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1205 banner hill road erwin, tn 37650 phone 423.743.9141
www.nuclearfuelservices.com

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Safety Culture Assessment Panel Report

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Robert C. Birmingham
Human Resource Director

Mark P. Elliott
Quality, Safety, and Safeguards Director

Nancy C. Kenner
Safety Culture Improvement
Manager

John W. Nagy
Assurance Director

James B. Perkins
Acting Quality Assurance Manager
and Operating Experience Program
Administrator

Lauri A. Turpin
Communication Manager

Concurrence:

Joseph G. Henry, President

Safety Culture Assessment Panel Report

BACKGROUND

In February 2012, a panel was designated by the NFS President to assess the effectiveness of the NFS Safety Culture Improvement Plan (SCIP) and recommend any additional corrective actions for weaknesses or deficiencies identified. This Safety Culture (SC) Assessment Panel convened April 23-24, and April 26, 2012 and included the Assurance Director, Human Resources Director, Communication Manager, Safety Culture Improvement Manager, Quality, Safety, and Safeguards Director and the Acting Quality Assurance (QA) Manager/Operating Experience Program Administrator. The panel reviewed various inputs in order to assess the effectiveness of the SCIP mid-term and to recommend any needed modification to implementation plans to address any weaknesses or deficiencies found. This assessment is responsive to the Nuclear Regulatory Commission's Confirmatory Order EA-10-076 Section III 4(d) where NFS agreed to "assess the effectiveness of its plan and implement any additional corrective actions for any weaknesses or deficiencies identified, by June 2012".

ASSESSMENT METHODOLOGY

The panel conducted the assessment in three parts: 1) a review of SCIP management; 2) a review of SCIP implementation and 3) a general safety culture review. The panel believed that the combination of these three reviews would provide the best perspective from which to judge the effectiveness of the SCIP. The SC Assessment Panel's review sessions were facilitated by consultant and retired Westinghouse Performance Improvement manager, Mr. Gary LaBruyere. The SCIP management review focused on mechanistic aspects, such as adequacy of protocols, processes and resources. The SCIP implementation review was a structured review of the plan's effectiveness at the safety culture component or trait level. To inform the assessment, the panel reviewed component descriptions in the NRC's *RIS-2006-13 Safety Culture Component Appendix*. The facilitator led the panel in a collegial review of each component and the associated 2009/2010 Independent Safety Culture Assessment (ISCA II) findings and actions. Several activities (QA Audit of SCIP completed actions and the QA Effectiveness Review of selected actions) had occurred prior to the panel convening, which provided the panel useful input for assessing the effectiveness of the SCIP. The panel reviewed the results from these activities as well as Key Performance Indicators (KPI's) and other metrics deemed relevant to corresponding component areas. The panel also reviewed the NFS notes from the NRC Inspection Closeout Meeting for the April 2-5, 2012 SCIP inspection. Lastly, the panel engaged in general safety culture reviews of overarching metrics, positive and negative traits observed and other data in order to provide a holistic view of the effectiveness of the SCIP and identify weaknesses and deficiencies that need additional attention by the organization.

SCIP MANAGEMENT REVIEW

The panel reviewed the effectiveness of the development and management of the Safety Culture Improvement Plan (SCIP) to date. The panel found that protocols and processes had been put in place to manage the SCIP and that resources had been provided to manage the improvement initiatives effectively. The SCIP, developed in March 2011, was found to provide a good framework for improving the NFS Safety Culture by first explaining what is important: our Core Values, our behavioral expectations, those attributes desired in our Conduct of Business and Workplace Priorities. The panel believes that the Action Listing tool maintained at the NFS facility provides an effective means to ensure that all the ISCA II findings are being addressed. The panel found that listing and tracking all the actions with the responsible individual and Senior Manager in the Plan of the Day schedule has proven to be extremely effective in ensuring accountability for completion of actions.

