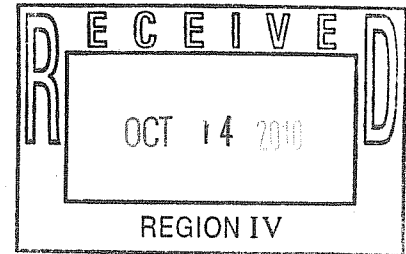


October 12, 2010

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
Response to the U.S. Nuclear Regulatory Commission Letter
Regarding Midcycle Performance Review and Inspection Plan at
San Onofre Nuclear Generating Station (dated September 1, 2010)**

References: See Attachment 1

Dear Mr. Collins:

This letter provides the response of Southern California Edison Company (SCE) to your September 1, 2010 letter regarding the midcycle performance review and inspection plan at the San Onofre Nuclear Generating Station (SONGS), which covered the first half of calendar year 2010 (Reference 1). This response was originally scheduled to be provided to the Nuclear Regulatory Commission (NRC) on October 1, 2010. However, SCE requested an additional two weeks for the response. This extension was agreed to in discussions with Kriss Kennedy, Director, Division of Reactor Projects, NRC Region IV.

The NRC noted in the midcycle letter that plant performance at SONGS, Unit 2, was within the Regulatory Response column of the NRC's Action Matrix, based on one White finding in the Mitigating Systems Cornerstone, while plant performance at SONGS, Unit 3, was within the Licensee Response column of the NRC's Action Matrix. The letter also discussed the status of open findings and other regulatory and performance issues.

The NRC has requested that SCE provide a written response to the midcycle review that includes information regarding initiatives associated with the degraded battery breaker connection White finding and the open NRC crosscutting themes in human performance (HU), problem identification and resolution (PI&R), and safety conscious work environment (SCWE). The requested information is to include those specific corrective actions in the Site Integrated Business Plan (SIBP), including schedules, milestones, and performance monitoring measures that SCE has taken and plans to take to achieve performance improvement at SONGS.

October 12, 2010

As set forth below, this letter addresses: (1) the actions not previously made available to the NRC that SCE has taken and is taking to address the White finding; (2) SCE's specific corrective actions, schedules, and milestones in the SIBP to address the crosscutting themes in HU, PI&R and SCWE; and (3) performance monitoring measures for the SCE actions.

These actions are a subset of the overall improvement plans contained in the SIBP. These overall improvement plans cover additional aspects of HU, PI&R and Safety Culture, as well as improvements in the overall areas of Organizational Excellence, Operational Focus, Equipment Reliability and Continuous Learning.

The metrics for the loose battery breaker connection White finding and the open crosscutting themes in HU, PI&R and SCWE are being included in the SONGS Management Review Meeting (MRM) package. Until closure of the associated issue or theme, these metrics will be reviewed periodically in MRMs. Subsequently, normal monitoring of these metrics will continue. Under that normal monitoring, for any metric that is in the "yellow or red" performance bands, SCE will take actions through the corrective action program (CAP) to address the adverse trend.

ACTIONS AND PERFORMANCE MEASURES TO ADDRESS THE DEGRADED BATTERY BREAKER CONNECTION WHITE FINDING

Actions to Address Degraded Battery Breaker Connection Issue

Following SCE's discovery of a degraded battery breaker connection on March 25, 2008, SCE conducted three cause evaluations, which were later determined not to have identified all of the underlying issues and causes. On December 19, 2008, the NRC notified SCE that the degraded battery breaker connection identified in March 2008 and associated problems in the cause evaluations constituted a White finding (Reference 5). SCE subsequently conducted an additional cause evaluation of the degraded battery breaker connection, the March 25, 2008 human performance issues, and the inadequate cause evaluations.

Ninety-two corrective actions were identified to address the three root cause areas of: 1) Inadequate Maintenance Planning, Field Implementation, and Testing to Prevent a Mistake in the Field; 2) Inadequate Procedural Adherence; and 3) Inadequate Station Ownership, Priority, and Accountability of the CAP with Respect to Cause Evaluations. SCE has previously made available 42 of these actions to the NRC for its review. The remaining 50 actions are listed, along with the status of each action, in Attachment 2. The majority of these remaining corrective actions are focused on equipment, while the other corrective actions relate to improvements to aspects of the CAP or work performance. Of the 50 remaining actions, all but five are closed, including completion of any applicable closure review process. Of the five open actions, four are complete except for the closure review process. The final corrective action requires presenting the case study of the event to SONGS leaders (supervisors and above) annually through the end of 2011.

Performance Measures for Degraded Battery Breaker Connection Issue

SCE has identified performance measures for assessing the effectiveness of its corrective actions that address the degraded battery breaker connection. These metrics and their descriptions, aligned to the three root causes of the event, include:

- 1) Inadequate Maintenance Planning, Field Implementation, and Testing to Prevent a Mistake in the Field
 - *Written Instruction Quality Count* – A three-month rolling average of the number of times written instruction quality impacts the completion of tasks or leads to errors in performance.
 - *Written Instruction Use Errors* – A three-month rolling average of the written instruction use error rate per 10,000 person hours per month.
- 2) Inadequate Procedural Adherence
 - *Written Instruction Use Errors* – A three-month rolling average of the written instruction use error rate per 10,000 person hours per month.
 - *Conservative Decision Making* – A three-month rolling average of the number of nuclear notifications that have trend codes associated with non-conservative decision making.
- 3) Inadequate Station Ownership, Priority, and Accountability of the CAP with Respect to Cause Evaluations
 - *Cause Evaluation Quality* – The quality of Root Cause Evaluations (RCEs) and Apparent Cause Evaluations (ACEs) as reviewed by the Corrective Action Review Board (CARB) using standard review criteria.
 - *Root Cause Evaluation Average Time to Perform Cause Evaluations – Adjusted* – The average time to perform RCEs from assignment of the RCE through CARB approval.
 - *Apparent Cause Evaluation Average Time to Perform Cause Evaluations – Adjusted* – The average time to perform ACEs from assignment of the ACE through CARB approval.

In addition to these specific metrics related to the causes of the loose battery breaker connection issue, SCE also has broader sets of metrics and reviews to more comprehensively measure HU and PI&R performance.

SCE is also applying a number of additional performance measures and management tools to monitor the effectiveness of the corrective actions for the degraded battery

breaker connection issue. Periodic MRMs, Effectiveness Review Challenge Boards, Human Performance Review Boards, and Closure Review Board (CRB) verification of corrective action completion are other means used to monitor and evaluate performance and progress toward closure of this issue. SCE also uses the Leadership Observation Engagement Trending System (LETS) to provide ongoing monitoring of behaviors related to the causes of the degraded battery breaker connection issue.

ACTIONS AND PERFORMANCE MEASURES TO ADDRESS OPEN HU CROSSCUTTING THEMES

Actions to Address Open HU Crosscutting Themes Included in the SIBP

The NRC has identified the following five themes in the HU crosscutting area:

- 1) Decision making involving the theme of using conservative assumptions [H.1(b)]
- 2) Resources involving the theme of providing adequate design documentation, procedures, and work instructions [H.2(c)]
- 3) Work practices involving the theme of using human error prevention techniques [H.4(a)]
- 4) Communicating expectations regarding procedural compliance and personnel following procedures [H.4(b)]
- 5) Ensuring supervisory and management oversight of work activities [H.4(c)]

In order to address each of the themes, SCE initially performed cause evaluations to identify corrective actions necessary to address each of the themes. More recently, SCE performed an additional cause evaluation to identify the current gaps between the desired performance in each of the themes and the actual performance at SONGS. As part of this cause evaluation, the evaluation team reviewed previously completed cause evaluations, NRC inspection results, CARB meeting minutes, Nuclear Oversight Board feedback, Performance Indicator/Metrics status, and the results of Effectiveness Review Challenge Boards. For each of the gaps, direct causes were identified, and corrective actions to address these causes were either developed or selected for additional focus from the existing SIBP. The resulting list of corrective actions, aligned according to each of the five themes, is presented in Attachment 3, which includes a description of each action, along with the schedule and current status.

Performance Measures for HU Open Crosscutting Themes

SCE has established performance metrics to measure progress in improving HU performance. These metrics and their descriptions, arranged according to the five identified themes, include:

- 1) Decision making involving the theme of using conservative assumptions [H.1(b)]

- *Conservative Decision Making* – A three-month rolling average of the number of nuclear notifications that have trend codes associated with non-conservative decision making.
 - *Operability Determination Quality* – The overall quality of Operability Determinations based on a specified scoring process used by the Operability Determination Quality Review Board (OD-QRB) and the reject rate of these determinations.
- 2) Resources involving the theme of providing adequate design documentation, procedures, and work instructions [H.2(c)]
- *Written Instruction Quality Count* – A three-month rolling average of the number of times written instruction quality impacts the completion of tasks or leads to errors in performance.
 - *Site Procedure Change Request Backlog* – The total number of open Procedure Change Requests (PCRs).
 - *Procedure Change Request Backlog Average Age* – The average age (in days) of the backlogged technical, administrative and modification PCRs.
 - *Site Procedure Change Request Throughput* – The number of new PCRs, completed PCRs, and the net PCR backlog change each month.
- 3) Work practices involving the theme of using human error prevention techniques [H.4(a)]
- *Station Event Rate* – A ratio of the number of division events meeting clock reset criteria (x 10,000) to the total number of person hours worked over the last 18 months.
 - *Divisional Event Rate* – A ratio of the number of division events meeting clock reset criteria (x 10,000) to the total number of person hours worked over the last 18 months for key site divisions.
 - *Human Performance Tool Use* – A three-month rolling average of the number of nuclear notifications that have trend codes associated with lack of human performance tool usage.
 - *Total Industrial Safety Accident Rate* – Rate, per 200,000 hours worked, of selected OSHA recordable injuries.
- 4) Communicating expectations regarding procedural compliance and personnel following procedures [H.4(b)]
- *Written Instruction Use Errors* – A three-month rolling average of the written instruction use error rate per 10,000 person hours per month.

- *Station Event Rate* – A ratio of the number of division events meeting clock reset criteria (x 10,000) to the total number of person hours worked over the last 18 months.
 - *Divisional Event Rate* – A ratio of the number of division events meeting clock reset criteria (x 10,000) to the total number of person hours worked over the last 18 months for key site divisions.
- 5) Ensuring supervisory and management oversight of work activities [H.4(c)]
- *Severity Index* – The weighted average of human performance nuclear notifications based on severity levels.
 - *Leadership Engagement*– A ratio of the number of leadership engagements performed by identified leaders compared to the monthly goal.
 - *Supervisory Oversight Trends* – Number of issues identified by nuclear notifications involving inadequate supervisory/management oversight.

In addition to the HU metrics, SCE uses a number of additional performance measures to monitor the effectiveness of the HU corrective actions. Periodic MRMs, Effectiveness Review Challenge Boards, and CRB verification of HU corrective action completion are other means used to monitor and evaluate HU performance and progress. SCE also uses the LETS to provide ongoing monitoring of behaviors related to the HU open crosscutting themes.

