

WOLF CREEK NUCLEAR OPERATING CORPORATION

Matthew W. Sunseri
President and Chief Executive Officer

September 18, 2013

WM 13-0021

Steven A. Reynolds, Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Reference: Letter dated August 19, 2013, from S. A. Reynolds, USNRC, to M. W. Sunseri, WCNOG

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

Dear Mr. Reynolds:

By letter dated August 19, 2013, (the "**Letter**") you notified Wolf Creek Nuclear Operating Corporation ("**WCNOG**") of two NRC concerns with the safety conscious work environment ("**SCWE**") at Wolf Creek Generating Station ("**WCGS**"). The first concern related to a July 25, 2013, finding by the Regional Administrator for the U.S. Department of Labor's Occupational Safety and Health Administration ("**OSHA**") Region VII that Enercon Services, Inc. ("**Enercon**"), a contract company ("**Contractor**"), performing work at WCGS had discriminated against one of its former employees for raising nuclear safety concerns at WCGS. The second concern related to the work environment in the WCNOG Quality organization.

Based on those concerns, the NRC requested specific information regarding WCNOG's assessment of its employees' willingness to raise safety concerns at WCGS and a description of remedial activity taken or planned to address any identified weaknesses as a result of the assessment. Certain information was requested within thirty days of the date of the Letter. Additional information was requested within six months of the date of the Letter. The information requested within 30 days ("**30 Day Response**") is set forth in Enclosure I. WCNOG will provide the balance of the information, as requested, within six months of the date of the Letter.

WCNOG is committed to cultivating and maintaining a strong SCWE. Following receipt of the Letter, WCNOG formed a diverse, multi-disciplinary team of employees comprised of four individual contributors, three supervisors, two managers and an executive, supported by an external SCWE expert, to consider the matters described in the Letter. The team reviewed actions taken to date to address the specific issues identified and recommended additional actions that would be effective in cultivating desired improvement. The team's effort is supporting a root cause analysis related to the issues identified in the Letter. As the executive sponsor for this team, I can say that its contribution has been instrumental in helping WCNOG

consider the specific concerns identified in the August 19, 2013, letter from different perspectives, thereby imparting a more complete awareness of the nature of the contributing factors and innovative solutions that can assist us in effectively addressing these specific NRC concerns.

More broadly, this team's work, in combination with input from employees within the Quality organization and supplemental workers, has helped WCNOG leadership gain insight regarding the strengths and weaknesses of the WCGS work environment generally. Based on these insights, site leadership recognizes the need to gain a better understanding of emerging issues in all segments of the WCNOG organization to prevent any erosion of the SCWE in those areas.

The team identified common themes between the two NRC concerns identified in the Letter and other WCNOG issues. These common themes include:

- a) Weaknesses in SCWE policy, oversight and monitoring;
- b) Employee Concerns Program programmatic weaknesses; and
- c) Lack of leadership skills to recognize and address challenges to SCWE and its various attributes

The team also performed benchmarking to identify industry standards and best practices in a variety of areas, including actions other NRC licensees have found effective in supporting a strong SCWE. The team considered the common themes in the context of the information gathered and its knowledge of the WCNOG history and culture to identify potential corrective actions that transcend the two specific NRC concerns.

These corrective actions, including WCNOG's plans for its leadership's dialogue with its workforce to support and sustain a SCWE, are outlined in Enclosure I. WCNOG's formal plan to communicate these corrective actions and other key messages to reinforce its commitment to a healthy SCWE is outlined in Enclosure II. Properly implemented, these actions will lay the foundation for sustained improvement in the work environment at WCGS generally, not just within the specific areas identified in the Letter.

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/rit

Enclosures

cc: C. F. Lyon (NRC), w/e
N. F. O'Keefe (NRC), w/e
Document Control Desk (NRC), w/e
Senior Resident Inspector (NRC), w/e

Information Requested Within 30 Days

Introduction

In its letter dated August 19, 2013 (the "**Letter**"), the NRC requested a response from WCNOG on seven specific items. Each of those requests, along with WCNOG's response, is set forth below.

