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WM14-0002

Marc L. Dapas, Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
1600 East Lamar Boulevard
Arlington TX 76011-4511

References:

- 1) Letter dated August 19, 2013, from S.A. Reynolds, USNRC, to M. W. Sunseri, WCNOG
- 2) Letter dated September 18, 2013, from M. W. Sunseri, WCNOG, to S.A. Reynolds, USNRC

Subject: Docket No. 50-482: Six Month Response to NRC Letter Regarding Work Environment Issues at Wolf Creek Generating Station

Dear Mr. Dapas:

By letter dated August 19, 2013, ("**Letter**") you notified Wolf Creek Nuclear Operating Corporation ("**WCNOG**") of two NRC concerns with the safety conscious work environment ("**SCWE**") at the Wolf Creek Generating Station ("**WCGS**") and requested WCNOG respond to certain issues identified in the letter within thirty days and within six months, respectively. By letter dated September 18, 2013, WCNOG provided the information requested within thirty days ("**30 Day Response**"). This letter provides the information requested within six months ("**Six Month Response**").

In order for the NRC to fully consider WCNOG's progress in addressing the referenced SCWE concerns in the context of its end-of-cycle performance review, the NRC requested WCNOG provide its Six Month Response by January 24, 2014. Therefore, this Six Month Response reflects developments as of January 23, 2014. In addition to providing this Six Month Response,

WCNOC officials discussed their progress in addressing the work environment concerns with NRC officials in a public meeting held in the NRC Region IV offices on January 22, 2014.

The Letter requested that WCNOC's Six Month Response address three specific issues:

- 1) The results of WCNOC's evaluations of progress in addressing SCWE concerns at WCGS;
- 2) The effectiveness of actions taken to address the SCWE concerns identified in Reference 1; and
- 3) Any additional actions or changes in actions planned and taken to address SCWE issues at WCGS.

Enclosure 1 contains this requested information by discussing the status of the actions taken in response to the seven specific items identified in Reference 1, as well as the effectiveness of those actions or plans to determine the effectiveness of those actions. Additional planned actions are also addressed in Enclosure 1.

As described in Enclosure 1, WCNOC has identified and implemented actions designed to strengthen its SCWE. It has enhanced its ability to assess the status of its work environment, established greater contractor understanding of their obligations to cultivate a SCWE, and developed greater attentiveness of the leadership team to their role in cultivating a SCWE in their daily interactions with WCGS personnel. WCNOC will continue to evaluate the effectiveness of its improvement efforts and make adjustments as necessary to ensure it maintains a healthy SCWE at WCGS.

This letter contains no regulatory commitments.

Please do not hesitate to contact me at (620) 364-4008 or Debbie Hendell at (620) 364-4065 if you have any questions or require further information.

Sincerely,



Matthew W. Sunseri

MWS/djr

Enclosure 1 – Information Requested Within Six Months

Enclosure 2 – SCWE Communication Plan

cc: C. F. Lyon (NRC)

N. F. O'Keefe (NRC)

Document Control Desk (NRC)

Senior Resident Inspector (NRC)

Enclosure 1 of WM 14-0002
Information Requested Within Six Months
13 Pages

Information Requested Within Six Months

Introduction

In its August 19, 2013, letter (the "**Letter**"), the NRC requested WCNOG to respond to seven specific items within thirty days and provide an additional update within six months. By letter dated September 18, 2013, (the "**30 Day Response**"), WCNOG identified actions taken or planned related to each of the seven items. Consistent with the NRC's update request in the Letter, set forth below are each of the seven items, the status of actions taken with respect to each item, and the results of any assessment of the effectiveness of such actions. Future plans to assess the effectiveness of such actions are also identified herein ("**Six Month Response**"). Finally, the additional actions that WCNOG plans to strengthen its safety conscious work environment ("**SCWE**") are addressed in the conclusion.

WCNOG identified three teams to be responsible for implementation of the Action Items relating to Quality Assurance, the supplemental workforce, and the employee concerns program ("**ECP**") (see Item 3). These three teams were coordinated through a fourth cross-functional team to ensure an integrated approach to implementation of the Action Items. The entire initiative was led by a project manager. In order to ensure WCNOG continued to benefit from diverse perspectives and expertise during the implementation of the Action Items, WCNOG followed the same model it had used in developing the 30 Day Response team. Specifically, it sought to ensure the implementation teams were multi-disciplinary and included individuals at a variety of levels within the organization. The composition and activities of the teams were communicated site-wide in our daily newsletter to employees, Crucial Times, and various face-to-face meetings led by senior management.

Item 1

WCNOG's position regarding whether the actions of Enercon Services, Inc. ("Enercon"), as described in the August 19, 2013, letter violated 10 CFR 50.7 and the basis for that position, including the results of any investigations WCNOG may have conducted to determine whether a violation occurred.

