

 Nuclear Department Fleet Procedure	FP-PA-HU-03	Revision: 6
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Title: Human Performance Observation Program		
Approval: Henry H. Butterworth _____ Director, Operations Standards		

INFORMATION USE

- Procedure should be available, but not necessarily at the work location.
- Procedure may be performed from memory.
- User remains responsible for procedure adherence.

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1.0 PURPOSE

1.1 The purpose of the Observation Program is to promote a leadership presence in the field on a regular basis to demonstrate a high level of commitment towards improving human performance by establishing, communicating and reinforcing clear expectations for behavior, continuous improvement, appropriate policies, efficient and effective processes and common values. This should in turn increase open communications and demonstrates a level of healthy concern about plant work that is recognized by all workers.

1.2 Station personnel at all levels must be involved in a cooperative effort to identify and address error likely situations by reinforcing desired behaviors and eliminating undesirable at risk behaviors. The leadership team should use observations as “coaching” opportunities to define and communicate high standards and expectations to station personnel. The leadership team must be sufficiently involved in day-to-day activities to facilitate reinforcement of high standards and expectations regarding personnel performance. Performance should be measured against well-established goals and standards while coaching personnel to achieve desired behaviors.

2.0 APPLICABILITY

2.1 This procedure is applicable to all NSPM sites and the headquarters office.

3.0 RESPONSIBILITIES

3.1 Department Managers:

1. Implement the requirements and expectations of this procedure within their departments.
2. Routinely conduct in-field observations of worker behaviors followed by timely coaching and feedback designed to promote continuous performance improvement.
3. Reinforce the use of Human Performance Tools.
4. Ensure data from the Observation Program is reviewed and incorporated into the Department Roll-Up Meeting (DRUM).
5. Review observations to ensure that the observers are displaying leadership skills by reinforcing desired behaviors and results.

3.2 Department Supervisors:

1. Routinely observe work in progress and training to promote application of the Human Performance Tools.
2. Provide coaching following observations to reinforce the use of Human Performance Tools through positive and constructive feedback. For maximum impact, coaching and feedback should include:
 - a. Observed worker behaviors designed to promote continuous performance improvement.
 - b. Instances where the lack or ineffective use of Human Performance Tools could have caused or contributed to an event.
 - c. Safety issues, worker practices, job planning and preparation activities, and/or verification/validation checks that could have been used to avoid events.
 - d. Instances where the ineffective use of these tools has caused or contributed to plant events.
 - e. Positive behaviors that were observed including but not limited to HU Tools use, safety practices, and behaviors aligned with our Picture of Excellence, ACEMAN, and the Barriers for Excellence.

3.3 Site Human Performance Coordinator:

1. Report observation trend results to plant management, the Site Human Performance Improvement and Site Human Performance Steering Team.
2. Provide oversight and general administration of the Observation Program at their respective site.
3. Conduct effectiveness reviews of the Observation Program against station performance (Corrective Action Process).
4. Communicate proposed changes to the Observation Program for approval to the Human Performance Peer Group prior to implementation.
5. Maintain Observation Program performance indicator(s).

3.4 All Site Individuals:

1. Conduct observations and provide feedback and coaching to their peers. Document observations using the Observation Program.
2. Perform tasks in a thoughtful and conscientious manner.

4.0 DEFINITIONS

4.1 Behaviors - Observable (action) activity by an individual; “what people do.”

4.2 Coaching - The process of observing behaviors, comparing them to desired behaviors and providing feedback by reinforcing desired behaviors and correcting those that do not meet expectations.

4.3 Contact Time - The cumulative amount of time spent in the company of employees, observing and coaching their behaviors.

4.4 Leader - Any individual who influences the actions of others or organizational processes in a constructive manner.

4.5 Observation - The process by which an individual observes work activities and evaluates that work against established standards. The observation includes providing timely positive and honest performance feedback to observed personnel.

The observation process contains four steps/phases including:

- a. Preparation
- b. Conduct
- c. Follow-up / Feedback
- d. Documentation

4.6 Observation Card - A ‘focused’ observational tool used to target a specific area of interest or general task within a specific department with the idea of improving performance. Each card lists expectations for the desired behaviors, which should be demonstrated during performance of an activity.

4.7 Observer - Any individual monitoring and documenting an observation

4.8 Paired Observation – Also known as “Coach the Coach”; this is an observation performed with one individual observing the person performing the task while another individual observes the observer. This allows for coaching to occur so that individuals perform better quality observations.

