

March 31, 2010

Elmo E. Collins, Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
612 East Lamar Blvd., Suite 400
Arlington, Texas 76011-4125

Subject:: Response to March 2, 2010 NRC Letter Regarding Work Environment Issues at San Onofre Nuclear Generating Station – Chilling Effect

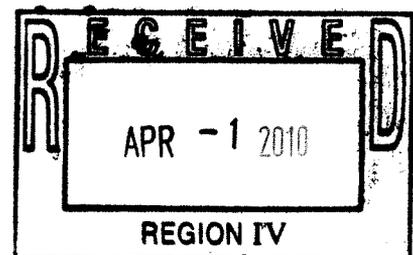
Reference:: Letter from E.E. Collins, Regional Administrator, NRC Region IV, to R.T. Ridenoure, Senior Vice President and Chief Nuclear Officer, Southern California Edison Company, dated March 2, 2010

Dear Mr. Collins:

This letter provides Southern California Edison's (SCE) response to your letter regarding work environment issues at the San Onofre Nuclear Generating Station (SONGS), dated March 2, 2010 (referenced letter). We have carefully reviewed the information provided in your letter. SCE and the SONGS leadership team are committed to an environment in which all personnel are encouraged and able to raise concerns by multiple pathways -- to their management, through the SONGS Corrective Action Program (CAP), via alternative programs such as the SONGS Nuclear Safety Concerns (NSC) Program, or to the NRC.

We have completed a detailed root cause evaluation (RCE) of safety conscious work environment (SCWE) issues at SONGS to make sure we understand those issues and their causes, and take corrective action to ensure they are addressed. While surveys and interviews indicate that most site personnel have no reluctance to raise safety concerns, both NRC inspection results and our own evaluations, surveys and interviews indicate a number of issues that require action to ensure a strong SCWE among all work groups at SONGS.

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Information in response to the specific requests in the referenced letter is provided in Attachment 1. As noted in that Attachment, beginning in November 2009, we have taken a number of immediate actions to address SCWE concerns. These immediate actions included:

- The Chief Nuclear Officer (CNO) communicated SCWE concepts and expectations and the importance of a healthy SCWE using video distributed by e-mail. This included encouraging workers to raise concerns to their supervisors, to the CAP using a Nuclear Notification, to the NSC Program, or to the NRC, without fear of retaliation. (Nov. 2009)
- SCE communicated SCWE concepts and expectations and the importance of a healthy SCWE to station leaders in “all leaders” meetings. This included encouraging workers to raise concerns to their supervisors, to the CAP using a Nuclear Notification, to the NSC Program, or to the NRC, without fear of retaliation. (Dec. 2009)
- SCE communicated SCWE concepts and expectations and the importance of a healthy SCWE to personnel using the weekly Stand Up meetings. This included encouraging workers to raise concerns to their supervisors, to the CAP using a Nuclear Notification, to the NSC Program, or to the NRC, without fear of retaliation. (Dec. 2009)
- SCE added a new “Create Notification” icon on computer desktops to improve the ability of first time and infrequent users of the CAP to access the CAP and report concerns via a Nuclear Notification. (Feb. 2010)
- SCE created a paper Nuclear Notification process to improve the ability of workers without computer access to generate Nuclear Notifications and to permit the submittal of an anonymous Nuclear Notification. (Feb. 2010)
- SCE conducted a site-wide Stand Down during the week of March 2, 2010, which addressed SCWE issues, emphasizing the methods available to raise concerns including through Supervision, the CAP, the NSC Program, and the NRC. The Stand Down also included discussion of the new computer icon to assist station personnel entering Nuclear Notifications into the CAP, and the new manual/paper method to submit Nuclear Notifications, including anonymously. (March 2010)
- Site personnel have been informed by multiple means of the receipt and contents of Reference 1, and will, by April 30, 2010, be informed of SCE’s response.

March 31, 2010

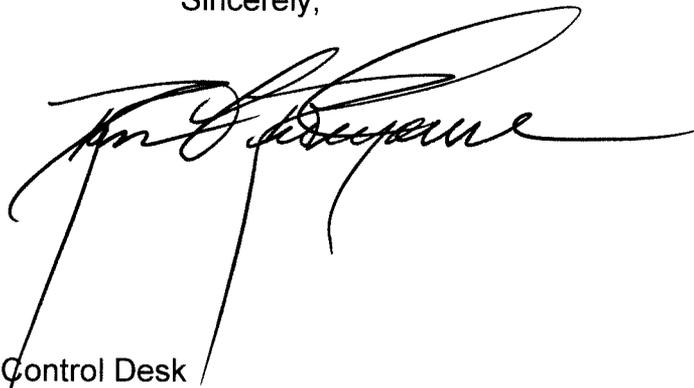
SCE has also developed additional near-term and longer-term actions through the RCE process, which have been entered into the SONGS CAP and are being incorporated into the Site Integrated Improvement Plan.

As described in Attachment 1, we are establishing the "Four Pillar" model as the framework for ensuring a strong SCWE at SONGS. That model, supported by organizational structures and formal processes, will be the basis for communications, training, management expectations, and monitoring of SCWE at the station. As part of the implementation of this model, we are also establishing stronger management engagement and oversight. Specifically, we will improve our processes for monitoring, management engagement, and taking prompt action to address SCWE issues as they emerge. To evaluate effectiveness and ensure we understand the SCWE issues across site work groups, we will conduct near-term focus group interviews and establish metrics and other ongoing monitoring processes. We will also conduct a follow-up comprehensive Safety Culture assessment, with specific focus on SCWE, in 2011 to gauge our effectiveness in addressing these issues.

As requested in Reference 1, we will be prepared to discuss our progress in addressing these issues, including progress in any additional identified groups and any additional actions or changes in our action plans, in a public meeting and written submittal by September 2010.

We will vigorously pursue the actions to improve the SCWE at SONGS, and will keep your staff informed of our progress. Please do not hesitate to call me or Richard St. Onge, Director of Nuclear Regulatory Affairs, if you have any questions or require further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Elmo E. Collins", written over a set of thin, light-colored lines that form a rectangular box.

Attachments

cc: NRC Document Control Desk
R. Hall, NRC Project Manager, San Onofre Unit 2 and 3
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3

Attachment 1

Information Requested in NRC Letter on Work Environment Issues at San Onofre Nuclear Generating Station-Chilling Effect (Mar. 2, 2010)

The following provides responses to the individual requests included in the NRC's March 2, 2010 letter regarding work environment issues at the San Onofre Nuclear Generating Station (SONGS). These responses address requests 1 through 8. Requests 9 through 13 involve progress reports and meetings to occur in several more months, and will be addressed at that time.

- 1. Results of your Safety Conscious Work Environment root cause evaluation and focus group interviews, conducted on or about January and February 2010. As part of the results, provide the basis for determining the number of interviews and scope of work groups selected, as well as the questions used for the interviews. Also provide what immediate actions were taken to address these results, and what longer-term actions are planned, including descriptions, milestones, and due dates.**

A. Root Cause Evaluation Team and Process

In December 2009, Southern California Edison Company (SCE) formed a joint bargaining unit-management team to perform a root cause evaluation (RCE) (NN 200709479) to determine the underlying causes of safety conscious work environment (SCWE) issues at SONGS. This team consisted of eight SONGS members and five subject-matter experts independent of SCE. The SONGS members included bargaining unit members, individual contributors, supervisors, managers, and new and long-term employees from various SONGS work groups and locations.

