

August 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: Docket Nos. 50-361 and 50-362
Six-Month Response to the U.S. Nuclear Regulatory Commission
Letter Regarding Work Environment Issues at San Onofre Nuclear
Generating Station – Chilling Effect (dated March 2, 2010)**

References: (1) Letter from E.E. Collins, Regional Administrator, NRC Region IV, to R.T. Ridenoure, Senior Vice President and Chief Nuclear Officer, SCE (dated March 2, 2010)

(2) Letter from R.T. Ridenoure, Senior Vice President and Chief Nuclear Officer, SCE, to E.E. Collins, Regional Administrator, NRC Region IV (dated March 31, 2010)

Dear Mr. Collins:

This letter provides the six-month response of Southern California Edison Company (SCE) to your letter regarding work environment issues at the San Onofre Nuclear Generating Station (SONGS), dated March 2, 2010 (Reference 1). Specifically:

- Attachment 1 provides the information in response to the U.S. Nuclear Regulatory Commission (NRC) requests in Reference 1.
- Attachment 2 provides the status of SCE's corrective actions to address the Safety Conscious Work Environment (SCWE) at SONGS, as identified in Reference 2. Attachment 2 also provides the additional actions SCE will take as a result of our assessments of progress to improve and enhance the SONGS SCWE.
- Attachment 3 provides the current set of performance metrics being used to measure progress in improving SCWE at SONGS.

As requested in Reference 1, we also will provide information regarding SCWE efforts in a public meeting with the NRC scheduled for September 16, 2010.

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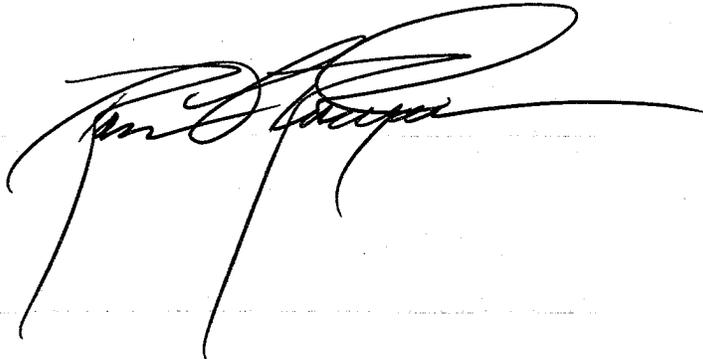
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As noted in Attachments 1 and 2, SCE has implemented a number of the actions to address the SCWE issues described in Reference 2. In addition, we have implemented mechanisms to more closely monitor the SCWE at SONGS, both site-wide and in specific work organizations. As a result, we are implementing actions for the organizations identified as requiring special SCWE focus. We also are taking measures to ensure that as we bring a large supplemental workforce on site, those personnel and their management receive proper training and direction to maintain a strong SCWE during the upcoming Unit 3 Steam Generator Replacement outage.

We continue to 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.

This response contains three (3) new regulatory commitments to improve and enhance the SCWE at SONGS.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard St. Onge", with a long horizontal flourish extending to the right.

Attachments: As stated

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 Regarding Work Environment Issues at SONGS – Chilling Effect (March 2, 2010)

Introduction

On March 2, 2010, the U.S. Nuclear Regulatory Commission (NRC) issued a “Chilling Effect” letter to Southern California Edison Company (SCE) regarding work environment issues at the San Onofre Nuclear Generating Station (SONGS). That letter requested that SCE provide within 30 days a written response to eight specific items. SCE responded to those eight items in a letter dated March 31, 2010 (hereafter referred to as SCE’s one-month response to the Chilling Effect letter).

The NRC Chilling Effect letter also requested that SCE provide a written response within six months that provides the following information:

- The effectiveness of actions taken to address Safety Conscious Work Environment (SCWE) concerns in the specific work organizations identified in the NRC Chilling Effect letter;
- The effectiveness of actions taken to address SCWE issues in any additional SCE-identified work organizations with SCWE concerns; and
- Any additional actions or changes in actions planned and taken to address SCWE issues at SONGS.

As discussed below, this six-month response provides the requested information by identifying: (1) the progress in implementing SCWE corrective actions described in SCE’s one-month response to the Chilling Effect letter; (2) the effectiveness of SCWE improvements to date (both site-wide and for particular work organizations); and (3) “check and adjust” actions to address current challenges in SCWE.

Progress in Implementing SCWE Corrective Actions

SCE has established the “Four Pillar” model as the framework for ensuring a strong SCWE at SONGS (see Item 31, CAPR-RC in Attachment 2), which is as follows:

Pillar 1 – Employees Raise Concerns without Fear of Retaliation

Pillar 2 – Effective Normal Problem Resolution Processes

Pillar 3 – Effective Alternate Problem Resolution Processes

Pillar 4 – Effective Methods to Detect and Prevent Retaliation

Based upon this framework, SCE's one-month response to the Chilling Effect letter identified 33 corrective actions to address SCWE issues at SONGS. Attachment 2 provides the status and applicable due dates for each of these 33 SCWE actions.

To ensure that these individual actions are properly implemented, SCE is completing action closure review in accordance with SONGS procedure SO123-XV-303, "Closure Review Process."¹ Nineteen of these 33 actions were due to have been implemented and accepted by a formal Closure Review Board (CRB) by August 31, 2010. SCE has implemented each of these 19 actions, and a CRB has accepted each of them. Since SCE's one-month response to the Chilling Effect letter, CRB-accepted actions include:

- 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 (see CA-2a(4) in Attachment 2).
- SCE enhanced the SONGS Employee Concerns Program (ECP) in several respects, including:
 - Establishing more intrusive and frequent oversight of contract personnel working at SONGS, including reviewing SCWE expectations with these personnel before they begin working at SONGS and upon their departure to identify potential SCWE issues (see CA-3c(6) in Attachment 2);
 - Requiring that ECP staff present data and programmatic performance monthly during the SONGS Executive Forum (see CA-3a(1) in Attachment 2);
 - Clarifying and providing additional details in ECP procedures governing the performance of ECP investigations (see CA-3b(3) and CA-3c(2) in Attachment 2); and
 - Implementing ECP investigator qualification training, including initial and continuing training requirements, as well as the timing and frequency of training (see CA-3b(5) in Attachment 2).
- SCE established and implemented a SCWE Communications Strategy to provide SONGS personnel with periodic reinforcement of SCWE policies and the current status of SONGS's SCWE and the SCWE improvement initiatives (see CA-3c(8) in Attachment 2). Recent communications on SCWE include:

¹ Under this procedure, closure is supported by a formal closure package providing evidence of the completion of each action. Additionally, Closure Review Boards (CRBs) evaluate closure using a detailed checklist and examine whether the scope and substance of the action implemented matches the description of the action, whether there is objective evidence of action completion, and whether (as appropriate) the improvement made by the action is sustainable (e.g., whether the improvement has been institutionalized through formal programs, procedures, or initial and continuing training).

- Education and updates for SONGS leaders during leader operational alignment meetings;
 - The three most recent quarterly SONGS All-Hands meetings have addressed SCWE issues (March, May and August 2010); and
 - A poster campaign and 24-hour Open House for the ECP to re-launch the program in its new location in June 2010. Individuals from all three work shifts attended the Open House.
- SCE revised the SONGS performance management system to include expectations that leaders' behaviors enhance rather than detract from a SCWE (see CA-RC(2) in Attachment 2).
 - SCE is holding "Two-Way Communication" meetings between SONGS senior management and working-level personnel randomly selected from work organizations. These meetings are intended to build trust and promote open communications, and provide the opportunity to discuss SONGS issues, including the Chilling Effect letter and SCWE. Senior management has met with small groups of 15–25 individuals on a weekly basis since April 2010. Over 550 personnel have participated in these meetings during the past five months (see CA-1c(3) in Attachment 2).