ACTIONS AND PERFORMANCE MEASURES TO ADDRESS OPEN PI&R CROSSCUTTING THEMES

Actions to Address Open PI&R Crosscutting Themes Included in the SIBP

The NRC has identified the following three themes in the PI&R crosscutting area:

- 1) Implementing the CAP with a low threshold for identifying issues [P.1(a)]
- 2) CAP involving the theme of thoroughly evaluating problems such that the resolutions address causes and extent of conditions [P.1(c)]
- 3) CAP involving the theme of taking appropriate corrective actions to address safety issues in a timely manner, commensurate with their safety significance [P.1(d)]

SCE initially performed cause evaluations to identify the corrective actions necessary to address each of the three themes. Recently, SCE performed an additional cause evaluation to identify the current gaps between the desired performance in each of the themes and the actual performance at SONGS. As part of this cause evaluation, the evaluation team reviewed previously completed cause evaluations, NRC inspection

results, CARB meeting minutes, Nuclear Oversight Board feedback, Performance Indicator/Metrics status, and the results of Effectiveness Review Challenge Boards. For each of the gaps, direct causes were identified, and corrective actions to address these causes were either developed or selected for additional focus from the existing SIBP. A number of check and adjust actions were identified, in addition to the previously-identified PI&R corrective actions that were determined by the team to directly address the three themes. The resulting list of corrective actions, aligned according to each of the three themes, is presented in Attachment 4, which includes a description of each action, along with the schedule and current status.

Performance Measures for PI&R Open Crosscutting Themes

SCE has established performance metrics to measure progress in improving PI&R performance. These metrics and their descriptions, arranged according to the three identified themes, include:

- 1) Implementing the CAP with a low threshold for identifying issues [P.1(a)]
 - *Notifications Generated* – The number of nuclear notifications generated each month.
 - *Timeliness of Notifications (Station)* – The percentage of nuclear notifications, station-wide, that were late or missed.
 - *Timeliness of Notifications (Division)* – The number of nuclear notifications that were late or missed.
- 2) CAP involving the theme of thoroughly evaluating problems such that the resolutions address causes and extent of conditions [P.1(c)]
 - *Cause Evaluation Quality* – The quality of RCEs and ACEs as reviewed by the CARB using standard review criteria.
 - *Root Cause Evaluation (RCE) Quality* – The number of RCEs that have been submitted and approved or were determined to require rework by the CARB.
 - *Apparent Cause Evaluation (ACE) Quality* – The number of ACEs that have been submitted and approved or were determined to require rework by the CARB.
 - *Cause Evaluation Rework Elements* – Elements identified as needing improvement in cause evaluations requiring rework.
 - *Root Cause Evaluation/Apparent Cause Evaluation (RCE/ACE) Rework by Division* – The total number of cause evaluations (RCEs and ACEs) assigned as rework by the CARB by division.

- *Operability Determination Quality* – The overall quality of Operability Determinations based on a specified scoring process used by the Operability Determination Quality Review Board (OD-QRB) and the reject rate of these determinations.
- 3) CAP involving the theme of taking appropriate corrective actions to address safety issues in a timely manner, commensurate with their safety significance [P.1(d)]
- *Root Cause Evaluation Average Time to Perform – Adjusted* – The average time to perform RCEs from assignment of the RCE through CARB approval.
 - *Apparent Cause Evaluation Average Time to Perform – Adjusted* – The average time to perform ACEs from assignment of the ACE through CARB approval.
 - *Cause Evaluation Work-Down Curve* – The number of open RCEs and ACEs at the end of the month.
 - *Effectiveness of Corrective Actions to Prevent Recurrence (CAPRs)* – The number of Effectiveness Reviews determined by the CARB as effective or ineffective.
 - *Quality of Corrective Action Implementation* – The quality (based on the 1st time presented to CRB) of the actions that are reviewed by the CRB.
 - *Repeat Events* – The number of “repeat events” as per defined criteria.
 - *Corrective Actions – Open* – The number of corrective actions open at the end of the month.
 - *Corrective Actions – Average Age* – The average age of open corrective actions.

In addition to the PI&R metrics, SCE uses a number of additional performance measures to monitor the effectiveness of the PI&R corrective actions. Periodic MRMs, Effectiveness Review Challenge Boards, Operational Focus Meetings, and CRB verification of PI&R corrective action completion are other means used to monitor and evaluate PI&R performance and progress. SCE also uses the LETS to provide ongoing monitoring of behaviors related to the PI&R open crosscutting themes. In addition, SCE also monitors CAP performance through use of the CAP Coordinator, CARB, and CAP Manager functions.

ACTIONS AND PERFORMANCE MEASURES TO ADDRESS THE CROSSCUTTING THEME IN THE AREA OF SCWE

Actions to Address the SCWE Crosscutting Theme Included in the SIBP

On March 2, 2010, the NRC issued a Chilling Effect Letter (Reference 4) to SCE regarding work environment issues at SONGS. As a consequence of issuance of the Chilling Effect Letter, the NRC identified a crosscutting theme in the area of SCWE in the midcycle performance review of September 1, 2010. During late 2009 and early 2010, SCE conducted a root cause evaluation of SCWE issues to understand the issues and their causes, and take corrective action to address them. In its response to the Chilling Effect Letter on March 31, 2010 (Reference 3), SCE presented 33 SCWE corrective actions and their status.

Subsequently, SCE performed additional surveys and focus group interviews to ensure that SCWE affected groups were identified and to evaluate progress. SCE reviewed the results of its performance monitoring measures against the SCWE issues to identify the gaps between the desired SCWE performance and the actual SCWE performance at SONGS. Based upon this gap analysis of the SCWE issues and corrective actions, SCE identified three additional “check and adjust” actions in its six-month response to the Chilling Effect Letter (Reference 2). One of these “check and adjust” actions was applicable to six different organizations, so it appears as six separate corrective actions in SIBP, rather than as one action.

References 2 and 3 describe the establishment of the “Four Pillar” model as the framework for a strong SCWE at SONGS, 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

The list of corrective actions that address the open SCWE crosscutting theme is provided in Attachment 5, and is organized under these four pillars. These actions were previously provided to the NRC in Reference 2.

Performance Measures for the SCWE Crosscutting Theme

SCE has established performance metrics to measure progress in improving SCWE performance. These metrics and their descriptions include:

- *Anonymous Notifications* – The number of anonymous nuclear notifications submitted.

- *General Work Environment (GWE) Notifications* – The number of GWE notifications submitted monthly.¹
- *Labor Grievances* – The number of open second and third step grievances that map to GWE trend codes.
- *Employee Concerns Program (ECP) Cases/NRC Allegations* – The number of ECP cases and NRC allegations received and the ratio of ECP cases to NRC allegations.
- *Early Interventions* – The number of early interventions conducted by the ECP group.
- *Anonymous Employee Concern Program (ECP) Concerns* – The percentage of anonymous ECP issues raised through various data sources.
- *Employee Concerns – Open Cases > 45 Days* – Displays the number of concerns that are received by the ECP that are open greater than 45 days on a monthly basis.
- *Employee Concerns Program (ECP) Group Contacts* – The number of contacts made by ECP personnel.
- *Harassment, Intimidation, Retaliation, Discrimination (HIRD)* – The number of substantiated HIRD concerns raised through various data sources, displayed as a six-month rolling total.

In addition to the SCWE metrics, SCE uses a number of additional performance measures to monitor the effectiveness of the SCWE corrective actions. SCE uses SCWE Review Boards, Effectiveness Review Challenge Boards, independent focus group interviews regarding SCWE, periodic surveys of the SONGS workforce on SCWE and testing for SCWE training programs to monitor and evaluate SCWE performance and progress. SCE also plans to conduct a site-wide Safety Culture assessment in 2011.

CONCLUSION

As noted in the attachments to this letter, SCE has implemented numerous corrective actions to address the degraded battery breaker connection White finding and the open crosscutting themes in the areas of HU, PI&R and SCWE. We have put in place improved programs and processes to achieve better performance results. However, we

¹ The definition and title for the GWE Notification metric has been revised from the metric provided in the August 31, 2010 response to the Chilling Effect Letter (Reference 2). In addition, Reference 2 also included an additional metric titled, "Safety Conscious Work Environment Review Boards (SCWERB)." Based on a challenge board review of the SCWE performance indicators, SCE determined that the SCWERB metric was not needed because the implementation of this process is governed by other controls.

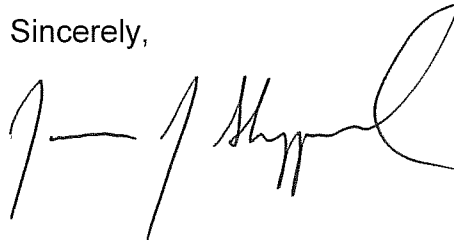
October 12, 2010

clearly understand that more improvement is needed. SCE continues to vigorously pursue the additional actions identified in the attachments to improve performance at SONGS, and will keep your staff informed of our progress. Clear and sustained performance improvement, consistently reflected in objective measures of performance, is necessary to meet our performance expectations. SCE will closely monitor the effectiveness of its actions using its established metrics and other performance measures. SCE is dedicated to achieving performance improvement.

There are no new commitments contained in this letter or its attachments. The actions and metrics described in this letter are controlled via SONGS procedures and are subject to adjustment pursuant to those procedures.

Please do not hesitate to call me or Richard St. Onge, Director of Nuclear Regulatory Affairs, if you have any questions or require further information.

Sincerely,



Attachments:

- Attachment 1 - References
- Attachment 2 - Actions to Address the Degraded Battery Breaker Connection White Finding
- Attachment 3 - Actions to Address Open HU Crosscutting Themes Included in the SIBP
- Attachment 4 - Actions to Address Open PI&R Crosscutting Themes Included in the SIBP
- Attachment 5 - Actions to Address Open SCWE Crosscutting Theme Included in the SIBP

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

Attachment 1

References

Docket Nos. 50-361 and 50-362

(1) NRC Letter, dated September 1, 2010, Midcycle Performance Review and Inspection Plan-San Onofre Nuclear Generating Station, from E.E. Collins, Regional Administrator, NRC Region IV, to R.T. Ridenoure, Senior Vice President and Chief Nuclear Officer, SCE.

(2) SCE Letter, dated August 31, 2010, Six-Month Response to the U.S. Nuclear Regulatory Commission Letter Regarding Work Environment Issues at San Onofre Nuclear Generating Station-Chilling Effect Letter, from R.T. Ridenoure, Senior Vice President and Chief Nuclear Officer, SCE, to E.E. Collins, Regional Administrator, NRC Region IV.

(3) SCE Letter, dated March 31, 2010, Response to March 2, 2010 NRC Letter Regarding Work Environment Issues at San Onofre Nuclear Generating Station-Chilling Effect, from R.T. Ridenoure, Senior Vice President and Chief Nuclear Officer, SCE, to E.E. Collins, Regional Administrator, NRC Region IV.

(4) NRC Letter, dated March 2, 2010, Work Environment Issues at San Onofre Nuclear Generating Station-Chilling Effect, from E.E. Collins, Regional Administrator, NRC Region IV, to R.T. Ridenoure, Senior Vice President and Chief Nuclear Officer, SCE.

(5) NRC Letter, dated December 19, 2008, Final Significance Determination for a White Finding and Notice of Violation-San Onofre Nuclear Generating Station-NRC Special Inspection Report 05000361/2008013; 05000352/2008013, from E.E. Collins, Regional Administrator, NRC Region IV, to R.T. Ridenoure, Senior Vice President and Chief Nuclear Officer, SCE.

Attachment 2

Actions to Address the Degraded Battery Breaker Connection White Finding

NOTE: Items listed as “closed” in the Closure Date column of the attached table are closed in the CAP and have been approved through any applicable closure review process (such as a Closure Review Board). Dates in the Closure Date column for closure of items not yet closed are the dates by which completion of the Closure Review Board process for those items is scheduled.