Status of Actions Taken in Response to Item 1

The 30 Day Response explained that the facts and circumstances described in the Letter were the subject of a complaint filed under Section 211 of the Energy Reorganization Act ("**ERA**") with the Occupational Safety and Health Administration of the U.S. Department of Labor ("**Section 211 Complaint**"). It further explained why WCNOG was not able to draw a legal conclusion regarding whether the actions of Enercon might constitute a violation of 10 CFR 50.7.

Since WCNOG's submittal of the 30 Day Response, the Section 211 Complaint has been resolved to the mutual satisfaction of the parties and is pending approval before the Administrative Law Judge assigned to the case. Resolution of this matter by the parties is a

positive development with respect to the individual matter and the work environment at WCGS generally.

To enable WCNOG to provide more effective support to the work environment for supplemental personnel, certain programmatic changes have been made in connections with the Employee Concerns Program (see Item 2). WCNOG management is also taking an active role to improve its contractors' awareness of their obligations to prevent discrimination and maintain a SCWE (see Item 3 and Conclusion). WCNOG is also increasing its oversight of personnel actions taken by contractors through implementation of the Personnel Action Review Board ("**PARB**") procedure. These actions will heighten WCNOG's ability to identify potential issues of discrimination involving supplemental personnel and address any need to take action to mitigate any potential adverse impact on the site's SCWE.

Item 2

Action WCNOG has already taken or plans to take to assure that the OSHA finding of discrimination by Enercon is not having a chilling effect on the willingness of other employees to raise safety and compliance concerns within the WCGS organization and, as discussed in NRC Form 3, to the NRC.

Status of Actions Taken in Response to Item 2

The 30 Day Response described the OSHA Region VII Acting Regional Administrator's May 15, 2013, decision regarding the Section 211 complaint ("**OSHA Decision**") and the pending appeal of that decision. It then outlined the actions WCNOG had already taken to ensure that such decision did not have a chilling effect on the willingness of other WCGS personnel to raise safety and compliance concerns within the WCGS organization.

The 30 Day Response also described additional actions it planned to assess the status of a SCWE at WCNOG following the issuance of the OSHA Decision. The results of these actions are described below.

First, WCNOG issued a survey to more formally assess the strength of the SCWE at WCGS, including whether individuals believe they can raise concerns without fear of harassment, intimidation, discrimination or retaliation, and their awareness and perception of different avenues for raising concerns (corrective action program ("**CAP**"), ECP, management and the NRC) at WCGS (the "**Baseline Survey**"). The Baseline Survey was administered to both WCNOG employees and supplemental site personnel. Site communications paved the way for broad participation by describing the confidential treatment of information collected and the identity of the individuals providing it. Alternative methods for completing the Baseline Survey were provided to enhance accessibility.

The Baseline Survey was administered between September 30, 2013 and October 15, 2013. Throughout this period, WCNOG encouraged completion of the survey in site wide communications through Crucial Times articles, leadership verbal reminders and email by explaining the survey's role in improving the work environment. These efforts resulted in over

1100 responses being received from both WCNOG and supplemental workers representing every work area at WCGS. The survey results indicated most respondents were comfortable reporting concerns, though improvement was needed in proper prioritization and timely and thorough resolution of issues. The Baseline Survey results did not identify any chilling effect associated with the issuance of the OSHA Decision. The Baseline Survey results are described further in Item 3, below.

Second, changes were made to the WCNOG ECP to refocus the program on, and provide greater accessibility of the WCNOG ECP to, the supplemental workforce. Programmatic changes were also made to demonstrate more clearly the ability of the WCNOG ECP to conduct investigations that not only are independent, but also are perceived to be independent. Accordingly, external resources have been relied upon to investigate certain concerns raised by supplemental workers since the issuance of the Letter. No chilling effect associated with the OSHA Decision has been identified as a result of these efforts.

Finally, following its receipt of the Letter, WCNOG heightened its informal efforts to encourage supplemental leaders to foster a culture where supplemental personnel feel comfortable raising issues and are encouraged to do so either within their organization or through WCNOG processes. These efforts included meeting with certain contractor management or ECP personnel to better understand their programmatic SCWE training and ECP activities. It also included more intrusive WCNOG oversight with respect to concerns raised. Although areas for improvement in work environment emerged through these efforts, no chilling effect associated with the OSHA Decision was identified.

Item 3

WCNOG's action plans to address existing SCWE issues in the Quality Department to improve the environment in the department and, if appropriate, throughout WCGS. The action plans, at a minimum, should specifically address how policies can be assured of setting a low threshold for writing condition reports and how each avenue for raising concerns will be improved, including ease of use and accessibility of the corrective action program, knowledge and use of the Employee Concerns Program, availability of the NRC, and WCGS's open door policy. Also include the measures that will be used to determine the action plan effectiveness.