Implementation of the remaining 14 actions described in SCE's one-month response to the Chilling Effect letter is in progress. Notable examples of these ongoing actions include the following:

- SCE is revising its Corrective Action Program (CAP) computer interface process. This revision will add a new "Notification Job Aid" icon on computer desktops to improve the ability of first-time and infrequent users of the CAP to generate, obtain the status of, and close Nuclear Notifications, as well as associated orders and tasks. SCE will complete this action prior to the upcoming Unit 3 Steam Generator Replacement outage. SCE also redistributed hard-copy versions of these "Notification Job Aids" to SONGS personnel (see CA-2a(2) and CA-2a(3) in Attachment 2).
- SCE is revising General Employee Training to include enhanced SCWE training (see CA-1a/b(1) and CA-1a/b(2) in Attachment 2). SCE will put this revised training in place prior to the Unit 3 Steam Generator Replacement outage.
- SCE is training select management and supervision on SCWE principles to reinforce that their behavior encourages workers to raise concerns without fear of retaliation (see CA-1c(1) and CA-1c(2) in Attachment 2). This training is in progress.

- SCE is training SONGS employee and contract personnel, as well as supervisors, on SCWE policies and principles. This training covers avenues to raise concerns without fear of retaliation, including via management, the CAP, and alternate processes such as the ECP and raising concerns directly with the NRC (see CA-1a/b(3) in Attachment 2).
- SCE is implementing an “early intervention” Task Group process for those organizations with identified SCWE issues. Under this process, line managers and working-level personnel meet to facilitate understanding and resolve work environment issues within these organizations (see CA-4a(2) in Attachment 2).

Effectiveness of SCWE Improvements to Date

A. Site-Wide Results

SCE’s one-month response to the Chilling Effect letter identified methods to monitor and evaluate effectiveness of its actions to address the site-wide SCWE, including: (1) independent focus group interviews; (2) survey instruments; (3) a formal management oversight process to monitor SCWE (including performance metrics); and (4) testing to verify personnel’s understanding of SCWE training. Information obtained from each of these methods is summarized below.

Independent Focus Group Interviews Regarding SCWE

In June 2010, SCE conducted independent focus group interviews to better understand SONGS personnel’s perceptions of the site’s SCWE (see CA-4a(3) in Attachment 2).

A team of five individuals independent of SCE with strong experience assessing and improving SCWE interviewed personnel from 47 SONGS work organizations. The interview team interviewed approximately 445 SONGS personnel in groups averaging eight to 10 individuals. Of the 445 interviewed, 410 were working-level personnel consisting of represented, non-represented, contract and SCE employees. The interview team also conducted five focus groups consisting exclusively of front-line supervisors. A random individual selection process was used for selecting personnel from site organizations to ensure representative groups of personnel.

Key site-wide results for the Four Pillars include:

- **SCWE Pillar 1**—SONGS personnel are willing to raise safety, compliance and quality issues, and are encouraged to do so by their management. Personnel provided helpful insights into specific areas for additional improvement under Pillar 1, including the need for steps to provide greater assurance that leadership behaviors and actions consistently support a healthy SCWE.
- **SCWE Pillar 2**—SONGS has improved accessibility of the CAP, and personnel agreed that SONGS management at all levels reinforces the use of the CAP and

the Nuclear Notification process. Over 97% of those interviewed knew how to initiate a Nuclear Notification. Personnel provided helpful insights into specific areas for additional improvement under Pillar 2, including instances where the CAP has failed to effectively resolve issues raised.

- **SCWE Pillar 3**—Virtually every person interviewed exhibited a general awareness of the alternative avenues for raising concerns. An overwhelming majority of interviewees indicated no fear of retaliation if they or someone they knew took a safety concern to the NRC. Interviewees also knew of recent programmatic changes to the ECP—including renaming the program and relocating it to a more accessible location. Personnel provided helpful insights into specific areas for additional improvement under Pillar 3, including the need for greater ECP visibility and outreach among the SONGS workforce.
- **SCWE Pillar 4**—Overall, personnel are aware that any type of harassment, intimidation, retaliation or discrimination against anyone for raising concerns is expressly prohibited. SONGS has reinforced this standard through various ongoing communications and training regarding SCWE and related issues. Personnel also provided helpful insights into specific areas for additional improvement under Pillar 4, including the need for action in certain work organizations where SCWE issues are present.

SCE has provided the report from these independent focus group interviews to the SONGS NRC Resident Inspector for his review.

Periodic Surveys

SCE committed to survey approximately 25% of the SONGS workforce on a quarterly basis for 2010 and 2011 to verify understanding of SCWE concepts and expectations (see Effectiveness Measure 1 in Attachment 2).²

SCE surveyed approximately 1,215 SONGS personnel representing all divisions on-site in connection with “All-Hands” meetings conducted on August 4 and 5, 2010. The survey asked personnel to indicate the extent to which they agreed or disagreed with specific statements regarding SCWE using the following ratings from 5 to 1:

5 — Always 4 — Often 3 — Sometimes 2 — Seldom 1 — Never

Key site-wide results indicated that:

- Over 98% agreed that they are “always” or “often” responsible for identifying problems and adverse conditions.

² Note that this action is not required when other more detailed assessments are completed for a particular quarter (e.g., independent focus group interviews).

- Over 92% “always” or “often” feel free to raise safety and quality concerns with their immediate supervisors.
- Approximately 95% are familiar with the ECP, and understand that they can raise concerns confidentially.
- Continued work is needed to ensure that individuals feel comfortable challenging what they consider a non-conservative decision, and understand that the SONGS culture supports raising nuclear safety and quality concerns.
- Additional work is needed to improve workers’ confidence in the results of ECP investigations and findings.

The surveys were tabulated using TeleForm software that interprets scanned surveys and generates raw data reports with a reported 99.7% accuracy. We believe that the surveys obtained sufficient demographic information (e.g., work position—individual contributor; supervisor; manager/director; hands-on worker/craft; office worker—and division at SONGS) to permit a more focused assessment of, and response to the results. SCE is currently evaluating this information and will determine what, if any, additional actions should be taken.

Apart from these paper surveys, SCE also conducted an electronic (computer) “Pulse” Survey from May 6–12, 2010. The “Pulse” survey is a computer-based survey that automatically launches when personnel with a network ID log on the SONGS network during the survey time period. More than 2,300 individuals completed this electronic survey.

This particular “Pulse” survey evaluated the effectiveness of site communications and other efforts to inform the SONGS workforce of: (1) the issuance of the NRC Chilling Effect letter; (2) SCE’s response to the NRC Chilling Effect letter; and (3) the various avenues to raise a concern at SONGS. Overall, the survey results were positive:

- 96% indicated they knew SCE had received a Chilling Effect letter from the NRC.
- 92% indicated they had learned more about SCE’s response to the NRC Chilling Effect letter by one or more of the following methods: (i) reading an e-mail from the Chief Nuclear Officer (CNO) along with an attached ECP newsletter; (ii) reading an ECP newsletter provided at the All-Hands meeting in May 2010; or (iii) reviewing a CNO video message distributed by e-mail.
- 98% indicated they knew at least three different avenues in which they could raise a concern at SONGS.

SCE has provided the May and August 2010 survey results to the SONGS NRC Resident Inspector for his review.

Formal Management Oversight Process

SCE established 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 2).

SCE's formal management oversight process includes a set of performance metrics to measure progress in improving SCWE at SONGS (see CA-RC(1) in Attachment 2). The current metrics are as follows:

- Anonymous ECP Concerns;
- ECP Cases/NRC Allegations;
- Early Interventions;
- Employee Concerns—Open Cases;
- General Work Environment (GWE) Notifications Open;
- Anonymous Notifications;
- NSC/ECP Group Contacts;
- Safety Conscious Work Environment Review Boards (SCWERB);
- Labor Grievances; and
- Harassment, Intimidation, Retaliation, Discrimination (HIRD).

