



NUCLEAR FUEL SERVICES, INC.

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March 23, 2011

Mr. Victor McCree, Deputy Regional Administrator
U.S. Nuclear Regulatory Commission, Region II
245 Peachtree Center Avenue NE, Suite 1200
Atlanta, GA 30303-1257

References: 1) Docket No. 70-143; SNM-124
2) NRC letter to NFS, "Confirmatory Order (Effective Immediately)
[NRC Office of Investigation Report No. 2-2010-001]", EA-10-076,
dated November 16, 2010

Subject: Safety Culture Improvement Plan

Dear Sir:

As discussed with you and your staff, Nuclear Fuel Services, Inc. (NFS) hereby submits its Safety Culture Improvement Plan (SCIP). The SCIP is designed to communicate NFS' perspectives on safety culture, the approach taken in planning the improvement initiatives, and how NFS is addressing the findings identified in the Independent Safety Culture Assessment (ISCA) report that was provided to the Nuclear Regulatory Commission (NRC) on June 29, 2010. As required in Reference 2, NFS is to address the findings in the ISCA. Therefore, NFS has developed and is maintaining on-site for inspection by you or your staff a detailed Action Listing that shows how each ISCA finding is analyzed and addressed. The Action Listing also includes statuses and schedule.

If you or your staff have any questions, require additional information, or wish to discuss this matter further, please contact me at (423) 743-1702, or Mr. Mark Elliott, Director of Quality, Safety and Safeguards, at (423) 743-1705. Please reference our unique document identification number (21G-11-0060) in any correspondence concerning this letter.

Sincerely,
NUCLEAR FUEL SERVICES, INC.



Joseph G. Henry
President

WRS/smd

Attachment: Safety Culture Improvement Plan, Revision 3

Copy:

Mr. Anthony Gody, Director
Division of Fuel Facility Inspection
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245 Peachtree Center Avenue NE, Suite 1200
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Mr. Kevin Ramsey, Senior Project Manager
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Mr. Galen Smith
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ATTACHMENT

**Safety Culture Improvement Plan, Revision 3
(16 Pages)**

Nuclear Fuel Services' Safety Culture Improvement Plan



REVISION 3

**Nuclear Fuel Services' Safety Culture Improvement Plan
Revision 3**

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APPENDICES

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1.0 NFS DEFINITION OF SAFETY CULTURE

Nuclear Fuel Services, Inc. (NFS) is committed to maintaining a strong safety culture. Safety culture is defined as the core values and behaviors resulting from a collective commitment by each of us to emphasize safety over competing priorities to ensure the protection of people and the environment.

We understand that the protection of people and the environment is the right thing to do and is fundamental to achieving our business objectives. As described in NFS-MGT-05-007, *Safety Culture Policy*, a strong safety culture must exhibit the following traits:

1. **Leadership Safety Values and Actions** – Leaders demonstrate commitment to safety in their decisions and behaviors.
2. **Problem Identification and Resolution** – Issues potentially impacting safety are promptly identified, fully evaluated and promptly addressed and corrected commensurate with their significance.
3. **Personal Accountability** – All individuals are personally responsible for safety.
4. **Work Process** – The process of planning and controlling work activities is implemented so that safety is maintained.
5. **Continuous Learning** – Opportunities to learn about ways to ensure safety are sought out and implemented.
6. **Environment for Raising Concerns** – A safety conscious work environment where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment or discrimination is maintained.
7. **Effective Safety Communication** – Communications maintain a focus on safety.
8. **Respectful Work Environment** – Trust and respect permeate the organization.

2.0 OVERVIEW OF NFS SCIP

The NFS Safety Culture Improvement Plan, Revision 3¹ (SCIP) ensures that the NFS workforce has a structured and easily understood plan for sustained, long-term improvement of the organizational safety culture. The plan addresses the findings identified in the second NFS-Erwin Site 2009/2010 Independent Safety Culture Assessment – Results Report (ISCA 2009/2010).