The team performed the RCE during December 2009 through March 2010. Data collection and analyses included conducting twelve focus group sessions with a cross-section of the workforce—all with workers only (no supervisors). These focus groups were facilitated by personnel independent of SCE with strong management and/or regulatory experience in addressing SCWE issues. These focus groups were drawn from the following site organizations:

- Design Engineering
- Fabrication Shop
- Fire Protection
- Health Physics
- Maintenance & Construction Services (M&CS) General
- M&CS Electrical/TT/MOVATS
- M&CS Instrumentation and Control (I&C)
- M&CS Painters
- Maintenance/Systems Engineering (ME/SE)

- Operations
- Security
- Stone & Webster (contractors)

These groups were selected based on previous surveys, allegations, focus groups, or inspection results that indicated the potential for SCWE or other work environment issues in those groups. Within these groups, the same random individual selection process that was used for the November 2009 and February 2010 NRC focus groups was used to select individual participants (i.e., a random number generator was used to select members from the group to be interviewed). Questions used during these focus group interviews are presented in Attachment 2. Attachment 3 presents key results from these groups.

Other information evaluated during the RCE included:

- Results of the 2009 Synergy Nuclear Safety Culture survey (statistics and employee comments)
- Results of the 2009 Independent Safety Culture Evaluation
- Results of the 2007 Utilities Service Alliance Nuclear Safety Culture assessment
- Trend data on numbers of contacts with the Nuclear Safety Concerns (NSC) Program
- NRC Inspection Reports, including information presented in the report of the NRC’s Focused Baseline Problem Identification and Resolution (PI&R) inspection, dated March 2, 2010
- NRC’s letter regarding work environment issues at SONGS—Chilling Effect, dated March 2, 2010
- Nuclear Notifications relating to SCWE during the past two years
- Allegations to the NSC program and to the NRC (to the extent known) within the past two years
- Results of the 2010 Independent Assessment of SONGS NSC Program
- Results of interviews with management personnel in Employee Relations, Labor Relations, Human Resources, Equal Employment Opportunity and NSC Program

The RCE Team analyzed this information using the “Four Pillar” model of SCWE to identify causes and corrective actions to improve, monitor and maintain the SCWE at SONGS. Under this model, the “Four Pillars” of SCWE are:

Pillar 1 – Employees Raise Concerns Without Fear of Retaliation

Pillar 2 – Effective Normal Problem Resolution Processes (primarily the CAP)

Pillar 3 – Effective Alternate Problem Resolution Processes

Pillar 4 – Effective Methods to Detect and Prevent Retaliation

B. Causes Identified

The causes identified through the RCE are as follows:

Root Cause (Applies to all Pillars)

Less than Adequate Accountability – The Station did not have an overall SCWE accountability model across the 4 Pillars with tools/metrics to be proactive to recognize, own, self-examine, and act on SCWE performance issues at precursor event and initial performance decline levels. There was less than adequate value given to critical self-assessment and industry learning. As a result, the Station was in a reactive mode responding to performance shortfalls as they became self evident.

Causes Related to Each SCWE Pillar:

In addition to the Root Cause, a number of specific causes related to each SCWE Pillar were identified. Each of these is specifically presented in Attachment 4. These causes are summarized below:

Pillar 1

- Less than adequate supervisor training to prevent behaviors that can impact worker willingness to report safety concerns.
- Less than adequate worker training on SCWE processes and roles and options for raising concerns.
- Less than adequate monitoring and reinforcement to proactively and effectively address worker concerns.

Pillar 2

- Less than adequate CAP infrastructure, making it difficult for workers without computers to submit problems into the CAP or for workers to submit concerns anonymously.
- Less than adequate CAP communications, resulting in a lack of worker understanding of the available tools and processes to get status on the resolution of concerns.

Pillar 3

- Less than adequate communications from the NSC program to site management and need for better followup and face-to-face communications with individuals who submit allegations to NSC.
- Less than adequate standards and reinforcement within NSC associated with a reliance on personal skills as opposed to procedures and process discipline to ensure program performance.

- Less than adequate priority placed by the NSC program on face-to-face interaction with workers, supervisors, and managers to discuss SCWE roles and responsibilities and facilitate early intervention in resolution of concerns, and lack of alignment with industry SCWE and alternate problem resolution practices/ models.

Pillar 4

- Less than adequate priority was given to a SCWE management oversight process/model with metrics to monitor real time performance with check & adjust actions to drive process and behavior improvements across the Pillars of a healthy SCWE.
- Less than adequate change management processes in reviewing, communicating, and mitigating the impact of change on SCWE, including perceptions that can exist in the absence of facts.

C. Corrective Actions

Immediate Corrective Actions Taken

Immediate Action 1: The Chief Nuclear Officer (CNO) communicated SCWE concepts and expectations and the importance of a healthy SCWE using video distributed by e-mail. This included encouraging workers to raise concerns to their supervisors, to the CAP using a Nuclear Notification, to the NSC Program, or to the NRC, without the fear of retaliation. (Nov. 2009)

Immediate Action 2: SCE communicated SCWE concepts and expectations and the importance of a healthy SCWE to station leaders in "all leaders" meetings. This included encouraging workers to raise concerns to their supervisors, to the CAP using a Nuclear Notification, to the NSC Program, or to the NRC, without the fear of retaliation. (Dec. 2009)

Immediate Action 3: SCE communicated SCWE concepts and expectations and the importance of a healthy SCWE to personnel using the weekly Stand Up meetings. This included encouraging workers to raise concerns to their supervisors, to the CAP using a Nuclear Notification, to the NSC Program, or to the NRC, without the fear of retaliation. (Dec. 2009)

Immediate Action 4: SCE revised SAP/CAP to add a new "Create Notification" icon on computer desktops to improve the ability of first time and infrequent users of the CAP to access the SAP Express Create Notification screen. (Feb. 2010)

Immediate Action 5: SCE revised SO123-XV-50.CAP-1 (Writing Nuclear Notifications for Problem Identification and Resolution) to establish a paper Nuclear Notification process to improve the ability of workers without computer

access to generate Nuclear Notifications and also submit an anonymous Nuclear Notification. (Feb. 2010)

Immediate Action 6: The site-wide Stand Down meeting for the week of March 2, 2010 addressed SCWE issues, emphasizing the methods available to raise concerns including through Supervision, the CAP, the NSC Program, and the NRC. The Stand Down also included discussion of the new computer icon to assist in navigating to SAP Express to enter Nuclear Notifications into the CAP, and the new manual/paper method to submit Nuclear Notifications including anonymously. (March 2010)

Additional Near-Term and Longer-Term Corrective Actions

SCE is adopting the “Four Pillar” model as the framework for ensuring a strong SCWE at SONGS. (See CAPR-RC in Attachment 4). Using that model, SONGS is implementing ongoing actions to:

- Train management and supervision on SCWE principles and behaviors to ensure that their behavior encourages workers to raise concerns without fear of retaliation.
- Train SONGS employee and contractor personnel on SCWE policies and principles, and avenues to raise concerns, including via management, through the CAP, through alternate processes such as the NSC program and to the NRC, without fear of retaliation.
- Make the CAP is easily available to both SONGS personnel and contractors for the reporting of concerns, and ensure that concerns can be reported anonymously and that personnel readily obtain feedback on how their concerns are addressed.
- Make the NSC program more available and responsive to employees and contractors, and increase face-to-face contacts between NSC program personnel and members of the workforce.
- Provide greater face-to-face management engagement with the workforce, including ongoing SCWE communications, actions to monitor the work environment, and actions to ensure prompt engagement to address potential SCWE issues as they emerge.