These metrics are included in the material reviewed at the Management Review Meeting on a monthly basis. Attachment 3 provides copies of the current SCWE metrics. For those metrics that report quarterly, performance is reflected as of June 30, 2010; for those metrics that report monthly, performance is reflected as of July 31, 2010.

Additionally, SCE has established a procedure for conducting SCWE Review Boards (Procedure SO123-XV-50.2.2, "Safety Conscious Work Environment Review Boards"). This Board reviews significant proposed organizational changes and certain disciplinary actions to better prevent and detect actual and perceived HIRD for raising nuclear safety or quality concerns or other forms of "protected conduct."

Finally, to further monitor and evaluate effectiveness of its actions to address SCWE, SCE will perform a site-wide Safety Culture assessment in 2011 (See Effectiveness Measure 4 in Attachment 2). This assessment will include additional focus group interviews to evaluate whether SONGS employee and contract personnel understand SCWE policies and expectations.

Testing for SCWE Training Programs

Training on SCWE policies and programs (see for example CA-1a/b(3) in Attachment 2) includes a pass/fail test to verify trainee understanding. For those who receive less than 80% on their test, remediation and re-testing is required until the individual receives an acceptable score (80%).

B. Results for Specific Work Organizations

Both the NRC and SCE have identified SONGS work organizations that have SCWE issues. The following addresses the current status of these organizations.

In its Chilling Effect letter, the NRC stated that it received concerns from “on-site organizations.” These organizations included “operations, engineering, maintenance, emergency preparedness, work control, procedure writers, procurement, painters, security, regulatory affairs, and contractor organizations.”

In its one-month response to the Chilling Effect letter, SCE noted that it would take “enhanced actions” to address actual and potential SCWE issues in certain work organizations. SCE identified these organizations—referred to as “Priority” groups—through the 2009 Synergy survey, the 2009 Independent Safety Culture Evaluation, and the SCWE Root Cause Evaluation completed in March 2010.

Because the overwhelming majority of SCE’s corrective actions apply station-wide, they therefore include the organizations identified by both the NRC and SCE. Nevertheless, for the Priority groups, SCE identified additional actions, including:

- Providing “Safely Speaking” training to selected managers and supervisors in the Priority groups (see CA-1c(1) in Attachment 2). 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 the Priority groups (see CA-1c(2) in Attachment 2).
- Conducting a pilot early intervention Task Group process in which a SCWE Recovery representative works with line management and workers in the Priority Groups to facilitate understanding and resolve SCWE and teamwork issues (see CA-4a(2) action in Attachment 2).³

In June 2010, as discussed above, SCE chartered independent focus group interviews to measure the effectiveness of its actions in specific organizations—and to identify any other organizations that may have SCWE issues that have not been previously identified. These interviews included personnel from 47 SONGS organizations, including: (1) groups identified in the NRC Chilling Effect letter; (2) Priority groups

³ SCE’s one-month response to the NRC Chilling Effect letter noted that an ECP representative would facilitate the Task Group process described in CA-4a(2). Since that time, SCE chartered a “SCWE Recovery Team,” whose purpose, in part, is to assist ECP in implementing its SCWE corrective actions. The SCWE Recovery Team is assisting the ECP in facilitating the Task Group process. Both the ECP and SCWE Recovery Team fall under the umbrella of the SONGS Nuclear Safety Culture organization, which also was created since SCE submitted its one-month response to the NRC Chilling Effect letter. SCE has briefed the SONGS NRC Resident Inspector on the SCWE Recovery Team and its responsibilities.

previously identified by SCE; and (3) select groups that had not previously participated in recent NRC or independent focus group interviews.

Of these 47 organizations, the interview team categorized 12 as having a strong SCWE and no other significant general issues, including organizations previously identified as Priority groups. But the focus group interviews also identified 13 of the 47 organizations as requiring either: (1) special SCWE focus and attention or (2) near-term action to prevent SCWE issues from developing. (SCE had already identified some of these 13 organizations as “Priority” groups).

“Check and Adjust” Actions to Address Current Challenges in SCWE

The results from the effectiveness measures described above indicate that actions to improve SCWE are having a positive impact. However, we recognize that SONGS must achieve further improvement.

The existing SCWE actions (a number of which are still in progress), as well as other site-wide initiatives currently in progress to address human performance and problem identification and resolution, will address many of the current SCWE challenges. Nonetheless, SCE has developed additional SCWE actions based on management review of progress in this area. “Check and adjust” actions added to the SCWE improvement plan are as follows:

- Conduct the early intervention Task Group process, as described in SCWE RCE CA-4a(2), for the newly identified “Priority” groups from the June 2010 independent focus group interviews (see Item 34, “Check and Adjust” actions in Attachment 2) [**New Regulatory Commitment**].
- SONGS Senior leaders responsible for SCWE recovery will meet with the supervision and management of the newly identified “Priority” groups from the June 2010 independent focus group interviews. These meetings will reinforce to supervision and management how to conduct themselves so that those they supervise are encouraged to raise issues (see Item 35, “Check and Adjust” actions in Attachment 2) [**New Regulatory Commitment**].
- Extend ECP normal working office hours to support the Fall 2010 Unit 3 Steam Generator Replacement outage (see Item 36, “Check and Adjust” actions in Attachment 2) [**New Regulatory Commitment**].

ATTACHMENT 2

Status of Actions to Address Safety Conscious Work Environment

The tables below describe the status of actions to address Safety Conscious Work Environment (SCWE) at SONGS. Specifically, these tables describe:

- The status of actions to improve SCWE, identified by SCE in its one-month response to the NRC “Chilling Effect” letter (dated March 31, 2010); and
- Three (3) “Check and adjust” actions in the SCWE area that SCE has developed since submitting its one-month response to the NRC “Chilling Effect” letter, which are denoted by: [**New Regulatory Commitment**].

Items listed as “Complete” under the “Completion Status” column below have been implemented and accepted as complete by a formal Closure Review Board (CRB).

Pillar 1 – Employees Raise Concerns Without Fear of Retaliation

	Action	Due Date	Completion Status
1	<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:</p> <ul style="list-style-type: none"> • 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. 	<p>12/03/2010</p> <p>(Action Scheduled to be Completed Prior to U3 SGR Outage; additional time provided for CRB process)</p>	<p>Action in Progress</p> <p>(Training content has been developed.)</p>
2	<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:</p> <ul style="list-style-type: none"> • 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. 	<p>12/03/2010</p> <p>(Action Scheduled to be Completed Prior to U3 SGR Outage; additional time provided for CRB process)</p>	<p>Action in Progress</p> <p>(Training content has been developed.)</p>
3	<p>CA-1a/b (3): Supervisor/Worker Training – Train active status (*) SCE and contract workers and supervisors on SCWE including:</p> <p>--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.</p> <ul style="list-style-type: none"> • 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. <p>(*) Active status will be on a defined date close to the initial training class and entered into Corrective Action Program documentation.</p>	<p>03/04/2011</p>	<p>Action in Progress</p> <p>(Training in progress.)</p>
4	<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.</p>	<p>03/04/2011</p>	<p>Action in Progress</p> <p>(Training in progress.)</p>

	Action	Due Date	Completion Status
5	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.	03/04/2011	Action in Progress (Training in progress.)
6	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.	Starting 06/30/2010	Complete (Action required that meetings begin in June 2010; Meetings have been ongoing since April 2010.)