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.

Response to Item 1

Enercon terminated the employment of an individual performing fence erection around the essential service water ("**ESW**") screen house at WCGS on January 30, 2012. A Wolf Creek employee concerns program ("**ECP**") representative investigated the termination. The ECP representative concluded that the termination was based on the individual's performance. WCNOG does recognize, however, that the Acting Regional Administrator for the Occupational Safety and Health Administration ("**OSHA**"), Region VII, issued a decision on May 15, 2013, finding that there is reasonable cause to believe that Enercon's actions in terminating the individual's employment violated Section 211 of the Energy Reorganization Act ("**ERA**"). Enercon's appeal of that decision is pending.

Because of the similarity of the standards of 10 CFR 50.7 and those of Section 211 of the ERA, information related to whether the actions of Enercon might constitute a violation of 10 CFR 50.7 remains under development in the OSHA proceeding. WCNOG does not have access to all of this information and is not in a position to draw a legal conclusion regarding whether the actions of Enercon violated 10 CFR 50.7. WCNOG will continue to monitor the proceeding to determine whether additional actions are necessary to address potential effects on the work environment.

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.

Response to Item 2

Actions Taken To Reinforce a SCWE Following Issuance of OSHA Decision

As indicated in the Response to Item 1, on May 15, 2013, the Acting Regional Administrator for OSHA Region VII issued a decision finding that there is reasonable cause to believe that Enercon's actions in terminating an individual's employment violated Section 211 of the ERA. On May 20, 2013, a WCNOG executive contacted an Enercon executive to request information

regarding actions Enercon was taking to reinforce its SCWE. Enercon shared with WCNOG its message, sent via e-mail on May 22, 2013, to all of its employees, to emphasize the need to raise concerns and the alternative pathways available through which to do so. The WCNOG executive reinforced WCNOG's expectations that Enercon cultivate a SCWE in performing its work at the WCGS site with the Enercon's executive.

Also on May 20, 2013, WCNOG published an article in *The Crucial Times*, its daily on-site news publication, making site personnel aware of the OSHA decision and reinforcing its commitment to create a safe work environment where anyone can raise concerns without fear of harassment, intimidation, retaliation or discrimination ("**HIRD**") and thanking individuals for raising concerns. The following month, WCNOG launched a video series discussing the nuclear industry's adoption of the new Traits of a Healthy Nuclear Safety Culture. This series will feature video messages explaining each trait.

More recently, WCNOG has taken actions to reinforce a SCWE with its supplemental work force. For example, the largest concentration of Contractors currently on site are working on the ESW pipe replacement project. WCNOG's Project Director for the ESW pipe replacement project has provided copies of the WCNOG trifold entitled *Our Commitment to a Safety Conscious Work Environment* to contractor managers for distribution to craft workers. Similar distribution of INPO 12-012: *Traits of a Healthy Nuclear Safety Culture* is planned. He has worked with Contractor leadership to increase discussions of SCWE at pre-job briefs, kick-off meetings and Plan of the Day Meetings, not only to educate managers and supervisors, but also to encourage them to share the information with craft workers. Cards for raising condition reports and drop boxes have been made more widely available to supplemental workers. Finally, together with the WCNOG Ombudsman, WCNOG's Project Director has taken a variety of measures to heighten the awareness of the availability of WCNOG's Employee Concerns Program ECP ("**ECP**") and Corrective Action Program ("**CAP**") to supplemental workers. As discussed in the Response to Item 4, these actions of the Project Director for the ESW Project will serve as a model that can be adapted for future SCWE engagement efforts with supplemental workers and employees across the WCGS site.