The specific actions to accomplish these goals are described in Attachment 4. The correlation of corrective actions to the causes they address is also provided in Attachment 4. These actions have been entered into the SONGS CAP and are being incorporated into the Safety Culture Action Plan of the Site Integrated Improvement Plan.

2. Your action plans to address existing Safety Conscious Work Environment issues to improve the environment at SONGS. The action plans, at a minimum, should specifically address how each avenue for raising concerns will be improved, including ease of use of the corrective action program, knowledge and use of the NSCP, availability of the NRC, and SCE's open door policy. Also include the measures that will be used to determine your action plan effectiveness.

The action plans to address existing SCWE issues are described in response to Request No. 1 above and in Attachment 4. In particular:

- Actions to improve ease-of-use of the CAP include Immediate Actions 4 and 5 above and other actions listed under "Pillar 2 Corrective Actions" in Attachment 4.
- Actions to improve knowledge and use of the NSC program include Immediate Actions 1, 2, 3, and 6 above and other actions listed under "Pillar 3 Corrective Actions" in Attachment 4.
- Actions to reinforce availability of the NRC include Immediate Actions 1, 2, 3 and 6 above and the actions listed in Attachment 4 which address Pillar 1 Contributing Causes 1a and 1b.
- Actions to improve and reinforce SCE's open door policy include Immediate Actions 1, 2, 3 and 6 above and other actions listed under "Pillar 1 Corrective Actions" in Attachment 4.

SCE will implement several actions to measure effectiveness:

- Training on SCWE policies and programs (See CA-1a/b (1), CA-1a/b(2), and CA-1a/b (3) in Attachment 4) will include testing to verify trainee understanding of these policies.
- SCE will conduct periodic sample surveys of site personnel to verify understanding of SCWE and assess the health of SCWE in particular groups. (See Effectiveness Measure 1 in Attachment 4).
- SCE will establish SCWE metrics to help assess performance in each of the Four Pillars. (See CA-RC (1) in Attachment 4).
- In the near term, SCE will conduct focus group interviews of personnel from site organizations to identify groups that may have SCWE issues. (See CA-4a (3) in Attachment 4).
- SCE will perform an integrated safety culture assessment in 2011 which will include focus group interviews to gather information on employee and

contractor perceptions of SCWE effectiveness. (See Effectiveness Measure 4 in Attachment 4).

- SCE is establishing a formal management oversight process to monitor SCWE, direct additional assessments of SCWE, and oversee resolution of SCWE issues. (See CA-4a (1) in Attachment 4).

3. Your plan to communicate expectations and policies concerning Safety Conscious Work Environment at SONGS, and methods used to verify that all SCE and contract personnel have received the message and clearly understand it.

SCE has completed numerous site-wide communications to reinforce the Company's SCWE expectations and policies. These communications included video messages from the CNO encouraging workers to raise concerns to their supervisors, by writing a Nuclear Notification, by contacting the NSC Program, or by informing the NRC. The communications emphasized that retaliation for raising concerns is unacceptable and will not be tolerated. "All Leaders" meetings were also conducted during which leaders were reminded of SCE's SCWE policies regarding the raising of concerns. Again, it was emphasized that these avenues can be used without the fear of retaliation. The Station also used the weekly Stand Up and Stand Down meetings to reinforce SCWE concepts and expectations and the importance of a healthy SCWE. See Immediate Actions 1, 2, 3 and 6 above.

In addition, during 2010 SCE will provide SCWE training to site personnel, including managers, supervisors, and other employees and contractors. This training will cover SCWE policies and expectations, such as SCE's open door policy, support for the use of the CAP, and escalating concerns if necessary to obtain resolution. This training will include case studies on actions that can constitute retaliation. Testing will be provided as part of this training to ensure comprehension. (See CA-1a/b (3) in Attachment 4).

SCE is also enhancing General Employee Training (GET). All personnel must receive this training prior to obtaining unescorted protected area access, and must successfully complete it annually thereafter. This enhanced GET will provide additional emphasis on policies with respect to raising of concerns, the site's open door policy, use of the CAP to raise concerns, and alternative means for raising concerns (including reporting to NRC). Testing will be provided as part of this training to ensure comprehension. (See CA-1a/b (1) and CA-1a/b (2) in Attachment 4).

In addition, periodic sample surveys to assess SCWE perceptions and understanding among the station population (including contractors and those based at SONGS who do not have protected area access) will be initiated during June 2010, and a follow-up site-wide Safety Culture assessment will be performed during 2011. This Safety Culture assessment will specifically

evaluate, through focus group interviews, whether site employees and contractors understand SCWE policies and expectations. (See Effectiveness Measures 1 and 4 from Attachment 4).

SONGS will also establish and implement a SCWE Communications Strategy to provide station personnel with periodic reinforcement of SCWE policies and the current status of SCWE at the site. (See CA-3c (8) listed in Attachment 4).

4. Your plan to ensure that individuals who are not satisfied with the resolution of a problem can pursue the concern further through additional avenues (such as SCE management, the corrective action program, the NSCP, or the NRC) without fear of retaliation.

As described in response to Request No. 3 above, SCE has completed several different forms of communications (See Immediate Actions 1,2,3 and 6) to address this issue. For example, (1) video messages from the CNO, (2) All-Hands meetings, and (3) Stand Down presentations have emphasized that individuals who are not satisfied with the resolution of a problem can pursue the concern further through additional avenues (including management, the CAP, the NSC Program or to the NRC) without fear of retaliation.

SCE will also implement other near-term and longer-term actions to provide personnel with reinforcement of the avenues to raise concerns:

- Actions to improve knowledge and use of the NSC program include those listed under "Pillar 3 Corrective Actions" in Attachment 4.
- Actions to reinforce availability of the NRC include those actions to address Pillar 1 Contributing Causes 1a and 1b listed in Attachment 4.
- Actions to improve SCE's open door policy include those listed under "Pillar 1 Corrective Actions" in Attachment 4.

5. Through focus group interviews, the NRC has identified Safety Conscious Work Environment issues in multiple work groups, as indicated in the enclosure to this letter. For those groups, provide your actions taken and planned to address the chilled environment. This discussion should include the specific actions taken to repair the willingness of individuals in those groups to raise safety concerns, and what longer term actions you are taking or plan on taking to ensure the effectiveness of these actions.

The enclosure to the NRC's letter regarding work environment issues at SONGS, dated March 2, 2010, stated that the NRC received concerns from "on-site organizations including operations, engineering, maintenance, emergency preparedness, work control, procedure writers, procurement, painters, security, regulatory affairs, and contractor organizations."