PILLAR 2 – Effective Normal Problem Resolution Processes

	Action	Due Date	Completion Status
7	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.	06/04/2010	Complete
8	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.	09/10/2010	Action in Progress (Closure Package in review.)
9	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.	07/09/2010	Complete
10	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.	06/04/2010	Complete
11	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.	08/20/2010	Complete
12	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.	06/18/2010	Complete

PILLAR 3 – Effective Alternate Problem Resolution Processes

	Action	Due Date	Completion Status
13	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.	06/04/2010	Complete
14	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.	07/23/2010	Complete
15	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.	02/18/2011	Action in Progress
16	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.	06/04/2010	Complete
17	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.	06/04/2010	Complete
18	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.	07/16/2010	Complete
19	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).	08/20/2010	Complete
20	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.	08/20/2010	Complete

	Action	Due Date	Completion Status
21	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.	03/04/2011	Action in Progress (The organization's name has been changed; procedure and other changes in progress.)
22	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.	09/10/2010	Complete
23	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.	08/20/2010	Complete
24	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 discussion concerns.	03/04/2011	Action in Progress (Office relocation complete. Closure package in progress.)
25	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.	08/20/2010	Complete

PILLAR 4 – Effective Methods to Detect and Prevent Retaliation

	Action	Due Date	Completion Status
26	<p>CA-4a (1): Management Oversight – Establish a procedure defining SCWE management oversight model including the roles and responsibilities for:</p> <ul style="list-style-type: none"> • 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. 	09/10/2010	Complete
27	<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.</p> <p>[This action—which is set forth in SCE’s one-month response to the Chilling Effect letter (March 31, 2010)—notes that an ECP representative would facilitate this Task Group process. Since that time, SCE chartered a “SCWE Recovery Team,” whose purpose, in part, is to assist ECP in implementing its SCWE corrective actions. The SCWE Recovery Team is assisting the ECP in facilitating the Task Group process. Both the ECP and SCWE Recovery Team fall under the umbrella of the SONGS Nuclear Safety Culture organization, which also was created since SCE submitted its one-month response to the NRC Chilling Effect letter. SCE has briefed the SONGS NRC Resident Inspector on the SCWE Recovery Team and its responsibilities.]</p>	12/03/2010	<p>Action in Progress</p> <p>(Task groups have been initiated for some groups.)</p>

	Action	Due Date	Completion Status
28	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 & adjust to communications to close gaps and, as necessary, define Task Groups to address Targeted Areas of SCWE concern.	10/01/2010	Action in Progress (Closure package in review.)
29	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.	09/17/2010	Complete
30	CA-4b (2): Change Management Program – Revise SO123-XV-50.7, Change Management Guideline Benchmark and revise Change Management Procedures to reflect industry practices.	06/04/2010	Complete

SCWE Root Cause Evaluation Corrective Actions to Prevent Recurrence

	Action	Due Date	Completion Status
31	<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.</p> <p>Note: This Corrective Action should apply Change Management per SO123-XV-50.7 (Change Management)</p>	08/20/2010	Complete
32	<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:</p> <ul style="list-style-type: none"> • 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. <p>Note: This Corrective Action should apply Change Management per SO123-XV-50.7 (Change Management)</p>	08/20/2010	Complete

	Action	Due Date	Completion Status
33	<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.</p>	06/04/2010	Complete

SCWE Root Cause Evaluation Effectiveness Measures

<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)</p>	<p>Initial by 06/30/2010 Then Quarterly for the rest of 2010 and 2011</p>	<p>Action in Progress (Electronic survey conducted in May 2010; paper survey conducted in August 2010; independent focus group interviews performed in June 2010.)</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. See CA RC(1) for additional metrics</p>	<p>07/01/2011</p>	<p>Future action</p>

“Check and Adjust” Actions to Address SCWE

	Action	Due Date	Applicable SCWE Pillar
34	Conduct the early intervention Task Group process, as described in SCWE RCE CA-4a(2), for the newly identified “Priority” groups from the June 2010 independent focus group interviews. [New Regulatory Commitment]	12/03/10	Pillar 4
35	SONGS Senior leaders responsible for SCWE recovery will meet with the supervision and management of the newly identified “Priority” groups from the June 2010 independent focus group interviews. These meetings will reinforce to supervision and management how to conduct themselves so that those they supervise are encouraged to raise issues. [New Regulatory Commitment]	12/10/10 (Action Scheduled to be Completed Prior to U3 SGR Outage; additional time provided for CRB process)	Pillar 1
36	Extend ECP normal working office hours to support the Fall 2010 Unit 3 Steam Generator Replacement outage. [New Regulatory Commitment]	12/10/10 (Action Scheduled to be Completed Prior to U3 SGR Outage; additional time provided for CRB process)	Pillar 3

ATTACHMENT 3

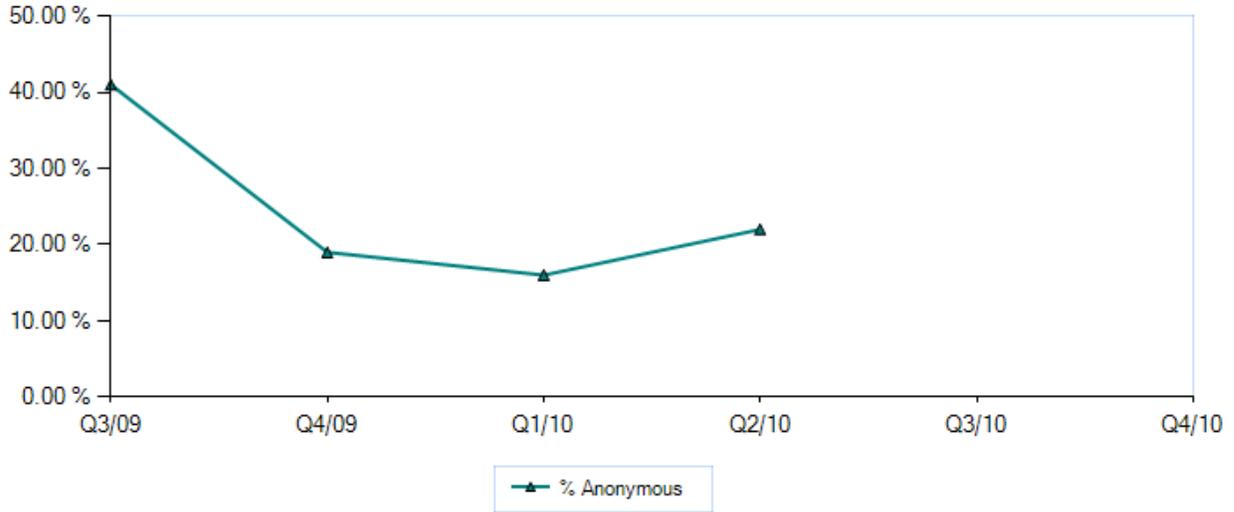
SCWE Metrics

Metric Title	Page
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Anonymous ECP Concerns	Q4/09	Q1/10	Q2/10
Owner: Willis Frick Contact: Laura Green	Anon: 19%	Anon: 16%	Anon: 22%