Actions to Address the Degraded Battery Connection White Finding

Action#	SIBP #	SAP #	Closure Date	Description	Source
1	4.3.3.A	O-800351324-0010	12/30/2011	Develop and implement a case study presentation that incorporates 10CFR50, Appendix B, Criterion V (for procedure usage), the safety culture aspect of decision making, risk associated with task performance, and events where workers made decisions to not follow the process (e.g. the battery event for notification of the control room) to illustrate the importance of using human performance tools to minimize the chance of an error leading to a significant event. Initiate the first presentation by 3/30/2010. Included with this corrective action presentation is a requirement to address the same topics annually through the end of 2011 for supervisors and above. Ref 1.6.2.A	NRC-HUX; RCE-WF-10/24/09; NRC-10/30/09 LTR; RCE-HU-2
2	5.21.1.Q	O-800390353-0010	10/30/2010	Establish corrective action implementation and closure training and provide to selected station personnel, including definition of (1) personnel to be trained, (2) initial training requirements, (3) continuing training requirements, and (4) timing and frequency of training, as necessary. This training will include use of the SMARTS criteria in establishing corrective actions, establishing due dates, justifying schedule extensions, and documenting closure.	NRC-3/31/10 LTR; NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
3	9.1.1.O	N-200403904-0004	CLOSED	IR 08-013-04 Failure to adequately assess the increase in risk and effectively implement risk mitigation actions for emergent maintenance activities. [The purpose of this action is to address this IR finding.]	RCE-WF-10/24/09; NRC-INSP RPT 2008
4	9.1.1.T	N-200414385-0003	CLOSED	IR 08-013-06 Failure of the licensee's regulatory compliance organization to submit a required Licensee Event Report within 60 days after discovering an event requiring a report. - corrective actions are not complete. [The purpose of this action is to address this IR finding.]	RCE-WF-10/24/09; NRC-INSP RPT 2008
5	9.3.10.H	O-800389757-0010	11/8/2010	Obtain assistance of external independent reviewers (e.g., USA/STARs, CAPOG) to conduct a quality review of a sample of RCE's and ACE's.	RCE-WF-10/24/09; RCE-BATT
6	1.1.2.D	N-200481911-0001	CLOSED	ICA-1 Interim Corrective Action for EOC; Communicate to employees that SONGS personnel must act to prevent non-conservative decision-making at all levels. Emphasizing the following points: - SONGS has a 4th NCV in the H.1(b) attribute within three consecutive quarters. - Significance of NRC Enforcement Actions - Emphasis on Procedure Use & Adherence - Notify the control room whenever something "goes wrong" or is amiss in the field - Must have a questioning attitude - Need to move away from the "presumption of operable" mindset. (REF SIBP 1.1.2.D)	RCE-DECISION MAKING; RCE-WF-10/24/09; ISCE-09
7	1.1.4.A	O-800389758-0010	11/10/2010	Perform an effectiveness review of the corrective actions to confirm the safety culture aspects identified in RCE N 800232925-0010 have been addressed. This action should be performed on the basis that the Nuclear Safety Culture components identified in the RCE were determined to be either a root cause or a significant contributing cause of the condition.	RCE-WF-10/24/09; RCE-BATT
8	9.3.3.C	O-800389754-0010	11/10/2010	The effectiveness of the N-CPR-1 will be measured by a reduction in the number of Work Plans that are issued by SONGS Electrical, Electrical Test, and I&C Planners with missed critical steps and without defense-in-depth steps. Review process to be used will be similar to that process established in 800121216 and will be completed on M.O.s written after 5/1/09.	RCE-WF-10/24/09; RCE-BATT
9	9.3.10.F	O-800389756-0010	CLOSED	Interim CAF. Review metrics associated with cause evaluation quality (CARB results) and timeliness to determine if corrective actions result in positive trends.	RCE-WF-10/24/09; RCE-BATT
10	9.3.11.G	N-200616788-0001	CLOSED	Revise Procedure SO23-XV-40 to reference SIBP Task 9.3.11.F / SAP-O-800232925-0290 in the References Section of this procedure.	RCE-WF-10/24/09

Actions to Address the Degraded Battery Connection White Finding

Action#	SIBP #	SAP #	Closure Date	Description	Source
11	4.25.1.A	O-800390390-0010	CLOSED	CA 1-18: Develop and implement a procedure, for SONGS, to address the application of disciplinary corrective actions for non-represented employees. This procedure should incorporate existing Corporate Policy #302 and any other applicable corporate policy that involves disciplinary action, and is intended to ensure consistent, timely application of discipline for the Nuclear Organization. Incorporate training, on the use of this procedure into the New Supervisory Training program. (See CA #3-3, also associated with New Supervisory Training). Ensure existing, active SCE supervisors of non-represented employees are trained, or briefed, on the procedure. Ensure reporting of disciplinary action by supervision to Employee Relations.	RCE-WF-10/24/09; ISCE-09; RCE-HU-2
12	4.2.11.H	O-800257053-0105	CLOSED	Develop a site standards document with guidance for general employee Conservative Decision Making Culture.	RCE-DECISION MAKING; RCE-WF-10/24/09; RCE-HU-2
13	4.25.1.C	O-800390350-0010	CLOSED	Develop and implement a procedure, for SONGS, to address the application of disciplinary corrective actions for represented employees. This procedure should incorporate existing Corporate Policy #302 and any other applicable corporate policy that involves disciplinary action, and is intended to ensure consistent, timely application of discipline for the Nuclear Organization. Incorporate training, on the use of this procedure into the New Supervisory Training program. (See CA #3-3, also associated with New Supervisory Training). Ensure existing, active SCE supervisors of represented employees are trained, or briefed, on the procedure.	RCE-WF-10/24/09; RCE-HU-2
14	4.3.7.E	O-800257053-0211	CLOSED	Implement training for work planners on how to look-up external operating experience (OE) and incorporating external and internal (Post job critiques) OE in work packages. (REF SIBP 1.15.1.Y)	RCE-WF-10/24/09; RCE-HU-2
15	4.4.1.F	O-800390341-0010	CLOSED	Beginning on 06/01/09 through 12/31/09 Leadership to reinforce written instruction use & adherence standards through a minimum of 25% of all engagements identifying the applicable attributes in the written instruction use criteria section of the Leadership Engagement Card in accordance with Leadership observation process goals.	RCE-WF-10/24/09; RCE-HU-1
16	4.5.1.F	O-800195258-0080	CLOSED	Create a quality measurement process procedure to be used by procedure writers for a consistent review of procedure quality. (REF SIBP 1.10.1.I)	RCE-HU-1; RCE-WF-10/24/09
17	4.5.1.G	O-800195258-0081	CLOSED	Revise SO123-I-1.7 WORK ORDER PREPARATION AND PROCESSING to maintain sustainability of the quality review process for Critical "A" work packages. (REF SIBP 1.10.1.K)	RCE-WF-10/24/09; RCE-HU-1
18	4.5.1.M	O-800257053-0210	CLOSED	Revise station procedures and SAP process to require work planners to incorporate internal and external operating experience into work packages.	RCE-WF-10/24/09; RCE-HU-2
19	4.5.6.C	N-200648052-0001	CLOSED	Assess implementation fulfillment expectation for use of the written instruction use criteria section of the Leadership Engagement Card.	RCE-WF-10/24/09; RCE-HU-1
20	4.6.1.E	O-800389750-0010	CLOSED	CA-3 for EOC; Include a specific emphasis on the systematic approach to conservative decision making as part of Human Performance Stand-Up meetings (for the 4th quarter of 2009)	RCE-DECISION MAKING; RCE-WF-10/24/09; ISCE-09
21	4.6.1.F	O-800389751-0010	CLOSED	CA-4 for EOC; Include a specific emphasis on the systematic approach to conservative decision making as part of Human Performance Stand-Up meetings (for the first 3 quarters of 2010)	RCE-DECISION MAKING; RCE-WF-10/24/09; ISCE-09
22	4.6.1.K	O-800349970-0010	CLOSED	CA 1-6 from HU-2 RCE (O 800349970-0010); Put into initial and annual training expectations for "Conservative Decision Making". This training is for those employees with unescorted Protected Area access.	RCE-DECISION MAKING; RCE-WF-10/24/09; RCE-HU-2
23	5.1.3.E	O-800351643-0010	CLOSED	Implement CAP qualification training for CAPCOs by (1) initial training requirements, (2) continuing training requirements, and (3) timing and frequency of training.	NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R

Actions to Address the Degraded Battery Connection White Finding

Action#	SIBP #	SAP #	Closure Date	Description	Source
24	5.21.1.P	O-800073513-0270	CLOSED	Improve metrics for the quality and timeliness of CAP activities including cause evaluations and corrective action implementation, with station and division level performance reviews. The metrics include: 1) Notifications Generated and Open 2) CPRs Open and Average Age 3) Cause Evaluation Corrective Actions Open and Percent Overdue 4) Corrective Actions Open and Percent Overdue 5) Root Cause Evaluation Average Time to Perform 6) Apparent Cause Evaluation Average Time to Perform 7) Cause Evaluation Quality 8) CAP Notifications/Orders - 2 Years Backlog Workoff 9) Quality of Corrective Action Implementation 10) Operability Determination Quality	NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR
25	5.1.5.B	N-200520999-0001	CLOSED	Revise PI Division guidelines to require a Nuclear Notification be issued when specific quality and timeliness standards are not met (i.e. yellow or red metrics). (REF SIBP 1.10.3.C)	RCE-WF-10/24/09; RCE-PI&R
26	5.21.1.K	O-800351647-0010	CLOSED	Establish Nuclear Notification generation training by identifying the (1) personnel to be trained, (2) initial training requirements, (3) continuing training requirements, and (4) timing and frequency of training.	NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
27	5.3.2.A	O-800351648-0010	CLOSED	Implement Nuclear Notification screening training for the CAP organization screeners and Action Review Committee (ARC) members, including (1) initial training requirements, (2) continuing training requirements, and (3) timing and frequency of training. This training will include operability, reportability, and the threshold for cause evaluation.	NRC-PIX; NRC-4/21/09 LTR; RCE-WF-10/24/09; RCE-PI&R
28	5.4.1.B	O-800351900-0010	CLOSED	Establish response team training and provide to selected station personnel, including definition of (1) personnel to be trained, (2) initial training requirements, (3) continuing training requirements, and (4) timing and frequency of training, as necessary.	NRC-3/31/10 LTR; NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
29	5.5.3.A	A O-800351901-0010	CLOSED	Implement cause evaluation qualification training for Cause Evaluators, including definition of (1) initial training requirements, (2) continuing training requirements, and (3) timing and frequency of training.	NRC-PIX; DCE-PI&R; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
30	5.22.1.H	O-800351651-0010	CLOSED	Implement Corrective Action Review Board (CARB) qualification training for CARB voting members, including (1) initial training requirements, (2) continuing training requirements, and (3) timing and frequency of training.	NRC-PIX; DCE-PI&R; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
31	5.7.2.A	O-800351654-0010	CLOSED	Establish CA effectiveness review training and provide to CAPCOs and CARB, including definition of (1) personnel to be trained, (2) initial training requirements, (3) continuing training requirements, and (4) timing and frequency of training, as necessary.	NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
32	9.1.1.Q	N-200403942-0002	CLOSED	CAT: A, IR 08-013-02 Failure of electrical maintenance personnel to follow Procedure S0123-XX-1, "Action Request/Maintenance Order Initiation and Processing," Revision 20 [The purpose of this action is to address this IR finding.]	RCE-WF-10/24/09, NRC-INSP RPT
33	9.1.1.U	N-200414063-0001	CLOSED	CAT: A, IR 08-013-08 Failure to establish measures to assure that deficient electrical connections were promptly identified and corrected - did not address CCA for effectiveness reviews [The purpose of this action is to address this IR finding.]	RCE-WF-10/24/09; NRC-INSP RPT 2008