4.9 Thumbs Down – The behavior was not properly performed in accordance with procedure or management expectation.

4.10 Thumbs Up – The behavior was properly performed, or the behavior was performed in such a manner so as to stand out for recognition or to be used as a model for others.

5.0 REQUIREMENTS

5.1 OBSERVATION PHILOSOPHY

5.1.1 Observations are useful tools for identifying problems and noting what may seemingly be insignificant events. The evaluation of human performance events has shown that the causes of inconsequential events are similar to those that have severe consequence. Real success in minimizing the occurrence of severe events should be realized by focusing on defense-in-depth. Identification and timely correction of “low-level” conditions such as process issues, procedure inadequacies, organizational weaknesses, etc. that cause such events can prevent consequential events.

5.1.2 Significant human errors do not occur without warning and are preventable. Numerous minor events (precursors) usually precede significant events. Individuals working in error-likely situations usually make several minor errors that could later lead to or trigger a significant event. When one purposely performs an observation looking for error-likely situations and also looks for how effectively individuals are using error reduction tools to reduce their vulnerability to error, needed interventions can be identified to avoid subsequent significant mistakes.

5.1.3 In any given workplace situation, a combination of internal (psychological) and external (cultural/latent organizational weaknesses) factors are at work to generate human errors. These are the error likely situations and flawed barriers (defenses) that exist within our organization. To counter these issues, systems or processes are implemented to aid in minimizing human errors and strengthen barriers (defenses). Knowing which error likely situations and weak/flawed barriers (defenses) are present, one can become conscious of how they manifest themselves and also how they interrelate. An observation program which is looking for, measuring, and analyzing human error likely situations and weak/flawed barriers (defenses) should provide opportunities to proactively intervene versus reactively respond.

5.1.4 Performing observations can also be an excellent platform for displaying leadership skills and enhancing working relationships. By focusing on leadership during the observation, the emphasis should be shifted from the traditional looking for errors, to looking for ways to enhance plant processes and improve the quality of work performed by workers. This places the focus on the observer and the team instead of the worker.

5.1.5 The Observation Program contributes to a robust safety culture, enhances direct management involvement in site activities, improves management's awareness of strengths and areas for improvement, and allows for reinforcement of expectations and standards. Cross functional observations can provide unique perspectives of performance and can result in improvement in other groups through sharing and emulating observed strengths.

5.1.6 In summary, focusing exclusively on human error reduction is a faulty strategy to prevent events; it simply reduces the time between such occasions. Improving defenses should minimize severity.

5.2 OBSERVATION OBJECTIVES

5.2.1 The expected outcome for the Observation Program is to accomplish the following objectives:

1. Provide specific guidance for implementing a consistent Observation Program.
2. Establish a consistent method for documenting observation results.
3. Facilitate timely coaching and performance feedback to individual(s) being observed.
4. Provide opportunities to improve human performance by correcting at-risk behaviors and reinforcing desired behaviors.
5. Provide guidance for consistent techniques, skills and terminology for conducting observations and assessing the effectiveness of observations.
6. Evaluate the quality of plant programs, values/culture, standards and expectations, processes, practices, procedures, supervision and training (Organizational Effectiveness).
7. Provide timely interventions to reduce the severity and frequency of events.
8. Promote participation in the Observation Program at all levels; management, supervisors, and individual contributors (peers).

9. Provide a means for analyzing, tracking, trending and reporting site, department, and individual performance.
10. Promote desired behaviors to ensure the organization supports safe, reliable and predictable operation. Ensure standards and expectations are clearly understood, communicated, implemented and reinforced on a continuous basis.
11. Validate the effectiveness of training and provide necessary feedback to training when gaps are identified.
12. Provide opportunities for “Co-Worker Coaching”. Co-Worker Coaching promotes a culture involving respect, fairness, and honesty that places a high value on healthy relationships among individuals and among groups. This is evident in the work quality, the conduct of business, and the way communication occurs.

5.3 EXPECTATIONS FOR PERFORMING OBSERVATIONS {C001}

5.3.1 The following expectations for conducting and documenting observations are applicable to all members of the Leadership Team who are part of the required population of observers (See Attachment 1).