Status of Actions Taken in Response to Item 3

Item 3 specifically focused on the Quality Assurance (“QA”) organization, but also led WCNOG to consider whether actions might be taken more broadly at WCGS to improve the work environment. As reflected in its 30 Day Response, WCNOG's evaluation concluded that broader actions were warranted, particularly with respect to certain existing policies, processes and practices. Based on its evaluation, WCNOG identified specific Action Items to address the work environment issues within the QA organization particularly and more broadly at WCGS.

Each of the Action Items identified in the 30 Day Response is set forth in the first column in the table below. The status of such Action Item and, as appropriate, its effectiveness or plans to assess its effectiveness, is summarized in the second column.

<u>Action Item</u>	<u>Status and Effectiveness Review</u>
<p>1. Review CAP policies and procedures to evaluate whether improvements can be made to emphasize a low threshold for writing a condition report (“CR”). These improvements should reinforce the need to identify issues early and at a low threshold such that more significant issues can be prevented and remind individuals of the ability to submit anonymous CRs.</p>	<p>Complete. See CR 75483 The evaluation revealed numerous places in WCNOC policies and procedures that emphasized a low threshold for writing condition reports. In addition, benchmarking revealed that WCNOC’s goal for generation of CRs was higher than most other single unit sites, and WCNOC exceeded its goal by almost 5000. A review of the CRs indicated that many were low level issues. Although no changes to policies or procedures were warranted, the evaluation recognized that continuous communication of this expectation is appropriate.</p>
<p>2. Clarify the distinction between writing a CR as an individual and writing a CR as a QA Audit Team Lead. Based on the results of benchmarking and feedback from the WCNOC QA personnel, develop appropriate processes to finalize QA audit findings in CAP. Evaluate whether similar structural issues related to writing CRs might require clarification in other site organizations (<i>e.g.</i> Security).</p>	<p>See CR 73241-02-01. Benchmarked with 16 nuclear industry peers. All respondents indicated that review is required prior to documenting QA Findings in a CR. Such review is not necessary for CRs that need to be written for immediate action. Consistent with benchmark results, WCNOC process requires collegial review of CRs documenting QA Findings and excludes immediate action items and CRs that do not document QA Findings from this review requirement. WCNOC, as well as the facilitator described in Action Item 5 below, have taken actions to explicitly encourage all QA Team members to write CRs. The QA personnel that participated in a recent focus group meeting acknowledged that barriers to writing CRs have been removed.</p>
<p>3. Implement improvement to CAP software interface to improve ease of CR initiation process. Increase the visibility of mechanisms for initiating CRs through the hard copy venue. Develop and implement a communications plan regarding such changes. Provide training to supervisors and managers on the changes and management’s role in supporting CAP and encouraging site personnel to identify issues at a low level in the CAP.</p>	<p>Complete. See CR 75483-01-02. Software enhancements have been made to provide defaults to screens for initiation of CRs and include a more visible option for initiating an anonymous CR. Hard copy CR initiation options have been simplified and more visible by use of colored covered sheets with clear instructions on how to</p>

<u>Action Item</u>	<u>Status and Effectiveness Review</u>
	<p>complete and submit the CR. New kiosks that are clearly marked provide for broader distribution of such forms, as well as convenient completion. Supervisors and managers were trained on these changes to the CAP and expectations for encouraging site personnel to identify issues at a low level in November-December, 2013.</p>
<p>4. Complete a root cause analysis to address the elements of the Letter. Identify and implement required corrective actions.</p>	<p>See CR 73241. Root cause evaluation is complete. Root causes included the following: 1) QA management was not sensitive to the individual consequences of their actions. 2) Wolf Creek did not take action to prevent a potential chilling effect from the Enercon adverse action. A contributing cause was also identified; specifically that current policy does not provide sufficient guidance to establish independence, or an alternate method for managing, employee concerns. The evaluation validated the corrective actions to be taken in the 30 day response. Additional corrective actions were identified and many have been implemented. An effectiveness review will be conducted in June 2014.</p>
<p>5. Retain third party resources to analyze the organizational dynamics within the QA organization. Implement an action plan to improve the work environment and organizational effectiveness. Establish criteria to measure current status and future progress, along with appropriate monitoring intervals.</p>	<p>See CR 73241-02-02. An external facilitator/coach performed a QA organization assessment in early September, 2013, reported on her findings and developed a six month action plan for improvements. Facilitator implemented the action plan during the intervening months by evaluating organizational dynamics, mapping audit processes, developing strategies for organizational improvement, facilitating team interactions, providing leadership coaching, assisting in conflict resolution and supporting personnel to develop their own personal development plans. Facilitator will conduct monthly follow-up visits starting February 3, 2013, to provide individual coaching to ensure ongoing progress. An overall evaluation will be conducted in March 2014. The new Quality Manager, in consultation with the facilitator, will review the</p>

