to continue the progress and create a sustainable healthy SSES work environment for the long term. The attributes of this plan have been modified to reflect the results of the assessment and PPL analyses described above. The June plan contained the following key attributes:

- Leadership
- Leadership Relationship with the Workforce
- Change Management
- Communications
- Work Environment Oversight
- Alternate Concern Resolution Processes
- Corrective Action Program Enhancements
- Station Health Evaluations
- Training
- Work Force Recognition
- Evaluation of the health of the work environment
- Metrics to be used to monitor effectiveness of our actions

The Appendix to this plan provides a summary level discussion of each of the June attributes and describes what has been accomplished and what is yet to be accomplished. Those yet to be accomplished have been incorporated into the revised plan described herein.

The key attributes of this plan incorporates and builds upon the previous, but is organized as follows:

- Maintaining Healthy Work Relationships - this attribute addresses, leadership skills, trust, teamwork, alignment, accountability, ECP, work force recognition, Communications and change management are also included.
- Continuous Performance Improvement - this attribute addresses effective use of performance improvement tools including the corrective action program, CAP trending, self-assessments, and benchmarking.
- Training – this attribute addresses new employee training, GWE/SCWE concepts reinforcing training.
- Work environment oversight - this attribute addresses evaluation of the health of the work environment and performance improvement.

The attributes are interrelated. Success of this plan will only be achieved through rigorous and timely implementation of the all key attribute actions.



## **Maintaining Healthy Work Relationships**

The leadership development program and leadership skills described in the June plan are integrated into our processes in a manner that will ensure that a high leadership capacity and high level of teamwork is sustained. Specifically addressed are the leadership development and training elements detailed in Appendix I and maintenance of a comprehensive fully integrated staffing plan annually updated to assess the needs of the organization. The fully integrated workforce plan addresses succession, training, and internal and external hiring. Employee development (including employees in leadership positions) is a focus area in the SSES Station Excellence plan.

The teamwork and alignment-related activities established that will be maintained include:

- station leaders attending opening sessions of training courses to reinforce the station values and expectations regarding nuclear safety and a constructive work culture,
- managers touring plant areas to observe work, communicate directly with employees in their workplaces, and otherwise constructively engage the workforce
- regular meetings with bargaining unit leadership
- regular meetings with bargaining unit stewards in maintenance, operations and health physics
- second-line and first-line supervisor meetings to promote alignment and provide organizational focus in a direct and interactive environment, to provide a feedback opportunity to the leadership team and a routine forum for supervisors to work together in a collaborative environment to address issues
- conduct of all-hands meetings and feedback and dialogue meetings on a regular basis.

The Employee Concerns Oversight Team (ECOT) will review proposed employee discipline actions to make recommendations to reduce the potential impact on the work environment of such actions. A review process has been established to provide oversight and ensure fairness and consistency of any employee discipline actions.

The ECP representatives will continue to proactively engage the workforce to identify and help resolve issues by being out in the plant. Work environment metrics will continue to be used to monitor the ECP. In 2010, PPL will perform an industry benchmark of the SSES ECP to identify enhancement opportunities.

The simplified employee recognition process developed in 2009 will be reassessed in 2010.

A general work environment procedure will be issued that will help assure sustainability of actions such as the review process that provides oversight of the employee discipline; use of alignment tools such as feedback and dialogue sessions, all-hands meetings, management bargaining unit leadership meetings; and GWE/SCWE communications.

## Communications

An integrated, internal communications plan will be developed by March 2010 and will be implemented post outage (April 2010) to incorporate many of the communication actions described in the Appendix and those that resulted from the communications survey conducted in 2009.