1. Each observation should last at least 30 minutes to receive contact time credit. Multiple cards may be used during one observation; however, in order to receive contact time credit, the observation must be greater than 30 minutes in length.
2. When multiple cards are used for a single observation, care is to be taken so as NOT to document the total time for the entire observation on each card. In other words, document actual time spent using a specific card; total observation time should equal the summed time for all cards used.
3. A total of eight (8) hours of contact time per month should be required for each Manager and Supervisor. One (1) hour of the eight (8) hours may consist of a Management Observation of Training. Senior Managers are required to have four (4) hours of contact time per month.
4. Training Management will be required to perform eight (8) hours that may consist of seven (7) hours of observations of training.
5. Observations of On the Job Training (OJT), Task Proficiency Evaluation (TPE), and Mentoring are NOT subject to the one (1) hour MOT limitation. Training observations of Classroom/Lab Instructor Evaluation and Simulator Instructor Evaluations do not qualify for contact time.
6. Exception to the four (4) or eight (8) hour monthly requirement is allowed for illness, special assignments, training, vacation, etc. only in a given calendar month under the following guidelines:

Number of Weeks Off in Calendar Month	Contact Time Required
Less than Two (2) Weeks	Eight (8) Hours
Two (2) Weeks	Four (4) Hours
Three (3) Weeks	Two (2) Hours

7. Selection of tasks to observe can be driven by multiple methods; Plan of the Day, Leadership Meetings, Critical or Infrequently performed Tasks, etc.

NOTE:	<ul style="list-style-type: none"> Credit for observations of meetings will generally <u>NOT</u> be given except for meetings related to production, challenge boards, D-15 Meetings, CAP Screening, Performance Assessment Review Board (PARB), and engineering modifications.
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5.3.2 It is strongly recommended, but NOT mandatory, that observations for Managers and Supervisors include a combination of the following:

1. Two (2) performance observations within their department,
2. One (1) outside their department, and
3. One (1) observing another Leadership Team Member (Paired Observation or Coach the Coach) within their department.

5.3.3 Observations are to be documented using approved Observation and site-specific cards only.

NOTE:	In accordance with FP-PA-ARP-01, a CAP must be written for observed behaviors that are conditions adverse to quality.
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5.3.4 Observation results are to be entered into the Observation Database (Passport) in a timely manner (within one week of the observation).

5.4 ELEMENTS FOR CONDUCTING OBSERVATIONS {C001}

Observations play a major role in the Site's Self-Assessment Program, and are geared towards the prevention of events. This requires behavior based coaching/feedback with a consistent set of standards and expectations for behavior that are continually reinforced. Behavior observations that constitute conditions adverse to quality SHALL be documented using the Corrective Action Program.

5.4.1 PREPARATION FOR PERFORMING AN OBSERVATION

1. Preparing for an observation can take the same amount of time as the actual observation and is perhaps the most important phase in the observation process.
2. Plan ahead by blocking out time in your day to conduct the observation with quality. Remember, your credibility is on the line each time you conduct an observation.
3. The observer should perform the following:
 - a. Select an activity to observe. Activities should be selected based on one or more of the following elements:
 - Routine monitoring to ensure expectations are met
 - Past and/or present performance concerns, targets of opportunity
 - Safety (personnel, industrial, nuclear and radiological)
 - Functional importance
 - Probabilistic safety analysis (PSA) considerations
 - Frequency of task
 - Scheduling of task (e.g., periodically select activities performed off-normal hours)
 - Assignment of personnel (e.g., recently qualified worker)
 - Plan of the day discussions

- Management discretion

 - b. Focus areas specifically targeted to address performance gaps identified through observations or the Corrective Action Process should get high priority as activities to be observed.

 - c. Prior to performing an observation, observers should be familiar with accepted expectations and standards for activities being observed. You must fully understand the right standards to be applied that should measure successful task performance

 - d. Review associated documents (e.g., work packages, procedures, checklists, qualification cards, and/or supporting training materials).

 - e. Identify what you expect to see during the observation and select the appropriate Observation Card. Electronic and paper observation cards are available for your use.
4. Review applicable administrative program requirements that workers should be expected to follow, e.g., FME, radiation worker practices, safety rules, housekeeping, security, problem identification and reporting, and contractor control.

 5. Ensure you are familiar with the aspects and accepted standards and expectations for successful completion of activities being observed.

 6. Coordinate with individual(s) or work group(s) supervisors prior to conducting observations.

5.4.2 OBSERVATION PRACTICES

As has been stated, the goal of human performance improvement is to correct undesirable behaviors and reinforce desired behaviors resulting in a reduced number of errors and elimination of significant events. Typical observation practices used by an observer that improve human performance include:

1. Checking work against a work plan.

2. Determining if scope of work changed and how the change was communicated.

3. Assessing presence of obstacles that affected performance of activity.

4. Identifying and anticipating error-likely situations.

5. Verifying availability and correct usage of appropriate tools.
6. Asking if workers have enough information to complete the task, and determining if the workers possess the proper skills to perform the work activity.
7. Verifying workers accurately perceive risk and priorities associated with observed activity.
8. Monitoring overall work/training environment.