The majority of SCE's corrective actions apply station-wide, and include the groups identified by the NRC. For instance, Immediate Actions 1–6 were applied site-wide, including site-wide communications encouraging workers to raise concerns to their supervisors, to the CAP using a Nuclear Notification, to the NSC Program, or to the NRC, without the fear of retaliation. Similarly, many of the near-term and longer-term actions presented in Attachment 4 will apply across the site.

Nonetheless, SCE believes enhanced actions are needed to address actual and potential SCWE issues in certain groups. Those groups were identified by the 2009 Synergy survey, the 2009 Independent Safety Culture Evaluation, and the 2010 independent contractor focus group interviews conducted in conjunction with the SCWE RCE. These actions include:

- Providing “Safely Speaking” training to selected managers and supervisors in groups known to have SCWE issues (See CA-1c(1) in Attachment 4). This training teaches supervisory personnel how to conduct themselves so that those they supervise are encouraged to raise issues.
- Providing nuclear safety culture training (including SCWE) to the first-line supervisors and workers in groups known to have SCWE issues (See CA-1c (2) in Attachment 4).
- Implementing a pilot early intervention Task Group process in which a NSC program representative works with line management and workers to facilitate understanding and resolution of SCWE and teamwork issues. This pilot process will be applied initially to those groups with known SCWE issues (See CA-4a (2) in Attachment 4).

To ensure the effectiveness of its actions to address SCWE issues, SCE will establish metrics to monitor the health of the SCWE under each of the 4 Pillars and periodically report performance to the Senior Leadership Team for review and direction (See CA-RC (1) in Attachment 4). Additionally, SCE is establishing procedures for increased oversight by Station Senior Management and the NSC program. (See CA-3c (1) and CA-4a (1) in Attachment 4). In the near term, focus group interviews will be conducted to ensure that SCWE issues in site groups (including those identified by the NRC) are understood. (See CA-4a(3) in Attachment 4). Periodic sample surveys and a follow-up site-wide Safety Culture assessment will be performed during 2011, which will include focus group interviews to evaluate whether site employees and contractors understand SCWE policies and expectations and whether they perceive that SCWE issues are being addressed. (See Effectiveness Measures 1 and 4 from Attachment 4)

6. Your plan to identify any other specific workgroup that may have Safety Conscious Work Environment issues that have not been previously identified.

As part of the RCE on SCWE issues, SCE reviewed data from a variety of sources to determine the nature and causes of SCWE issues. Also, the 2009 Synergy survey and the 2009 Independent Safety Culture Evaluation identified various safety culture and SCWE issues in particular groups. As noted in SCE's letter to NRC regarding actions to address safety culture issues, dated October 29, 2009, specific action plans have been developed and are being implemented to address issues in those groups. In addition, a process for early intervention to address SCWE issues in those groups (and certain other identified groups) will be implemented. (See CA-4a (1) and CA-4a (2) in Attachment 4).

SONGS will implement the following additional actions to ensure that other specific work groups that may have SCWE issues are identified. These include:

- In the near term, SCE will conduct focus group interviews of personnel selected from site groups not previously identified as warranting special attention in order to identify any other site work groups in which SCWE issues may be present. (See CA-4a (3) in Attachment 4).
- To identify SCWE issues on an ongoing basis, SCE is establishing programs for more frequent communication, monitoring and oversight of the SCWE in individual groups and for more systematic consideration and prompt response to potential SCWE issues. (See CA-3c (1); CA-3c (6); CA-4a (1); CA-4a (2); CA-4a (4); and Effectiveness Measures 1 and 4 in Attachment 4).

7. What actions you have taken or plan to take to ensure that actions taken against individuals are not perceived as retaliatory to avoid a further chilling of the environment at SONGS.

SONGS will implement a Discipline Management Program. This program will require specific reviews to ensure that more significant personnel actions are not retaliatory and that appropriate steps are taken to ensure that any potential adverse perceptions that might lead to a chilling affect are minimized. (See CA-4a (4) in Attachment 4). SCE is also establishing programs for more frequent communication, monitoring and oversight of the SCWE in individual groups and for more systematic consideration and response to potential SCWE issues. (See CA-3c (1); CA-3c (6); CA-4a (1); CA-4a (2); and Effectiveness Measures 1 and 4 in Attachment 4). In addition, SCE has reinforced its policy of zero tolerance for retaliation as part of Immediate Actions 1,2,3 and 6, and will continue to reinforce that policy. (See CA-1a/b (1) and CA-1a/b (2) listed in Attachment 4).

8. Your plans to inform the SONGS workforce, including contractors of: (i) the issuance and content of this chilling effect letter; (ii) the current status of Safety Conscious Work Environment at SONGS; and (iii) your action plans to address the Safety Conscious Work Environment issues.

SCE has taken several immediate actions to inform the SONGS workforce, including contractors, of the issuance and content of the NRC's Chilling Effect letter and the current status of the SCWE at SONGS. These include the following:

- A CNO site-wide video distributed by e-mail during the week of March 8, 2010.
- A scripted, one-hour Station Stand Down meeting during the week of March 8, 2010.
- March 2010 All-Hands meetings (with SCE employees and contractors).

SCE is planning several actions to inform the SONGS workforce of its response to the Chilling Effect letter and its action plans to address SCWE issues. These include:

- In April 2010, the CNO will distribute both e-mail and video messages that outline SCE's response and key actions to be taken regarding SCWE.
- In April 2010, a written summary of the NRC's March 2, 2010 letter regarding the SONGS work environment and SCE's responsive actions will be made available to personnel at Communication brochure kiosks located throughout the station.
- May 2010 All-Hands meetings (with SCE employees and contractors) will provide an update on SCE's actions plans to address SCWE issues.

Finally, SCE will establish and implement a SCWE Communications Strategy to provide station personnel (Managers, Supervisors, Workers, Supplemental Employees, Contractors) with periodic updates on the status of SCWE performance issues (See CA-3c (8) listed in Attachment 4).

Attachment 2

**San Onofre Nuclear Generating Station
Safety Conscious Work Environment (SCWE) Questionnaire**

1. Do you know how to initiate a Nuclear Notification (NN)? Yes ___ No ___
- A. Have you received any specific training on how to generate a NN? Yes ___ No ___
- B. If yes, was the training beneficial? Yes ___ No ___
- C. Do you currently have the ability to initiate a NN electronically? Yes ___ No ___
- D. If no, do you know of another way to report an issue? Yes ___ No ___

2. Have you ever submitted an issue to the Corrective Action Program? Yes ___ No ___
- A. Was the issue adequately addressed? Yes ___ No ___
- B. If not, did you pursue the issue? Yes ___ No ___
- C. How did you pursue the issue?