An Accountability Matrix was prepared to bin the findings into high priority areas (as defined by ISCA II) and the Safety Culture Component. This matrix has assisted in ensuring accountability for addressing the ISCA II findings by assigning Champions to each High Priority Area, and Subject Matter Experts for each Safety Culture Component. The closure documentation approval process (which requires that the Champions and Subject Matter Experts review and approve any action associated with a finding assigned to them) has been effective in ensuring closure standards for improvement actions are being met and appropriate objective evidence is being provided.

The panel determined that the development and management of the SCIP thus far has been effective. The QA Audit report substantiated this appraisal noting that “The SCIP Action Listing and associated documentation was observed to be well-organized and a robust methodology employed to facilitate use and tracking.”

SCIP IMPLEMENTATION REVIEW

The panel assessed the effectiveness of the SCIP implementation by performing a review of each Safety Culture Component, the ISCA II findings and actions implemented, results from the Quality Assurance Audit, results from the Quality Assurance Effectiveness Review, Key Performance Indicators and other metrics and data to determine effectiveness of the plan in that component area. Lastly, the panel reviewed actions in progress. The panel agreed that all of these items “In Progress” should go forward with no change.

No items that require additional action by the organization were found from review of the Quality Assurance Audit report. In fact, the report indicated that, “The audit team was able to review the 121 completed action items and the objective evidence efficiently due to the tremendous organization of the vast amount of paperwork. The response to the issues identified with immediate action was a very positive aspect of this audit as well.” The panel agreed that three items identified by the Quality Assurance Effectiveness Review and two items identified

by the NRC during the SCIP inspection require additional action by the organization. These are listed below:

Deficiency/Weakness #1: There is a lack of organizational penetration of Operating Experience information to front-line supervisors. Additional efforts are needed relative to the use of Operating Experience and how to access the information.

Deficiency/Weakness #2: There is not a way to document the review of major Organizational Changes identified by the president for review by the Change Control Board.

Deficiency/Weakness #3: Although NFS-EFFECT-EVAL was created for assigning and performing Effectiveness Evaluations (EE's), it appears the guidance document may be impractical (i.e., much more robust) for what is actually needed to perform most EE's at NFS, therefore its use has been very limited.

Deficiency/Weakness #4: Deficiencies in consistent use of tracking and trending in the Corrective Action Program (CAP). (NRC Unresolved Item URI-70-143/2012-07-01)

Deficiency/Weakness #5: Deficiencies in consistent application of the CAP in Security and MC&A. (NRC Unresolved Item URI-70-143/2012-07-02)

GENERAL SAFETY CULTURE REVIEW

In conducting the review, the panel considered whether the actions underway were leading to a change and improvement in the safety culture at NFS. The committee considered the numerous changes that have taken place over the past 18 months to enhance safety culture. This has included training for all members of leadership on "Building a Safe and Accountable Workplace" provided by an outside Safety Conscious Work Environment (SCWE) expert and SCWE Refresher training for all employees; it has included the development of a number of infrastructure support systems, such as the development and expansion of an Ombudsman Program, resourcing and establishment of a Work Control center, and a Senior Management Observation program and schedule; a dedicated focus on challenges to retention of professional staff, strengthening HR support systems, and improving relationships between labor and management. These programs, along with a higher degree of attention to the safety culture aspects of events and incidents has led to an increased awareness to making safety the over-riding priority as a part of the way work is accomplished at the site. Several incidents, and the lessons learned from those incidents, have provided opportunities to incorporate these lessons in work planning, process and procedure changes going forward.

In the review of key metrics, positive and negative traits observed and other data to provide a more general or holistic view of the effectiveness of the SCIP, the panel found overall the SCIP to be effective in driving positive change to the safety culture at NFS. Several key metrics reviewed such as injury statistics, NRC violation data, Human Performance Event Clock Resets, Overdue Corrective Actions and Overdue Investigations indicate improved performance since 2008/2009. The panel's discussions during the review continually focused on whether or not we

were on the right path in a given area, and whether or not we were in an appropriate trajectory to achieve our safety culture improvement goals.