Anonymous ECP Concerns

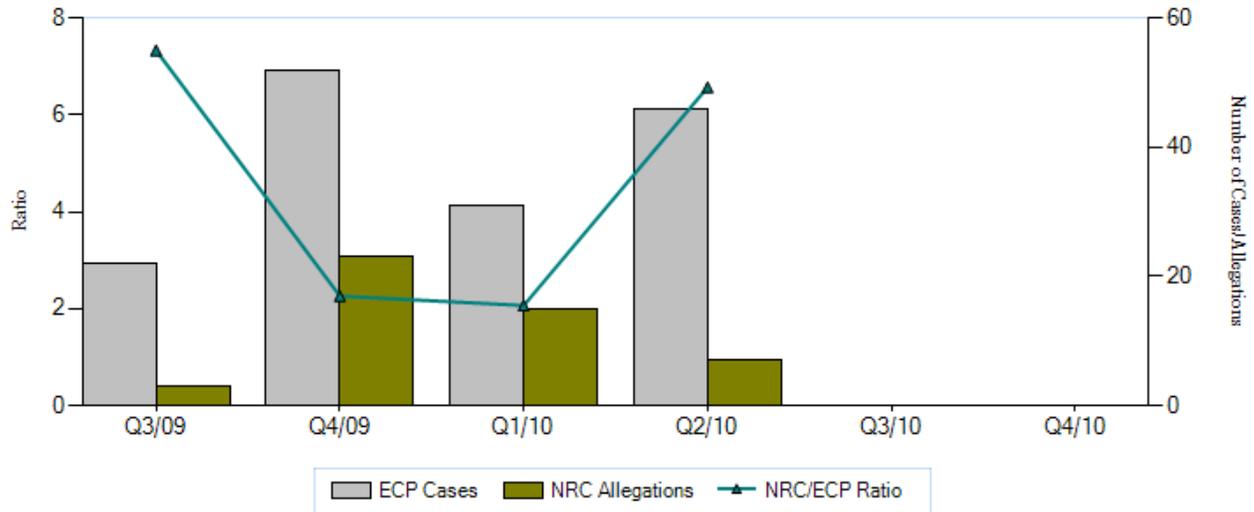


	Q3/09	Q4/09	Q1/10	Q2/10	Q3/10	Q4/10
% Anonymous	41%	19%	16%	22%		
Definition			Performance Measures			
The metric displays the number of anonymous ECP issues raised through various data sources (hotline, concerns). The indicator displays the data over an 18-month period, as a percentage of total ECP concerns.	It is recognized that raising concerns anonymously may not be motivated by a fear of retaliation. Thus the acceptance criterion is not 0. No data is available that would allow determination of specific acceptance limits. As a result, the indicator will be judged based on the data trends as described in the analysis.					
Analysis			Actions			
A numeric threshold for % anonymous ECPs cannot be established. In general, a lower % anonymous ECP issues suggests less concern by the workforce about retaliation for raising issues.	Some of the actions from the SCWE RCE (NN200709479) will address reluctance in the workforce to identify themselves when raising an issue and will encourage workers to raise their issues to supervisor or by creating a NN or the ECP. These actions will tend to reduce the % anonymous.					

ECP cases/NRC Allegations	Q4/09	Q1/10	Q2/10
Owner: Willis Frick Contact: Laura Green	Ratio: 2.3	Ratio: 2.1	Ratio: 6.6



ECP cases/NRC Allegations



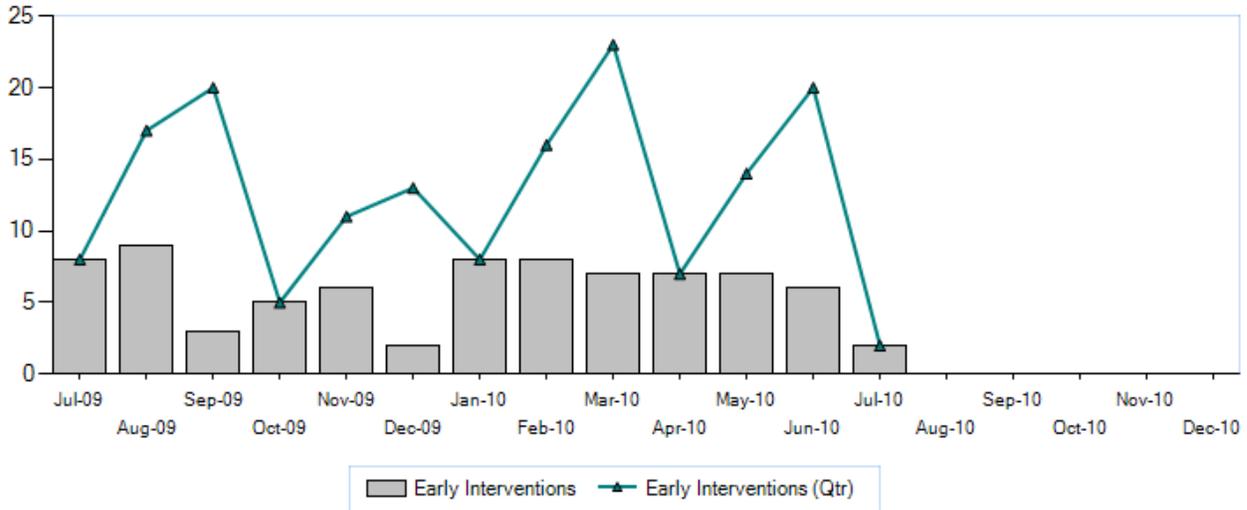
	Q3/09	Q4/09	Q1/10	Q2/10	Q3/10	Q4/10
NRC Allegations	3	23	15	7		
ECP Cases	22	52	31	46		
NRC/ECP Ratio	7.3	2.3	2.1	6.6		

Definition	Performance Measures
<p>This indicator displays by quarter, the number of and the ratio of allegations received by the NRC and by Employee Concern Program (ECP) cases. The indicator displays the data over a rolling 18-month period.</p> <p>Purpose: This indicator is used to help assess the effectiveness of the internal alternate resolution processes. This indicator may also be used to help assess the willingness of employees to raise concerns without fear of harassment, intimidation, retaliation, or discrimination.</p>	<p>Reference: It is difficult to conclude what is an acceptable performance criterion. As a result, the indicator will be judged based on the data trends as described in the Data Analysis section. In general, the ratio should be high as having more issues raised to ECP is desirable.</p>
Analysis	Actions
<p>Note: The number of NRC allegations is not available until about the 20th of the month after the end of the quarter. Hence this metric cannot be updated until the 2nd month after the end of a quarter.</p> <p>SONGS continues to have a large number of ECP cases and NRC Allegations compared to other plants.</p>	<p>The actions from the SCWE RCE (NN200709479) will encourage workers to raise their issues to supervisor or by creating a NN or the ECP. If effective, these actions will improve this ratio.</p>

Early Interventions	May-10	Jun-10	Jul-10
Owner: Willis Frick Contact: Laura Green	Qtr: 14	Qtr: 20	Qtr: 2