An Internal Communications Department (ICD) recently established is pursuing specific actions on several fronts to markedly improve the communications function of the station and increase the flow of vital information to plant personnel. ICD will develop and deliver effective communications training to management personnel, improving both personal communications effectiveness and improved written and visual communications processes. ICD will continue to enhance the use of established communication vehicles, which include:

- The Susquehanna Focus newsletter (published twice each week) incorporating articles which address current safety issues, organizational changes, as well as improved operations processes and plant condition;
- The Susquehanna Grapevine newsletter (published as needed) is used to respond immediately (within hours) of hearing rumors circulating among station workforce. One of the highest readerships on site, the Grapevine effectively states the rumor, then shares factual and current information to help squash further negative, fictional accounts. The Grapevine has enhanced senior management credibility and reduced the destructive nature of frequently embellished accounts;
- Articles of importance are submitted for publication in the daily Station Status Report (SSR). The SSR receives submissions of immediate interest to all personnel, used as a basis for discussion between management and site personnel during 'Tailboard' meetings which occur daily in departments across the station;
- 'Puffer' messages (12 second audio messages) are delivered daily to every person as they enter the site. These messages are refreshed every seven days and focus on recognition, achievements, celebrations and safety messages.

## Change Management

A department level change management procedure has been issued and a change champion assigned to help employees implement the process. The ECOT reviews potential work environment-impacting change plans. An effectiveness review was completed in 2009. Another effectiveness review will be completed by November 15, 2010. The importance of use of the change management procedure will be reinforced periodically.

## Continuous Performance Improvement

Use of performance improvement tools such as self-assessments, benchmarking, corrective action program, and trending need to be improved to effectively drive performance improvement at the station. Corrective actions are being implemented to

ensure that performance improvement, including the corrective action program, are considered core business and embraced by the organization. These changes will enable Susquehanna to become a better learning organization and close gaps to excellence. The actions currently planned include:

- Reorganization of personnel to focus resources on the performance improvement process and use of the performance improvement tools.
- Improved Corrective Action Program training for root cause analysis and Corrective Action Review Board members.
- Increased rigor in performance and review of root cause analysis.
- Increased management involvement and oversight of the performance improvement programs.
- Improved metrics to monitor the effectiveness of the performance improvement tools.

The anonymous action requests and hotline processes will be maintained and continue to be monitored by the ECOT and the work environment metrics. The plant focus top ten list will continue to be maintained as a tool to identify, communicate and track to closure plant equipment issues.

### **Training**

Training Curriculum committees and Training Oversight Committees review performance and identify performance improvement opportunities. Included in these assessments are GWE/SCWE topics, when appropriate.

The SSES training program will be benchmarked to the practices that contribute to establishing and maintaining a safety conscious work environment identified in "NRC Regulatory Issue Summary 2005-18 Guidance for Establishing and Maintaining a Safety Conscious Work Environment." Gaps will be analyzed and actions taken as deemed appropriate to close the gaps.

The SSES training program will be benchmarked to plants with historical low allegation rates to determine opportunities for further program enhancements. Gaps will be analyzed and actions taken as deemed appropriate to close the gaps.

### **Work Environment Oversight**

Several organizations have a role in the monitoring and oversight of SCWE/GWE. The organizations include:

- Employee Concerns Oversight Team (ECOT)
- Quality Assurance (QA)
- Susquehanna Review Committee (SRC)
- PPL Executive Management
- Nuclear Regulatory Affairs
- Independent Organizational Effectiveness Oversight Panel

The ECOT most directly provides the work environment oversight role. The ECOT's role will evolve and be integrated into the implementation of the industry initiative NEI 09-07 "Fostering a Strong Nuclear Safety Culture" at SSES.

The work environment metrics will continue to be reviewed on a monthly basis to continually assess the health of the work environment and identify opportunities to intervene proactively to address potential issues.

The "top ten" work environment issue list will continue to be used as a tool to communicate recommendations to management and the workforce of the highest priority work environment issues and provide a means to track their closure.

The QA organization will continue to assess safety culture and work environment and communicate trends to the SRC.

The Susquehanna Review Committee will continue to advise the chief nuclear officer about Nuclear Safety Culture, SCWE and GWE issues they identify. The SRC meetings will continue to be periodically attended by members of the PPL executive management team to provide oversight and directly obtain SRC insights.