Actions Taken or Planned To Evaluate SCWE Following Issuance of OSHA Decision

On June 7, 2013, the NRC completed a supplemental inspection pursuant to Procedure 95002. This inspection included a limited scope safety culture assessment follow-up in accordance with Inspection Procedure 4100, "Independent Safety Culture Assessment Follow-up." Based on this assessment, the NRC concluded WCNOG's nuclear safety culture was adequate to support nuclear safety and was improving. The inspection team did, however, note a number of safety culture challenges within a few work groups. These challenges have been entered into the WCNOG CAP.

WCNOG has also initiated its own efforts to evaluate the strength of its SCWE following the issuance of the OSHA decision. First, WCNOG is providing supplemental resources to its ECP function to permit broader scope follow-up on concerns raised among the supplemental workforce regarding HIRD and to strengthen the ability to conduct investigations that not only are independent, but are also perceived by the workforce to be independent. WCNOG expects this approach will yield a more complete picture of the status of the work environment within the relevant work groups following issuance of the OSHA decision. Inputs relevant to SCWE identified from such investigations shall be considered in connection with WCNOG's response sixth months following the date of the Letter (the "**Six Month Response**").

In addition, in late September 2013, WCNOC will request site personnel to complete a SCWE survey. The communications regarding this survey will emphasize the confidential nature of the survey and encourage site personnel to complete the survey to support WCNOC's efforts to improve the work environment. The survey results will assist WCNOC in assessing the work environment following issuance of the OSHA decision. These results will also provide baseline data regarding the work environment against which to measure the effectiveness of WCNOC improvement efforts. A subsequent survey will be conducted to help assess the effectiveness of corrective actions, identify any need for course corrections, and for trending purposes. The survey results and trends will be addressed in the Six Month Response.

WCNOC will continue to collect data between surveys by creating a dialogue on SCWE issues within their work groups and across the WCGS site. As discussed in item 4 below, WCNOC will use engagement and skip-level meetings to create an ongoing dialogue through which to gather information about the work environment generally and the effectiveness of corrective actions specifically.

Finally, WCNOC is treating the Letter and the associated root cause analysis as an emergent safety issue in its nuclear safety culture monitoring process. Accordingly, this item will be a standing agenda item for regularly scheduled nuclear safety culture monitoring panel meetings and the panel's reports to the nuclear safety culture monitoring panel senior leadership team. Corrective action timeliness and effectiveness will be monitored and assessed by this process. This process also monitors other inputs that may indicate developing issues in the specific trait areas of environment for raising concerns, respectful work environment, and problem identification and resolution.

Item 3

WCNOC'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.

Response to Item 3

Many of the work environment issues in the Quality organization have emerged in the context of efforts to drive improved performance based on the results of an audit performed by the Nuclear Industry Evaluation Program ("*NIEP*") in 2011. NIEP identified several significant deficiencies, some of which were repeat issues from the 2009 NIEP audit. WCNOC has expended substantial effort attempting to understand and address the work environment issues within the Quality organization through use of internal and external resources, but recognizes that these efforts have not been sufficient.

During the course of its review of the work environment concerns in the Quality organization and the other issues identified in the Letter, WCNOC identified areas for improvement in existing policies, processes and practices. Improvement in these areas is expected to improve the overall work environment at WCGS on a sustained basis. Among these enhancements are those designed to ensure condition reports are written at a low level and heighten the visibility,

ease of use, and accessibility of alternative pathways for raising concerns. Set forth below are the action items that have been initiated or are planned to address the work environment issues within the Quality organization particularly and more broadly at WCGS. These actions will be supplemented by those actions identified in the responses to Items 2, 4, 5 and 6. The effectiveness of these actions will be assessed as described in the Response to Item 2.