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Action#	SIBP #	SAP #	Closure Date	Description	Source
34	9.3.11.D	O-800073513-0270	CLOSED	Improve metrics for the quality and timeliness of CAP activities including cause evaluations and corrective action implementation, with station and division level performance reviews. The metrics include: 1) Notifications Generated and Open 2) CPRs Open and Average Age 3) Cause Evaluation Corrective Actions Open and Percent Overdue 4) Corrective Actions Open and Percent Overdue 5) Root Cause Evaluation Average Time to Perform 6) Apparent Cause Evaluation Average Time to Perform 7) Cause Evaluation Quality 8) CAP Notifications/Orders - 2 Years Backlog Workoff 9) Quality of Corrective Action Implementation 10) Operability Determination Quality	RCE-WF-10/24/09; RCE-BATT
35	9.3.11.E	O-800232925-0280	CLOSED	CAT: A, Self-Assessment program owner shall assess the Self Assessment program for vulnerability to the aforementioned Root Cause of identified in this RCE. The intent of this N-CA is to assure that the causes that led to the inadequate cause evaluation preparation do not exist in the Self Assessment program.	RCE-WF-10/24/09; RCE-BATT
36	9.3.11.F	O-800232925-0290	CLOSED	Operating Experience (OE) program owner shall assess the OE program for vulnerability to the aforementioned Root Cause of identified in this RCE. The intent of this N-CA is to assure that the causes that led to the inadequate cause evaluation preparation do not exist in the OE program.	RCE-WF-10/24/09; RCE-BATT
37	9.3.12.B	O-800393913-0010	CLOSED	Change SO123-I-1.3 and SO123-I-1.7 to add the following words when surveillances fail: "After notifying the Control Room back out of the surveillance must be conducted, and a notification must be written. NO WORK is to be performed until a determination is made on how to proceed (i.e., troubleshooting, maintenance, corrective NMO). (RCE #800232925)"	RCE-WF-10/24/09
38	9.3.12.C	O-800393013-0010	CLOSED	Complete the project to perform a 5 year look back at cause evaluations (RCEs, ACEs, and DCEs that should have been classified as ACEs) that involved system/component failures for the 12 most risk significant systems (as identified by PRA). The review shall not include those root and apparent cause evaluations for which the root, apparent, and contributing causes were confined to human performance. This is because corrective actions to address human performance shortfalls are already in progress as a result of RCEs 800257053 and 800195258. The review shall address the period January 1, 2004, through March 31, 2009, and identify any potential vulnerabilities. Deficiencies will be entered into CAP as appropriate to address cause evaluation quality and potential vulnerabilities.	RCE-WF-10/24/09
39	9.3.12.D	O-800232925-0310	CLOSED	Revise 800121510-0010, "Root Cause Evaluation Deficiencies Associated with the 2D201 Breaker Connection Reportability Assessment" to incorporate revised time line from this RCE." Also, review the corrective actions to determine whether conflict exists with this RCE.	RCE-WF-10/24/09; RCE-BATT
40	9.3.3.A	O-800232925-0080	CLOSED	N-CPR-1: Maintenance Organization is to send SONGS Electrical, Electrical Test, and I&C Planners to training per SO123-XXI-1.11.17. Developed under 80010140. The intent of this N-CPR is to enforce procedure compliance with a focus on identifying critical work steps and implementation of defense in-depth steps in work orders to prevent human performance errors and from having disrupted impact on safety or plant operation.	RCE-WF-10/24/09; RCE-BATT; NRCIR 08-013
41	9.3.3.D	O-800232925-0092	CLOSED	Assess the adequacy of supervisory oversight of the Maintenance electricians. Effectiveness review shall include field observation of Pre-job briefs, critical step identification, critical step verification by supervisor and use of procedure in the field, emphasizing verbatim procedure compliance.	RCE-WF-10/24/09; RCE-BATT

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Action#	SIBP #	SAP #	Closure Date	Description	Source
42	9.3.3.E	O-800351644-0010	CLOSED	Complete field verification of potential loose fasteners per the following MOs. Order: Action: Component 800223047: I/C Verify Terminal Tightness: U2 Aux Isolation Valve 2HV4714, 800223049: I/C Verify Terminal Tightness: U3 Aux Isolation Valve 3HV473, 800223051: I/C Verify Terminal Tightness: 3G002 Cylinder Crank Pressure, 800223052: I/C Verify Terminal Tightness: 2G002 Cylinder Crank Pressure, 800223053: I/C Verify Terminal Tightness: 3G003 Cylinder Crank Pressure, 800223745: TT Verify Terminal Tightness: U2 AFW Pump 2P141, 800225545: TT Verify Terminal Tightness: U2 AFW Pump 2P504, 800225567: TT Verify Terminal Tightness: U2 2A01 supply breaker, 800225560: TT Verify Terminal Tightness: U2 2A02 supply breaker, 800225564: TT Verify Terminal Tightness: U2 AFW NEAL Pump, 800225568: TT Verify Terminal Tightness: U3 Non-1E Charger, 800225570: TT Verify Terminal Tightness: U3 AFW Pump 3P504.	RCE-WF-10/24/09; RCE-BATT
43	9.3.3.L	O-800232925-0095	CLOSED	CAT: A, Assess the adequacy of electrical maintenance planning procedures to develop work plan that prevent human performance error from going uncorrected before turnover of work. Work planning procedure should: 1) Emphasize the identification of critical components function 2) Emphasize identification of critical steps in work plan 3) Identification of human performance tools at those critical steps. Use of self checking, peer checking, supervisor oversight or independent checking for critical steps is a requirement 4) Emphasize the use of verbatim procedural compliance	RCE-WF-10/24/09; RCE-BATT
44	9.3.4.B	N-200347902-0007	CLOSED	CAT: A, Interim Action: Operations to communicate with the control room that all T.S. Surveillances with no-none designators will be communicated with them and they are to log them in.	RCE-WF-10/24/09; RCE-BATT
45	9.3.4.C	O-800393908-0010	CLOSED	Using a cross functional team, develop an integrated risk management program by revising SO23-XX-8, Integrated Risk Management, to include the following: - Identification of risk significant activities and evolutions - Risk assessment guidance for emergent activities - Operations awareness of all risk sensitive activities.	RCE-WF-10/24/09; RCE-BATT
46	9.3.4.D	O-800393909-0010	CLOSED	Institutionalize the risk management program developed in order operation 800393908-0010 with a major revision to SO23-XX-8, Integrated Risk Management.	RCE-WF-10/24/09
47	9.3.9.A	O-800232925-0107	CLOSED	CAT: A, SONGS Directors conduct a stand-down with all leaders (i.e., managers, supervisors, GFs) in their Divisions for the purpose of reviewing policies governing procedure use and procedure adherence. This stand-down should emphasize that procedure compliance is necessary to ensure continued operation of SONGS. The expectation is that all leaders adhere to all policies and procedures and enforce procedure compliance.	RCE-WF-10/24/09; RCE-BATT
48	9.3.9.B	O-800389737-0010	CLOSED	Develop and Institutionalize this event as a "case study" for SONGS employees and new employees and through continuing training. Case study will be similar to the one developed by Salem-Hope Creek and/or Davis-Besse.	RCE-WF-10/24/09; RCE-BATT
49	9.3.9.C	O-800232925-0109	CLOSED	Trend procedure non-compliance issues.	RCE-WF-10/24/09; RCE-BATT

Actions to Address the Degraded Battery Connection White Finding

Action#	SIBP #	SAP #	Closure Date	Description	Source
50	9.3.9.F	O-800232925-0113	CLOSED	<p>Evaluate the process where Operations authorizes and documents Tech Spec Surveillances that touch plant equipment. This effort should include a cross functional team. This effort should address NO-NONE designator in SO123-XX-5, Attachment 3, and other Tech Spec procedures.</p> <p>From the evaluation, establish the list of Tech Spec Surveillances that Operations authorizes. Also from the evaluation, establish the methodology for informing Operations when the listed Tech Spec Surveillances are performed and the results.</p>	RCE-WF-10/24/09; RCE-BATT

Attachment 3

Actions to Address Open HU Crosscutting Themes Included in the SIBP

NOTE: Dates listed in the Closure Date column in the attached table are the dates by which completion of the Closure Review Board (CRB) process was or is scheduled. For those items with a Closure Date that has already passed, CRB review and approval has been completed.

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INITIATIVE: 4.21			H.1(b) - Conservative Decision Making: The licensee uses conservative assumptions in decision making and adopts a requirement to demonstrate that the proposed action is safe in order to proceed rather than a requirement to demonstrate that it is unsafe in order to disapprove the action. The licensee conducts effectiveness reviews of safety-significant decisions to verify the validity of the underlying assumptions, identify possible unintended consequences, and determine how to improve future decisions.		
Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
4.21.1.A	O-800389748-0010	CLOSED	6/1/2010	<p>CA - Revise SO123-XV-52 Functionality Assessments and Operability Determinations to incorporate industry benchmarking and include:</p> <ul style="list-style-type: none"> - Clarity and accuracy of process actions in an executable step format - The transfer of departmental ownership of the process to Operations - Incorporation of the INPO Principles for Effective Operational Decision Making - An appropriate operability checklist - Real-time, in-line expert independent review of PODs and periodic quality checks of IODs - Appropriate linkages to other processes (e.g., the Operational Decision Making Process). <p>[Note: Prior to closure, this action was modified because some of the changes were determined to be more appropriately incorporated in other procedures or had already been included in those procedures. See closure package.]</p>	RCE-DECISION MAKING; NRC-HUX; NRC-3/31/10 LTR; DCE-PI&R; ISCE-09
4.21.1.B	O-800389749-0010	CLOSED	11/15/2010	CA-1 for RC-1, CC-1, and CC-3; Complete the training documented in the Training Needs Analysis titled, "Operability Determination Program Knowledge Gaps," including the Training of Experts.	RCE-DECISION MAKING; DCE-PI&R; ISCE-09
4.21.1.C	O-800389752-0010	CLOSED	06/28/2010	CA-5 for RC-1; Operations assume departmental ownership of the Operability Determination process upon completion of the revision of SO123-XV-52 required by CAPR-1.	RCE-DECISION MAKING; DCE-PI&R; ISCE-09
4.21.1.D	O-800437935-0010	CLOSED	06/30/2010	<p>CAPR-2: Revise SO123-XV-52, Functionality Assessments and Operability Determinations to incorporate a review of industry procedures and include:</p> <p>Define the term "conservative" in relation to assumptions regarding degradation, initial conditions, and time/conditions for when the function is required;</p> <p>Require review of source documents for immediate operability determination; Consideration of all modes of system operation and consideration of different accident/transient scenarios;</p> <p>Consideration of potential degraded condition from an ability to monitor, control, and predict further degradation; Establish independent review of PODs and periodic quality checks of IODs.</p>	NRC-HUX; NRC-3/31/10 LTR; DCE-PI&R; RCE-2 DECISION MAKING

Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
4.21.1.E	N-201026985-CA0001	WORKING	1/15/2011	<p>Revise the Pre-Job Brief Checklists in SO123-XV-HU-2, Human Performance Tools, Attachments 7 and 9 to include the Decision Making Questions contained in the Decision Making HU tool. Specifically, this revision would require discussing decision making by reviewing the following questions during Pre-Job Briefs: Ask if you are making a decision:</p> <ul style="list-style-type: none"> - To do something different from the written instruction? - To not do something that is in the written instruction? - To do something that is not in the written instruction? 	DCE-HU Check & Adjust