Nuclear Regulatory Affairs will continue to monitor NRC feedback and help assure the feedback is appropriately addressed.

A full-scope work environment survey by an independent third party is planned to be performed in the first quarter 2011 to provide an independent external assessment of the SSES Safety Culture, SCWE and GWE. The Independent Organizational Effectiveness Oversight Panel will help us assist an assessment of our progress to determine if this plan has sufficiently achieved its success criteria in a sustainable manner such that specific focus beyond the focus provided to our station excellence plan is no longer warranted.

**Appendix I**  
**June Work Environment Improvement Plan**  
**Update**

**Appendix I**  
**June Work Environment Improvement Plan Update**

This appendix provides a summary of the June plan attributes, identifying actions completed and those that are incorporated into the new plan and attributes.

**Key Attributes**

**Leadership**

Assessments identified that a plan of action was necessary to develop the leadership team, to build leadership capacity in the station management team, and to improve teamwork.

PPL did implement a leadership development program that embodies the following elements:

- Assessments of each leadership team member, both as an individual contributor and team member.
- Creation of development plans and coaching based on the assessments. The individual development plans are being developed and coaching has occurred.
- Creation of an Independent Organizational Effectiveness Oversight Panel, which will independently assess the scope, implementation, and effectiveness of actions being taken to improve the organizational effectiveness of SSES. The panel is established and functioning.
- Leadership team-building.
- A standard approach to integration of new leaders.

The leadership development program included refresher training on the attributes of a healthy nuclear safety culture using the Institute of Nuclear Operators (INPO) "Principles for a Strong Nuclear Safety Culture." The objective of this training was to influence the values and behaviors of the leadership team to provide a continuous framework for a healthy nuclear safety culture. The principles addressed were:

- Everyone is personally responsible for nuclear safety
- Leaders demonstrate commitment to safety
- Trust permeates the organization
- Decision-making reflects safety first
- Nuclear technology is recognized as special and unique
- A questioning attitude is cultivated
- Organizational learning is embraced
- Nuclear safety undergoes constant examination

Another area of the leadership development program is based on the leadership expectations and attributes using the INPO "Leadership Fundamentals to Achieve and

Sustain Excellent Station Performance." This training embodied the six attributes which industry has identified in high performing organizations.

- Core Values
- Vision and Plan for Excellence
- Effective Leadership Team
- Engaged Employees
- Healthy Accountability
- Effective Processes and Structures

These values and behaviors are attributes PPL used in selecting the chief nuclear officer.

The expectations, attributes, behaviors, and associated goals have been incorporated in assessing the performance of the station leaders. Leadership team building and development efforts, based on the individual and team assessments, were focused on the leadership team's responsibility to define strategy, vision, roles, responsibilities, and accountability, and to achieve alignment throughout the organization.

A comprehensive fully integrated staffing plan has been developed that assessed the needs of the organization and then identifies the actions that will support the organization's needs. The fully integrated workforce plan addresses succession, training, and internal and external hiring.

These actions will result in current and future SSES leadership teams who have the leadership skills to ensure a sustained healthy nuclear safety culture and excellent plant performance.

In September, a reorganization and reassignment of key management personnel was implemented.

### **Leadership Relationship with the Workforce**

The SSES leadership team is taking actions to address the issues that contributed to the erosion of trust, teamwork and alignment of the leadership team and workforce.

PPL has modified the review process for events based on benchmarking. This has resulted in the replacement of the event review boards with a human performance assessment process. The functions of the accountability review board are being replaced. The call-off sick process that was implemented during the 2008 refueling outage has also been modified. Station leadership has worked with bargaining unit leadership to address how the scheduled time-off (ST) days will be handled for outage and non-outage periods. Modifications have been implemented to the first-line supervisor pay practices to make them consistent throughout PPL.

Mid-level managers, who have previously held operating licenses at SSES, have engaged Control Room personnel regularly to ensure that work environment issues are being proactively addressed.

Station leaders are attending the opening sessions of training courses to reinforce the station values and expectations regarding nuclear safety and a constructive work culture.

