

## **POLICY ISSUE (Information)**

January 26, 2010

SECY-10-0009

FOR: The Commissioners

FROM: R. W. Borchardt  
Executive Director for Operations

SUBJECT: INTERNAL SAFETY CULTURE UPDATE

### PURPOSE:

This paper provides the outcome of a review of the Internal Safety Culture Task Force results (SECY-09-0068, "Report of the Task Force on Internal Safety Culture," dated April 27, 2009) in comparison with the Office of the Inspector General (OIG)'s 2009 Safety Culture and Climate Survey results. In addition, this paper: 1) describes staff's intention to conduct further analysis of the OIG survey data; 2) provides an update on the implementation of the original task force recommendations; and 3) explains plans for conducting a periodic, comprehensive review of the agency's Open Collaborative Working Environment (OCWE).

### SUMMARY:

The agency's Internal Safety Culture Task Force was in place from October 2008 through May 2009. The staff revisited the task force results by comparing them with the recently available results of the 2009 OIG survey. This review found that the OIG survey data generally support the task force results where applicable. Therefore, no modifications to the original task force recommendations are needed. However, because of its wider scope, the OIG survey identified a number of additional results and insights that the task force did not explore or identify. Accordingly, the staff intends to conduct further analysis to fully understand these issues and develop actions to facilitate continuous improvement in these areas.

CONTACT: June Cai, OE  
(301) 415-5192

## The Commissioners

Staff has already begun implementing the task force recommendations; this paper describes both these activities and plans for ongoing implementation. In addition, this paper summarizes how offices responded when asked to consider the task force's internal and external benchmarking results for potential application to their organization. Finally, the paper describes plans to conduct a comprehensive assessment of the agency's OCWE within 1 year after each OIG survey.

### BACKGROUND:

The U.S. Nuclear Regulatory Commission (NRC) consistently seeks to improve its internal organizational effectiveness. In accordance with the direction provided by the Commission in staff requirements memorandum (SRM) M080317B, "Staff Requirements—Briefing on State of NRC Technical Programs," dated April 3, 2008, the staff formed the Internal Safety Culture Task Force in October 2008. This task force sought to identify: 1) ways to increase awareness of the agency's internal safety culture, 2) initiatives that could potentially improve it, and 3) best practices already in use across the agency.

The task force engaged in intensive data gathering activities from October 2008 through December 2008, using the following methods: 1) facilitated employee focus groups, 2) a Web page portal for anonymous employee input, 3) management interviews, 4) a public meeting, and 5) external and internal benchmarking. In early 2009, the task force aggregated and analyzed the data to formulate its recommendations. In April 2009, the Executive Director for Operations (EDO) approved these recommendations for implementation (SECY-09-0068). At the completion of task force activities, the staff briefed the Commission on May 27, 2009, on the task force's results and recommendations. In response, the Commission provided additional guidance to the staff in SRM M090527B, "Staff Requirements Memorandum—Briefing on Internal Safety Culture...", dated June 5, 2009. The Commission directed that while implementing the recommendations, staff should continue to look for ways to communicate expectations clearly, to reinforce across the agency the primary focus of protection of the public health and safety, and to appropriately balance the importance of quality and timeliness.

The task force activities were independent of the OIG's periodic Safety Culture and Climate Survey. The OIG surveys are another means for the agency to identify organizational improvements. The surveys are voluntary, make provisions for anonymity, and are offered to all NRC employees, supervisors, and managers. In addition, the survey allows the NRC to compare its results to other U.S. organizations that have completed similar surveys. OIG has conducted the survey approximately every 3–4 years since 1998, and the latest survey was conducted in May 2009. After each OIG survey, the agency has responded to the results with actions to maintain areas identified as strengths and to improve areas identified as challenges.

The Commission's April 2008 SRM had originally asked the task force to provide its report within 3 months of the next OIG survey, which the agency at that time anticipated would be completed by late 2008. However, in early 2009, the projected timeframe for conducting the OIG survey was moved to May 2009 and issuance of the final report to fall 2009. Therefore, in SRM-COMSECY-09-0001, "Internal Safety Culture Task Force Interface with Office of the Inspector General Safety Culture and Climate Survey," dated February 6, 2009, the Commission approved the staff's recommendation that the task force complete its activities, render its report as planned in April 2009, and subsequently review the task force report from the perspective of the OIG survey results when those became available. Based on insights derived from this review, the staff would, if appropriate, suggest any additional actions or

## The Commissioners

modifications to the original recommendations. In addition, the staff would provide an update on the implementation of the task force recommendations. This paper provides the outcomes of this review and the update on the recommendations.