5.4.3 CONDUCTING THE OBSERVATION

NOTE:

Even with the benefit of notes, it is hard to accurately document the details of your observation several days after it was performed. Take the time to summarize in rough draft the key things you saw, along with the things you need to follow up on to be able to write the full report.

1. Observations should be at least 30 minutes in duration. Emphasis should, however, be placed on spending enough contact time to allow a routine standard level of performance and behavior to be observed.
2. It is important to emphasize that weaknesses seen in an observation can be indicators of a problem. Be sure personnel understand that the observation is not intended to be used to criticize them personally, but to look for indicators of flawed defenses in the organization.
3. It is recommended that you obtain an Observation card to support your observation activity (paper or electronic). While not mandatory during the observation, the cards provide areas to consider and documentation on the cards should be required at the end of the observation.
4. If an activity is performed in accordance with a procedure, the observer should have a reference copy of the procedure during performance.
5. Identify yourself as an observer and discuss anticipated interactions with personnel being observed (e.g., when to ask and answer questions).
6. Evaluate the overall processes supporting the activity along with the administrative controls during the observation. What is affecting performance of the activity? (e.g., procedure or other guidance/reference material in use; planning, scheduling, and other work controls; coordination with other work groups, etc.) Questions to focus on here could include:
 - a. How clear are procedures, manuals, work orders, log sheets, radiation work permits (RWPs), and other reference materials?

- b. Are the copies in use controlled, up-to-date, accurate and properly maintained?
 - c. Could the job be performed more effectively and with less opportunity for error if special controls are established?
- 7. Observations should be conducted in a manner that does not interfere with performance of the activity. However, an observer should intervene if:
 - a. Personnel, radiological or plant safety becomes an issue, or
 - b. Procedural violations occur as a result of continuing the observed behavior(s).
- 8. If work stoppage occurs, the responsible supervisor and/or manager should be notified. Authorization to recommence work is required by a responsible supervisor or manager.
- 9. Some actions may require that you ask the worker(s) questions. Take care not to interrupt dynamic activities by asking observation questions.
- 10. Try to ask required questions when worker(s) first arrive at the job site, during a natural break, or pick an appropriate time after the work is completed. Avoid lunch and break periods.
- 11. Take thorough notes; be as quantitative and qualitative in your note taking as you can. It is vitally important that your notes are factual.
- 12. Elicit feedback from the worker if necessary. Clearly understand what is seen and heard during the observation. Trust in the integrity of the process can only come from the level of trust and confidence workers place in the observer's competence and honesty.
- 13. Observed weaknesses should be noted. For trending purposes, each weakness observed needs to be addressed with a "why" question (e.g. "Why did you do it that way?" or "Why did you not follow the procedure?").

5.4.4 INITIATE FOLLOW-UP ACTIONS / FEEDBACK

The key to the effectiveness of an observation lies with the observer's understanding of the issues, their perspective as to why an element of an observation is an issue, and their mental list of other proven solutions. The observer must be able to put the significance of a set of facts into the value perspective of the person or persons being observed. The evaluator must understand an issue and be able to communicate why it is an issue. Feedback should be critical, fair, and balanced. The following are actions to be taken to address follow-up and feedback issue:

1. Provide immediate (within twenty four (24) hours) coaching/feedback (positive and honest) to the individual(s) or work group and their supervisor upon completion of the observation. If it is not possible at that time to provide immediate coaching/feedback, then make an appointment to have the discussion with as many of the workers and supervisors as soon as practical.
2. Observers should share results of the completed observation with the person or persons observed. This SHALL include both coaching in areas in need of improvement as well as identifying positive performance attributes and highlighting them to allow these to be built on and incorporated during other activities.
3. Observers should ensure all questions related to the observation are answered in a timely manner.
4. Initiate additional corrective actions, e.g., action requests, procedure changes, work requests, requests for training, etc., when applicable.
5. The Observation Program does not replace any program for reporting adverse conditions or initiating corrective action. Any observed conditions or actions which require the initiation of corrective actions, a work request, or other process change SHALL be initiated in accordance with the applicable procedure.

5.4.5 DOCUMENT THE OBSERVATION

1. As noted previously, it is recommended that the Observation card be used during the actual activity observation. Regardless of whether it's used during or following the actual activity, an Observation Card should be completed for all observations.
2. The following guidance is provided for completing an observation card.
 - a. Access the desired Observation card for the observed activity (paper or electronic). Cards are located on the Nuclear Department Report webpage.

