

**POLICY ISSUE**  
**(Information)**

September 27, 2013

SECY-13-0102

FOR: The Commissioners

FROM: K. Steven West, Chairman  
Lessons Learned Oversight Board

SUBJECT: ANNUAL REVIEW OF THE LESSONS-LEARNED PROGRAM

PURPOSE:

This paper provides the Commission with the annual review of the Lessons-Learned Program. The report covers the period from August 1, 2012, through July 31, 2013. This paper does not address any new commitments.

BACKGROUND:

At a Davis-Besse Lessons-Learned Task Force Recommendations Commission briefing on December 8, 2004, the staff proposed the Lessons-Learned Program (LLP). In a Staff Requirements Memorandum (SRM) dated December 15, 2004, the Commission approved the proposal and directed the staff to keep it apprised of the LLP's status. Beginning February 2007, the staff provided semiannual status reports to the Commission. On August 15, 2007, in its SRM (ML072270124) to SECY-07-0121, "Semiannual Update of the Lessons-Learned Program and Annual Lessons-Learned Program Review," dated July 25, 2007 (ML071780197), the Commission approved the staff's recommendation to provide annual LLP reports.

The LPP is described in Management Directive (MD) 6.8, "Lessons-Learned Program," which sets out the processes, procedures, and oversight designed to collectively ensure that significant agency deficiencies are identified and corrected in such a way that they do not recur. This goal is accomplished by using a rigorous process to identify significant lessons learned, develop detailed corrective action plans, subject those plans to formal review and approval,

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and ensure that the plans have been effective and did not result in any unintended consequences. Each corrective action plan includes an explanation of what actions will be taken to institutionalize the knowledge gained through the identification of a lesson learned to help prevent recurrence of the deficiency resolved by the corrective actions.

In accordance with MD 6.8, the Executive Director for Operations designates the LLOB, which is composed of senior managers nominated by office directors and regional administrators, to provide oversight to the LLP and to provide an independent review and approval of proposed corrective action plans and their eventual closeout. Currently, the deputy director of the Office of Nuclear Regulatory Research (RES) chairs the LLOB and RES provides the Lessons Learned Program Manager (LLPM).

## DISCUSSION:

### Lessons-Learned Criteria

Deficiencies entered into the LPP are expected to require significant resources to correct. In addition, the agency has other corrective action processes that function at the office level and below. Therefore, a high threshold has been established for entering deficiencies into the LLP. MD 6.8 specifies that a candidate lessons-learned item must meet all four of the following criteria to be designated a lessons-learned item:

1. The item has significant organizational, safety, security, emergency preparedness, or generic implications.
2. A need exists to institutionalize corrective action for this item because the failure to do so would reasonably be expected to challenge the ability of the agency to meet any of the strategic outcomes designated in the Strategic Plan, or the corrective action would substantially improve the safety or security of NRC employees.
3. A root cause exists or can be identified.
4. The apparent resolution is actionable.

These LLP criteria ensure that only the most important issues will be considered, maximizing the impact of agency resources and focusing senior management on the most important lessons learned. Because of the high profile associated with items that meet these criteria, the Commission or senior management will most likely have approved the corrective action plans before the LLOB review. The LLP process also reduces the likelihood that important items will be missed and ensures that any items that pass the screening criteria will receive the appropriate attention of senior management throughout the implementation and closeout of the corrective action plan and any subsequent effectiveness review.

### Review of Potential Lessons-Learned Items

Between August 2012 and April 2013, the LLPM screened 137 items as potential lessons-learned items and identified 13 items for review by the LLOB. In a meeting of April 5, 2013, the LLOB determined that none of the 13 potential lessons-learned items met the criteria for entrance into the LLP. Enclosure 1 lists these 13 potential lessons-learned items. Since the

April LLOB meeting, the LLPM has screened an additional 23 items as potential lessons-learned items. None of these additional items met the screening threshold for LLOB consideration as candidates for lessons-learned under the LLP.

#### Other Lessons-Learned Oversight Board Activities

The LLOB is considering a revision to the LLP to more clearly define the parameters for its screening of potential lessons-learned items. Specifically, it is considering a fifth criterion for identifying a lessons-learned item. The potential criterion would address whether or not a potential item is being addressed by an existing agency or office program. This change would improve the efficiency and effectiveness of the LLP by ensuring that the LLOB is fully informed about any agency or office plans for addressing a potential lesson-learned item during its decision-making process.

The Office of Enforcement (OE) provided an update to a comment made in the 2011 LLP annual report regarding its monitoring of the status of the safety culture case study on the “Report to the President from the National Commission on the BP Deepwater Horizon Oil Spill and Offshore Drilling.” OE informed the LLPM that it will not issue the case study because of the ongoing pending litigations involved in the accident. The LLPM will continue to monitor the status of OE’s review and will advise the LLOB of its status at the next LLOB meeting.

The LLP’s knowledge management system—known as SharePoint Executive Lessons-Learned System (SPELLS)—was a Web-based interface used for tracking, searching, archiving, and documenting LPP information and activities. This system was retired in August 2013 and replaced with the Agency Lessons Learned Tracking System (ALLTS), an ADAMS P8 case management tool that streamlines the lessons-learned process by eliminating additional data entry on the part of the NRC user and creates a lessons-learned knowledge management area within ADAMS. The system tests have been completed and ALLTS was placed in the production environment on April 26, 2013. Agencywide deployment of ALLTS is slated for the last quarter of fiscal year 2013.

#### RESOURCES:

Resources information is contained in Enclosure 2.

The Commissioners

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COORDINATION:

The Office of the General Counsel has reviewed this package and has no legal objection. The Office of the Chief Financial Officer (OCFO) has reviewed this package for financial implications and has determined that OCFO concurrence on this report is not necessary because it is informational and does not request any budgetary resources.

*/RA/*

K. Steven West, Chairman  
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Enclosures:  
As stated

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