Early Interventions

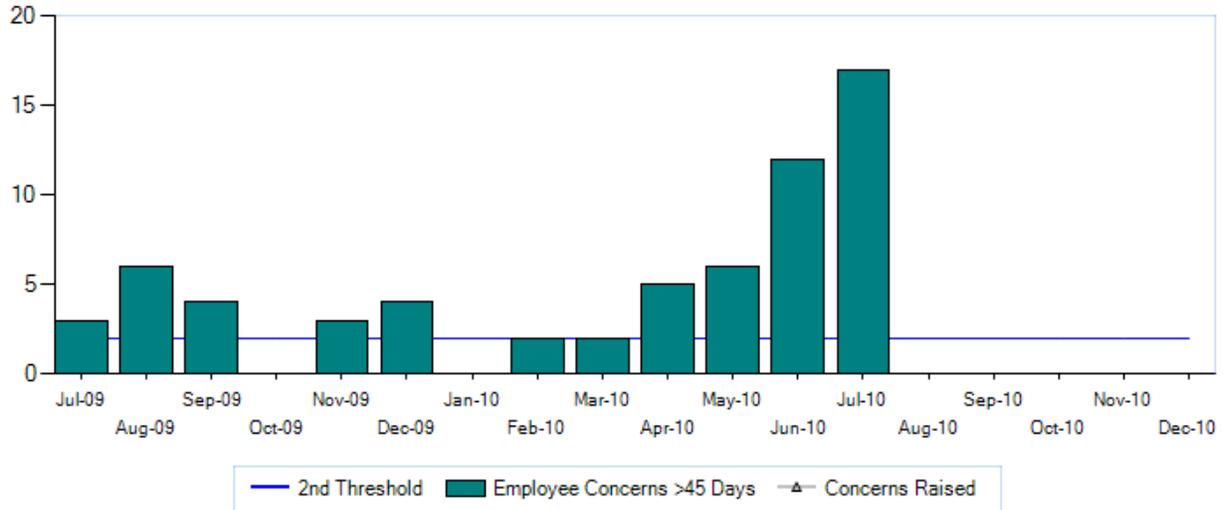


Definition	Performance Measures
<p>The indicator monitors the number of early interventions conducted by the NSC/ECP group.</p> <p>Purpose: This indicator is used to help assess the effectiveness of internal resolution processes. This indicator also provides additional insight on the current morale of the nuclear department and can provide insights on the General Work Environment.</p> <p>Early interventions conducted by the NSC/ECP group are a method to detect and prevent retaliation and show that the station is providing proactive measures to ensure a healthy SCWE.</p>	<p>Green: ≥ 1 /qtr Red: < 1 /qtr</p>
Analysis	Actions
<p>Notes: Early Interventions are contact with the ECP management by other leaders to discuss SCWE or GWE issues or to request assistance in resolution of personnel or other cultural issues. A numeric threshold cannot be established except by historical data at SONGS, which is the basis for the performance measures shown.</p> <p>In general, a larger number of EIs suggests enhanced understanding of interest in SCWE and GWE issues by management as it shows that supervisors and managers are thinking about SCWE and GWE issues before they come to the ECP or NRC.</p>	<p>Revise Performance Measures - increase Red threshold (under review) Convert to a 3-month rolling total</p>

Employee Concerns – Open Cases	May-10	Jun-10	Jul-10
Owner: Willis Frick Contact: Laura Green	Concrns: 6	Concrns: 12	Concrns: 17



Employee Concerns – Open Cases

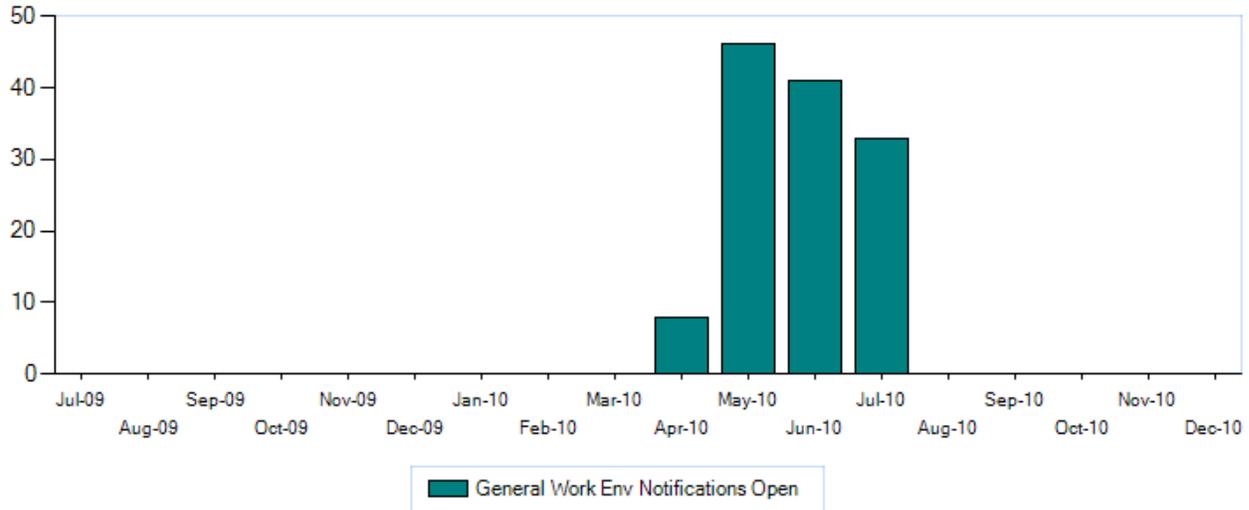


Definition	Performance Measures
The indicator monitors the timeliness of resolution for issues raised through the Employee Concern Program. The indicator also displays the number of Concerns that are received by the Employee Concerns Program that are open greater than 45 days on a monthly basis. The data are displayed over a rolling 18-month period.	Green: ≤ 1 >45 days Blue: ≤ 2 >45 days Yellow: ≤ 3 >45 days Red: > 3 >45 days
	There currently are no industry benchmark data. As a result, the indicator will be judged based on the data trends as described in the Data requirements section using the following metrics:
Analysis	Actions
The number of ECP cases open > 45 days remains high.	Two contractor investigators have been assigned to reduce the number of case open >45 days. Formation of the Nuclear Safety Culture organization will shift some of the SCWE corrective actions from the ECP to the Nuclear Safety Culture organization and increase the ECP resources assigned to cases.

General Work Environment (GWE) Notifications Open	May-10	Jun-10	Jul-10
Owner: Willis Frick Contact:	GWE Notifications: 46	GWE Notifications: 41	GWE Notifications: 33



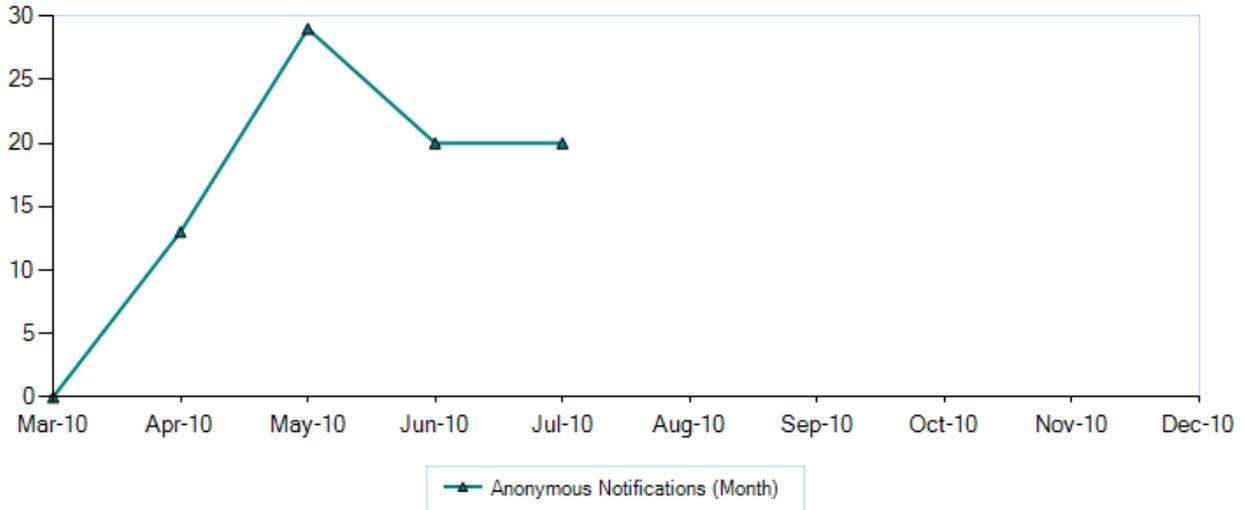
General Work Environment (GWE) Notifications Open



	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10
GWEN Open										8	46	41	33					
Definition	<p>The metric displays the number of GWE notifications that are open > 90 days. GWE trend codes are used to track and trend General Culture issues. Some of these Nuclear notifications (NNs) identify interactions and communication between workers and supervision that could impede a free flow of information. Other GWE trend codes measure the ineffectiveness of the CAP to address GWE issues raised that could erode the confidence of the workers to raise issues into the CAP.</p> <p>This indicator can also be used to assess the general willingness of employees to raise concerns without fear of retaliation including harassment, intimidation retaliation and discrimination.</p>									<p>Performance Measures</p> <p>It is recognized that the open notification with GWE trend codes may not be indicative of a fear of retaliation. Thus the acceptance criterion is not 0. No data is available that would allow determination of specific acceptance limits. As a result, the indicator will be judged based on the data trends as described in the analysis.</p>								
Analysis	<p>GWE trend codes were available to be assigned to NNs starting in April 2010. Since this is a measure of GWE NNs open for more than > 90 days, limited data will be available until August 2010. Currently the data displayed only shows the number of NNs trended in a particular month and does not show the length of time open.</p>									<p>Actions</p> <p>Continuing to be under development.</p>								