Leadership team members are touring plant areas to observe work, communicate directly with employees in their workplaces, and otherwise constructively engage the workforce.

Meetings between bargaining unit leadership and the leadership team have been reestablished to improve communications, alignment and enhance issue resolution processes. Meetings between management and bargaining unit stewards in maintenance, operations and health physics are being held.

Second-line and first-line supervisor meetings are being conducted. The meetings promote alignment and provide organizational focus areas to a broad population of second lines in a direct and interactive environment. They provide a feedback opportunity to the leadership team and also provide a routine forum for supervisors to work together in a collaborative environment to address issues important to the working level. The goal of this effort is to continue to build alignment and teamwork throughout the organization.

The Employee Concerns Oversight Team (ECOT) has reviewed proposed employee discipline actions to assess the potential impact on the work environment. A review process has been established to provide oversight and ensure fairness and consistency of employee discipline.

The objective of these actions is to foster a work environment where all levels of the organization are comfortable raising and addressing concerns in a constructive respectful manner. The organization will resolve issues as a team and all levels of the organization will be aligned with respect to the mission, vision, and values.

### **Change Management**

Change management is another key area for improvement. The lack of effective change management was a key contributor to the dissatisfaction with changes such as the implementation of Event and Accountability Review Boards, changes to the overtime pay policy for first-line supervisors and management personnel, the ST day (time-off) policy for the spring 2008 refueling outage, the call-off-sick policy, and organizational changes. Adequate consensus and alignment were not achieved, and the changes were not well understood, communicated, or accepted by the entire management team or bargaining unit.

While a change management guideline was available for use on the SSES website, the guideline was not consistently used. The lack of consistent use of change management is an underlying cause that resulted in the perception that the leadership team did not value employee input or appreciate the impact that the changes would have on employees.



SSES has benchmarked industry change management practices and used the information to develop a procedure that incorporates a graded approach to change management. The revised process incorporates additional management oversight for changes that could have a significant effect on the workforce. PPL established a change management champion who will monitor, coordinate, serve as an expert resource, and generally assist with administration of the process.

Other corrective actions we have taken to institutionalize the change management process at SSES are:

- Provided training to the management team on the use and application of the change process.
- Assess implementation, and identify successes and areas for improvement in the change management processes.

### **Communications**

Some leadership team decisions and events in 2008 resulted in a lack of alignment and trust by the work force. This was caused, in part, because of less-than-effective communications. The team relied heavily on print and electronic communications and did not use face-to-face communications as often and as effectively as needed.

As a result, numerous actions have been taken, including:

- Increased face-to-face interactions, e.g., in the meetings described in the **Leadership Relationship with the Workforce** section above.
- Face-to-face communication between the leadership team and the workforce in all hands meetings, SCWE review meetings and key activity rollouts.
- Feedback and dialogue meetings with the workforce.
- Quarterly All Hands Meeting for the entire station.
- Susquehanna Focus articles have been created to provide frequent communication to station personnel on issues of interest.
- A Grapevine communication has been created to discuss rumors.
- Work environment-related audio messages at South Gate House entrance portals.
- Highly visible communication centers in areas where people gather to provide reinforcement of key communications.
- Communication of the role and responsibility of the ECOT to the workforce.
- Numerous Station Focus and Grapevine articles have been published communicating trends and status of the work environment initiatives.
- A Work Environment web site providing status of work environment issues has been established.
- Completed a survey to assess the effectiveness of communications. Numerous actions have been added to the plan to further enhance station communications as a result of this survey.

Other corrective actions that we will be taking, in addition to continued implementation of the above actions are:

- Communication of the status of work environment trends and status of the work environment initiatives regularly to the workforce.
- Provide communications training for the station leadership team.
- Emphasize the use of appropriate communication in accordance with the Change Management Process that explains the "who, what, when, where, why and how."
- Issuance of periodic communications that will remind the workforce of the processes that can be used to raise concerns, their responsibility to raise concerns, and assurances that no one will be retaliated against for raising an issue.

