



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

July 10, 2024

Robert Schuetz, Chief Executive Officer
Energy Northwest
76 North Power Plant Loop
P.O. Box 968
Richland, WA 99352

**SUBJECT: COLUMBIA GENERATING STATION – SAFETY CONSCIOUS WORK
ENVIRONMENT ISSUE OF CONCERN FOLLOWUP INSPECTION
05000397/2024012**

Dear Robert Schuetz:

On June 4, 2024, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Columbia Generating Station and discussed the results of this inspection with you and other members of your staff. The results of this inspection are documented in the enclosed report.

This inspection was performed in response to an identified chilled work environment in the operations department during a previous 2023 Problem Identification and Resolution Inspection because of a perception that operators were not free to raise safety concerns using all available avenues without fear of retaliation. As a result of this latest June 2024 inspection, the team did not identify any significant issues with the safety conscious work environment (SCWE) in the areas of radiation protection, security, engineering, or licensing departments. In the area of operations, the inspection team noted some improvement, however, based on the inspection, the team is still concerned about the SCWE in the operations department. In particular, the NRC concerns relate to the scope of corrective actions and the pace at which corrective actions are being taken to address the chilled work environment.

Based on the inspection team's observations, and due to the corrective action sustainability concerns involved, Region IV management has determined that it is appropriate that the NRC continue to monitor your progress in addressing the SCWE conditions in the operations department. As a result, the Region IV Regional Administrator has authorized the NRC staff to perform an additional inspection using Inspection Procedure 93100, "Safety Conscious Work Environment Issue of Concern Follow-up," at a future time to evaluate the effectiveness of your corrective actions. The NRC staff will contact you to schedule this inspection.

No findings or violations of more than minor significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,



Signed by Vossmar, Patricia
on 07/10/24

Patricia J. Vossmar, Chief
Reactor Projects Branch A
Division of Operating Reactor Safety

Docket No. 05000397
License No. NPF-21

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV

COLUMBIA GENERATING STATION – SAFETY CONSCIOUS WORK ENVIRONMENT ISSUE OF CONCERN FOLLOWUP INSPECTION 05000397/2024012 – DATED JULY 10, 2024

DISTRIBUTION:

JMonninger, ORA
 JLara, ORA
 GMiller, DORS
 MHay, DORS
 TBloomer, DRSS
 JGroom, DRSS
 MSimmons, RIV/OEDO
 DCylkowski, RC
 VDricks, ORA
 LWilkins, OCA
 MChawla, NRR
 AMoreno, RIV/OCA
 RAlexander, RSLO
 PVossmar, DORS
 RBywater, DORS
 VLee, DORS
 CHighley, DORS
 JBrodlowicz, DORS
 WSchaup, ORA
 RAzua, DORS
 DWillis, OE
 MKeefe-Forsyth, OE
 NHughes, R1/DRSS
 AAgrawal, DORS
 AEIam, DORS
 R4-DORS-IPAT

DOCUMENT NAME: COLUMBIA GENERATING STATION – SAFETY CONSCIOUS WORK ENVIRONMENT ISSUE OF CONCERN FOLLOWUP INSPECTION 05000397/2024012

ADAMS ACCESSION NUMBER: **ML24173A224**

<input checked="" type="checkbox"/> SUNSI Review		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	
OFFICE	SRI:DORS:IPAT	TL:OE:AT	PM:OE:SC	RI:DRSS:PSB	BC:DORS:PBA
NAME	RAzua	DWillis	MKeefe-Forsyth	NHughes	PVossmar
SIGNATURE	/RA/	/RA/	/RA/	/RA/	/RA/
DATE	06/24/24	06/24/24	07/01/24	06/25/24	07/10/24
OFFICE	TL:DORS:IPAT	TL:ORA:ACES			
NAME	AAgrawal	WSchaup			
SIGNATURE	/RA/	/RA/			
DATE	06/24/24	07/01/24			

OFFICIAL RECORD COPY

**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket No. 05000397

License No. NPF-21

Report No. 05000397/2024012

Enterprise Identifier: I-2024-012-0014

Licensee: Energy Northwest

Facility: Columbia Generating Station

Location: Richland, WA

Inspection Dates: May 06, 2024 to June 04, 2024

Inspectors: R. Azua, Senior Reactor Inspector
N. Hughes Green, Human Factors Psychologist
M. Keefe-Forsyth, Safety Culture Program Manager
D. Willis, Team Leader

Approved By: Patricia J. Vossmar, Chief
Reactor Projects Branch A
Division of Operating Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a SCWE issue of concern follow-up inspection at Columbia Generating Station, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

OTHER ACTIVITIES – TEMPORARY INSTRUCTIONS, INFREQUENT AND ABNORMAL

93100 - Safety-Conscious Work Environment Issue of Concern Follow-up (1 Sample)

- (1) During a PI&R inspection, held the week of September 15, 2023, the inspection team inspected the safety conscious work environment (SCWE) in the operations department. Based on the interviews with operations personnel, the team concluded that recent management actions had caused a chilled work environment in the operations department because of a perception that operators are not free to raise safety concerns using all available avenues without fear of retaliation. In general, at the time of the September 2023 inspection, the team heard that over half of the employees in the operations department were aware of multiple events in which upper management's reactions to others raising concerns could be perceived as retaliation. These management actions had caused operations department employees to state that they would raise a concern, but they would ensure that they only raised it to their first line supervisor, excluding department heads and senior management, and would make sure that they stated their concern in only the most professional manner, and setting, to protect against senior management taking exception to the way the concern was raised and the venue it was raised in.