The plan illustrates via a timeline our plan for conducting future independent safety culture assessments. As we progress through the various actions and assessments discussed in the SCIP, we may discover that additional changes or enhancements to this

¹ The issuance of this document, the Nuclear Fuel Services Safety Culture Improvement Plan, Revision 3 (SCIP) supersedes all former documents and plans relating to safety culture improvement at NFS.

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plan are necessary. To that end, we reserve the right to revise the SCIP. We will maintain a record of change log in future revisions, excepting updates to the Appendices for which current versions will be maintained and available on-site.

Appendices to the plan provide a summary timeline of required actions and illustrate the matrix of management accountability with regard to high-priority areas, individual expertise, and each ISCA 2009/2010 finding.

Our top priority at NFS is to ensure the safe operation of our facility. We understand the need for a robust safety culture to ensure the long-term safety of our employees and the public. Accordingly, we have created the SCIP to delineate the specific actions that are planned, in progress, or completed, that will promote a robust safety culture. NFS has made progress with instilling a strong safety culture at the facility, and we understand the actions necessary to continue toward a long-term robust safety culture.

3.0 COMPONENTS AND CONCEPTS

COMPONENTS

The ISCA 2009/2010 report is an overarching review of historical NFS safety culture issues, operational events and upsets, employee surveys and other assessment results. The ISCA 2009/2010 outlines both findings and recommendations in summary, by high-priority area, and individually throughout the report.

As discussed in the ISCA 2009/2010 report, the NFS Safety Culture Board of Advisors (SCUBA) team began the assessment process in August 2009, and completed it in early May 2010. The report states that “recent changes, areas of emphasis, and additional planned changes at the NFS-Erwin Site... appear to have had a positive effect on organizational safety culture in the short-term and hold the promise for continued and future improvements that could prove to have a long-term, lasting positive effect.” (ISCA 2009/2010 report, pg. 2)

Many of the long-term and ongoing actions at the NFS facility that were begun in December 2009 as a result of the comprehensive conduct of operations and safety improvement initiative, substantially address a number of the findings in the ISCA 2009/2010 report. These include actions completed prior to facility restart and reviewed by the NRC during subsequent readiness review assessments.

The NFS SCIP was created to show how the findings of the ISCA 2009/2010 are being addressed as required by Confirmatory Order EA-10-076 (the Order). The SCIP Appendix A – Accountability Matrix, is used in concert with an Action Listing (which is maintained on-site) that provides responsible NFS Management with the ISCA finding/recommendation details, and includes action plans (with statuses and timing) needed for day-to-day management of the improvement initiatives.

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CONCEPTS

The NFS team maintains the following overarching concepts to address safety culture improvement at NFS, and to serve as a framework designed to illustrate the expected behaviors of all NFS employees and contractors. These concepts have been disseminated to all employees in various formats and publications, and are summarized in the “Charting a New Course – Supporting the Future State” presentation. These concepts include the following:

1. NFS Core Values (NFS-MGT-08-014)

1. Integrity
2. People
3. Formality & Discipline
4. Respect for Health & Environment
5. Technical Excellence
6. Accountability
7. Cost-Consciousness

2. Workplace Priorities listed in order of importance (NFS-OPS-001)

1. Safety
2. Quality
3. Schedule
4. Cost

Safety is built on the principle that no one wants to get hurt or put anyone else in harm's way. Quality is the commitment made as professionals to deliver a product that meets or exceeds the standards and requirements. If our first two priorities ever suffer, schedule and cost are soon to follow. At NFS, we take pride in meeting our commitments, and we strive to accomplish our work within budget. However, we pursue these latter two priorities under the umbrella of the first two.

3. Conduct of Business (NFS-OPS-001)

1. **Personal Accountability:** each individual, as a professional, takes responsibility for their contribution to the overall effort. Each person should be able to take pride in what they have accomplished at the end of the shift or the end of the day.
2. **Procedure Compliance:** a thinking compliance. When combined with training and experience, the use of the procedure tool provides the highest probability of the desired outcome. The procedure is written by a subject matter expert and verified through review and walk down. As a tool, a procedure should be

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both respected and suspected, which is why a questioning attitude is necessary.