Future communications will be monitored, evaluated and adjusted to be sure they are as effective as possible.

### **Work Environment Oversight**

Several organizations have a role in the monitoring and oversight of SCWE/GWE. These organizations were not as effective as they could have been, possibly due in part to the reporting relationships of these organizations and their charters. The organizations include:

- Employee Concerns Oversight Team (ECOT)
- Quality Assurance (QA)
- Nuclear Regulatory Affairs (NRA)
- Susquehanna Review Committee (SRC)

The organizational structure has been reviewed and changed in September 2009 to improve organizational alignment and independence; QA and NRA report directly to the chief nuclear officer.

The ECOT most directly provides the day-to-day work environment oversight role.

A number of factors contributed to the ECOT not being effective in identifying the decline in the work environment at the station. For example, the previous change management process did not require changes that could impact the work environment to be reviewed by the ECOT. The ECOT's scope did not include the GWE. The ECOT was too narrowly focused, and sufficient metrics were not available to identify trends and portray an accurate picture of the work environment.

SSES benchmarked industry work environment oversight practices and used the information to revise the ECOT process. The change management process now requires the ECOT review of changes that could have an impact on the work environment. The ECOT procedure has been revised to expand the ECOT scope to include GWE. Further enhancements are planned. The current scope, membership, and alignment of the work environment oversight structure was reviewed and deemed to be adequate for our current needs. However, we are watching closely the industry

initiative to implement NEI 09-07 "Fostering a Strong Nuclear Safety Culture" and are currently planning to integrate the results of that initiative with our work environment oversight structure.

Detailed metrics have been created and are reviewed by the ECOT on a monthly basis to assess the health of the work environment. Actions are being identified to address areas in need of improvement or to perform analysis of the indicator data to gain insights and define areas for action. The results of the ECOT assessment of the metrics is reviewed each month with the management team.

The ECOT is meeting most weeks and is required to meet no less frequently than monthly.

In March, the ECOT created a "top ten" work environment issue list. This list is used as a tool to communicate recommendations to management and the workforce of the highest priority work environment issues. With completion of the 2009 refueling outage, maintenance of this list was reassigned to the first-line and second-line supervisors. These management personnel are closest to the issues and thus better able to identify the issues for inclusion on the list. The "top ten" work environment issues list is reviewed once per week by the station management team and is published once a week in the plant daily report. Resolution of items on the list is communicated to station personnel and replaced with a new issue.

PPL is taking actions to assure the activities described above are integrated into the appropriate programs and processes to ensure sustainability.

The Susquehanna Review Committee is an off-site review committee responsible for providing a comprehensive and independent oversight of SSES-related activities pertaining to safety (e.g., nuclear, radiological, environmental or industrial) and any matters that could affect safety. The SRC is expected to be watchful for trends that are not obvious to the day-to-day observer. The SRC reports to and advises the Chief Nuclear Officer. Nuclear Safety Culture, SCWE and GWE issues were not specifically reviewed prior to October 2008 but have been since. The SRC meetings have been periodically attended by members of the PPL executive management team to provide oversight and directly obtain SRC insights.

Although it is not an oversight body, NRA is to provide insights concerning NRC regulatory and inspection themes, trends in enforcement issues and provide an aggregate review of NRC interactions regarding SSES. There were missed opportunities for documented reporting of these insights, trends, and reviews in the corrective action process. Actions have been taken to revise procedural direction to assure feedback provided by NRC is provided to NRA and entered into the corrective action program as appropriate.

#### **Alternate Concern Resolution Processes**

Before July 2008, PPL utilized two employee concern representatives as the primary concern resolution option for SSES employees. The Employee Concerns Program

(ECP) in 2006 and 2007 was deemed to be an effective means for employees to raise and resolve concerns.

In July 2008, two changes were made. An additional alternate employee concern resolution option was created and the reporting relationships were changed.