In addition, at the time of the September 2023 inspection, the team heard that a number of operations department employees will not use the Employee Concerns Program (ECP), due to a perceived lack of independence. Finally, while operation's employees were willing to write condition reports (CRs), they had an overall perception that they will not always receive adequate feedback on the resolution of those CRs. Following the 2023 PI&R inspection, the NRC decided to provide this feedback to the licensee and allow them time to enact corrective actions to improve the SCWE at their facility. The inspection conclusions associated with the 2023 Columbia Generating Station - Biennial Problem Identification and Resolution inspection are documented in NRC inspection report 05000397/2023010 (ML23310A103). Due to the seriousness of the concerns raised by the 2023 PI&R team, the Region IV Regional Administrator determined that it was appropriate for the NRC to perform Inspection Procedure 93100, "Safety-Conscious Work Environment Issue of Concern Follow-up."

The purpose of this IP 93100 inspection was to evaluate the SCWE in the operations department and other departments at the Columbia Generating Station, and to assess the effectiveness of the licensee's actions to address the previously identified chilled work environment in the operations department. The inspection consisted

primarily of reviewing the licensee’s SCWE assessments and audits, reviewing SCWE related issues identified in the licensee's corrective action program (CAP), and conducting focus group and individual interviews with licensee employees from various departments.

INSPECTION RESULTS

Assessment	93100
<p>Assessment</p> <p>Safety Conscious Work Environment</p> <p><u>Overall Assessment of SCWE</u></p> <p>Based on the inspection, the team observed some progress with the station’s efforts to address the chilled work environment in the operations department. However, the team remains concerned about the SCWE in the operations department, including the scope of corrective actions and the pace at which corrective actions are being taken to address the chilled work environment.</p> <p>The team did not identify any significant issues with the SCWE in the radiation protection, security, engineering, or licensing departments. All employees interviewed in these departments stated that they would raise nuclear safety issues without fear of retaliation. However, regarding the safety culture trait Resources (LA.1) defined in NUREG 2165 “Safety Culture Common Language,” the team did hear consistent concerns about resources for personnel and concerns about addressing equipment deficiencies.</p> <p><u>Willingness to Raise Safety or Regulatory Issues</u></p> <p>As part of this inspection, the team interviewed approximately 100 individuals in nine focus group interviews, and multiple individual interviews. Based on the discussions with operations department employees the team heard from the majority of interviewees that, at the time of the inspection, management has taken some actions to address the work environment issues identified in operations, but operators are in ‘wait and see’ mode about the effectiveness of the actions.</p> <p>The team heard perceptions from operations that they believe that the management team has waited too long to develop the comprehensive action plan, and many believe that the plan was created in response to the timing of the NRC inspection. In addition, the team heard that many operators feel that the recovery plan actions are not robust and that many of them are only going to treat symptoms but not the underlying root case of the issues in the department. The operations staff are concerned about the sustainability of the action items and the changes they have seen.</p> <p>The team heard that operators feel comfortable raising concerns up through the Acting Operations Manager but feel uncertain as to who will be ultimately chosen to fill the position permanently. The team heard that operations is feeling fairly satisfied with how equipment deficiencies are being addressed. The Backlog reduction week was viewed very favorably, however, there is some concern that the efforts to address long standing equipment issues will not be able to be sustained in the future. The team heard from operations that there are still negative perceptions of the employee concerns program (ECP) although it was</p>	

recognized that the new ECP manager was making a concerted effort to restore trust.

Based on their own independent review, the team was concerned that the recovery plan was only recently compiled and that it seemed to only address the symptoms and not the underlying problems with respect to the chilled environment. The team was also concerned that there was a lack of corrective actions for senior management documented in the recovery plan. This signaled to the team that senior management may not have taken ownership of the work environment issues in the operations department.

The team identified that communications did increase from management to the site employees, however timing of the communications was not always prompt nor complete and therefore did not always build trust between the operations staff and management. The team identified that the licensee may be able to reevaluate the level and type of information that is communicated to staff even if the issue is connected to Human Resource or legal concerns, allowing for more comprehensive and timely communications with personnel.

Based on the inspection, the team is still concerned about the SCWE in the operations department including the scope of corrective actions and the pace at which corrective actions are being taken. Therefore, the NRC plans to continue to monitor the SCWE within the operations department through information provided by other NRC resident and regional inspections, especially following the licensee selection of the permanent Operations Manager. In addition, the NRC plans to conduct an additional follow-up inspection using Inspection Procedure 93100 to be completed at a future date, to ensure that the SCWE within the operations department, continues to improve.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On June 4, 2024, the inspectors presented the inspection results to Robert Schuetz, Chief Executive Officer, and other members of the licensee staff.
- On May 8, 2024, the inspectors presented the Inspection Debrief inspection results to Grover Hettel, Chief Nuclear Officer, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
93100	Corrective Action Documents	AR 00450673-09	Columbia Generating Station Operations Recovery Plan	05/03/2024
93100	Corrective Action Documents	IT-AR 450673	(NRC 2023 PI&R) Safety Conscious Work Environment Concern	1
93100	Miscellaneous		2024- February-All Employee Meeting Slides	02/2024
93100	Self-Assessments		2024 SCWE Extent of Condition and Trajectory Check of the Operations Department (Industry Peer Review)	03/15/2024
93100	Self-Assessments		Energy Northwest Independent Third-Party Assessment of Operations Department Reluctance to Raise Safety Concerns at Columbia Generating Station by NRC in September 2023 Rev 1	12/31/2023