Anonymous Notifications	May-10	Jun-10	Jul-10
Owner: Willis Frick Contact: Willis Frick	18-Mth: 29	18-Mth: 20	18-Mth: 20

Anonymous Notifications



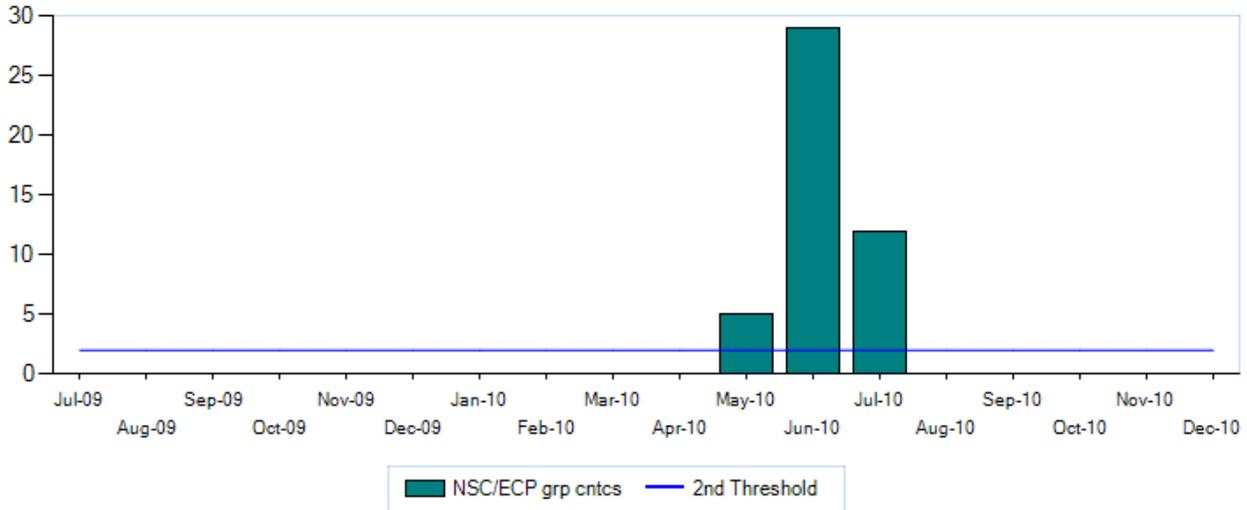
	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10
Anonymous Notifications (Mth)	0	13	29	20	20					

Definition	Performance Measures
<p>The metric displays the number of anonymous notifications submitted. The indicator displays the data over an 18-month period, starting in March 2010. Anonymous notifications have a "created by ID" of GB_NN_USER.</p>	<p>It is recognized that raising concerns anonymously may not be motivated by a fear of retaliation. Thus the acceptance criterion is not 0. No data is available that would allow determination of specific acceptance limits. As a result, the indicator will be judged based on the data trends as described in the analysis.</p>
Analysis	Actions
<p>Note: Data for March 2010 is not available.</p> <p>Anonymous NN have not been available for long enough to be able to evaluate trends. It is noted that some of the anonymous NNs are related to General Culture Issues (working schedules and conditions, compensation, etc.)</p>	<p>Continue to monitor anonymous NN's for potential trends.</p>

NSC/ECP Group Contacts	May-10	Jun-10	Jul-10
Owner: Willis Frick Contact: Laura Green	NSC cntcs: 5	NSC cntcs: 29	NSC cntcs: 12



NSC/ECP Group Contacts

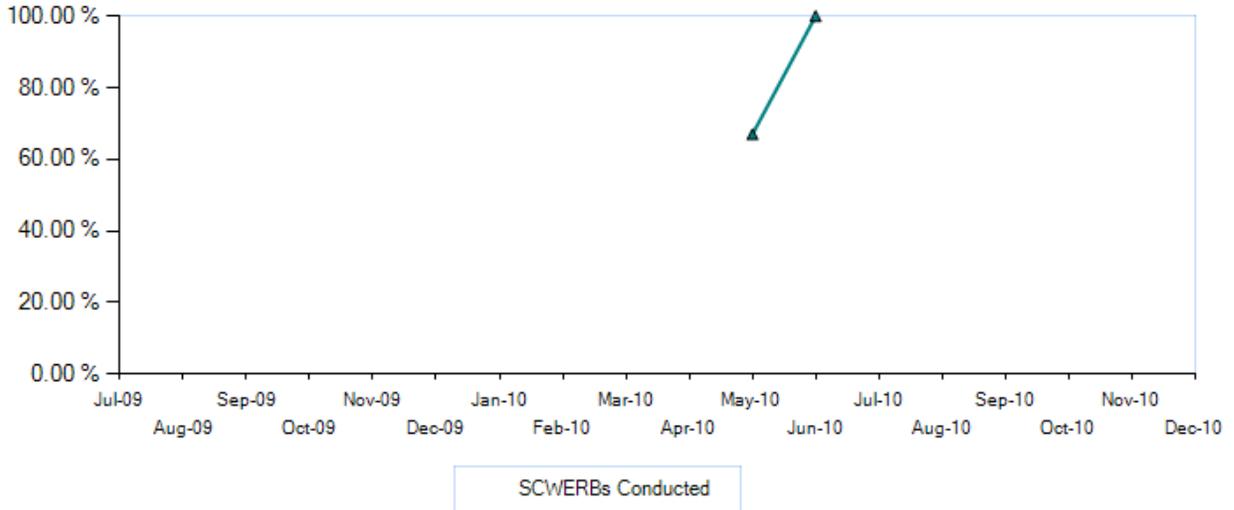


Definition	Performance Measures
<p>The indicator monitors the number of contacts made by NSC/ECP personnel. Contact with a group is made anytime an NSC/ECP staff member meets with two or more individuals in a work group to pulse the health a SCWE in that group.</p> <p>Purpose:</p> <p>This indicator is used to help assess the effectiveness of effective methods to detect and prevent retaliation (pillar 4). This indicator also provides additional insight on the current morale of the nuclear department and can provide insights on the General Work Environment.</p> <p>NSC/ECP group contacts are a method to detect and prevent retaliation and show that the station is providing proactive measures to ensure a healthy SCWE.</p>	<p>Green: ≥ 3 /month Blue: ≥ 2 /month Yellow: ≥ 1 /month Red: < 1 /month</p> <p>Reference: It is difficult to conclude what number of contacts that should be required on a periodic basis. As a result, the indicator will be judged based on the data trends as described in the Data Analysis section, and where possible, against industry benchmarks.</p>
Analysis	Actions
<p>The process to track ECP contacts started in May 2010. While the increase in July is favorable, insufficient "run time" is available to reach a conclusion. Some trends in subject matter and work group from the contacts have been identified and provided to senior leadership and is being provided to work group leaders.</p>	<p>Beyond providing the information in subject matter and work group noted in the analysis section, insufficient "run time" has elapsed for specific actions to be developed.</p>

Safety Conscious Work Environment Review Boards (SCWERB)	May-10	Jun-10	Jul-10
Owner: Willis Frick Contact: Laura Green	Actual: 67%	Actual: 100%	