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INITIATIVE : 4.22			H.2(c) - Resources: SONGS ensures that personnel, equipment, procedures, and other resources are available and adequate to assure nuclear safety. Specifically, those necessary for complete, accurate and up-to-date design documentation, procedures, and work packages, and correct labeling of components.		
Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
4.22.1.A	O-800180140-0280	CLOSED	01/30/2009	Establish a standard format for work instructions/packages including a check list to identify potential error traps. [NRC TASK: Enhanced work package development via: - Establishment of one standard format for work Packages. - Implementation of a checklist/template to enhance work instruction quality by identifying and minimizing error traps.]	NRC-HUX; NRC-4/21/09 LTR; RCE-HU-1
4.22.1.B	O-800180140-0300	CLOSED	03/13/2009	Revise the planner's guide. [NRC TASK: Enhanced work package development via: - Revision of the planner's guide to current industry standards.]	NRC-HUX; INPO-AFI-ER.4-3; NRC-4/21/09 LTR
4.22.1.C	O-800390384-0010	CLOSED	02/19/2010	CPR-3 Establish and use one standard format for procedures (associated with non-administrative procedures) and establish and issue one guiding document in each of the following procedure areas: processing, developing, and use.	NRC-HUX; NRC-10/30/09 LTR; RCE-HU-1
4.22.1.D	N-200655777-0006	CLOSED	01/29/2010	Develop and implement a single standard for procedure writing that is in alignment with the NEI working group report on procedure writing.	NRC-HUX; NRC-10/30/09 LTR
4.22.1.E	N-200655777-0065	CLOSED	07/30/2010	Develop and implement a single standard for procedure development process that is in alignment with the NEI working group report on procedure development process.	NRC-HUX; NRC-10/30/09 LTR
4.22.1.F	O-800195258-0060	CLOSED	11/22/2010	Review and prioritize the current Station backlog in PRO assignments	RCE-HU-1
4.22.1.G	O-800345002-0010	CLOSED	11/13/2009	Develop and implement a site procedure that includes the requirements, instructions and forms to provide a method for a field supervisor, shift manager or procedure group manager/supervisor to suspend a procedure when the incorrect procedure will not be immediately fixed. This process is implemented at other nuclear facilities and represents a gap in the SONGS procedure control process.	ACE-WIQ
4.22.1.H	N-201026985-CA0009	WORKING	2/15/2011	Expand the existing Operation Procedure Modification Permit (PMP) process to all station divisions. The expansion of this process will include the following: - Required procedure revisions - Communication / briefings to impacted organizations - Any needed IT changes	DCE-HU Check & Adjust

Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
4.22.1.I	N-201026985-CA0010	WORKING	2/15/2011	Manage and prioritize the procedure backlog. Completion of this action includes the following: <ul style="list-style-type: none"> - Application of the TEAM priority change process - Identification of the procedure backlog - Communication of the number of procedure change requests for each category in the TEAM priority system - Projected burn-down curves / due dates for completion of the procedure change requests in the backlog - Communication of the status of the procedure backlog reduction to station personnel 	DCE-HU Check & Adjust

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INITIATIVE: 4.23			H.4(a) - Human Error Prevention Techniques: SONGS communicates human error prevention techniques, such as holding pre-job briefings, self and peer checking, and proper documentation of activities. These techniques are used commensurate with the risk of the assigned task, such that work activities are performed safely. Personnel are fit for duty. In addition, personnel do not proceed in the face of uncertainty or unexpected circumstances.		
Action #	SAP #	SAP Status	Closure Date	SIBP Description	Source
4.23.1.A	N-200415807-0001	CLOSED	04/06/2009	Issue a Prompt Investigation and Clock reset templates to enhance communication of human performance events and associated learning.	NRC-HUX; NRC-4/21/09 LTR
4.23.1.B	O-800257053-0125	CLOSED	03/12/2009	Initiate site-wide weekly Human Performance/Industrial Safety stand up meetings with active non-contract SCE employees. [NRC TASK: Conduct weekly follow-up sessions with station personnel to focus and realign the Organization in the areas of Human performance and Industrial Safety.]	NRC-HUX; NRC-4/21/09 LTR; RCE-HU-2
4.23.1.C	N-200415807-0017	CLOSED	10/31/2010	Revise/improve human performance tools handbook (blue book) for all workers.	HU Program Enhancement
4.23.1.D	O-800195258-0013	CLOSED	08/31/2009	Revise the Human Performance procedure SO123-XV-50.8 or develop other procedure to define a list of potential error traps for written instructions and expectation for use and adherence. Revise SO123-XV-50.8, Human Performance Program (HU) procedures to current industry practices: 1) Detailed expectations for HU tool use, 2) Prompt investigations for HU events and the conduct of HU review boards, 3) HU "clock reset" templates and communications, 4) a site HU working team to trend performance, 5) A HU training qualification process.	NRC-HUX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-HU-1
4.23.1.E	N-200415807-0025	CLOSED	11/7/2010	Create a procedure for Human Performance Tools for workers, managers, supervisors, and engineers, and other knowledge workers.	HU Program Enhancement
4.23.1.F	O-800257053-0699	CLOSED	08/31/2009	CAPR - 7 The Human Performance sponsor shall establish an expectation for formal identification of division-level human performance advocates in all Divisions. These advocates shall be responsible to oversee effective program implementation within their respective divisions, communicate regularly with the Human Performance Manager to promote continuous improvement of the Human Performance Program, implement human performance program requirements within their respective divisions, and assist the Human Performance Manager with implementation of the station Human Performance Program and initiatives. [NRC TASK: (CAPR) Establish division-level human performance advocates in all Divisions to assist in program administration as defined in S0123-XV-50.8 (Human Performance Program)].	NRC-HUX; NRC-4/21/09 LTR; RCE-HU-2

Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
4.23.1.G	O-800257053-0708	CLOSED	09/15/2009	Develop Dynamic Learning Activities, DLAs, for the use of HU tools for worker and supervisory level personnel to include training for supervisors such as: performance of task preview and job site monitoring, and conduct of effective pre and post work briefings in accordance with the Systematic Approach to Training process. [NRC TASK: Develop Dynamic Learning Activities, DLAs, for the use of HU tools.]	NRC-HUX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-HU-2
4.23.1.H	N-200415807-0030	CLOSED	10/30/2009	Human Performance Training Implementation, Train hands-on outage workers. [NRC Task: Human Performance Training Implementation - Train and qualify SCE hands-on outage workers]	NRC-HUX; NRC-4/21/09 LTR
4.23.1.I	N-200415807-0028	CLOSED	11/30/2009	Human Performance Training Implementation, Train supplemental (contractor) outage worker.	NRC-HUX; NRC-4/21/09 LTR; ISCE-09
4.23.1.J	O-800351467-0010	CLOSED	06/30/2010	Complete the training for CA 3-10 using Human Performance Dynamic Learning Activities (DLAs) for active non-contract SCE employees. [NRC TASK: Human Performance Training Implementation - Train and qualify all remaining SCE site workers.]	NRC-HUX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-HU-2
4.23.1.K	N-201026985-CA0006	WORKING	12/15/2010	Revise SO123-XV-HU-1, Human Performance Program, to develop and implement Divisional Management Review Meetings (D-MRMs). The purpose of a D-MRM is to challenge HU behaviors and focus on improvements, trends, and safety performance. (See also 4.8.1.B)	DCE-HU Check & Adjust
4.23.1.L	O-800553404-0010	WORKING	11/8/2010	Revise the Leadership Observation Trending System (LETS) database to include the on-line and outage goals for Paired Observations, the ability to document completion of paired observations, and a report providing status on meeting goals.	DCE-HU Check & Adjust

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INITIATIVE : 4.24			H.4(b) - Procedural Compliance: SONGS defines and effectively communicates expectations regarding procedural compliance and personnel follow procedures.		
Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
4.24.1.A	N-200415807-0031	CLOSED	05/12/2009	<p>Conduct a site-wide stand down event to focus and realign the Organization in the areas of Human performance and Industrial Safety. Specific expectations for reinforcement included:</p> <p>a. Know, Understand and Use the procedures that guide our work.</p> <p>b. Our written instructions will be followed exactly as written or work will be stopped. If instructions are incomplete, confusing or if conditions occur that are not consistent with the written instructions, contact your supervisor.</p> <p>c. We will read, understand and use the tools in the Human Performance Blue Book that help us stay sharp, foresee challenges and avoid mistakes.</p> <p>d. We all will demonstrate safe work practices every day for every task.</p> <p>Build into this event process a method for collecting employee feedback on ways to improve Station, Division and Personal performance.</p> <p>[NRC TASK: Conduct a site-wide stand down event to focus and realign the Organization in the areas of Human performance and Industrial Safety. Specific expectations for reinforcement included:</p> <p>a. Know, Understand and Use the procedures that guide our work.</p> <p>b. Our written instructions will be followed exactly as written or work will be stopped. If instructions are incomplete, confusing or if conditions occur that are not consistent with the written instructions, contact your supervisor.</p> <p>c. We will read, understand and use the tools in the Human Performance Blue Book that help us stay sharp, foresee challenges and avoid mistakes.</p> <p>d. We all will demonstrate safe work practices every day for every task.]</p>	NRC-HUX; NRC-4/21/09 LTR
4.24.1.B	O-800195258-0030	CLOSED	05/29/2009	Develop and implement an expectation, and associated trending, that notifications will be generated when forced to STOP work due to procedure or work instruction inadequacies preventing continuation of work.	RCE HU-1
4.24.1.C	N-200415807-0002	CLOSED	08/31/2009	Include in procedure SO123-XV-50.11 "PROCEDURE USE AND ADHERENCE" a list of potential error traps for written instructions and expectations for use & adherence.	NRC-HUX; NRC-4/21/09 LTR

Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
4.24.1.D	N-200655777-0053	WORKING	10/30/2010	Review Dynamic Learning Activities (DLAs) on written instruction use and adherence as provided in HUIS01 and HUIS02 DLAs to validate the training material for written instruction use. Review lesson plans to ensure emphasis on training on written instruction use and adherence and strengthen DLA regarding written instruction use provided in HUIS01 training. Provide options for additional DLA for supervisors to use to address specific group behaviors).	ERCB Check & Adjust
4.24.1.E	N-201026985-CA0006	WORKING	12/15/2010	Revise SO123-XV-HU-1, Human Performance Program, to develop and implement Divisional Management Review Meetings (D-MRMs). The purpose of a D-MRM is to challenge HU behaviors and focus on improvements, trends, and safety performance. (See also 4.8.1.B)	DCE-HU Check & Adjust
4.24.1.F	N-201026985-CA0007	WORKING	2/15/2011	Revise SO123-XV-HU-2, Human Performance Tools, to modify the SAFER Conversation that would include discussion of written instruction use expectations.	DCE-HU Check & Adjust
4.24.1.G	O-800553406-0010	WORKING	11/29/2010	Revise Attachment 18 of SO123-XV-HU-1, Human Performance Program, to reference the Culpability Model in Attachment 3 of PI-SO23-G-4 as a human performance evaluation tool.	DCE-HU Check & Adjust