The panel noted that the Nuclear Safety Review Board (NSRB) has met regularly and maintained their overview of relevant site activities that impact safety culture. It had issued three formal Recommendations to the NFS Board of Directors. All three of these Recommendations dealt with safety culture improvements arising from observations of various site events and activities. NFS has taken appropriate actions related to these recommendations, all of which are now closed. In their discussions with the NFS management team, the NSRB has provided positive feedback, suggestions, and a general affirmation of the improvements in safety culture at NFS. In addition to the NSRB's reaction, the positive and negative traits observed by members of the Safety Culture Assessment Panel were discussed. It was noted that overall, there have been more positive behaviors and attributes than negative behaviors or attributes over the past 18 months. Positive observations noted by the panel and the NSRB from their past few meetings, included an increased questioning attitude and willingness to stop demonstrated by the workforce, increased error/event prevention techniques and discussion in the workforce and prompt, appropriate responses to events. One item for action identified during this review is listed below:

Deficiency/Weakness #6: Lack of consistent expectations and reinforcement regarding Supervisory oversight.

The Safety Culture Assessment Panel developed the following Corrective actions to address the Deficiencies and Weaknesses identified. These actions will be added to the Plan of the Day schedule in addition to being assigned in PIRCS. The PIRCS assignment should include an Effectiveness Evaluation assignment for each action.

	Action Description	Responsible Individual
Deficiency/Weakness #1	Develop and provide formal training to appropriate front-line supervisors to improve understanding and use of Operating Experience.	Brad Perkins
Deficiency/Weakness #2	Revise ECR form to have an attribute to document the major organizational changes identified by the president for review by the Change Control Board.	Richard Storey
Deficiency/Weakness #3	Action 1: Revise CAP-EFFECT-EVAL to be a more user friendly guide.	Vanessa Peterson
	Action 2: Evaluate the current list of individuals assigned to NFS-EFFECT-EVAL as a T&Q requirement; and make additional personnel assignments as applicable for this T&Q requirement.	Vanessa Peterson

	Action Description	Responsible Individual
Deficiency/Weakness #4	Resolution per response to NRC Unresolved Item (URI-70-143/2012-07-01) PIRCS 34083	Vanessa Peterson
Deficiency/Weakness #5	Resolution per response to NRC Unresolved Item (URI-70-143/2012-07-02) PIRCS 34085	Vanessa Peterson
Deficiency/Weakness #6	Develop consistent standards and expectations for supervisors with regards to improving oversight of work activities.	Josh Birmingham

CONCLUSION

The NFS Safety Culture Assessment Panel completed its three part reviews and concluded that the NFS SCIP is having a notable positive effect on the safety culture at NFS, and that the safety culture is on an improvement path and trajectory appropriate to achieving NFS’ goals. Additionally, the panel found that the NFS SCIP management protocols, processes and resources have been and continue to be effective in assuring that the plan is fully implemented, and that completed actions are well documented. The review identified six items that fall into the category of deficiencies or weaknesses under the NRC Order. In accordance with the order, corrective actions for these items must be assigned and underway by June 30, 2012.

REFERENCE DOCUMENTS

1. NRC Confirmatory Order EA-10-076
2. Safety Culture Improvement Plan (SCIP) (66T-12-0014)
3. Safety Culture Improvement Plan (SCIP) Action Listing (66T-12-0011)
4. Safety Culture Improvement Plan Audit QA-12-01 (56T-12-0017)
5. NRC Regulatory Issue Summary 2006-13, July 31, 2006
6. NRC Team Inspection Report No. 70-143/2012-007 dated May 4, 2012
7. Safety Culture Improvement Plan Action Effectiveness Review Results (56T-12-0031)

Distribution

Robert C. Birmingham
Mark P. Elliott
Joseph G. Henry
Nancy C. Kenner
John W. Nagy
James B. Perkins
Lauri A Turpin
Jennifer K. Wheeler

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