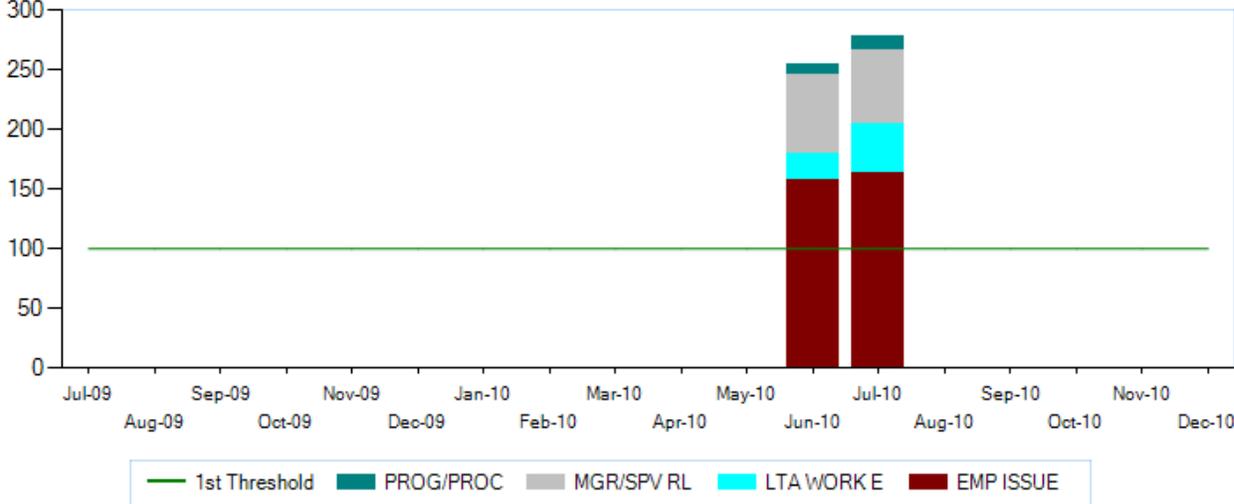


Safety Conscious Work Environment Review Boards (SCWERB)



	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10
SCWERBs Conducted											67%	100%						

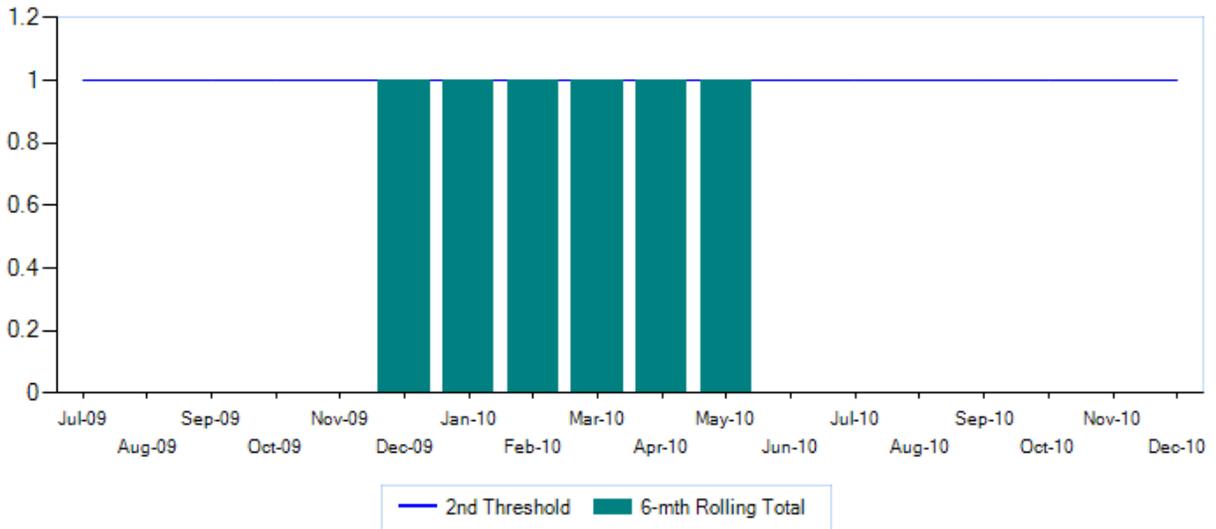
Definition	Performance Measures
<p>The SCWE review board will ask questions to ensure that as a result of reorganizations and reductions in force, any chilling effects are considered discipline and appropriately addressed. The SCWERB also ensures that a communication plan is considered for minimizing the SCWE effects on the affected group.</p> <p>This indicator is used to help assess the effectiveness of effective methods to detect and prevent retaliation</p>	<p>Green: 100%</p> <p>Red: < 100%</p>
Analysis	Actions
<p>Until August 2010 SCWERB are not requested except for Stone & Webster and Williams painters. SCWERBs include Discipline Review Boards.</p> <p>There were no SCWE review boards conducted in July.</p>	<p>One required SCWERB for Stone & Webster painters was not held in May. M&CS to implement actions to ensure SCWE Review Boards are performed. ECP to evaluate actions to ensure deficiency corrected. NN 200941305 (Sig 4). Owner - Willis Frick, Due Date 8/31/10.</p>

Labor Grievances		May-10	Jun-10	Jul-10												
Owner: Gary Zwissler Contact: Tammy Bauer			Labor Grievances: 255	Labor Grievances: 278												
<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;">  <p>Good</p> </div> <div style="text-align: center;"> <h2>Labor Grievances</h2> </div> </div>  <table border="1" style="margin-top: 10px; width: 100%; text-align: center;"> <thead> <tr> <th>Category</th> <th>Color</th> </tr> </thead> <tbody> <tr> <td>1st Threshold</td> <td>Green Line</td> </tr> <tr> <td>PROG/PROC</td> <td>Teal</td> </tr> <tr> <td>MGR/SPV RL</td> <td>Grey</td> </tr> <tr> <td>LTA WORK E</td> <td>Cyan</td> </tr> <tr> <td>EMP ISSUE</td> <td>Dark Red</td> </tr> </tbody> </table>					Category	Color	1st Threshold	Green Line	PROG/PROC	Teal	MGR/SPV RL	Grey	LTA WORK E	Cyan	EMP ISSUE	Dark Red
Category	Color															
1st Threshold	Green Line															
PROG/PROC	Teal															
MGR/SPV RL	Grey															
LTA WORK E	Cyan															
EMP ISSUE	Dark Red															
Definition		Performance Measures														
<p>The indicator monitors the number of open second and third step grievances that map to GWE trend codes.</p> <p>Purpose: This indicator provides generalized insight into represented employee issues by GWE trend code.</p>		<p>Green: ≤ 100 Blue: ≤ 225 Yellow: ≤ 350 Red: > 350</p> <p>Purpose: This indicator provides generalized insight into represented employee issues.</p>														
Analysis		Actions														
<p>This metric measures general trends in employee issues as captured by open second and third step grievances that may be mapped to GWE trend codes. Analysis of data and subsequent conclusions may be affected by grievances generated for reasons other than employee concerns.</p>		<p>Continued processing of open grievances via the Article IV of the Collective Bargaining Agreement.</p>														

Harassment, Intimidation, Retaliation, Discrimination (HIRD)	May-10	Jun-10	Jul-10
Owner: Willis Frick Contact: Laura Green	HIRD: 1	HIRD: 0	HIRD: 0



Harassment, Intimidation, Retaliation, Discrimination (HIRD)



Definition	Performance Measures
<p>The metric displays the number of substantiated HIRD concerns raised through various data sources. Performance Measures based on total events during any 6-month rolling period.</p> <p>This indicator is used to assess the willingness of employees to raise concerns without fear of harassment, intimidation, retaliation, or discrimination (HIRD). This in turn may be an indication of management’s effectiveness at detecting and preventing retaliation.</p>	<p>Green: ≤ 1</p> <p>Red: > 1</p> <p>Reference: It is recognized that any HIRD or chilled work environment concern must be taken seriously and substantiated HIRD or chilled work environment concerns are not acceptable, thus the acceptance criterion is 0.</p>
Analysis	Actions
<p>One substantiated case of a chilled work environment was identified in December 2009. As this metric is a 6 month rolling average, it cleared in June 2010.</p>	<p>Although this metric is now green, not all challenges to the SCWE have been resolved. Continuing actions from the SCWE RCE (NN200709479) will address the challenges and assess the SCWE in the future.</p>