**San Onofre Nuclear Generating Station
Safety Conscious Work Environment (SCWE) Questionnaire**

3. Do you receive feedback on the NNs that you have generated or issues you have brought forward to your supervisor? Yes ___ No ___

A. What kind of feedback is received?

B. Is the feedback timely? Yes ___ No ___

C. Do you believe that the site's Corrective Action Program is successful in addressing issues that are submitted? Yes ___ No ___

D. Are you aware of any specific instances in which another employee (or contractor) submitted an issue to the Corrective Action Program and considered the response s/he got to be incomplete or unacceptable? If yes, please describe? Yes ___ No ___

4. Does management encourage personnel to report safety concerns? Yes ___ No ___

**San Onofre Nuclear Generating Station
Safety Conscious Work Environment (SCWE) Questionnaire**

5. Are you willing to raise a safety concern? Yes ___ No ___

A. Are there any conditions under which you would be hesitant to raise a safety concern? Yes ___ No ___

B. If yes, why and what are they?

6. Are you aware of situations in the past year where any employee (or contractor) may have been hesitant to raise concerns, internally or externally)? Yes ___ No ___

A. If yes, please explain:

**San Onofre Nuclear Generating Station
Safety Conscious Work Environment (SCWE) Questionnaire**

B. What, if anything, was done about the concern?

C. Has the made you or others less likely to report concerns? Yes ___ No ___

7. Do you have any fear of retaliation if you or someone else took a safety concern to the Nuclear Regulatory Commission (NRC)? Yes ___ No ___

A. If yes, why do you feel this way?

B. Do you know of anyone who has been retaliated against for taking a concern to the NRC? Yes ___ No ___
If yes, please provide details:

**San Onofre Nuclear Generating Station
Safety Conscious Work Environment (SCWE) Questionnaire**

8. How would you raise a safety concern?

A. Why would you choose that avenue?

B. Have you or others had any experiences, or know of any situations that have influenced your decision to pick this avenue? Yes ___ No ___
If yes, please describe:

9. Are you aware of the site's Nuclear Safety Concern (NSC) program? Yes ___ No ___

A. If yes, how did you become aware of it? _____

B. Who is the NSC Manager? _____

C. Do you know the manager or any member of the NSC Team? Yes ___ No ___

**San Onofre Nuclear Generating Station
Safety Conscious Work Environment (SCWE) Questionnaire**

10. Do you know how to access the NSC program? Yes ___ No ___

A. If yes, please explain how:

B. Is the NSC office accessible? Yes ___ No ___

C. Do you routinely see the NSC Manager / investigators around the plant? Yes ___ No ___

D. If yes, please give examples:

E. Is your management supportive of the NSC program? Yes ___ No ___

**San Onofre Nuclear Generating Station
Safety Conscious Work Environment (SCWE) Questionnaire**

11. Has your confidentiality been breached if you have raised a safety concern to the NSC? Yes ___ No ___

A. If yes, please describe:

B. Do you know of anyone else who may have had their confidentiality breached after raising a safety concern to the NSC program? Yes ___ No ___

C. If yes, please describe:

**San Onofre Nuclear Generating Station
Safety Conscious Work Environment (SCWE) Questionnaire**

12. Have there been any events or circumstances in the past year that have reduced:

- A. Your willingness to identify or raise safety issues? Yes ___ No ___
- B. Your confidence in the Corrective Action Program? Yes ___ No ___
- C. Your willingness to challenge actions or decisions you believe are wrong? Yes ___ No ___
- D. Your comfort level in voicing your viewpoints and opinions? Yes ___ No ___
- E. If yes to any of the above, please describe:

13. What does a Safety Conscious Work Environment (SCWE) mean to you?

**San Onofre Nuclear Generating Station
Safety Conscious Work Environment (SCWE) Questionnaire**

14. Have you been informed that you have a right to raise safety concerns without fear of retaliation? Yes ___ No ___

15. Have you received training on a SCWE or your right to raise safety concerns as a part of GET or other training? Yes ___ No ___

A. If yes, from whom and describe what it covered:

B. When did you last receive SCWE training? _____

C. Is there periodic SCWE refresher training? Yes ___ No ___

D. If yes, how often: _____

16. Have there been any instances in which you or another individual experienced a negative reaction for raising a safety issue? Yes ___ No ___

A. If yes, please describe the incident, including any information conveyed by management concerning the incident:

**San Onofre Nuclear Generating Station
Safety Conscious Work Environment (SCWE) Questionnaire**

17. Are you aware of any specific instances in which an employee (or contractor) submitted an issue to the Corrective Action Program, NSC, or the NRC and was retaliated against for pursuing the issue? Yes ___ No ___

A. If yes, please describe the situation:

B. What form did the retaliation take?

18. Do you know Southern California Edison's policy with regard to protecting employees who raise safety concerns from retaliation and/or discrimination? Yes ___ No ___

A. What is it? _____

B. How successful are they in detecting and preventing such retaliation / discrimination?

- ___ Very successful
- ___ Successful
- ___ Moderately successful
- ___ Unsuccessful

**San Onofre Nuclear Generating Station
Safety Conscious Work Environment (SCWE) Questionnaire**

19. Were you advised of the results of either the 2009 Synergy Safety Culture survey or the Independent Safety Culture evaluation? Yes ___ No ___

A. If yes, by whom / when / how much detail was provided?

20. Do you have any nuclear safety concern that has not been reported? Yes ___ No ___
(offer to talk later if anyone would like to)

Attachment 3

Summary of Key Results from San Onofre Nuclear Generating Station (SONGS) Safety Conscious Work Environment (SCWE) Focus Group Interviews January-February 2010

The following presents the results of responses from interviews conducted of 12 focus groups, encompassing 88 individuals. These focus groups were conducted by independent consultants with extensive regulatory and/or management experience in evaluating and addressing SCWE issues. The 88 total includes 64 SCE employees and 24 contractors, further differentiated by 51 of the participants being represented employees (covering both SCE and contractors) and 37 non-represented employees. [Note: Numbers and percentages are as accurate as possible given the inherent difficulties associated with accurately capturing responses from individuals during group interview discussions involving between 4 and 11 participants. For the same reason, it was not possible to record numerical values for the responses to all questions.] The detailed reports of the results of these focus group interviews are voluminous and have therefore not been included in this response; however, they have been made available for NRC review.

- Do you know how to initiate a Nuclear Notification (NN)?
Yes 70 No 18 (mostly contractors)
- Do you currently have the ability to initiate a NN electronically?
Yes 77 No 11 (mostly contractors)
- Does management encourage personnel to report safety concerns?
Yes 87 No 1
- Are you willing to raise a safety concern?
Yes 88 No 0
- Do you have any fear of retaliation if you or someone else took a safety concern to the Nuclear Regulatory Commission (NRC)?
Yes ~6 No ~82
- Do you know of anyone who has been retaliated against for taking a concern to the NRC?
Yes 2 No 86
- Are you aware of the site's Nuclear Safety Concern (NSC) program?
Yes 85 No 3

- Do you know the location of the NSC office?
Yes ~33% No [Number not recorded]
- Do you know of anyone else who may have had their confidentiality breached after raising a safety concern to the NSC program?
Yes 1 No [Number not recorded]
- Have there been any events or circumstances in the past year that have reduced:
 - A. Your willingness to identify or raise safety issues?
Yes 2 No [Number not recorded]
 - B. Your confidence in the Corrective Action Program?
Yes ~4 No [Number not recorded]
 - C. Your willingness to challenge actions or decisions you believe are wrong?
Yes ~11 No [Number not recorded]
 - D. Your comfort level in voicing your viewpoints and opinions?
Yes ~10 No [Number not recorded]
- Have you been informed that you have a right to raise safety concerns without fear of retaliation?
Yes 88 No 0
- Have there been any instances in which you or another individual experienced a negative reaction for raising a safety issue?
Yes ~5-10 No [Number not recorded]
- Are you aware of any specific instances in which an employee (or contractor) submitted an issue to the Corrective Action Program, NSC, or the NRC and was retaliated against for pursuing the issue?
Yes 0 No 88
- Do you have any nuclear safety concern that has not been reported?
Yes 0 No 88