3. **Technical Inquisitiveness:** a questioning attitude about everything. This approach to every situation means taking nothing for granted and double-checking everything. It means always making sure, to the maximum extent possible, that the outcome of one's actions will be what is anticipated. Most importantly, it also means asking for help when unsure of the outcome.
4. **A Willingness to Stop:** at NFS, stopping to get help is treated as an act of integrity. A willingness to stop is perhaps the most important attribute. It means never proceeding in the face of uncertainty.

4. NFS Employee Expectations (C-HR-11-001-A)

1. Practice safety in all endeavors.
2. Treat all others with respect.
3. Support NFS workplace priorities, a Safety Conscious Work Environment (SCWE), and good conduct of business attributes.
4. Display a questioning attitude in a professional and courteous manner.
5. Seek to understand management's direction and to follow the direction as it was intended.
6. After providing input, do what management directs:
 - a. Unless the direction is unsafe, illegal, or immoral
 - b. If you believe 6.a. is the case, elevate your concern to the next level of management or to other avenues
 - c. If you are a union employee and you feel the instruction is in violation of the contract, follow the grievance process
7. Do what you say you will do; take responsibility for your actions.
8. Report to work areas at the scheduled time in appropriate work dress; union employees are to adhere to the provisions of the contract in this regard.
9. Communicate; keep your management informed and ask for help from others.

5. NFS Manager Expectations (C-HR-11-001-A)

1. As much as possible, explain "why" when you give direction.
2. Listen to feedback from employees and understand their concerns.
3. Clearly set expectations for employees.
4. Manage all employees in accordance with company rules; in addition, interface with the union employees in accordance with the contract.

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5. Document and advise your management and Human Resource (HR) of problems and shortcomings.
6. Manage performance: recognize positive behavior; when necessary, apply discipline within company guidelines.
7. Support the management chain, especially first line leadership, so that work rules and contract provisions can be consistently applied.
8. Communicate; keep the workforce informed and call on resources when needed for advice and assistance.

4.0 PROCESS AND RECENT HISTORY – DEVELOPING THE PLAN

PROCESS

The NFS senior leadership team gathered in September 2010 to formulate an action plan to address the ISCA 2009/2010 findings and recommendations, in conjunction with the NFS safety culture and conduct of operations initiatives already underway. The team determined that the ISCA 2009/2010 should be approached comprehensively, as many of the findings and recommendations from the report addressed analogous issues, or suggested similar corrective actions.

The team also considered the appropriate themes or characteristics of high-performing organizations, and recognized that trust and respect among employees is imperative for fostering a strong safety culture.

In order to build a robust safety culture, industry best practices from commercial nuclear facilities, Department of Energy facilities, or nuclear industry groups, such as the Institute for Nuclear Power Operations (INPO), and the International Atomic Energy Agency (IAEA), have been leveraged.

RECENT HISTORY

The NFS manufacturing operation has been sited at its current location since 1957, and has long been the primary supplier of fuel for the United States Naval Nuclear Propulsion Program. The company has also been contracted to convert surplus weapons-grade uranium into a low-enriched form suitable for use in commercial reactors, or for return to the customer. NFS employs close to 800 people, with many more contributing daily in mission essential contractor roles. The NFS workforce is comprised of both union and non-union employees. Due to collective bargaining agreement issues, intermittent challenges arise with regard to implementation of new policies or initiatives. Following the acquisition of NFS by The Babcock & Wilcox Company (B&W) on December 31, 2008, the salaried employee workforce is now comprised of primarily long-term NFS employees and some B&W employees. This is a factor in overall culture change as long-term NFS employees have sustained a major paradigm shift over the last several years, while B&W employees have been challenged to understand the impacts on change management resulting from long-term NFS culture.

