

Vendors' Safety Culture

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Safety Culture Gone Wrong

- From 2010-2013, the NRC noted an increasing trend in safety conscious work environment (SCWE)-related concerns at Shaw Modular Services (SMS)
- The NRC performed inspections in January 2011, November 2011, and September 2012
 - Identified ineffective corrective action program (CAP)
- A third-party SCWE assessment conducted in February 2012
 - Identified a chilled environment existed at SMS
 - After a year, no plan was drafted to address identified issues (February 2013 Chicago Bridge & Iron (CB&I) purchased SMS)
- In April 2013, NRC issued CB&I a CEL
 - Notice of Violation (NOV) with proposed civil penalties

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- In September 2013, NRC issued Confirmatory Order (CO) to CB&I
 - Title 10 of the *Code of Federal Regulations* (10 CFR) Section 52.5, “Employee Protection”
 1. Terminated QA supervisor for notifying NRC licensee of potential faulty rebar, and
 2. Language in Corporate Code of Conduct restricting employees engaged in protected activities of notifying NRC licensee of matters within NRC’s regulatory responsibility
- In February 2014, NRC inspection to assess progress
 - SCWE assessment part of inspection
- In September 2014, revised CO issued. §52.4, “Deliberate Misconduct,” for:
 1. SMS welder taking qualification test for a coworker;
 2. Coworker allowing the action; and
 3. Weld test administrator participating

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- In December 2014, NRC issued Discretion Letter against \$52.4 for the following:
 - Two NOVs:
 1. SMS foreman signing weld tags for welders;
 2. Foreman instructing welder to sign off on welds not qualified to perform
 - Three Notices of Nonconformance (NONs):
 1. Foreman failing to ensure qualified welder used to perform specific welds;
 2. Not following procedure for submodule lift; and
 3. Failure to initiate a nonconformance report (NCR) for dropped submodule

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- In December 2014, NRC issued Choice Letter for two \$52.4 NOVs for two CB&I officials and safety representative instructing employees to omit the following from an incident report:
 1. Submodule had been dropped and damaged; and
 2. Improper rigging used and broke
- Severity Level (SL) II violation and civil penalty issued for dropped submodule, and SL III violation issued to a former company official

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- In May 2015, NRC inspection to assess CB&I implementation CO and SCWE. Progress was noted.
 - However, effectiveness of Corrective Actions at other facilities were of concern . . .

Questions . . .