Attachment 4

Actions to Address Causes of SCWE Issues Identified in Root Cause Evaluation

PILLAR 1 Causes	PILLAR 1 Corrective Actions
<p>Contributing Cause 1a: Less than adequate Supervisor Training – Some supervisors/managers do not understand that being unresponsive to Worker GWE and other concerns may impact a worker’s willingness to report a safety concern. It further may impact the level of worker confidence and trust in supervision/management.</p> <p>Contributing Cause 1b: Less than adequate Worker Training – Some workers do not understand GWE/SCWE processes and their roles and options in raising GWE/SCWE concerns and getting resolution.</p>	<p>CA-1a/b (1): SCWE General Employee Training (GET) – Revise GET to introduce the 4 Pillar concept including roles and responsibilities for each Pillar. The training will: --Emphasize the importance of the First Pillar (Supervisor/Management Support) in raising concerns up through the open door policy and supervisors being receptive to employee concerns. --Show how the Second Pillar (Corrective Action Program) can also be used to identify and resolve concerns, especially when personnel do not feel comfortable with the First Pillar of Supervisor/Manager Support). --Show how the Third Pillar (Alternate Resolution Support) can be used at any time, and including going directly to the NRC, however at good plants with a good SCWE, it is usually not needed because of effective First and Second Pillars. --Make it clear that the Company and SONGS senior leadership has a zero tolerance for retaliation. Due Date: 12/03/2010 (Action Scheduled to be Completed Prior to U3 SGR Outage; additional time provided for CRB process)</p> <p>CA-1a/b (2): SCWE General Employee Training (GET) – Revise initial GET so that it provides enhanced SCWE training for workers and supervisors including: --The importance of SCWE. --The relationships between SCWE, Nuclear Safety Culture, and Cross-Cutting Areas. --The definitions of Protected Activity and Retaliation. --Case studies to show what can constitute Retaliation. Due Date: 12/03/2010 (Action Scheduled to be Completed Prior to U3 SGR Outage; additional time provided for CRB process)</p> <p>CA-1a/b (3): Supervisor/Worker Training – Train active status (*) SCE and contract workers and supervisors on SCWE including: --The importance of SCWE. Emphasize the First Pillar (Supervisor/Management Support) in raising concerns up through the open door policy and supervisors being receptive to employee concerns. Being receptive include supporting their use of the Corrective Action Program in NN generation, looking up status in resolution, and escalating resolution if necessary. --The relationships between SCWE, Nuclear Safety Culture, and Cross-Cutting Areas. --The definitions of Protected Activity and Retaliation. --Case studies to show what can constitute Retaliation. Due Date: 03/04/2011</p> <p>(*) Active status will be on a defined date close to the initial training class and entered into Corrective Action Program documentation.</p>
<p>Contributing Cause 1c: Less than adequate Monitoring and Reinforcement – Supervisors/managers do not proactively and effectively identify, prioritize, and resolve, worker GWE and other concerns to build trust and confidence. A failure to build team and worker relationships and resolve GWE issues, as precursor issues, will impact a workers willingness to raise a safety concern.</p>	<p>CA-1c (1): Manager/Supervisor Training – Provide “Safely Speaking” training to Managers and Supervisors in the Targeted Groups identified in the 2009 Synergy Survey, 2009 Independent Safety Culture Evaluation, and the Design Engineering Electrical Group and Security. Due Date: 03/04/2011</p> <p>CA-1c (2): First Line Supervisor/Worker Training – Provide Nuclear Safety Culture Training including SCWE to the First Line Supervisors and Workers in the Targeted Groups identified in the 2009 Synergy Survey, 2009 Independent Safety Culture Evaluation, and the Design Engineering Electrical Group and Security. Due Date: 03/04/2011</p> <p>CA-1c (3): Management 2-Way Communication Sessions – The Chief Nuclear Officer (CNO) or Site Vice President (VP), Station Manager (SM), and Plant Manager (PM) (2 of 3) will have 2-Way Communications meetings with work groups. These meetings will be with workers. The meetings will focus on building trust by promoting dialog and listening to worker concerns. Due Date: Starting 06/30/2010</p>

PILLAR 2 Causes	PILLAR 2 Corrective Actions
<p>Contributing Cause 2a: Less than adequate Corrective Action Program Infrastructure – Workers without computers were not provided with a readily available tool to generate a Notification to raise a concern, and there was no readily available way to generate an anonymous concern. In addition, the infrastructure did not exist to support the trending and analysis of GWE/SCWE issues.</p>	<p>CA-2a (1): Corrective Action Program Infrastructure – Revise SAP/CAP to add a new Create Notification icon on computer desktops to improve the ability of first time and infrequent users of the Corrective Action Program to access the SAP Express Create Notification screen. Due Date: 06/04/2010 (Action Complete—CRB Pending)</p> <p>CA-2a (2): Corrective Action Program Infrastructure – Revise SAP/CAP to add a new Notification job aids icon, or other easy path, on computer desktops to improve the ability of first time and infrequent users of the Corrective Action Program to generate, obtain status, and close Notifications/Orders/Tasks. Due Date: 09/10/2010</p> <p>CA-2a (3): Corrective Action Program Infrastructure – Redistribute hard copy jobs aids to station personnel to improve the ability of first time and infrequent users of the Corrective Action Program to generate, obtain status, and close Notifications/Orders/Tasks. This is an Interim Action for CA-2a2 above. Due Date: 07/09/2010</p> <p>CA-2a (4): Corrective Action Program Infrastructure – Revise SO123-XV-50.CAP-1 (Writing Nuclear Notifications for Problem Identification and Resolution) to establish a paper Notification process to improve the ability of workers without computer access to generate Notifications and also submit an anonymous Notification. Due Date: 06/04/2010 (Action Complete—CRB Pending)</p> <p>CA-2a (5): Corrective Action Program Infrastructure – Revise the Corrective Action Program and Self-Assessment Program to require establishment and use of trend codes for NNs to identify adverse trends in GWE/SCWE. Due Date: 08/20/2010</p>
<p>Contributing Cause 2b: Less than adequate Corrective Action Program Communications – Workers lack an understanding of the available tools and processes to get status on the resolution of concerns.</p>	<p>CA-2b (1): Corrective Action Program Communications – Communicate to station personnel the methods to get status on problem resolution, including use of the “Feedback Required” feature when generating Notifications for those with computers, requesting feedback through your supervisor, and requesting feedback through your division CAPCO including a list of names and phone numbers for reference. Note: This is an interim action pending completion of the new PI&R RCE (NN 200758654) on problem threshold/identification (P.a.1) and corrective action (P.a.4), currently work in progress. Due Date: 06/18/2010</p>
PILLAR 3 Causes	PILLAR 3 Corrective Actions
<p>Contributing Cause 3a: Less than adequate Communications – The Nuclear Safety Concerns Program was reliant on the Nuclear Safety Concerns Quarterly Report to communicate performance over discussions with the Senior Leadership Team/Division Managers in a forum to review, validate, challenge, and support Nuclear Safety Concerns Program performance, including case timeliness and backlog. Limited communications also applied to providing follow-up with Submitters during investigations – the need for timely, face-to-face status. (Ref: Nuclear Safety Concerns Program ACE NN 200494695)</p>	<p>CA-3a (1): NSC Program Communications - Provide to the Executive Forum on a periodic basis (initially monthly) a review of Nuclear Safety Concern data (issue awareness and trending) and programmatic performance (timeliness, backlog and Submitter feedback data). The purpose of this review is for the Executive Forum to review, validate, challenge, and support NSC Program performance. The metrics will be built into the NSC Quarterly Report. Due Date: 06/04/2010 (Action Complete—CRB Pending)</p>