<u>Action Item</u>	<u>Status and Effectiveness Review</u>
	results of such assessment and determine next steps at that time.
<p>6. Evaluate the Quality organization's reporting relationships and the QA organizational structure.</p>	<p>See CR 73241-02-02. The new Quality Manager will assume his responsibilities on January 27, 2014. The facilitator and a subject matter expert assisted the team in mapping the work processes to effectively group tasks into separate work functions. On or before June 30, 2014, WCNOG will review the results of such organizational changes and determine next steps at that time.</p>
<p>7. Evaluate whether the current ECP policy, procedures, processes, resources and oversight are consistent with industry best practices. Such evaluation will specifically consider whether they are adequate to support heightened reinforcement of SCWE at WCGS, including among the supplemental workforce. This evaluation will include, but is not limited to the following.</p> <ul style="list-style-type: none"> a) Consideration of a threshold screening process for concerns to determine whether background of the investigator might lead to perceptions of bias. Identification of methods to ensure availability of third party investigation resources when ECP personnel may be perceived to lack independence and effective methods to communicate the availability of those alternatives. b) Development of clearer guidance regarding confidential treatment of information brought to ECP. c) Clarification of the distinction between the traditional ECP and ombudsman roles and evaluation of WCNOG's current practice of combining these roles within the ECP function. <p>Implement changes indicated by such evaluation. Develop strategies to communicate changes to the ECP while strengthening the view of the ECP as a viable alternative for raising concerns among WCNOG employees and supplemental workers.</p>	<p>Evaluation is complete. This evaluation was supported by a self-assessment performed November 4-7, 2013. The self-assessment evaluated the WCNOG ECP's compliance with the Attributes set forth in NECEP 08-001, as well as the specific issues identified in this Action Item 7. The self-assessment was led by an external consultant with extensive experience in safety culture, SCWE, and ECP. The self-assessment team included five ECP industry peers, the WCNOG Ombudsman, and a member of the WCNOG management team. The results were documented in Self-Assessment Report SA-2013-60. The Report concluded WCNOG ECP was effectively implemented, but improvement in ECP processes and procedures was necessary to align with ECP industry best practices. Nine performance deficiencies and twenty recommendations were identified. The performance deficiencies and recommendations were included in WCNOG's CAP for evaluation and development of corrective actions. See CRs 76347-76352; 76355; 76357; 76359; 76360; 76361; 76363-76366; 76369; 76370; 76372; 76373; 76507; and 76377-76383. WCNOG will evaluate the adequacy of these changes collectively to ensure key messages and processes are appropriate and consistent. WCNOG will assess the effectiveness of the changes as part of the self-assessment</p>

Action Item	Status and Effectiveness Review
	<p>process and through regular self-assessments of the ECP (CR 76370), independent review of case files (CR 76373), and the Nuclear Safety Culture Monitoring Panel (CR 76351).</p>
<p>8. Provide training to WCNOC executives, managers, supervisors and project managers regarding SCWE and strategies for managing and leading in a way that strengthens a SCWE. Include application of SCWE attributes into the implementation of the WCNOC Accountability Model.</p>	<p>Complete. See CR 73241-02-04. Training was conducted to 7 groups of approximately 30 individuals in four hour sessions in November and December 2013. Required participants included the WCNOC leadership team, certain project managers, and on-site leadership of supplemental workforce. WCNOC has also revised its Leadership and Professional Development Training to include initial and continuing SCWE training for leaders. The class provides leaders with in-depth information about characteristics of a chilled work environment, OSHA and NRC evaluation of allegations of discrimination, and the structural and behavioral components of SCWE. Case studies are used to further reinforce the critical role leadership plays in a cultivating and sustaining a strong and healthy work environment. Feedback from employees at recent focus groups and other meetings have recognized changes in behaviors of member of the WCNOC leadership team that support a healthy SCWE.</p>
<p>9. Conduct benchmarking with licensees who have substantial Contractor workforces on their sites to identify best practices to encourage supplemental workers to raise concerns and provide work environment oversight for supplemental workforces. Identify any modifications to existing approaches indicated by such evaluation.</p>	<p>Complete. Benchmarked numerous licensees, many of whom have or have recently had substantial Contractor workforces on their site. Benchmarking supported the following corrective actions: strengthening contract language prohibiting retaliation and setting expectations for maintaining a SCWE; implementation of a review procedure for significant adverse personnel actions proposed for supplemental workers; and an improved onboarding process to include a greater focus on SCWE.</p>
<p>10. Develop and implement a process for evaluating certain proposed employment actions affecting employees and supplemental workers to ensure such actions do not constitute retaliation for engaging in</p>	<p>Complete. See CR 73241-02-07. Personnel Action Review Board procedure AI 13C-003 was issued with an effective date of January 7, 2014. The</p>