The additional alternate employee concern resolution option was created by establishing an Ombuds position at SSES. This resulted in having no employee concerns representative located at SSES. The primary goal of the Ombuds position was to resolve concerns at an early stage and to approach work-related conflicts constructively without resorting to more formal dispute mechanisms. Based on the number of contacts made with the Ombuds since the position was established in July 2008, we concluded that it was an effective alternate means of resolution of employee concerns.

The ECP representatives reported to the chief nuclear officer prior to July 2008. When the Ombuds position was created, the ECP representative and Ombuds were reassigned to the general manager-nuclear support. Industry benchmarking indicates that a direct reporting line to the Site VP or CNO is the standard. Without this direct path to the highest levels of the organization, some personnel may have been reluctant to raise concerns utilizing these avenues. The reporting relationship of the ECP representatives was changed in September 2009 so that the ECP representatives report directly to the chief nuclear officer.

Several actions have been taken to increase the ability of the workforce to raise concerns. A new process, anonymous action requests, has been implemented which is monitored by the ECOT. A work environment metric is also used to monitor the process.

A toll-free telephone hotline service, provided by a third-party vendor, has been established that will allow the workforce to confidentially and anonymously report and receive responses to concerns. The toll-free hotline has been used successfully by a large number of other nuclear utilities. This service is in addition to PPL Corporation's existing ethics hotline. This process will also be monitored by the ECOT. A work environment metric is used to monitor this process.

The ECP representative established an additional office at SSES to increase visibility and availability. This office is in addition to the existing office located in Allentown. PPL evaluated the effectiveness of the combined ECP and Ombuds processes. Based on this evaluation, PPL re-established a full time ECP representative at SSES and eliminated the Ombuds position. One key change from current practice is that this person proactively engages the workforce to identify and help resolve issues by being out in the plant. A work environment metric is used to monitor the ECP.

## **Corrective Action Program Enhancements**

As a result of benchmarking, an enhancement to the Corrective Action Program was identified, and the process now includes both SCWE and GWE trend codes. These trend codes have now been developed and applied to issues identified in the Corrective Action Program. They allow tracking, trending and analysis via metrics of issues related to the work environment. The metrics are discussed below.

A daily Management Review Committee (MRC) has also been established. This committee has been created to screen Corrective Action Program issues, which could be potential work environment issues, and to assess the overall health of the Corrective Action Program. The program has been revised to provide feedback mechanisms to the action request originator and actions have been taken to increase communications and the knowledge base of the workforce on the corrective action program's proper use, effectiveness, and issue prioritization features.

## **Station Health Evaluations**

SSES maintains a station health evaluation and equipment reliability process that focuses on the health of programs, systems, structures and components important to plant safety and critical equipment reliability. Issues related to non-critical support equipment such as non-safety related plant cranes, general area lighting, or station elevators are not within the scope of the station health process. However, these types of issues are important to the work environment and have not always been resolved in a manner acceptable to the workforce. PPL has evaluated the use of the plant focus top ten list and determined it should not be incorporated into the station health evaluation process. It has been maintained, reviewed weekly by the management team, and used to communicate and track resolution of plant equipment issues.

## **Training**

Safety Conscious Work Environment Refresher Training has been provided to managers and supervisors to address their role in the work environment and their responsibility in the resolution of employee issues and concerns. The training reinforced the expectation that safety will not be compromised for production and included an SSES case study of a work environment event that occurred at SSES in 2008.

PPL has reevaluated the content and frequency of Safety Conscious Work Environment Refresher and other relevant training based on the lessons learned in implementing these initiatives.

Analyses have also been performed to assess training needs related to the bargaining unit contract, the new quick hit assessment process, communicating nuclear safety concerns and supplemental workers. Training has been provided as these analyses determined appropriate.

## **Workforce Recognition**

A renewed emphasis has been placed on recognizing workforce achievements.