<p>Contributing Cause 3b: Less than adequate Standards and Reinforcement – Instead of reliance on process discipline (procedure quality and use) the Nuclear Safety Concerns Program was reliant on Nuclear Safety Concerns Program personnel skills and knowledge to meet the needs of the program and station personnel. A lack of process discipline has the potential to impact consistent application and trust in the Nuclear Safety Concerns Program. (Ref: Nuclear Safety Concerns SCP ACE NN 200494695)</p>	<p>CA-3b (1): NSC Program Standards and Reinforcement – Perform a gap analysis of program requirements and implementation using RIS 2005-18, IP 40001, the 2009 Nuclear Safety Culture Survey (Synergy), the 2009 Independent Safety Culture Evaluation Team (ISCET) Assessment, and the 2010 Independent Assessment of the Nuclear Safety Concerns Program; develop an improvement plan; and establish a NSC Program Design Basis Document. Due Date: 07/23/2010</p> <p>CA-3b (2): NSC Program Standards and Reinforcement – Implement the Nuclear Safety Concerns Program improvement plan. This action will close upon closure of gaps in program/procedure requirements, infrastructure, training and reporting tools identified in the improvement plan. Due Date: 02/18/2011</p> <p>CA-3b (3): NSC Program Standards and Reinforcement – Update procedure SO123-XV-50.2 (Nuclear Safety Concerns Program) to provide clear and detailed requirements from initial investigation through case closure documentation and records management to support consistent performance and objective evidence. Due Date: 06/04/2010 (Action Complete—CRB Pending)</p> <p>CA-3b (4): NSC Program Standards and Reinforcement – Establish requirement in SO123-XV-50.2 (Nuclear Safety Concerns Program) to complete NSC case closure documentation within 30 days after closure with Submitter. Due Date: 06/04/2010 (Action Complete—CRB Pending)</p> <p>CA-3b (5): NSC Program Standards and Reinforcement – Implement NSC investigator qualification training, including 1) initial training requirements, 2) continuing training requirements, and 3) the timing and frequency of training. Due Date: 07/16/2010</p>
<p>Contributing Cause 3c: Less than adequate Priorities – It was not a Nuclear Safety Concern Program priority to interact/communicate with workers/supervisors/managers face-to-face in forums to explain SCWE roles/responsibility and facilitate the early intervention and resolution of concerns. In addition, the program was not aligned with some industry practices, such as establishing a DPO process, a 4 Pillar or similar SCWE process with effective management oversight Management Oversight.</p>	<p>CA-3c (1): NSC Program Priorities: Establish expectations in SO123-XV-50.2 (Nuclear Safety Concerns Program) for the NSC/SCWE Program Manager/Investigators to periodically meet face-to-face with the line organizations to communicate SCWE concepts and facilitate discussions and resolutions. These expectations will be built into NSC personnel Performance & Development Plans (PDPs). Due Date: 08/20/2010</p> <p>CA-3c (2): NSC Program Priorities: Establish a rapid resolution process to aid in resolution of low level issues (HR matters, conflict resolution and general work environment concerns) and to optimize utilization of personnel resources. Due Date: 08/20/2010</p> <p>CA-3c (4): Less than adequate Priority - Change the name of the Nuclear Safety Concerns Program to Employee Concerns Program (ECP) similar to others in the industry. Establish the expectation in procedures that the ECP Manager is a Point of Contact for direction and follow-up on concerns falling under the roles and responsibilities of other groups, such as, Equal Employment Opportunity, Human Resources, Labor, etc. Due Date: 03/04/2011</p> <p>CA-3c (5): NSC Program Priorities: Establish a Differing Professional Opinion process building off industry models, with defined roles and responsibilities, and expectations for tracking, timeliness, documentation and management review. Due Date: 09/10/2010</p> <p>CA-3c (6): NSC Program Priorities: Establish a policy in SO123-XV-50.2 (Nuclear Safety Concerns Program) for more intrusive and frequent oversight of contractors working under the Station’s SCWE and contractor established Employee Concerns Programs (ECPs). This should include overt review of SCWE expectations with contractors prior to arrival at the Station and upon exiting the station to surface and resolve potential or real weaknesses. This also includes the reporting of real or potential SCWE weaknesses to SCE senior leadership. Due Date: 08/20/2010</p> <p>CA-3c (7): NSC Program Priorities: Relocate the Nuclear Safety Concerns Program Office from the Mezzanine to a location not as frequently traveled by the Senior Leadership Team and Managers to improve the perception of independence and confidentiality with employees that visit the Nuclear Safety Concerns Program Office to raise and discuss concerns. Due Date: 03/04/2011</p>

<p>Cont: Contributing Cause 3c: Less than adequate Priorities – It was not a Nuclear Safety Concern Program priority to interact/communicate with workers/supervisors/managers face-to-face in forums to explain SCWE roles/responsibility and facilitate the early intervention and resolution of concerns. In addition, the program was not aligned with some industry practices, such as establishing a DPO process, a 4 Pillar or similar SCWE process with effective management oversight Management Oversight.</p>	<p>CA-3c (8): NSC Program Priorities: Establish in procedures a SCWE Communications Strategy to provide station personnel (Managers, Supervisors, Workers, Supplemental Employees, Contractors, etc.) with reinforcement of the avenues to raise concerns, SCE open door policy, the zero tolerance for retaliation, the status of SCWE performance issues, improvement plans, self-assessment and survey results, and external agency findings and issues. The Strategy should define the roles and responsibilities for each communications including the use of communication tools (emails, meetings, videos, handouts, posters, etc.) and the periodicity of each communications. Due Date: 08/20/2010</p>
<p>PILLAR 4 Causes</p>	<p>PILLAR 4 Corrective Actions</p>
<p>Contributing Cause 4a: Less than adequate Priority – There was less than adequate priority was given to a SCWE management oversight process/model with metrics to monitor real time performance with check & adjusts actions to drive process and behavior improvements across the Pillars of a healthy SCWE.</p>	<p>CA-4a (1): Management Oversight – Establish a procedure defining SCWE management oversight model including the roles and responsibilities for: --Directing in-house and independent SCWE assessments, surveys, and focus groups to pulse the organization. ----Reviewing results and the tracking of findings and recommendations. ----Directing Management 2-Way Communication Sessions with Workers/Groups, and use of Task Groups --Reviewing organization and program changes for SCWE impacts. --Reviewing outage plans and resources for SCWE impacts. --Reviewing disciplinary actions, resignations and promotions for SCWE impacts. ----Establishing mitigation and communication plans. --Reviewing SCWE performance (SCE and Contractors) and metrics periodically (initially monthly) with the Senior Leadership Team. ----Defining action plans and communicating SCWE performance to the station and external agencies. Due Date: 09/10/2010</p> <p>CA-4a (2): Management Check & Adjust Tools – Implement a pilot early intervention Task Group process where a Nuclear Safety Concerns Program representative works with line management and workers to facilitate understanding and resolution of GWE/SCWE and teamwork issues within work groups. Apply the pilot process to Targeted Groups as defined in the 2009 Synergy Survey, and also the Design Engineering Electrical Group and Security. Upon implementation, present the findings to the Senior Leadership Team and built requirements/expectations into SCWE procedures. Due Date: 12/03/2010</p> <p>CA-4a (3): Diagnostic to Identify Target Groups - Conduct focused group interviews to pulse the organization, including SCE employees and contractors, on perceptions of SCWE effectiveness and retaliation. Review the results to make check & adjusts to communications to close gaps and, as necessary, define Task Groups to address Targeted Areas of SCWE concern. Due Date: 10/01/2010</p> <p>CA-4a (4): Discipline Management Program – Revise SO23-XV-53 (Employee Discipline) to add a review board for more significant discipline. The process will include challenges to show that the discipline is not related to protected activities and retaliation. The process will also include plans to minimize any chilling effects that the discipline could create in the affected work group. Due Date: 09/17/2010</p>
<p>Contributing Cause 4b: Less than adequate Change Management – There was less than adequate change management in reviewing, communicating and mitigating the impact of change on SCWE, including perceptions that can exist in the absence of facts.</p>	<p>CA-4b (2): Change Management Program – Revise SO123-XV-50.7, Change Management Guideline Benchmark and revise Change Management Procedures to reflect industry practices. Due Date: 06/04/2010</p>