<u>Action Item</u>	<u>Status and Effectiveness Review</u>
protected activity and do not create a chilling effect in the affected work group or elsewhere on the WCGS site.	PARB has reviewed certain proposed employment actions relating to performance reviews and, as warranted, implemented chilling effect mitigation plans. Between early November 2013 and the effective date of the PARB procedure, senior management also informally evaluated significant proposed employment actions affecting employees and, where possible, supplemental workers.
11. Develop provisions that outline a Contractor's obligations to prohibit retaliation for engaging in protected activity, cultivate a SCWE, and cooperate with WCNOG in monitoring the work environment and investigating concerns, provide access to an ECP, and participate in WCNOG's process for evaluating certain proposed employment actions. Incorporate this provision in WCNOG's standard terms and conditions for inclusion in new contracts with major Contractors performing work at WCGS. Consider contract amendments with existing Contractors as appropriate.	Complete. See CR 73241-02-04. These provisions have been included in WCNOG's standard terms and conditions and will be included in a substantially similar form in future material contracts between WCNOG and nuclear materials and services suppliers. Certain existing contracts with large outage services providers having a significant site presence will be amended to include these provisions prior to the Spring 2014 mid-cycle outage.

WCNOG conducted focus group meetings with members of different work groups in January 2014. The specific work groups included Quality Assurance, Maintenance, Information Services, Performance Improvement/Organizational Effectiveness and Health Physics (Security will be scheduled for February 2014). Work groups were selected based on results from the Baseline Survey. The interviews were intended to assess the effectiveness of certain corrective actions taken, identify any need for course corrections and to collect data for trending purposes. Certain themes emerged. In the QA organization, the participants acknowledged that barriers to raising concerns have been removed, that they understand the alternative avenues for raising concerns and they are willing to report concerns through these avenues. Moreover, they reported organizational dynamics are improving. Other teams had similar views and reported that the cascading message on Baseline Survey results was effective. One participant from the QA organization did express residual concerns during the focus group about using ECP but was unaware of actions taken to address their specific concern. It was also too early to assess the effectiveness of the recent changes to ECP as well as certain other corrective actions. Proper prioritization and timely and thorough resolution of issues in CRs also is perceived to be an area for improvement (see Item 2).

WCNOG plans to conduct additional focus group meetings during 2014 to help assess the effectiveness of the corrective actions discussed herein. WCNOG also plans to conduct a mid-year safety culture assessment (developed by the Utility Services Alliance), a follow-up SCWE survey later in 2014, and additional SCWE surveys thereafter. The Baseline Survey will provide the baseline data regarding the work environment that WCNOG will use to measure the

effectiveness of WCNOC work environment improvement efforts. WCNOC will make adjustments to its improvement efforts as dictated by the information gathered through these efforts.

Item 4

WCNOC's plan to communicate expectations and policies concerning SCWE at WCGS, and methods used to verify that all WCGS and contractor personnel have received the message and clearly understand it.

Status of Actions Taken in Response to Item 4

The 30 Day Response described WCNOC's integrated communications strategy and how it had updated the SCWE component of that strategy to incorporate communications related to the Letter. A current version of the SCWE communication plan is attached as Enclosure 2. Recent communications under this plan are described in greater detail in Item 7 below. In addition, WCNOC has updated its Corporate Policies regarding both SCWE and ECP to reinforce the expectation that employees raise concerns and the alternative avenues for doing so.

The results of the Baseline Survey indicate that site personnel understand their obligation to raise nuclear safety and other concerns and are comfortable doing so. Site personnel were also aware of different avenues for raising concerns. An area for improvement included prioritization, rigorous evaluation, and timely resolution of concerns. In December 2013, a cascading message was delivered to all WCGS site personnel regarding these survey results and key corrective actions. Management engaged their direct reports in discussions on the Baseline Survey results and used this as an additional opportunity to reinforce the availability of alternative avenues for raising concerns.

More recently, the effectiveness of these messages has been reflected in the comments provided in the Focus Group meetings described in Item 3 above. In addition, beginning in April 2014, part of each WCNOC Division's Excellence Plan will include actions the work group has identified to improve a SCWE. These actions will be developed based on each division manager's dialogue with the work group on the Baseline Survey results for their group. This will provide an opportunity for dialogue on the effectiveness of the actions taken to date, but will also allow each division to tailor additional actions based on its unique needs. Finally, the surveys and additional focus group meetings during 2014 will help assess the effectiveness of these corrective actions and communications (see Item 3). WCNOC will make adjustments to its improvement efforts as dictated by the information gathered through these efforts.

Item 5

WCNOC's plan to ensure that individuals who are not satisfied with the resolution of a problem can pursue the concern further through additional avenues (such as WCGS management, the corrective action program, the Employee Concerns Program or the NRC) without fear of retaliation.

Status of Actions Taken in Response to Item 5

The Baseline Survey responses referred to above suggest that individuals are aware of alternate avenues for pursuing concerns, however improvements are necessary in both the ECP and CAP to more broadly encourage individuals to use these avenues as alternatives for individuals to use when they are not satisfied with the initial resolution of a problem. WCNOG is implementing corrective actions to drive these improvements.