Action Item	Status and Schedule
<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>The August 27, 2013 issue of <i>The Crucial Times</i> described to site personnel the process by which CRs can be initiated and the process by which to submit anonymous CRs. Scheduled completion of other action items by Six Month Response.</p>
<p>2. Clarify the distinction between writing a CR as an individual and writing a CR as a Quality Assurance ("QA") Audit Team Lead. Based on the results of benchmarking and feedback from the WCNOG 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 (e.g. Security).</p>	<p>The August 27, 2013, issue of <i>The Crucial Times</i> reaffirmed that no prior approval or permission from another is required to initiate a CR. Benchmarking completed. Scheduled completion of other action items by October 18, 2013.</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>Enhancement to the CAP software to reduce CR initiation burden have been identified and are scheduled to be implemented at the next software update planned in 2013. Scheduled completion of other action items by Six Month Response.</p>
<p>4. Complete a root cause analysis to address the elements of the Letter. Identify and implement required corrective actions.</p>	<p>A root cause analysis is in progress. Information gathered to support this 30 Day Response will be considered. Upon identification of action items, the schedule for implementing any additional corrective actions shall be set forth in CR 73241. The status</p>

	<p>of any such corrective actions shall be addressed in the Six Month Response.</p>
<p>5. Retain third party resources to analyze the organizational dynamics within the QA organization. Implement an action plan to enhance organizational effectiveness and to coach manager and supervisor on how to improve the work environment. Establish criteria to measure current status and future progress, along with appropriate monitoring intervals.</p>	<p>Third party consultant performed assessment: September 2-6, 2013. Preliminary results were presented to WCNOE executives on September 6, 2013. Report of assessment results and strategy for improvement under development. The strategy and status of any corrective actions shall be addressed in the Six Month Response.</p>
<p>6. Evaluate the Quality organization's reporting relationships and the QA organizational structure.</p>	<p>Evaluation underway. Executive Team will consider recommendations. The status of implementation of any changes shall be addressed in the Six Month Response.</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 WCNOE'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 WCNOE employees and</p>	<p>The evaluation shall be completed by the Six Month Response. The status of the implementation of any changes to the ECP program shall be addressed in the Six Month Response.</p>

<p>supplemental workers.</p>	
<p>8. Provide training to Quality manager and supervisors, as well as other WCNOG 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 WCNOG Accountability Model.</p>	<p>A training needs analysis has been initiated and approved, trainers have been identified and training materials are under development. Scheduled completion by the Six Month Response.</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>Benchmarking of licensees has been undertaken and is largely complete. Evaluation completed by the Six Month Response. The status of any modifications will be addressed in the Six Month Response.</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 protected activity and do not create a chilling effect in the affected work group or elsewhere on the WCGS site.</p>	<p>Development of the process shall be completed by the Six Month Response. The status of implementation of such processes will be addressed in the Six Month Response.</p>
<p>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.</p>	<p>Draft provisions have been prepared and will be adjusted as necessary to address other programmatic changes discussed herein. Implementation of the provision into WCNOG's standard terms and conditions will be completed by the Six Month Response. The status of any completed amendments will be addressed in the Six Month Response.</p>

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.

Response

WCNOC has built an integrated communication strategy for WCGS. Communication plans are developed for specific initiatives that include key topics, key messages, communication tools and a summary of communication activities related to that area. These individual plans are integrated into the overall station strategy to provide an overview of the multiple pathways through which site personnel hear key messages.

To ensure the information communicated is reinforced and retained by site personnel, consistent messages are developed. A core team of subject matter experts help Corporate Communications to determine the key messages to communicate for a specific initiative. A Corporate Communications representative meets with the President and Chief Executive Officer weekly to discuss key communication items and any associated emerging issues to determine whether adjustments to the communication plan is necessary, thus allowing a timely response to developing information. The station communication plan is updated with this information and is shared weekly with the Executive Team for awareness and input. This ensures the leadership team is aligned to the messages and priorities for station communication.

WCNOC has incorporated its expectations and policies concerning SCWE, refined to incorporate its receipt of the NRC's Letter, into this communication strategy. Enclosure II includes the SCWE communication plan excerpt from this communication strategy.

WCNOC realizes, however, that its leadership must reinforce these formal communications by creating a dialogue on SCWE issues within their work groups and across the WCGS site. As discussed in the Response to Item 2, the Project Director for the ESW project has provided a useful model. WCNOC will adapt and implement this model site-wide. Adaptations may include engagement meetings and skip-level meetings to create an ongoing dialogue within and among the WCNOC workforce on these issues.