SCWE RCE Root Cause	SCWE RCE Corrective Actions to Prevent Recurrence
<p>Root Cause: Less than adequate Accountability – The Station did not have an overall SCWE accountability model across the 4 Pillars with tools/metrics to be proactive in thinking and behaviors to recognize, own, self-examine, and act on SCWE performance issues at precursor event and initial performance decline levels. There was less than adequate value given to critical self-assessment and industry learning. As a result, the Station was in a reactive mode responding to performance shortfalls as they became self evident.</p>	<p>CAPR-RC: SCWE Program Management – Establish a 4 Pillar SCWE process/model with a procedure defining overall SCWE Program ownership with roles and responsibilities for accountability. The model should align with the industry, such as Davis Besse or Susquehanna, and include Pillar 1 (Effective Management Support of Workers), Pillar 2 (Effective Corrective Action Program), Pillar 3 (Effective Alternate Processes), and Pillar 4 (Effective Management Oversight). Rollout a communications strategy employing items, such as posters, pins, All-Hands Meetings, and All-Leader Meetings. Note: This Corrective Action should apply Change Management per SO123-XV-50.7 (Change Management) Due Date: 08/20/2010</p> <p>CA-RC (1): SCWE Program Management – Establish metrics to monitor the health of the SCWE 4 Pillars and periodically report performance to the Senior Leadership Team for review and direction. For example, the metrics could include for: Pillar 1 - # of anonymous NSC cases, # of anonymous NN's, and # of HIRD contacts. (HIRD = Harassment, Intimidation, Retaliation, or Discrimination). Pillar 2 - # of open CAP NN's, # of open NN's, and # of overdue NNs. Pillar 3 - # of open NSC cases, # of NRC Allegations, # of grievances, and the ratio of NSC to NRC contacts. Pillar 4 - # of early interventions, # of NSC Target Group contacts, and # of Discipline Review Boards. Note: This Corrective Action should apply Change Management per SO123-XV-50.7 (Change Management) Due Date: 08/20/2010</p> <p>CA-RC (2): Accountability for NSC performance is a part of 2010 Performance & Development Plans (PDPs) for Managers and Supervisors. PDPs include review of values and behaviors supporting a Strong Nuclear Safety Culture. Specifically, achieving and sustaining excellent performance is dependent on a strong nuclear safety culture. At SONGS, this is demonstrated by our values and behaviors – modeled by our leaders and practiced by the workforce – serving to make nuclear safety an overriding priority. Attributes of a Strong Nuclear Safety Culture include: (1) Everyone is Personally Responsible for Nuclear Safety; (2) Leaders Demonstrate Commitment to Safety; (3) Trust Permeates the Organization; (4) Decision-Making Reflects Safety First; (5) Nuclear Technology is Recognized as Special and Unique; (6) A Questioning Attitude is Cultivated; (7) Organization Learning is Embraced and (8) Nuclear Safety Undergoes Constant Examination. Under (3) Trust Permeates the Organization, personnel can raise nuclear safety concerns without fear of retribution and have confidence their concerns will be addressed. Also, supervisors are skilled in responding to employee questions in an open, honest manner. Under (8) Nuclear Safety Undergoes Constant Examination, periodic safety culture assessments are conducted and used as a basis for improvement. Also, insights and fresh perspectives provided by quality assurance, assessment, employee concerns, and independent oversight personnel are valued. These competencies are closely linked to improving the SCWE and management oversight. Due Date: 06/04/2010 (Action Complete—CRB Pending)</p>

Metrics and Criteria to Measure Effectiveness of CAPRs

Corrective Actions to Prevent Recurrence	Effectiveness Measures
<p>RC CAPR: SCWE Program Management – Establish a 4 Pillar SCWE process/model with a procedure defining overall SCWE Program ownership with and roles and responsibilities for accountability. The model should align with the industry, such as Davis Besse or Susquehanna, and include Pillar 1 (Effective Management Support of Workers), Pillar 2 (Effective Corrective Action Program), Pillar 3 (Effective Alternate Processes), and Pillar 4 (Effective Management Oversight). Rollout a communications strategy employing items, such as posters, pins, All-Hands Meetings, and All-Leader Meetings. Note: This Corrective Action should apply Change Management per SO123-XV-50.7 (Change Management) Due Date: 08/20/2010</p>	<p>Effectiveness Measure 1 (Check & Adjust): Conduct computer and paper surveys, using a random process covering ~25% of the station population, to test work force knowledge of SCWE and 4 Pillar concepts and expectations, and perceptions of SCWE effectiveness and retaliation. Review the results to make check & adjusts to communications to close gaps and, as necessary, define Task Groups to address Targeted Areas of SCWE concern. Action to close upon surveys indicating adequate worker knowledge of SCWE concepts and expectations. Note: This action does not need to be done when other more detailed assessment are done within the quarter (e.g. Synergy Survey) Due Date: Initial by 06/30/2010 and then quarterly for the rest of 2010 and 2011.</p> <p>Effectiveness Measure 4 (CAPR Closure): Perform a 2011 Integrated Safety Culture Assessment including SONGS SCWE. This is to include the conduct of focused group interviews to pulse the organization, including SCE employees and contractors, on perceptions of SCWE effectiveness and retaliation. The CAPR under this SCWE RCE will be considered effective based on the assessment indicating satisfactory SCWE performance, and a review of two consecutive quarters with a declining trend in SCWE cases documented under as Nuclear Safety Concerns Program. Due Date: 07/01/2011</p> <p><i>See CA RC(1) for additional metrics</i></p>