2010 - Human Performance

SONGS Site Integrated Business Plan

INITIATIVE : 4.25			H.4(c) - Oversight: SONGS ensures supervisory and management oversight of work activities, including contractors, such that nuclear safety is supported.		
Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
4.25.1.A	O-800390390-0010	CLOSED	01/15/2010	CA 1-18: Develop and implement a procedure, for SONGS, to address the application of disciplinary corrective actions for non-represented employees. This procedure should incorporate existing Corporate Policy #302 and any other applicable corporate policy that involves disciplinary action, and is intended to ensure consistent, timely application of discipline for the Nuclear Organization. Incorporate training, on the use of this procedure into the New Supervisory Training program. (See CA #3-3, also associated with New Supervisory Training). Ensure existing, active SCE supervisors of non-represented employees are trained, or briefed, on the procedure. Ensure reporting of disciplinary action by supervision to Employee Relations.	RCE-WF-10/24/09; ISCE-09; RCE-HU-2
4.25.1.B	O-800257053-0805	CLOSED	05/15/2009	Revise the "Temporary Supervisor and PRO Supervisor Responsibilities" procedure, SO123-I-1.48, to require a Manager 2 individual or above to approve all actions taken by an upgrade or new supervisor if they have not completed the required initial supervisory training.	RCE-HU-2
4.25.1.C	O-800390350-0010	CLOSED	01/22/2010	Develop and implement a procedure, for SONGS, to address the application of disciplinary corrective actions for represented employees. This procedure should incorporate existing Corporate Policy #302 and any other applicable corporate policy that involves disciplinary action, and is intended to ensure consistent, timely application of discipline for the Nuclear Organization. Incorporate training, on the use of this procedure into the New Supervisory Training program. (See CA #3-3, also associated with New Supervisory Training). Ensure existing, active SCE supervisors of represented employees are trained, or briefed, on the procedure.	RCE-WF-10/24/09; RCE-HU-2
4.25.1.D	O-800351465-0010	CLOSED	11/17/2010	CA 3-4: Review and update current Supervisory Development Training. Ensure the training aligns with INPO 04-003 Guidelines for Effective Nuclear Supervisor Performance.	RCE-HU-2
4.25.1.E	O-800257053-0803	CLOSED	11/17/2010	CA CC-3: Review Supervisory Development Training and ensure that new supervisor developmental training incorporates DLAs that apply Human Performance topics and how the tools apply to their work groups and the station.	RCE-HU-2
4.25.1.F	O-800351464-0010	CLOSED	11/17/2010	CA 3-3: Review Supervisory Development Training and ensure that upon completion, candidates will understand the various Human Performance Tools and how the tools apply to their work groups and the station.	RCE-HU-2

Action #	SAP #	SAP Status	Closure Date	SIBP Description	Source
4.25.1.G	N-200655777-0002	CLOSED	06/30/2010	Develop and start implementation of training for leader observation and coaching skills. This training is being presented as part of the multi-week Leadership Academy sessions, and will be provided over a multi-year period.	NRC-HUX; NRC-3/31/10 LTR; NRC-10/30/09 LTR
4.25.1.H	O-800550712-0010	WORKING	01/14/2011	Develop and implement "Coach-the-Coach" training that will be conducted as a computer-based course with a Dynamic Learning Activity (DLA) to demonstrate proficiency. This training will be completed by 95% of supervisors / managers in Operations, Maintenance Chemistry, and Health Physics that have direct reports assigned to field activities.	DCE-HU Check & Adjust

Attachment 4

Actions to Address Open PI&R Crosscutting Themes Included in the SIBP

NOTE: Dates listed in the Closure Date column in the attached table are the dates by which completion of the Closure Review Board (CRB) process was or is scheduled. For those items with a Closure Date that has already passed, CRB review and approval has been completed.

2010 - Corrective Action Program

SONGS Site Integrated Business Plan

INITIATIVE : 5.21		P.1(a) SONGS implements a corrective action program with low threshold for identifying issues. The licensee identifies such issues completely, accurately, and in a timely manner commensurate with their safety significance.				
Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source	
5.21.1.A	O-800482555-0010	CLOSED	06/04/2010	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.	NRC-SCWE; RCE-PI&R-X; DCE-PI&R; RCE-SCWE	
5.21.1.B	N-200758654-0002	WORKING	11/22/2010	IA-1: Interim Action for Continuing Reinforcement of Expectations and Supports Root Cause No. 1: As a method of continuing reinforcement of expectations related to timely generation of Nuclear Notifications, at least once each quarter, the weekly "Station Stand Up or Stand Down" should have a dedicated topic of discussion related to the "Timeliness and Thresholds of Writing Nuclear Notifications."	RCE-PI&R-X	
5.21.1.C	O-800482558-0010	CLOSED	06/04/2010	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.	NRC-SCWE; RCE-PI&R-X; DCE-PI&R; RCE-PI&R; RCE-SCWE	
5.21.1.D	N-201018826-CA0001	WORKING	2/15/2011	CA - Formalize and implement team walk downs of the plant by an inter-discipline team. Walk downs will be formalized in procedures including roles and responsibilities, frequency of walk downs, plant area for walk downs, and team composition to present the multi-discipline mindset in the identification of plant degradations and conditions.	DCE-PI&R Check & Adjust	
5.21.1.F	N-201018826-CA0002	WORKING	11/22/2010	CA - Formalize the 'good catch' program by defining the frequency, incentive, and communication to station personnel.	DCE-PI&R Check & Adjust	
5.21.1.G	N-201018826-CA0016	CLOSED	10/24/2010	CA - Establish and initiate a long-term communication strategy, reiterating to the organization the requirement to promptly identify, report, and document problems in writing, the writing of notifications for late or missed notifications, and communicate the definition of a problem.	DCE-PI&R Check & Adjust	
5.21.1.H	N-201018826-CA0017	WORKING	11/29/2010	Add to ARC/MRC training lesson plans the need to generate a notification for identified late or missed notifications.	DCE-PI&R Check & Adjust	
5.21.1.I	N-201018826-CA0020	WORKING	11/22/2010	CA for M&CS Division- Issue a required reading assignment. Reading assignment target audience is SCE supervisors and above in M&CS. Reading assignment is to communicate the expectation for writing an NN for late or missed NNs. This is a one-time action. (The acceptance criteria will 90% of the target audience)	DCE-PI&R Check & Adjust	

Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
5.21.1.J	N-201018826-CA0018	WORKING	12/10/2010	Issue a required reading assignment. Reading assignment is to the personnel on the Ops Required Reading listing for SROs (SROs and Supervisory level personnel are included on this list) Reading assignment is to communicate the expectation for writing an NN for late or missed NNs. This is a one-time action. (The acceptance criteria will 90% of those Operations Division personnel on the Ops Required Reading listing for SROs {and Supervisory level personnel})	DCE-PI&R Check & Adjust
5.21.1.K	O-800351647-0010	CLOSED	12/31/2009	Establish Nuclear Notification generation training by identifying the (1) personnel to be trained, (2) initial training requirements, (3) continuing training requirements, and (4) timing and frequency of training.	NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
5.21.1.L	O-800073513-0260	CLOSED	06/30/2009	Establish in Management Performance Development Plans (PDPs) specific site and division CAP performance requirements and expectations. The criteria shall be weighted such that a person's performance is directly coupled with pay for performance.	NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
5.21.1.N	O-800073513-0360	CLOSED	05/13/2009	Revise station CAP procedures to align with industry practices for CAP implementation using benchmarking results. These revisions will include improvements to interfaces between CAP and Work Management to support equipment reliability.	NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
5.21.1.P	O-800073513-0270	CLOSED	08/31/2009	Improve metrics for the quality and timeliness of CAP activities including cause evaluations and corrective action implementation, with station and division level performance reviews. The metrics include: 1) Notifications Generated and Open 2) CPRs Open and Average Age 3) Cause Evaluation Corrective Actions Open and Percent Overdue 4) Corrective Actions Open and Percent Overdue 5) Root Cause Evaluation Average Time to Perform 6) Apparent Cause Evaluation Average Time to Perform 7) Cause Evaluation Quality 8) CAP Notifications/Orders - 2 Years Backlog Workoff 9) Quality of Corrective Action Implementation 10) Operability Determination Quality	NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR
5.21.1.Q	O-800390353-0010	CLOSED	10/30/2010	Establish corrective action implementation and closure training and provide to selected station personnel, including definition of (1) personnel to be trained, (2) initial training requirements, (3) continuing training requirements, and (4) timing and frequency of training, as necessary. This training will include use of the SMARTS criteria in establishing corrective actions, establishing due dates, justifying schedule extensions, and documenting closure.	NRC-3/31/10 LTR; NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R

2010 - Corrective Action Program

SONGS Site Integrated Business Plan

INITIATIVE : 5.22		P.1(c) SONGS thoroughly evaluates problems such that the resolutions address causes and extent of conditions, as necessary. This includes properly classifying, prioritizing, and evaluating for operability and reportability conditions adverse to quality. This also includes, for significant problems, conducting effectiveness reviews of corrective actions to ensure that the problems are resolved.				
Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source	
5.22.1.A	O-800389752-0010	CLOSED	06/28/2010	CA-5 for RC-1; Operations assume departmental ownership of the Operability Determination process upon completion of the revision of SO123-XV-52 required by CAPR-1.	RCE-DECISION MAKING; DCE-PI&R; ISCE-09	
5.22.1.B	O-800389749-0010	CLOSED	11/15/2010	CA-1 for RC-1, CC-1, and CC-3; Complete the training documented in the Training Needs Analysis titled, "Operability Determination Program Knowledge Gaps," including the Training of Experts.	RCE-DECISION MAKING; DCE-PI&R; ISCE-09	
5.22.1.C	O-800437935-0010	CLOSED	06/30/2010	CAPR-2: Revise SO123-XV-52, Functionality Assessments and Operability Determinations to incorporate a review of industry procedures and include: Define the term "conservative" in relation to assumptions regarding degradation, initial conditions, and time/conditions for when the function is required; Require review of source documents for immediate operability determination; Consideration of all modes of system operation and consideration of different accident/transient scenarios; Consideration of potential degraded condition from an ability to monitor, control, and predict further degradation; Establish independent review of PODs and periodic quality checks of IODs.	NRC-HUX; NRC-3/31/10 LTR; DCE-PI&R; RCE-2 DECISION MAKING	
5.22.1.D	O-800389748-0010	CLOSED	6/1/2010	Revise SO123-XV-52 Functionality Assessments and Operability Determinations to incorporate industry benchmarking and include: - Clarity and accuracy of process actions in an executable step format - The transfer of departmental ownership of the process to Operations - Incorporation of the INPO Principles for Effective Operational Decision Making - An appropriate operability checklist - Real-time, in-line expert independent review of PODs and periodic quality checks of IODs - Appropriate linkages to other processes (e.g., the Operational Decision Making Process). [Note: Prior to closure, this action was modified because some of the changes were determined to be more appropriately incorporated in other procedures or had already been included in those procedures. See closure package.]	RCE-DECISION MAKING; NRC-HUX; NRC-3/31/10 LTR; DCE-PI&R; ISCE-09	
5.22.1.E	O-800389735-0010	CLOSED	05/28/2010	CA-2 for CC-1; Develop and maintain a group of IOD/POD Experts from Operations and Engineering through specialized training on the process developed by CAPR-1 to perform the real-time in-line reviews for PODs and periodic Quality Checks for IODs. (Specialized trainers may need to be brought in from industry.)	RCE-DECISION MAKING; DCE-PI&R; ISCE-09	

Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
5.22.1.F	N-201018826-CA0015	WORKING	11/13/2010	CA - Establish Quality Review Board expectations in SO123-XV-52 Functionality Assessments and Operability Determinations to include roles and responsibilities, membership requirements, daily reviews of OD quality, rating of OD attributes to identify and focus on areas for improvement and feedback to Operations and Engineering	DCE-PI&R Check & Adjust
5.22.1.G	N-201018826-CA0021	WORKING	11/13/2010	CA - Revise SO123-XV-52, Functionality Assessments and Operability Determinations to change the requirements for screening IODs/PODs by the Shift Technical Advisor (STA). Process change to reduce unnecessary program entry requirements for reduction in control room burden and better focus on proper scope quality.	DCE-PI&R Check & Adjust
5.22.1.H	O-800351651-0010	CLOSED	12/31/2009	Implement Corrective Action Review Board (CARB) qualification training for CARB voting members, including (1) initial training requirements, (2) continuing training requirements, and (3) timing and frequency of training.	NRC-PIX; DCE-PI&R; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
5.22.1.I	O-800240411-0150	CLOSED	11/22/2010	Establish an internal Quality Review Board to assess the quality of IODs and PODs and feed back to the author (s).	DAR_FA&OD
5.22.1.J	N-201018826-CA0012	WORKING	11/22/2010	CA - Implement an ACE/RCE grading sheet for use by the Corrective Action Review Board (CARB).	DCE-PI&R Check & Adjust
5.22.1.K	N-201018826-CA0004	WORKING	12/24/2010	CA - Institutionalize the requirements for review of CAP products at Divisional Corrective Action Review Board (DCARB). Requirements to include the following: 1) Members shall be appointed by the Division Director/Manager. 2) At least one quorum member must have attended Cause Evaluation Classroom Training (PIICET) or have the qualification for CARB Chairperson, Member and Alternate (PICRBQ). 3) Responsible Management will present the evaluation at DCARB. 4) DCARB will review division metrics periodically. 5) Define the purpose of DCARB 6) Identify documents to be reviewed by DCARB	DCE-PI&R Check & Adjust
5.22.1.L	O-800511188-0010	WORKING	2/18/2011	Streamline the ACE/RCE review cycle with a shift in purpose from backend reviews to rework quality into evaluations, to front-end Cause Evaluator Leader accountability for quality first effort. --Self-critical review/examination of RCE quality will rest with Station CARB, and they will also be the forum to share and challenge performance across divisions for more significant events. --Self-critical review/examination of ACE quality will rest with Division CARB, and the Station CARB will be the backstop to quality issues until consistent satisfactory performance. --Self-critical review/examination of DCE quality will rest with Division CARB until consistent satisfactory performance. This process/accountability improvement will be incorporated into procedure SO123-XV-50.CAP-3 (Cause Evaluations) including a flowchart defining reviews and approvals.	ACE-CE
5.22.1.N	O-800511191-0010	WORKING	11/22/2010	Establish roles and responsibilities for Division CARBs in Corrective Action Program procedures. This will include their role in reviewing ACE quality and timeliness, and monthly review of CAP metrics.	ACE-CE

Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
5.22.1.O	O-800073513-0410	CLOSED	08/15/2009	Revise CAP procedures to clarify the roles and responsibilities of Cause Evaluators in performing cause evaluations and the Corrective Action Review Board in reviewing cause evaluation quality.	NRC-PIX; DCE-PI&R; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
5.22.1.P	O-800073513-0420	CLOSED	08/15/2009	Revise CAP procedures and provide detailed requirements for performance Root Cause Evaluations and Apparent Cause Evaluations, including extent of condition and development of timely interim and final corrective actions.	NRC-PIX; DCE-PI&R; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
5.22.1.Q	O-800351901-0010	CLOSED	12/31/2009	Implement cause evaluation qualification training for Cause Evaluators, including definition of (1) initial training requirements, (2) continuing training requirements, and (3) timing and frequency of training.	NRC-PIX; DCE-PI&R; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
5.22.1.R	O-800073513-0060	CLOSED	01/07/2009	Complete NRC PI&R cause evaluation utilizing station multidiscipline team and an industry expert. (Rev.1, 05/06/2009)	INPO-AFI-PI.2-2; INPO-AFI-PI.2-1
5.22.1.U	O-800073513-0260	CLOSED	06/30/2009	Establish in Management Performance Development Plans (PDPs) specific site and division CAP performance requirements and expectations. The criteria shall be weighted such that a person's performance is directly coupled with pay for performance.	NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
5.22.1.V	O-800511187-0010	WORKING	7/24/2011	Revise Corrective Action Program procedures and define that the station should establish and maintain at least 12 (twelve) RCE qualified team leaders with Encode PIRCEQ. The RCE leaders should be distributed across the Engineering (2), Maintenance & Construction Services (2), Operations (2), Security (1), Training (1), Work Control (1) and Performance Improvement Divisions (3). If the total of 12 is reduced due to actual or anticipated loss, then a NN will be generated to develop action(s).	DCE-PI&R; ACE-CE
5.22.1.X	O-800073513-0360	CLOSED	05/13/2009	Revise station CAP procedures to align with industry practices for CAP implementation using benchmarking results. These revisions will include improvements to interfaces between CAP and Work Management to support equipment reliability.	NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
5.22.1.Z	O-800073513-0270	CLOSED	08/31/2009	Improve metrics for the quality and timeliness of CAP activities including cause evaluations and corrective action implementation, with station and division level performance reviews. The metrics include: 1) Notifications Generated and Open 2) CPRs Open and Average Age 3) Cause Evaluation Corrective Actions Open and Percent Overdue 4) Corrective Actions Open and Percent Overdue 5) Root Cause Evaluation Average Time to Perform 6) Apparent Cause Evaluation Average Time to Perform 7) Cause Evaluation Quality 8) CAP Notifications/Orders - 2 Years Backlog Workoff 9) Quality of Corrective Action Implementation 10) Operability Determination Quality	NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR

Action#	SAP #	SAP Status	Closure Date	STBP Description	Source
5.22.2.A	O-800390353-0010	CLOSED	10/30/2010	Establish corrective action implementation and closure training and provide to selected station personnel, including definition of (1) personnel to be trained, (2) initial training requirements, (3) continuing training requirements, and (4) timing and frequency of training, as necessary. This training will include use of the SMARTS criteria in establishing corrective actions, establishing due dates, justifying schedule extensions, and documenting closure.	NRC-3/31/10 LTR; NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R

2010 - Corrective Action Program

SONGS Site Integrated Business Plan

INITIATIVE : 5.23		P.1(d) SONGS takes appropriate corrective actions to address safety issues and adverse trends in a timely manner, commensurate with their safety significance and complexity.			
Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
5.23.1.A	O-800511009-0010	WORKING	11/22/2010	Revise SO123-XV-50 (Corrective Action Program) to redefine DCE/ACE/RCE timeliness. For ACE/RCE, the clock should start the day the ACE/RCE is assigned and stop clock upon CARB approval or approval with comments. For DCE, the clock should start the day the DCE is assigned and stop upon CAPCO approval or approval with comments. The timeliness expectations are: --less than or equal to 35 days for RCEs --less than or equal to 40 days for ACEs (40 days provides time for Division & Station CARBs) --less than or equal to 35 days for DCEs	ACE-CE
5.23.1.B	N-201018826-CA0007	WORKING	11/22/2010	Define expectations for ACE/RCE Pre-Job Briefs in SO123-XV-50.CAP-3 to include a review of: - Team member participation and support - Overview of the aspects of the cause evaluation (e.g. Problem Statement, Extent of Condition, Analysis Techniques) - Application of SMART(s) in developing corrective actions and expected buy-in from owners - Time line and deliverable dates (e.g. Problem statement, data gathering complete, initial analysis, conclusions & corrective actions complete, report to Management Owner/Sponsor, report to CAPCO, report to CARB Secretary, required periodic Management Owner/Sponsor updates) - Escalation process to management when there are barriers to meeting timeliness and deliverables.	DCE-PI&R Check & Adjust
5.23.1.C	N-201018826-CA0008	WORKING	12/17/2010	CA - Establish a closure review process using the CAP electronic database for corrective actions (by CAPCOs) and condition reports (Assigned Owners) associated with cause evaluations. Note - CAPR closures are not included in this population of CAs as they are reviewed by CARB.	DCE-PI&R Check & Adjust
5.23.1.D	O-800550968-0010	CLOSED	12/15/2010	Corrective Action to Improve Change Management to Cause Evaluation Interface by implementing the following: - Strengthen procedure SO123-XV-50.CAP-3 (Corrective Action Program Evaluations and Action Plans) to require that formal Change Management is applied for all RCE related Corrective Actions (not just CAPRs) to address potential resource, priority and cost challenges throughout the Station. The Change Management plan should be issued within 15-calendar days after CARB approval of a RCE and submitted to CARB for review. The responsibility to develop and submit the plan rest with the RCE management sponsor and RCE team lead using the resources of the RCE team members as appropriate.	RCE-PI&R
5.23.1.E	N-201018826-CA0009	WORKING	11/22/2010	CA - Formalize weekly update of in progress RCEs at CARB.	DCE-PI&R Check & Adjust

Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
5.23.1.F	N-201018826-CA0019	WORKING	1/8/2011	Include as a responsibility of CARB a weekly review of the list of open RCEs, ACEs, EFRs and CAPRs completed but not yet reviewed by CARB.	DCE-PI&R Check & Adjust
5.23.1.G	O-800073513-0260	CLOSED	06/30/2009	Establish in Management Performance Development Plans (PDPs) specific site and division CAP performance requirements and expectations. The criteria shall be weighted such that a person's performance is directly coupled with pay for performance.	NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
5.23.1.I	O-800073513-0360	CLOSED	05/13/2009	Revise station CAP procedures to align with industry practices for CAP implementation using benchmarking results. These revisions will include improvements to interfaces between CAP and Work Management to support equipment reliability.	NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R
5.23.1.J	N-201018826-CA0011	WORKING	11/22/2010	Revise Corrective Action Program procedures for the following: <ul style="list-style-type: none"> • CAPCOs should ensure trend information for the organization(s) they represent is reviewed on a periodic basis relative to: late problem identification, cause evaluation quality and corrective action closure quality shortfalls. The CAPCO will be responsible for ensuring adverse trends in these areas are appropriately identified and lessons-learned are provided to their organizational leadership and the CAP Manager. • CAP Manager should ensure station trend information is reviewed on a periodic basis relative to: late problem identification, cause evaluation quality and corrective action closure quality shortfalls. The CAP Manager will be responsible for ensuring adverse trends in these areas are appropriately identified and lessons-learned are provided to the senior leadership team. 	DCE-PI&R Check & Adjust
5.23.1.K	N-201018826-CA0014	WORKING	1/30/2011	Include monthly review of CAP Metrics at CARB.	DCE-PI&R Check & Adjust
5.23.1.M	O-800073513-0270	CLOSED	08/31/2009	Improve metrics for the quality and timeliness of CAP activities including cause evaluations and corrective action implementation, with station and division level performance reviews. The metrics include: 1) Notifications Generated and Open 2) CPRs Open and Average Age 3) Cause Evaluation Corrective Actions Open and Percent Overdue 4) Corrective Actions Open and Percent Overdue 5) Root Cause Evaluation Average Time to Perform 6) Apparent Cause Evaluation Average Time to Perform 7) Cause Evaluation Quality 8) CAP Notifications/Orders - 2 Years Backlog Workoff 9) Quality of Corrective Action Implementation 10) Operability Determination Quality	NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR
5.23.1.N	O-800390353-0010	CLOSED	10/30/2010	Establish corrective action implementation and closure training and provide to selected station personnel, including definition of (1) personnel to be trained, (2) initial training requirements, (3) continuing training requirements, and (4) timing and frequency of training, as necessary. This training will include use of the SMARTS criteria in establishing corrective actions, establishing due dates, justifying schedule extensions, and documenting closure.	NRC-3/31/10 LTR; NRC-PIX; RCE-WF-10/24/09; NRC-4/21/09 LTR; RCE-PI&R

Attachment 5

Actions to Address Open SCWE Crosscutting Theme Included in the SIBP

NOTE: Dates listed in the Closure Date column in the attached table are the dates by which completion of the Closure Review Board (CRB) process was or is scheduled. For those items with a Closure Date that has already passed, CRB review and approval has been completed.