First, as indicated in the 30 Day Response, WCNOG has evaluated its SCWE policy to determine whether it appropriately encourages the use of additional avenues when individuals are not satisfied with the resolution of a concern. WCNOG also considered comments contained in the ECP Self-Assessment described in Item 3 above regarding this issue. Based on its evaluation, WCNOG has revised its policies regarding safety culture, SCWE, and ECP to acknowledge the opportunity employees have to pursue resolution of issues through additional avenues.

Second, WCNOG has also revised its ECP procedure (AP 18A-001) to clearly identify each of the alternative methods for reporting concerns. The revised procedure includes contact information for both WCNOG and NRC reporting alternatives. AP 18A-001 explicitly identifies management as responsible for establishing and maintaining an atmosphere that encourages employees and supplemental workers to raise concerns through station processes or to the NRC. Management responsibility for supporting the use of alternate avenues to pursue resolution of concerns was reinforced in the SCWE training provided to WCGS leadership.

Third, the lowest scores in the Baseline Survey brought our attention to the proper prioritization and timely and thorough resolution of issues placed in CAP. WCGS has engaged in a successful reduction in the backlog that existed in the corrective action program since the survey was conducted reaching its end of year 2013 reduction goal to be below 450 open items. Further efforts to maintain a low inventory of open CAP items continues in 2014.

As reflected in the response to Item 3 above, WCNOG has very recently instituted several improvements to strengthen its ECP function and enhance the ECP's credibility as an alternative through which to pursue resolution of concerns. The ECP Assessment suggested that the Ombudsman's many roles and responsibilities, which extended beyond ECP, could be impairing individuals' confidence in the ECP. The role of Ombudsman was renamed ECP Coordinator and referrals by the ECP Coordinator to other departments for non-ECP matters were more clearly defined. This also allowed the ECP Coordinator to refocus the program on, and provide greater accessibility of the WCNOG ECP to, the supplemental workforce as well as WCNOG employees. Improvements to confidentiality protocols, and additional options for ensuring the independence of investigations, were also designed to increase transparency and reinforce to WCGS personnel that the WCNOG ECP is a viable and safe alternative for seeking resolution of concerns.

The ECP changes described above are included in the WCNOG CAP system, and have been communicated to all site personnel in a Crucial Times article dated January 22, 2014.

The surveys and additional focus group meetings during 2014 will help assess the effectiveness of these corrective actions and communications. WCNOG will make adjustments to its improvement efforts as dictated by the information gathered through these efforts.

Item 6

What actions WCNOG has taken or plans to take to ensure that actions taken against individuals are not perceived as retaliatory to avoid a further chilling of the environment at WCGS.

Status of Actions Taken in Response to Item 6

A key aspect of the SCWE Training for WCGS leadership included clarification of the term “chilling effect,” examples of actions that can have a chilling effect, and guidance on how to avoid or mitigate a potential chilling effect. This training also provided practical approaches for managing in a way that not only avoids a chilling effect, but actively strengthens a SCWE.

In addition, as discussed in Item 3 above, WCNOG has implemented the PARB process for evaluating certain proposed employment actions affecting employees and supplemental workers to ensure such actions do not create a chilling effect. (See Personnel Action Review Board, AI 13C-003). The procedure applies to WCNOG employees and supplemental workers. Implementation of this procedure is specifically intended to prevent retaliation and mitigate potential chilling effects associated with the covered employment actions. But over time it is also expected to enhance the ability of managers site-wide to identify potential perceptions of retaliation in other contexts and take actions to avoid or mitigate associated chilling effects.

The application of AI 13C-003 to certain proposed employment actions affecting supplemental workers is one of two actions directly focused on avoiding a chilling effect among the ranks of the WCNOG supplemental workforce. The second included development of a SCWE contract provision, and inclusion of such provision in new contracts and in amendments to some existing contracts (see Item 1). These new contract obligations will provide a means through which to ensure WCNOG is promptly informed of all claims of discrimination involving WCGS supplemental personnel such that it can be involved in assessing any associated chilling effect. These contract provisions will also actively reinforce WCNOG’s expectations that its contractors maintain a healthy SCWE.

With respect to the QA organization, the intensive involvement of the external consultant has helped improve communication within the QA organization. This communication has heightened management attention to actions that could be perceived to have a chilling effect and allowed prompt intervention.

Based on the ECP Self-Assessment described in the response to Item 3 above, WCNOG is enhancing the ECP to help ensure individuals are more likely to identify concerns regarding discrimination. This should assist in early assessment of potential chilling effects and timely mitigation efforts.