A celebration of SSES's 25<sup>th</sup> anniversary was held in September 2008 under the theme, "SSES Nuclear Professionals Safely Producing Electricity for 25 Years." On February 19, 2009, SSES Unit 2 exceeded its previous continuous-run record. Various recognition events were held for employees to celebrate this achievement. A celebration also was held to commend design engineering, plant modification and electrical maintenance employees involved in the installation of a new stair landing. The employees were recognized for raising this personnel safety concern and for completing this work in a safe and timely manner. On June 18, 2009, a station celebration was held to recognize the Unit 2 record run of 723 days and the successful completion of the unit's refueling and maintenance outage.

A team of employees was established to evaluate the effectiveness of the corporate and SSES policies and practices regarding workforce recognition. This evaluation has been completed and has resulted in the identification of process improvements that are expected to simplify the recognition process. The team will perform an effectiveness review in 2010.

## **Evaluation of the Health of the Work Environment**

Assessments have been conducted to determine if the actions taken and planned will ensure resolution of the work environment issues. These assessments included benchmarking to determine how similar issues were resolved at other facilities. Other activities included: a safety conscious work environment survey performed by an independent outside consultant; activities facilitated by an independent third-party consultant with operations, maintenance, and health physics personnel to ensure we understood their issues; a root cause analysis of the work environment issues; focus group interviews by an expert independent panel; and assessment of the roles and responsibilities of the work environment oversight function.

The quality assurance organization (QA) has incorporated data gathering and analysis regarding nuclear safety culture and SCWE into its routine assessment and audit activities. QA has modified their process to include a "generic element" to interview and/or survey personnel with regard to safety culture, SCWE, and general work environment. These include specific questions derived from industry guidance (INPO Principles for a Strong Nuclear Safety Culture, NRC documents RIS 2005-18 and 2006-13). Analysis of the responses will be performed using tools such as that developed by the Utility Service Alliance for use during its Safety Culture Assessments. A periodic summary of the results will be included in the routine Station Summary Reports issued by QA and will be provided to the ECOT and presented to SRC.

The ECOT is reviewing metrics monthly to assess the health of the work environment.

INPO performed an evaluation of SSES in September 2009.

A full-scope work environment survey by an independent third party has been performed.

**Metrics to be used to monitor effectiveness of our actions**

SCWE indicators have been created and grouped to allow assessment of each of the four pillars of SCWE. We also have created metrics to assess the general work environment (GWE) that are based on the types of issues that have been identified through diagnostics completed thus far. The indicators are being assessed monthly by the ECOT along with perspectives provided by internal and external assessments and oversight committees. The assessment will result, as necessary, in recommendations to the chief nuclear officer and the senior leadership team. A description of the metrics to be evaluated for each group is as follows:

**Workforce willingness to raise concerns through the normal problem resolution process** - This group of metrics trends how often the action report system is used and the types of work environment issues that are identified.

**Management effectiveness at resolving concerns through the normal problem resolution process** - This group of metrics trends resolution of work environment and corrective action program issues.

**Effectiveness of the alternate resolution processes** - This group includes trends associated with use of the employee concern, ombuds, NRC allegations, anonymous condition reports, concern hotline issues and bargaining unit grievance processes. The effectiveness and timeliness of concern closure will also be measured.

**Management effectiveness at detecting and preventing retaliation** - This group of metrics includes trends associated with proposed workforce discipline actions.

**General work environment** - This group of metrics includes trends associated with change management, communications, workforce relationship issues, and resource.

A metric bases document has been created to create common understanding and interpretation of the metrics.

**Conclusion**

The actions described in the June plan, many of which have been taken, focused on constructive leadership, improved relationships with the workforce, and increasing confidence in our commitment to a healthy Safety Culture and to a Safety Conscious Work Environment. The initiatives included enhancing the Corrective Action Program, revitalizing our change management program, increasing the effectiveness of our employee communications, and enhancing the confidence of our employees in their ability to effectively raise and resolve concerns.

The June plan has improved the SSES work environment. The plan has evolved as we incorporate additional diagnostic activities and the lessons learned from those activities, benchmarking, or other sources.

We have operated the SSES units safely while making these improvements.