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In 2006, NFS began developing plans for an independent safety culture assessment as a result of a series of issues and events, which raised questions about NFS' commitment to and the effectiveness of its efforts to improve upon operational performance and safety. After discussions with the Nuclear Regulatory Commission (NRC), NFS entered into a formal agreement to conduct a series of assessments over a period of two years. In 2007, NFS contracted a team of third-party independent nuclear and safety industry experts to begin the multi-year assessment process, which involved observations, interviews and confidential surveys. This team operated under the title Safety Culture Board of Advisors, or SCuBA.

In 2008, the SCuBA team developed an initial report. This report was provided to both NFS and the NRC. It identified a number of cultural and operational challenges at the facility. NFS immediately began implementation of a number of actions to address the challenges.

In the Fall of 2009, NFS experienced a series of operational upsets. These events included a fire safety device inspection violation, an unexpected chemical reaction in the downblending facility, and a fire inside a glove box in the Commercial Development Line. Following consultation with the NRC, NFS instituted a temporary shutdown of the facility in late December 2009. The NRC issued NFS a Confirmatory Action Letter (CAL), which outlined a number of corrective actions for NFS to implement prior to restarting facility operations.

Concurrent with these events, a second Independent Safety Culture Assessment (ISCA) was underway by the same team that conducted the 2007/2008 assessment. The second (2009/2010) assessment was conducted principally in 2009 and the report was released in June 2010. The report concluded, as had the earlier report, that NFS' safety culture required strengthening.

Additional factors impacting the workforce during this overall timeframe included implementation of new management systems for business practices, heightened public/media attention, and increased NRC oversight.

The historical perspective, associated workforce and planning impacts are important to understand and consider in that they have impacted the overall culture at the facility. Communications strategies, implementation of new programs and policies, and succession planning all must be predicated upon an understanding of the aforementioned historical factors.

DEVELOPING THE PLAN

The events leading up to the December 2009 shutdown, the shutdown itself, and a preview of the likely findings of the second ISCA spurred the leadership team and the workforce to take prompt action to address the noted deficiencies. The NFS team immediately began to implement fundamental changes in the conduct of operations. Actions were taken to correct the specific events that caused the shutdown, and to correct the root causes that contributed to the events. Following an intensive three-month period

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of effort, change and improvement, B&W and NRC evaluators determined that the safety culture at NFS had improved substantially and permission was granted to restart the Navy fuel operations. Restart of these operations was successful because:

- There was a clear vision and mission,
- Restart actions were well-defined and focused,
- People were held accountable for their actions,
- A questioning attitude permeated, and
- Communications were effective.

Members of the SCuBA team, who were present during portions of the restart effort, acknowledged that management involvement to change culture and hold individuals accountable was apparent, effective, and successful. Increased workforce sensitivity to key attributes such as developing a questioning attitude and willingness not to proceed in the face of uncertainty was observed.

Although the restart actions were very successful, they were not the end of a change cycle but rather the beginning. Best practices at other nuclear sites were benchmarked. Additional actions were initiated based on the success of these actions at other sites to supplement those already underway. By May 2010, NFS had charted and set sail on a new course leading to an improved safety culture.

Some of these changes included²:

- Ensuring behaviors always support safety as the top priority,
- Increasing accountability,
- Establishing higher standards and improved tools for the corrective action program,
- Implementing a resource-loaded work schedule,
- Establishing Plan of the Day (POD) and Plan of the Week (POW) accountability meetings,
- Introducing workplace priorities and conduct of business attributes,
- Organizational realignment that provided new checks and balances, and
- Enhancing understanding of a safety conscious work environment.

² The Action Listing, which is maintained on-site, provides specific information regarding the changes (when applicable) that apply to specific ISCA findings.

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In May 2010, NFS restarted the Uranium-Oxide dissolution line. The sequential, methodical restart followed both NFS and NRC reviews of corrective actions taken to improve performance in the areas listed above. Significant improvement in the NFS conduct of operations had been observed and tracked through a series of performance metrics implemented at the NFS facility.