Another key change to WCNOC's ECP is the plan to reinvigorate focus groups conducted by the ECP Coordinator. These focus groups can help identify chilling effects, but can also be targeted to help WCNOC assess the effectiveness of its efforts to mitigate any potential chilling effects associated with actions taken with individuals. In addition, the effectiveness of these actions will be evaluated through the 2014 SCWE survey and focus group meetings.

Item 7

Your plans to inform the WCGS workforce including contractors, of: (i) the issuance and content of this chilling effect letter; (ii) the current status of SCWE at WCGS; and (iii) your action plan to address the SCWE issues.

Status of Actions Taken in Response to Item 7

As described in the 30 Day Response, WCNOC broadly communicated to the WCGS workforce regarding the issuance of the chilling effect letter and its action plan to address the SCWE issues. In addition, WCNOC has communicated broadly to the WCGS workforce the results of the Baseline Survey, and improvements to the WCNOC ECP.

WCNOC is continuing its frequent and transparent communication approach by sharing this Six Month Response site wide. WCNOC will continue to communicate key SCWE messages and updates through the SCWE Communication Plan component of its integrated communications strategy.

Additional Actions Planned

In addition to the actions identified in the 30 Day Response, WCNOC has identified other enhancements that will help strengthen its SCWE. These actions are outlined below.

First, WCNOC has updated its new employee onboarding session to include instructions on alternative avenues for raising concerns. These changes will become effective in February 2014. Importantly, the sessions will now be scheduled to occur within weeks of the new employee's arrival and will be taught by an independent contributor.

Second, WCNOC is updating its process for onboarding supplemental workers. This new process will include a session facilitated by a senior WCNOC leader to communicate expectations regarding five basic elements:

1. Traits of a healthy nuclear safety culture
2. Site wide fundamental behaviors and WCNOC's accountability model
3. Industrial safety and human performance
4. Avenues for reporting concerns
5. Training as core business.

Third, the Nuclear Safety Culture Monitoring Panel ("*NSCMP*") is reviewing the timeliness and effectiveness of the corrective actions identified in the root cause analysis performed in response

to the Letter. The NSCMP has also monitored other inputs, including the Baseline Survey results, that may indicate developing issues related to the WCNOG work environment. The NSCMP is increasing the number of inputs it considers to evaluate work environment (*e.g.* engagement/focus group meeting results, exit interview results, etc.), as well as its methodology for evaluating and reporting on those inputs to the senior leadership team. This revised approach is designed to support the senior leadership team's efforts to take a more proactive approach to cultivating a strong SCWE. The NSCMP is piloting methodologies for reporting such information in the first quarter of 2014 and plans to implement this revised approach in the second quarter of 2014.

In September 2013, Mr. Matthew Sunseri, President and Chief Executive Officer of WCNOG, announced his retirement. On January 17, 2014, WCNOG announced that Mr. Adam Heflin will succeed Mr. Sunseri as President and Chief Executive Officer. This transition will occur on January 31, 2014. During this transition, Mr. Heflin will be briefed on the Letter and the actions taken by WCNOG to improve its work environment. Mr. Heflin's views and perspectives, along with those of the senior leadership team collectively, as informed by the various inputs outlined herein, will help guide WCNOG in its development of any additional plans to strengthen its SCWE.

Enclosure 2 of WM 14-0002

SCWE Communication Plan

3 Pages

Communication Plan for Chilling Effects Letter Response

Topic/issue:

- Wolf Creek received a Chilling Effects Letter from the NRC on Aug. 19.
- The letter describes two NRC concerns about Wolf Creek's safety-conscious work environment (SCWE)
- An initial response is due within 30 days of the letter date. A second response is due January 24, 2014.

Key messages:

- ✓ It is important that we have a strong SCWE.
- ✓ We encourage anyone working at Wolf Creek to raise issues without fear of retaliation.
- ✓ We encourage initiation of Condition Reports by anyone working at Wolf Creek.
- ✓ We communicate issues with our supervision and management team first.
- ✓ We give nuclear safety concerns raised diligent priority.

Milestones:

	Date:
CEL team charter developed	Aug. 28, 2013 (complete)
Weekly CEL Meetings	Aug. 28, 2013 (scheduled, complete)
Final date for collection of requested information for 30-day response	Sept. 4, 2013
Submit 30-day response to corporate sponsor	Sept. 13, 2013
Submit 30-day response to NRC	Sept. 18, 2013
Submit six-month response to NRC	January 24, 2014 (formerly Feb. 19, 013)

Communication type

	Communication vehicle
Outage handbooks include SCWE information	<i>Distributed to all personnel prior to an outage</i>
Station-wide Fundamental Behaviors include SCWE	<i>Distributed to all personnel working at Wolf Creek</i>
Face-to-face communications to align the station on actions being taken	<i>Leadership Team e-mails/Crucial Times/Wolf Tracks</i>
Leader Alignment Meetings and All-Hands Meetings	<i>Bi-weekly/every six week presentations</i>
Visual reminders on SCWE	<i>Marquee messages, posters, presentations</i>
Surveys used to pulse the organization on progress	<i>Survey Monkey</i>