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.

As a threshold matter, WCNOC will evaluate its SCWE policy to ensure it appropriately encourages the use of additional avenues when individuals are not satisfied with the resolution of a particular problem. It will communicate any changes to the workforce, along with a reminder of the available alternatives for raising concerns and that retaliation for raising concerns is prohibited. Completion is scheduled by October 31, 2013.

As reflected in the Response to Item 3, WCNOC also intends to provide training to the WCNOC leadership team that reinforces their obligations to cultivate a SCWE and practical strategies for

doing so. This training not only will provide an overall foundation for understanding SCWE, but also will address particular cultural issues at WCNOG that may present barriers to a strong, sustainable SCWE. In particular, the training will be designed to assist WCNOG leadership to cultivate awareness among site personnel of the alternative pathways that are available for raising concerns and to encourage their use.

WCNOG also recognizes that the availability of viable alternative avenues through which to raise concerns will give individuals confidence in using them. Therefore, as reflected in the Response to Item 3, WCNOG plans to strengthen the ECP function. WCNOG plans to undertake a review of all of its ECP policies, processes and procedures to determine whether they are consistent with industry best practices. Issues that warrant particular attention include the need to strengthen confidentiality protocols and enhance the alternatives WCNOG ECP can provide to ensure independence in investigating issues. A communication strategy regarding these changes will be implemented to ensure the changes provide meaningful benefit.

Finally, on January 1, 2013, WCNOG implemented a Differing Professional Opinion Resolution Process, procedure AP 17B-001. This process outlines an alternative way to formally review these differences of opinion and incorporates the opportunity for an independent, impartial review by individuals who are knowledgeable about the underlying technical issues. The process is available to all employees. The availability of this new alternative process was most recently communicated to site personnel on September 3, 2013 in *The Crucial Times*, the WCNOG daily on-site news publication.

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.

Response

Many of the actions identified in the Response to Item 2 were designed to communicate WCNOG's prohibition on retaliation against individuals for raising safety concerns. This message will be reinforced by certain action items identified in the Response to Item 3. These action items include a) leadership training regarding strategies for managing and leading in a way that strengthens a SCWE, particularly with respect to performance improvement and Contractor oversight, and b) the development and implementation of a process for evaluating significant employment actions taken with employees and supplemental workers to ensure such actions do not constitute retaliation for engaging in protected activity and do not create a chilling effect. Both of these actions, effectively implemented, will help ensure that actions taken against individuals are not perceived as retaliatory, thus helping to avoid any chilling effect associated with such actions.

The enhancements to the ECP function and the action plan developed to improve the work environment within the QA organization also contain elements that will assist in identifying potential perceptions of retaliation and taking effective actions to prevent any associated chilling effect.

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.

Response

WCNOC informed site personnel of the receipt of the Letter through an e-mail from the CEO published on August 21, 2013. A copy of the Letter was attached to the e-mail. In this e-mail, the CEO explained that certain prompt actions had been taken to address some of the identified issues and described planned actions, including plans to give leaders the tools to cultivate a strong safety conscious work environment. He also summarized the path forward, stating that additional corrective actions would be identified during the course of developing the response to the Letter and a plan to ensure certain corrective actions are deployed broadly. He reinforced the practice of notifying the NRC when individuals do not feel comfortable raising concerns internally, recognized the licensee's responsibility to create an environment where individuals feel encouraged to raise concerns internally, and requested individuals to inform any member of WCNOC leadership or the WCNOC Ombudsman of any examples of requirements or actions they believed could have the effect of discouraging individuals from raising concerns to help them ensure those issues are addressed. Finally, the CEO reaffirmed his commitment to achieving the goal of creating an environment where each individual feels comfortable raising concerns.