In June 2010, the 2009/2010 ISCA team presented their final report. The report is important in that it outlines areas necessary for improvement at the NFS site as captured in its High Priority Findings and Recommendations; and it provides specific, technical details on cultural and procedural changes necessary for excellent facility performance. The report represented the "Current State" of NFS circa December 2009. The future state of NFS must be well-defined and contain:

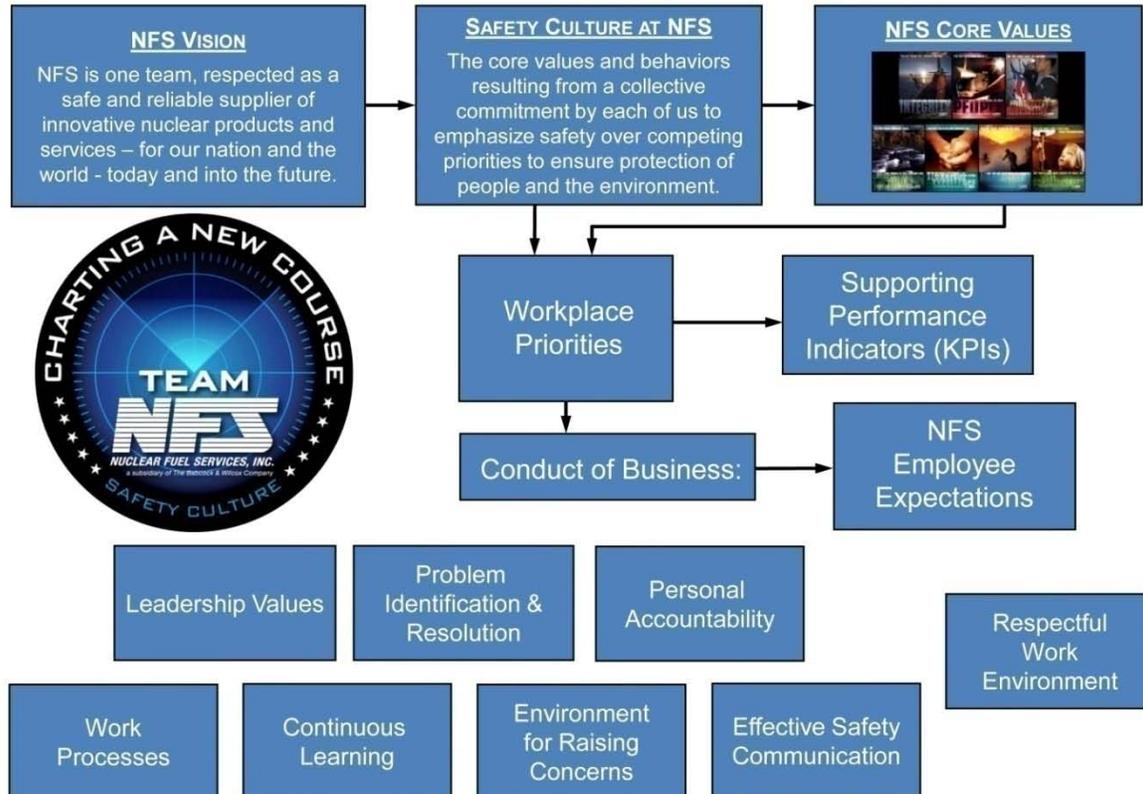
- The company's vision for its safety culture,
- The attributes and behaviors that characterize that culture, and
- Agreement, understanding, and a belief that the vision is achievable.

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That future state and the path to reach it, entitled “Charting a New Course – Supporting the Future State,” (Figure 1) is available in an interactive format on the NFS intranet site.

Figure 1

CHARTING A NEW COURSE - SUPPORTING THE FUTURE STATE



5.0 ACTION PLAN

To formulate the SCIP, NFS leadership performed in-depth interviews with employees who were closely connected to both the 2010 restart activities and the first ISCA report. This resulted in the following themes:

- While specific deficiencies were addressed, some latent errors were not,
- Significant progress was made but not always appropriately documented,
- Corrective actions were sometimes implemented without workforce input,
- Single-point accountability was not adequately utilized, and
- Management of action items lacked prioritization.