Activity/Key Messages/Delivery Method

Crucial Times:

Wolf Creek supports a strong SCWE

Site-wide e-mail:

Video about Environment for Raising Concerns

	Contact/person responsible	Delivery Date(s)	Completed Date
	C. Bailey	May 20, 2013	May 20, 2013
	M. Sunseri	June 17, 2013	June 17, 2013

Enclosure 2 to WM 14-0002
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Site-wide e-mail: Site-wide message to the station about receipt of CEL with letter attached	M. Sunseri	Aug. 21, 2013	Aug. 21, 2013
Crucial Times: Message about how to initiate a Condition Report	C. Bailey	Aug. 27, 2013	Aug. 27, 2013
Crucial Times: Message about team formation and introducing Lisa Vaughn	C. Bailey	Aug. 29, 2013	Aug. 29, 2013
Marquee Messages: Messages on the marquees about SCWE	C. Bailey	Began Aug. 27, 2013	Ongoing
Crucial Times: Differing professional opinion procedure released	J. Bronaugh	Sept. 3, 2013	Sept. 3, 2013
Crucial Times: NIEP provides preliminary results	C. Bailey	Sept. 11, 2013	Sept. 11, 2013
Crucial Times: Maintaining a strong safety culture is key to avoiding willful misconduct	C. Bailey	Sept. 11, 2013	Sept. 11, 2013
Crucial Times: Team members' insights valuable to NRC response	C. Bailey	Sept. 13, 2013	Sept. 13, 2013
Site-wide e-mail: Site-wide message to the station about initial response	M. Sunseri	Sept. 19, 2013	Sept. 19, 2013
Site-wide e-mail: Request to complete SCWE survey	M. Sunseri	October 2013	October 2013
Crucial Times: Personnel encouraged to complete SCWE survey	J. Bronaugh	Oct. 2, 2013	Oct. 2, 2013
Crucial Times: CEL implementation teams formed	C. Bailey	Oct. 8, 2013	Oct. 8, 2013
Crucial Times: Don't forget to submit SCWE survey	C. Bailey	Oct. 8, 2013	Oct. 8, 2013
Crucial Times: Update on ECP implementation team	C. Bailey	Oct. 24, 2013	Oct. 24, 2013
Crucial Times: SCWE survey responses reviewed	J. Bronaugh	Oct. 30, 2013	Oct. 30, 2013
Crucial Times: ECP self-assessment team shines light on program health	J. Bronaugh	Nov. 14, 2013	Nov. 14, 2013
Crucial Times: CARB approves CEL root cause	C. Bailey	Nov. 20, 2013	Nov. 20, 2013
Crucial Times: LCT kicks off, participants increase understanding of SCWE	C. Bailey	Nov. 21, 2013	Nov. 21, 2013
Site-wide e-mail: Results from recent SCWE survey	C. Bailey	Dec. 9, 2013	Dec. 9, 2013
Site-wide e-mail: Station communication about issuance of survey and results	C. Bailey	Dec. 9, 2013	Dec. 9, 2013

Site-wide e-mail: Leadership Team e-mail about ESW incident	C. Bailey	Dec. 18, 2013	Dec. 18, 2013
Leadership Team Training: Training conducted with all Leadership Team members during fall 2013 Leadership Continuing Training	D. Hendell/L. Vaughn	October 2013	December 2013
Focused Teambuilding: Kick-off with Quality organization on teambuilding	External Facilitators	Sept. 3, 2013	Ongoing
Site Artifacts: Replace current safety culture posters with site specific information	C. Bailey	Dec. 2013	Complete
Face to Face Communications: Conduct focused group interviews to assess effectiveness of SCWE corrective actions	S. Koenig/E. Peterson	Week of Jan. 1, 2014 and Jan. 20, 2014. Security to be scheduled	Ongoing
Cascade message: Cascade SCWE survey results through all site organizations	C. Bailey	Dec. 9, 2013	Dec. 27, 2013
Leadership Action: Action: Review PARB procedure and affirm by January 28	C. Bailey	Jan. 14, 2014	Jan. 14, 2014
Crucial Times: New PARB procedure issued	C. Bailey	Jan. 15, 2014	Jan. 15, 2014
Crucial Times: Ombudsman title change	C. Bailey	Jan. 21, 2014	Jan. 21, 2014
Crucial Times: Wolf Creek representatives to meet with the NRC in Arlington	C. Bailey	Jan. 21, 2014	Jan. 21, 2014
Crucial Times: Employee Concerns Program improvements	J. Bronaugh	Jan. 22, 2014	Jan. 22, 2014
Site-wide e-mail: Site-wide message to the station about Six Month Response to CEL with letter attached	M. Sunseri	Jan. 27, 2014	