2010 - Nuclear Safety Culture

SONGS Site Integrated Business Plan

INITIATIVE : 1.7		Improve SONGS Safety Conscious Work Environment (SCWE) and implement the "Four Pillar" model.			
Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
1.7.1	MILESTONE		03/04/2011	PILLAR 1	
1.7.1.A	O-800482550-0010	WORKING	12/03/2010	CA-1a/b (1): SCWE General Employee Training (GET) - Revise GET to introduce the 4 Pillar concept including roles and responsibilities for each Pillar. The training will: --Emphasize the importance of the First Pillar (Supervisor/Management Support) in raising concerns up through the open door policy and supervisors being receptive to employee concerns. --Show how the Second Pillar (Corrective Action Program) can also be used to identify and resolve concerns, especially when personnel do not feel comfortable with the First Pillar of Supervisor/Manager Support). --Show how the Third Pillar (Alternate Resolution Support) can be used at any time, and including going directly to the NRC, however at good plants with a good SCWE, it is usually not needed because of effective First and Second Pillars. --Make it clear that the Company and SONGS senior leadership has a zero tolerance for retaliation.	NRC-SCWE; RCE-SCWE
1.7.1.B	O-800482551-0010	WORKING	12/03/2010	CA-1a/b (2): SCWE General Employee Training (GET) - Revise initial GET so that it provides enhanced SCWE training for workers and supervisors including: --The importance of SCWE. --The relationships between SCWE, Nuclear Safety Culture, and Cross-Cutting Areas. --The definitions of Protected Activity and Retaliation. --Case studies to show what can constitute Retaliation.	NRC-SCWE; RCE-SCWE
1.7.1.C	O-800482552-0010	WORKING	3/4/2011	CA-1a/b (3): Supervisor/Worker Training - Train active status (*) SCE and contract workers and supervisors on SCWE including: --The importance of SCWE. Emphasize the First Pillar (Supervisor/Management Support) in raising concerns up through the open door policy and supervisors being receptive to employee concerns. Being receptive include supporting their use of the Corrective Action Program in NN generation, looking up status in resolution, and escalating resolution if necessary. (*) Active status will be on a defined date close to the initial training class and entered into Corrective Action Program documentation. --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.	NRC-SCWE; RCE-SCWE
1.7.1.E	O-800480613-0010	WORKING	03/04/2011	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, Canister Fabrication Shop, and Security.	NRC-SCWE; RCE-SCWE
1.7.1.F	O-800482553-0010	WORKING	03/04/2011	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, Canister Fabrication Shop, and Security.	NRC-SCWE; RCE-SCWE

Action#	SAP #	SAP Status	Closure Date	STBP Description	Source
1.7.1.G	O-800480614-0010	CLOSED	06/30/2010	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.	NRC-SCWE; RCE-SCWE
1.7.1.I	N-201088265-0001	WORKING	12/10/2010	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.	NRC-SCWE
1.7.2	MILESTONE		09/10/2010	PILLAR 2	
1.7.2.A	O-800482555-0010	CLOSED	06/04/2010	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.	NRC-SCWE; RCE-PI&R-X; DCE-PI&R; RCE-SCWE
1.7.2.B	O-800482556-0010	CLOSED	09/10/2010	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.	NRC-SCWE; RCE-SCWE
1.7.2.C	O-800482557-0010	CLOSED	07/09/2010	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.	NRC-SCWE; DCE-PI&R; RCE-SCWE
1.7.2.D	O-800482558-0010	CLOSED	06/04/2010	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.	NRC-SCWE; RCE-PI&R-X; DCE-PI&R; RCE-PI&R; RCE-SCWE
1.7.2.E	O-800482559-0010	CLOSED	08/20/2010	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.	NRC-SCWE; RCE-SCWE
1.7.2.G	O-800480616-0010	CLOSED	06/18/2010	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.	NRC-SCWE; RCE-SCWE
1.7.3	MILESTONE		03/04/2011	PILLAR 3	

Action#	SAP #	SAP Status	Closure Date	STBP Description	Source
1.7.3.A	O-800486341-0010	CLOSED	06/04/2010	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.	NRC-SCWE; RCE-SCWE
1.7.3.B	O-800486342-0010	CLOSED	07/23/2010	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	NRC-SCWE; RCE-SCWE
1.7.3.C	O-800486343-0010	WORKING	02/18/2011	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.	NRC-SCWE; RCE-SCWE
1.7.3.D	O-800480617-0010	CLOSED	06/04/2010	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.	NRC-SCWE; RCE-SCWE
1.7.3.E	O-800486344-0010	CLOSED	06/04/2010	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.	NRC-SCWE; RCE-SCWE
1.7.3.F	O-800486345-0010	CLOSED	07/16/2010	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.	NRC-SCWE; RCE-SCWE
1.7.3.H	O-800486347-0010	CLOSED	08/20/2010	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).	NRC-SCWE; RCE-SCWE
1.7.3.I	O-800480618-0010	CLOSED	08/20/2010	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.	NRC-SCWE; RCE-SCWE
1.7.3.K	O-800486349-0010	WORKING	03/04/2011	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.	NRC-SCWE; RCE-SCWE
1.7.3.L	O-800486350-0010	CLOSED	09/10/2010	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.	NRC-SCWE; RCE-SCWE

Action#	SAP #	SAP Status	Closure Date	STBP Description	Source
1.7.3.M	O-800486351-0010	CLOSED	08/20/2010	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.	NRC-SCWE; RCE-SCWE
1.7.3.N	O-800486352-0010	WORKING	03/04/2011	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.	NRC-SCWE; RCE-SCWE
1.7.3.O	O-800480619-0010	CLOSED	08/20/2010	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.	NRC-SCWE; RCE-SCWE
1.7.3.Q	N-201088307-0010	WORKING	12/10/2010	Extend ECP normal working office hours to support the Fall 2010 Unit 3 Steam Generator Replacement Outage.	NRC-SCWE
1.7.4	MILESTONE		12/03/2010	PILLAR 4	
1.7.4.A	O-800486354-0010	CLOSED	09/10/2010	CA-4a (1): Management Oversight - Establish a procedure defining SCWE management oversight model including the roles and responsibilities for: --Directing in-house and independent SCWE assessments, surveys, and focus groups to pulse the organization. ----Reviewing results and the tracking of findings and recommendations. -----Directing Management 2-Way Communication Sessions with Workers/Groups, and use of Task Groups --Reviewing organization and program changes for SCWE impacts. --Reviewing outage plans and resources for SCWE impacts. --Reviewing disciplinary actions, resignations and promotions for SCWE impacts. -----Establishing mitigation and communication plans. --Reviewing SCWE performance (SCE and Contractors) and metrics periodically (initially monthly) with the Senior Leadership Team. -----Defining action plans and communicating SCWE performance to the station and external agencies.	NRC-SCWE; RCE-SCWE

Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
1.7.4.B	O-800486355-0010	WORKING	12/03/2010	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, Canister Fabrication Shop and Security. Upon implementation, present the findings to the Senior Leadership Team and built requirements/expectations into SCWE procedures.	NRC-SCWE; RCE-SCWE
1.7.4.C	O-800486400-0010	CLOSED	10/01/2010	CA-4a (3): Diagnostic to Identify Target Groups - Conduct focused group interviews to pulse the organization, including SCE employees and contractors, on perceptions of SCWE effectiveness and retaliation. Review the results to make check & adjusts to communications to close gaps and, as necessary, define Task Groups to address Targeted Areas of SCWE concern.	NRC-SCWE; RCE-SCWE
1.7.4.D	O-800486356-0010	CLOSED	09/17/2010	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.	NRC-SCWE; RCE-SCWE
1.7.4.F	O-800486358-0010	CLOSED	06/04/2010	CA-4b (2): Change Management Program - Revise SO123-XV-50.7, Change Management Guideline Benchmark and revise Change Management Procedures to reflect industry practices.	NRC-SCWE; RCE-SCWE
1.7.4.G	N-201038036-0016	WORKING	12/03/2010	Critique Issue - Nuclear Regulatory Affairs - conduct "Task Groups" facilitated by the SCWE recovery team to go over the results of the interviews. This task may be closed with the creation of a notification to develop an action plan for the issues identified from the task group meetings and specific 2010 independent focus group issues. [NRC TASK: 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.]	NRC-SCWE
1.7.4.H	N-201038036-0017	WORKING	12/03/2010	Critique Issue - Nuclear Business Administration (Represented and Non Represented) -conduct "Task Groups" facilitated by the SCWE recovery team to go over the results of the interviews. This task may be closed with the creation of a notification to develop an action plan for the issues identified from the task group meetings and specific 2010 independent focus group issues. [NRC TASK: 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.]	NRC-SCWE

Action #	SAP #	SAP Status	Closure Date	STBP Description	Source
1.7.4.I	N-201038036-0018	WORKING	12/03/2010	<p>Critique Issue - NTD Maintenance and Technical Training - conduct "Task Groups" facilitated by the SCWE recovery team to go over the results of the interviews. This task may be closed with the creation of a notification to develop an action plan for the issues identified from the task group meetings and specific 2010 independent focus group issues.</p> <p>[NRC TASK: 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.]</p>	NRC-SCWE
1.7.4.J	N-201038036-0019	WORKING	12/03/2010	<p>Critique Issue - DEO Design Group - conduct "Task Groups" facilitated by the SCWE recovery team to go over the results of the interviews. This task may be closed with the creation of a notification to develop an action plan for the issues identified from the task group meetings and specific 2010 independent focus group issues.</p> <p>[NRC TASK: 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.]</p>	NRC-SCWE
1.7.4.K	N-201038036-0020	WORKING	12/03/2010	<p>Critique Issue - Nuclear Information Services - conduct "Task Groups" facilitated by the SCWE recovery team to go over the results of the interviews. This task may be closed with the creation of a notification to develop an action plan for the issues identified from the task group meetings and specific 2010 independent focus group issues.</p> <p>[NRC TASK: 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.]</p>	NRC-SCWE
1.7.4.L	N-201038036-0021	WORKING	12/03/2010	<p>Critique Issue - SEP Emergency Planning -conduct "Task Groups" facilitated by the SCWE recovery team to go over the results of the interviews. This task may be closed with the creation of a notification to develop an action plan for the issues identified from the task group meetings and specific 2010 independent focus group issues.</p> <p>[NRC TASK: 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.]</p>	NRC-SCWE
1.7.5	MILESTONE		08/20/2010	Corrective Actions to Prevent Recurrence	
1.7.5.A	O-800486359-0010	CLOSED	08/20/2010	<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>	NRC-SCWE; RCE-SCWE

Action#	SAP #	SAP Status	Closure Date	SIBP Description	Source
1.7.5.B	O-800486420-0010	CLOSED	08/20/2010	<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> <p>Pillar 1 - # of anonymous NSC cases, # of anonymous NN's, and # of HIRD contacts. (HIRD = Harassment, Intimidation, Retaliation, or Discrimination).</p> <p>Pillar 2 - # of open CAP NN's, # of open NN's, and # of overdue NNs.</p> <p>Pillar 3 - # of open NSC cases, # of NRC Allegations, # of grievances, and the ratio of NSC to NRC contacts.</p> <p>Pillar 4 - # of early interventions, # of NSC Target Group contacts, and # of Discipline Review Boards.</p> <p>Note: This Corrective Action should apply Change Management per SO123-XV-50.7 (Change Management)</p>	NRC-SCWE; RCE-SCWE
1.7.5.C	O-800486421-0010	CLOSED	06/04/2010	<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.</p> <p>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>	NRC-SCWE; RCE-SCWE