Palisades 2009 Nuclear Safety Cultural Assessment

Entergy Presentation
to

NRC Region III

March 29, 2010

NRC ORDER EA-09-060

Task 5 :

Entergy shall meet with the NRC Regional Administrators in the three regions in which Entergy owns and operates plants, to discuss the results of the safety culture workplace surveys conducted in 2009.

Scope & Methodology

Scope of 2009 NSCA

- Comprehensive, Psychometrically Validated Nuclear Safety Culture Survey with Write-In Comments Using:
  - SYNERGY's Standard Cultural Models
    - Nuclear Safety Culture Model (NSC)
      - Nuclear Safety Values, Behaviors & Practices
      - Safety Conscious Work Environment
      - Employee Concerns Program
    - General Culture & Work Environment (GCWE)
    - Leadership, Management and Supervision (Abridged) (LMS)
  - SYNERGY'S Model for INPO Principles
  - SYNERGY'S Model for NRC RIS 2006-13

Scope & Methodology

Methodology Update – Rating Criteria

- Measuring site performance acceptability based on comparisons to the industry norms.
  - Top Industry Quartile – "Areas of Strength" (AOS)
  - Middle Industry Quartiles – "Areas of Adequacy / Competency" (AOA)
  - Low 3rd Industry Quartile – "Opportunities for Improvement" (OFI)
  - Bottom Industry Quartile – "Area in Need of Attention" (ANA)
  - Bottom Industry Decile – "Area for Improvement" (AFI)

Summary of Results

2009 Response Summary

- 96.5% Response Rate
- 95% Provided Organizational Affiliation

Summary of Results

Palisades – NSC & GCWE Metric Results & Rankings

Location	**NSC**	NS VB&P	SCWE	ECP	**GCWE**
	Metric / Trend	Metric / Trend	Metric / Trend	Metric / Trend	**Metric / Trend**
Palisades	4.45	4.37	4.67	4.43	4.22
- Description	Strength	Strength	Strength	Strength	Strength
- Industry Rank (quartile)	1st	1st	1st	1st	1st
- Fleet Rank (position / 9)	1st	1st	1st	1st	1st
Entergy North Composite	4.11 +8.2%	4.00 +9.6%	4.47 +4.3%	3.89 +12.1%	3.76 +10.6%
Entergy Composite	4.08 +6.0%	3.96 +6.9%	4.46 +3.1%	3.87 +9.2%	3.71 +7.4%

- No trends for Palisades are shown as this is a baseline assessment for Palisades.
- 2006 to 2009 Trends are shown for Entergy Composite results.

Summary of Conclusions

Palisades Specific

- Survey Ratings for all Nuclear Safety Culture Questions and Models were measured as "Areas of Strength."
- Survey Ratings for General Culture & Work Environment and Leadership, Management and Supervision Questions and Models were also measured as "Areas of Strength."
- SYNERGY detected systematic positive bias in the ratings and cautioned that the results should not be considered fully accurate.
  - Recommended further validation of results.
  - Suggested addressing lower rated attributes.
  - Suggested addressing lower rated organizations as part of continuous improvement.

Summary of Conclusions

Palisades Specific

- NSC Weaknesses
  - No "Areas for Improvement," "Area in Need of Attention," or "Opportunities for Improvement" were identified.
- NSC Lower Rated Areas (< 4.15)
  - Contractor oversight
  - Sufficient staffing
  - Corrective Action Program feedback to those who identify issues.
  - Correcting deficient procedures in a timely manner.
  - Seeking new ideas and best practices from other sites and organizations.
  - Implementing Self-assessment recommendations in a timely manner.
  - Selected areas of SCWE receptiveness.

Summary of Conclusions

Palisades Specific

- GCWE / LMS Weaknesses
  - No "Areas for Improvement," "Area in Need of Attention," or "Opportunities for Improvement" were identified.
- GCWE / LMS Lower Rated Areas (< 4.15)
  - Change Management
  - Effective Technical Training.
  - General Communications
  - Sufficient Sr. Management / Management Communication
  - Sr. Management Visibility
  - Middle Management Trust

Summary of Actions Taken or Planned

- Communications of Results
  - Executive Management was briefed by Synergy on fleet wide results
  - Site lead teams were briefed by Synergy on site specific results
  - Site lead team members briefed all-hands on site results
  - Department managers brief workers on department results
- Action Planning
  - Action Planning Guidelines and Action Plan Templates were developed and provided to the sites to ensure consistency and focus when developing action plans.
  - The Corrective Action Program (CAP) is used to track each site's review of results and the development of action plans.
  - Each site (NSA Director) reviews their site specific results to determine what will be addressed in their site action plan and for the need for specific department action plans.
  - Fleet wide results were reviewed to determine common themes and areas appropriate for inclusion in the fleet wide action plan.

Summary of Actions Taken or Planned

- Action Planning (continued)
  - Action plans are submitted to the VP Oversight for Management review.
  - Periodic summary report of action plan status will be provided to Fleet Management.
- Palisades Specific Action Plan Focus Areas
  - Survey Results Validation
  - Corrective Action Feedback
  - General Communications
  - Reinforcement of Nuclear Safety Culture Principles
  - Procedure Quality
  - Supplemental Worker Oversight

Glossary of Terms

- CCI – Composite Cultural Indicator
- ENT – Entergy
- NSC – Nuclear Safety Culture
- GCWE – General Culture and Work Environment
- LMS – Leadership, Management and Supervision
- SCWE – Safety Conscious Work Environment
- NSVB&P – Nuclear Safety Values, Behaviors and Practices
- ECP – Employee Concerns Program