On August 29, 2013, WCNOC published an article in *The Crucial Times* informing site personnel of the formation of a team to assist in developing WCNOC's response to Letter, identified each team member, and encouraged input from site personnel to support the effort. Many individuals responded to this request, providing input either directly or indirectly. On September 13, 2013, WCNOC published another article in *The Crucial Times* updating site personnel on the work of the team to date, its future role in the site's SCWE efforts, and plans to share the WCNOC response with site personnel.

The Response to Item 4 outlines the approach taken by WCNOC for important communication initiatives. WCNOC will rely on this approach to communicate at appropriate intervals the current status of SCWE at WCGS and its action plans to address the SCWE issues. The communication plan set forth in Enclosure II will be updated to plan and track these communications.

Communication Plan for Chilling Effects Letter Response

Topic/issue:

- Wolf Creek received a Chilling Effects Letter from the NRC on Aug. 19 (Letter).
- The letter describes 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 six months from the letter date.

Key messages:

- ✓ To be developed specific to each action item (if appropriate) set forth in the 30 Day Response.

Milestones:

Date:

Response team charter developed	Aug. 28, 2013 (complete)
Kickoff response team meeting	Aug. 28, 2013 (complete)
Target date for collection of requested information for 30-day response	Sept. 4, 2013 (complete)
Submit 30-day response to corporate sponsor	Sept. 13, 2013 (complete)
Submit 30-day response to NRC	Sept. 18, 2013 (complete)
Submit six-month response to NRC	Feb. 19, 2014

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	<i>Pre-job briefs, kick-off meetings, plan of the day meetings, engagement meetings, skip-level meetings and All Hands Meetings</i>
Written communications	<i>Leadership Team initiated e-mails/Crucial Times/Wolf Tracks</i>
Leadership Team meetings	<i>Bi-weekly/every six week presentations</i>
Visual reminders on SCWE, ECP and CAP	<i>Marquee messages, posters, presentations</i>
Surveys	<i>Electronic, paper</i>

Activity/Key Messages/Delivery Method

Targeted Delivery Date(s)

Completed Date

Crucial Times: Wolf Creek supports a strong SCWE	May 20, 2013	May 20, 2013
Site-wide e-mail: Site-wide message to the station about receipt of Letter with Letter attached	Aug. 21, 2013	Aug. 21, 2013
Leadership Team meeting (MRM): Message about response team initiative and key SCWE messages	Aug. 23, 2013	Aug. 23, 2013
Crucial Times: Message about how to initiate a Condition Report and anonymous CRs	Aug. 27, 2013	Aug. 27, 2013

Crucial Times: Message about team formation and introducing external SCWE advisor	Aug. 29, 2013	Aug. 29, 2013
Marquee Messages: Weekly messages on the marquees about SCWE	Began Aug. 27, 2013	Underway
Crucial Times: Differing professional opinion procedure	Sept. 3, 2013	Sept. 3, 2013
Crucial Times: NIEP provides preliminary results	Sept. 11, 2013	Sept. 11, 2013
Leadership Alignment Meeting: Meeting discussed SCWE purpose and progress on preparing our 30 Day Response	Sept. 16, 2013	Sept. 16, 2013
Site-wide e-mail: Site-wide message to the station about 30 Day Response	Sept. 18, 2013	
Station-wide Survey: Station communication about issuance of survey and results	September and October 2013	
All-Hands Meeting: Discuss 30 Day Response action items, implementation plan and key SCWE messages	Oct. 1, 2013	
Crucial Times: Communicate any changes to the SCWE policy and alternate methods to report concerns	Oct. 31, 2013	
Crucial Times: Communicate root cause for issues raised in Letter	October 2013	
Crucial Times: Training provided to Leadership Team during fall 2013 Leadership Continuing Training	October 2013	
Crucial Times and Leadership Team Meetings: Communicate changes with CAP software and management's role to encourage low threshold for initiation	October 2013	
Site Artifacts: Replace current safety culture posters with site specific information	October 2013	
Crucial Times: Communicate updated ECP policies and processes	TBD	
Other communications as directed by implementation teams (to be updated)		