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The NFS senior leadership team determined that the ISCA 2009/2010 report would be addressed in a more encompassing way than the prior one. An Accountability Matrix (Appendix A) was developed. This matrix listed the seven high-priority areas (as determined by the SCuBA team) on one axis, and Safety Culture Components (SCCs) on the other. Each high-priority area was assigned an NFS senior leadership member as Champion, and each SCC was assigned an NFS team-member to serve as the Subject Matter Expert (SME). All the high-priority findings were entered into the matrix in red ink. Positive findings were shown in green ink, and other findings were entered into the matrix in blue ink. This ensured a single-point of accountability for the high-priority areas and that all findings would be addressed.

During the last quarter of 2010, Champions and Subject Matter Experts determined that the NFS team would respond to the findings and recommendations of the ISCA 2009/2010 with the following guidelines (these were intended as overarching guidance upon which teams could base their specific action plans going forward, and would not be addressed as specific action items in and of themselves):

- Address high priority findings and recommendations first,
- Address causes of deficient conditions rather than only specific deficiencies,
- Work issues across the organizational structure rather than within organizational silos,
- Create and maintain objective evidence of actions taken and their effectiveness,
- Establish realistic schedules that take resource availability and prioritization into account,
- Require individual accountability from each person assigned an action,
- Take credit for what has already been accomplished, and
- Do it right the first time.

NFS Safety Culture Champions and Subject Matter Experts developed a management tool to aid in management of the many actions identified to address ISCA findings and recommendations. This tool, a detailed Action Listing, includes status and schedule and shows how each ISCA finding is addressed. In order to assure comprehensiveness, the Action Listing also addresses the recommendations in the ISCA report. The Actions Listing is maintained on-site and available for review by the NRC.

6.0 SAMPLE LISTING OF PROGRAMS/ACTIONS COMPLETED²

- Established a comprehensive Safety Culture definition
- Defined eight Safety Culture traits to guide Safety Culture improvement
- Reorganized to provide increased checks and balances

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- ❖ Engineering Department moved to report directly to President
- ❖ Program Management Group created
- ❖ Restructured Safety and Regulatory Department
- ❖ Assurance Department reporting to the Board of Directors
- Reinvigorated workforce understanding of and commitment to Core Values
- Established Workplace Priorities
- Implemented Conduct of Business Attributes
- Established Employee/Management Expectations
- Established an independent Nuclear Safety Review Board (NSRB)
- Established an Executive Review Board (ERB)
- Implemented a Senior Engineering Watch (SEW)
- Established an Operating Experience (OE) Program
- Established a People Team
- Established an Ombudsman Program
- Established a Differing Professional Opinions (DPO) Process
- Instituted a Work Control Program
- Improved Communications
- Strengthened the Corrective Actions Program (CAP)
- Revised CAP procedures to include a Safety Culture Implications Review (SCIR)
- Revised programmatic guidance to provide specific criteria to invoke Corrective Action Review Board (CARB) effectiveness reviews
- Conducted an independent review of NFS investigation processes
- Developed and implemented a standard operating guide for evaluations of Unusual Incidents
- Strengthened Configuration Management (CM)
- Implemented a Management Oversight Program and Schedule
- Established Plan of the Day (POD) / Plan of the Week (POW) schedules/meetings
- Revised Operational Decision Making (ODM) Procedure and developed associated training
- Strengthened Program to Communicate basis of Significant Decisions (Operational Decision Making)
- Established a Senior Training Advisory Committee (STAC)

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- Developed and conducted Refresher SCWE training for all employees
- Implemented Metrics program using Key Performance Indicators (KPI)
- Implemented Salaried Performance Management Program

7.0 SAMPLE LISTING OF PROGRAMS/ACTIONS UNDERWAY²

- Constructing new Warehouse and improving Inventory Management
- Developing an Equipment Reliability Program
- Improving Facility Material Condition
- On-going implementation of Human Performance (HuP) processes
- Ongoing Leadership Training modules
- Increasing the Training Opportunities and Requirements for Technical Specialties
- Performed “gap” analysis of Corrective Action Program against applicable NQA-1 Standards and creating a plan to address gaps
- Conducting additional management training on “Building a Safety & Accountable Workplace” provided by an outside SCWE expert.