## DISCUSSION

### Review Results

Because of differences in the scope and methodology between the task force activities and the OIG survey, the staff could not make a direct one-to-one comparison of the results. Instead, the staff focused on general topics that both the task force and the OIG survey evaluated, where applicable. In general, the results from the OIG survey supported the results from the task force. However, due to its broader scope, the OIG survey results also identified a number of additional insights. Enclosure 1 contains detailed information on the review methodology and the results.

The following are high-level insights from the review:

1. Overall, the OIG survey had strong positive results in job satisfaction, which supports the task force's finding that staff have pride in their work and are proud of their personal accomplishments. In addition, the OIG survey also found strong positive results in the area of engagement, which supports the task force finding of employees feeling connected to and support for the mission.

2. Based on its review of the data collected, the task force had identified several high-level themes as areas where the agency should continue or further increase its focus. For each theme from the task force results, related questions or categories of questions from the OIG survey were analyzed.

- Theme 1: Lack of clarity and confusion about the concept of safety culture

Due to the limited amount of data, the OIG survey result in this area did not provide sufficient information to clearly support or not support the task force's overall theme. However, there were group differences from the OIG survey results that do support the task force finding that technical (versus nontechnical) staff and management in general had greater level of understanding of safety culture.

- Theme 2: Importance of communications, specifically in terms of feedback, expectations, and bases of decisions

Overall, the OIG survey results show improvements in this area but that there is need for continued focus. In general, these results support the task force insights in this area.

- Theme 3: Leaders modeling safety culture behaviors, as identified from the external benchmarking activities

Because this theme was based on external information and not internal data, there was no direct relation with the OIG survey. However, staff did review some survey questions in the area of management and leadership for general insights. Overall, the survey

## The Commissioners

results contained fairly positive responses, showing improvements from the previous OIG survey results; however, staff did identify some areas warranting additional focus.

- Theme 4: Questions about the effectiveness of the agency's differing views processes and continued perceptions that engaging these processes may lead to some form of adverse consequences

These processes include the Open Door Policy, the Non-Concurrence Process, and the Differing Professional Opinions (DPO) Program, and there were a number of OIG survey questions in this area. Overall, the OIG results support the task force's results that there are continuing questions on effectiveness of the differing views processes (even though awareness has increased); continuing perception of potential negative consequences for engaging in these processes; and the need for providing improved communications on resolution of differing views.

- Theme 5: The challenge of communicating and demonstrating the appropriate focus in meeting the potentially conflicting goals of quality and production or timeliness

The OIG survey results related to this topic support the task force results and show the important need for continued focus on appropriately conveying and demonstrating this balance.

3. In addition to the themes described above, the task force identified two issues from the focus group results that the OIG survey results also support. The first issue is in knowledge management, where the survey results showed increased positive results from 2005, although there is still room for improvement. The second issue is the turnover rates of supervisors, which the task force identified as a concern. On the OIG survey, there was no improvement from the 2005 results on this topic, which is an interesting insight considering there were improvements in general on all the survey categories and on the majority of the questions.

4. Due to the broader scope of the OIG survey, there were a number of additional results and insights indicated in the survey results that the task force did not explore or identify based on its activities. These were related to the following issues:

- Employees being held to the same standards of ethical behavior
- Concerns about the future of the nuclear industry
- Having the computer systems support needed to carry out job functions
- Empowerment of staff
- Availability of classes and workload interfering with training
- Perceptions of effectiveness of various communication tools
- Multiple headquarters locations inhibiting communication
- General trends noted for specific groups

In summary, where there was comparable data, the OIG results generally supported the task force results. Therefore, no modifications to the original recommendations are needed. Because the OIG survey identified a number of additional trends and insights as discussed above, however, the staff intends to conduct additional analysis to fully understand this information. As the OIG survey contractor indicated in their presentation of the results, the high participation rate from the survey was driven in part by the staff's belief that the agency would fully consider their insights and feedback from the survey and take appropriate improvement efforts. Conducting additional analysis in order to gain full and clear understanding of the issues

## The Commissioners

will directly guide the development of appropriate and effective actions for continuous improvement. Implementing such actions will demonstrate responsiveness to the staff, which could facilitate continued or even improved participation rates on future employee surveys and encourage further engagement on similar activities for providing employee views and feedback.