- b. Record the date, work activity, department/work group observed, start time of the observation, and time finished with observation.
- c. Answer all listed questions either 'Thumbs Up' (U) 'Thumbs Down' (D), or 'Not Observed' (N).
- d. When an expectation is not met (e.g., typically when a question is marked 'Thumbs Down'), the behavior should be documented in the attribute notes section. Also document any undesirable behavior or condition and actions taken (e.g., immediate coaching, issue discussed at departmental meeting, action request, procedure change request, request for training, etc.). This should include why the observed expectation was not met.
- e. Additional comments related to the observation may be recorded in the attribute notes section as well (e.g., performance that exceeds expectations or additional clarifying information related to a particular question).
- f. Observers are required to enter observation information into the Observation Program (Passport); however, there may be times when this is not possible. If an observer is unable to enter observation information then they are to send completed paper copies of observation cards for electronic processing (Observation Database (Passport) entry) to the appropriate department clerical staff or to the Performance Assessment Department, for informational, trending, and future reporting. The Job Aid for entering observations is located on the Passport Webpage.
- g. Managers should review the observation reports of their direct reports, determine whether the observation met substantive feedback standards, and complete the appropriate attribute in the OBS.
- h. Manager(s) should ensure that observation data is trended for their departments and initiate additional corrective actions, training requests, etc. if appropriate for targeted areas resulting from adverse trends to ensure behavior changes and performance improvement is taking place.
- i. The Department Human Performance Liaison should periodically (see HU Program procedure for details) review observation reports for quality and trending purposes.
- j. The criteria used to determine whether an observation is substantive is as follows:

- 1) At least one Thumbs Down, or a “standout/model” Thumbs Up behavior is identified.
- 2) The behavior or condition is clearly and specifically described such that a cold reader can understand and learn from the observation, including information for the first step of the “Why Staircase” (e.g., why wasn’t STAR used).
- 3) Evidence exists that feedback was provided to the observed individual for behavioral related items.
- 4) A CAP was initiated when appropriate and cross-referenced to the OBS.

6.0 RECORDS

None

7.0 REFERENCES

7.1 SOURCE DOCUMENTS

1. CD 3.3, “Performance Assessment Program”
2. CD 4.2, “Human Performance Improvement Program” reference documents
3. FP-PA-HU-01, “Human Performance Program”
4. FP-PA-HU-02, “Human Performance Tools”
5. FP-PA-HU-04, “Picture of Excellence”
6. FP-PA-ARP-01, “Action Request Process”

7.2 REFERENCE DOCUMENTS

1. FP-PA-ARP-01, “Action Request Process”

7.3 COMMITMENTS

1. {C001} This supports a Regulatory Commitment made by NMC to the NRC via letter dated 10/04/2004 in response to RIII-04-A-0051, which discussed defining clear observation requirements including frequency as well as quality requirements.

8.0 REVISION SUMMARY

8.1.1 Section 4 – Added definitions for Thumbs Up and Thumbs Down

8.1.2 Section 5.4.5 – Added criteria for substantive observation and guidance for supervision to review observations of their direct reports

8.1.3 Section 7.2 – Added FP-PA-ARP-01

9.0 ATTACHMENTS

1. Attachment 1, Required Leadership Team Observation Population

Attachment 1**Required Leadership Team Observation Population**

Below is a listing of those individuals (by position) that are required to conduct observations on a monthly basis in accordance with the requirements of this procedure. Department managers are responsible for notifying the Human Performance Coordinator of any changes that occur to this list. This is so that accurate accounting of observations on a monthly basis can be accomplished.

Monthly Contact Time Four (4) Hrs

Director, Site Operations
Site Engineering Director
Plant Manager

Monthly Contact Time Eight (8) Hrs

Business Support Manager
Engineering Plant and Systems Manager and Direct Reports (Supervisors)
Engineering Design Manager and Direct Reports (Supervisors)
Engineering Programs Manager and Direct Reports (Supervisors)
Training Manager
Chemistry Manager and Direct Reports (Supervisors)
Maintenance Manager and Direct Reports (General Supervisor and Supervisors)
Radiation Protection Manager and Direct Reports (Supervisors)
Operations Manager
Assistant Operations Manager
Operations Support Manager
Work Control Center Manager
Operations Shift Managers
Operations Control Room Supervisors
Outage and Scheduling Manager
Outage Manager
Scheduling Manager
Manager of Projects
Security Manager

NOTE: Specific requirements (4 hour / 8 hour) for Managers and Supervisors working in the headquarters office will be determined by the Fleet PARB Chairman.