Appendix A – Accountability Matrix

Area/Champion → ↓ SC Attribute /SME	Organizational & Individual Accountability (M. Elliott)	Corrective Action program Effectiveness (C. Reed)	Resource Management (R. Dailey)	Tech/Pro Competencies (WCW) (R. Barrientos)	Questioning Attitude (G. Athon)	Work Control (J. Nagy)	Safety Conscious Work Environment (M. Moore)	Other Grouping (L. Turpin)
Decision Making (DEC) (M. McKinnon)	AFI-DEC-02				AFI-DEC-01 AFI-DEC-03 AFI-CS/PSL-04 AFI-SUM-06			
Resources (RES) (R. Moore)			AFI-RES-03 AFI-RES-04 AFI-RES-01 AFI-RES-02					
Work Control (WC) (K. Engle)				AFI-WC-05		AFI-WC-03/04 AFI-WC-01 AFI-WC-02 AFI-WC-06 ANA-WC-01 ANA-WC-02		
Work Practices (WP) (N. Kenner)	AFI-WP-01 AFI-WP-02 OFI-WP-01 AFI-WP-05	AFI-WP-07		AFI-WP-06		AFI-WP-08 ANA-WP-01 ANA-WP-02	AOA-WP-01 AFI-WP-04 AFI-CS/PSL-06	AFI-WP-03 ANA-WP-03
Corrective Action Program (CAP) (R. Crowe)		AFI-CAP-02/04 AFI-CAP-06/07 AFI-CAP-01/03 AFI-CAP-05 AFI-CS/FD-01 AFI-CS/FD-02 AFI-RCC-01 ANA-RCC-01 AFI-CS/PSL-05 AFI-CS/BPF-01 AFI-CS/CDL-01				ANA-CAP-01		
Operating Experience (OE) (B. Perkins)		AFI-OE-01 AFI-OE-02			AFI-OE-03			AFI-CS/PSL-08
Self & Independent Assessments (SA) (M. Dotson)	AFI-SA-01 AFI-SA-02	AFI-SA-06					AFI-SA-03 AFI-SA-04 AFI-SA-05 AFI-SUM-08	
Environment for Raising Concern (ERC) (N. Marchioni)							AOA-ERC-01 ANA-ERC-01 ANA-LOC/HP-01 OFI-LOC/CS-01	
Prevent, Detect, & Mitigate Perceptions of Retaliation (N. Marchioni)							AFI-PDM-01 AFI-LOC/AS-01 AFI-LOC/HP-01	
Accountability (ACC) (K. Weir)	AFI-ACC-04/06 AFI-ACC-03 AFI-CS/FD-03 AFI-CS/BPF-02 AFI-CS/CDL-02 AFI-CS/PSL-07	AFI-ACC-02	AFI-ACC-05		AFI-ACC-01			
Continuous Learning Environment (CLE) (S. Sanders)	AFI-CLE-01 AFI-CLE-10 ANA-CLE-01			AFI-CLE-03/04 AFI-CLE-05/06 AFI-CLE-07/08 AFI-CLE-02 OFI-CLE-02				AFI-CLE-09
Organizational Change Management (OCM) (D. Wise)								AFI-OCM-01 AFI-OCM-02 ANA-OCM-01
Safety Policies (SP) (R. Shackelford)	AFI-SP-03 AFI-SP-04	AFI-NOV-01			AFI-SP-01		AOA-SP-01 AFI-SP-02	AFI-CS/PSL-03
Other Categorizations (R. Storey)	AFI-SUM-01 AFI-SUM-05		AFI-CM-01 AOA-CM-01			ANA-CM-02	AFI-SUM-02 AFI-SUM-03 AFI-SUM-07	AFI-SUM-04 AFI-SUM-09 OFI-CM-01 OFI-CM-02 OFI-CM-03 ANA-CM-01 AFI-CS/PSL-01 AFI-CS/PSL-02

Appendix B - Timeline

Charting a New Course