### Status of Recommendations

Activities to implement the original task force recommendations have been underway. The Office of Enforcement (OE) has taken the lead in this area and has been coordinating and communicating with other offices and staff as appropriate. Enclosure 2 describes the current status and upcoming plans for each recommendation.

As these activities are being implemented, the staff will review and consider relevant insights from the OIG survey results to inform its progress. In addition, there will be continued focus to appropriately communicate and coordinate with offices and staff across the agency, because there are many initiatives and activities planned or already underway which relate to the OIG survey results. Awareness and coordination of such activities are important to ensure efficiency and to avoid duplication of efforts. In addition, there will be strong focus on sharing information and best practices across offices. All agency staff and organizations contribute to its mission and effectiveness; therefore, active engagement and support from all offices is necessary to achieve continued improvements in this area.

### Benchmarking Review Results

As part of its data collection activities, the task force conducted external benchmarking (with other agencies and organizations) as well as internal benchmarking. By letter dated July 2, 2009 (Agencywide Documents Access and Management System (ADAMS) accession number ML091770022), as suggested by the task force, offices were requested to review the task force's internal and external benchmarking results for potential application to their organization. Enclosure 3 contains a summary of these results. In general, most offices reemphasized the best practices they currently engage in as originally reported to the task force, and some offices mentioned specific practices from other offices that they would be interested in applying. In addition, several offices indicated they would identify additional areas after reviewing the 2009 OIG survey results. The practices most consistently described by the offices in their responses were related to the areas of communications; demonstration of support from management; continuous learning environment; and identification, evaluation, and resolution of problems.

### Comprehensive OCWE Assessment

On April 30, 2009, the EDO approved combining the current assessment requirements for the DPO Program into one review and report for efficiency and effectiveness (ML090920526). These requirements, which are described in Management Directive 10.159, "NRC Differing Professional Opinions Program," are to perform annual in-depth reviews as well as periodic reviews of the DPO program. This approval eliminates the requirement to perform the annual review.

To implement this new review, the staff is planning an approach that combines the goals of the current annual DPO program review, review of the Non-Concurrence Process, and the periodic in-depth assessment and insights from the OIG survey, to provide a comprehensive assessment of the agency's OCWE. OCWE is an open collaborative working environment which (1) ensures individuals/groups can come together to solve problems, (2) values input and

## The Commissioners

feedback that may differ from the prevailing view, (3) encompasses the entire staff, where administrative and corporate support personnel, as well members of the technical staff, work together, (4) encourages trust, respect, and open communications to foster and promote a positive work environment. A comprehensive assessment that goes beyond the DPO program will provide valuable insights on areas for focus and continuous improvement. Such an assessment will also support implementation of the task force recommendation to establish a dedicated position or group to lead and coordinate safety culture efforts and activities, which included discussion on conducting OCWE assessment activities.

This comprehensive OCWE assessment would be accomplished by establishing a multifaceted approach. Each assessment will utilize a combination of assessment activities and techniques as needed. The staff plans to conduct this assessment within 1 year after each OIG survey, which are conducted approximately every 3-4 years. This timeframe allows the staff to effectively utilize the OIG survey insights to inform the assessment and to identify trends or focus areas to further explore. Enclosure 4 provides more detailed information regarding this review.

### Senior Leadership Meeting

Safety Culture was also the focus of the NRC senior leadership meeting this past November. During the meeting the senior managers discussed the findings from the Inspector General (IG) Safety Culture and Climate Survey and the Internal Safety Culture Task Force efforts. Following the meeting, the Office of the Executive Director of Operations (OEDO) requested that each office and region develop action plans based on their own assessments, focusing on areas for improvement.

The senior managers agreed to adopt the theme of an Open, Collaborative Working Environment (OCWE) as an inclusive term to describe the model workplace for the NRC. Since the senior leadership meeting, OEDO has sent two written communications to NRC staff addressing OCWE. We believe that OCWE is consistent with NRC's established values, is inclusive of the entire staff, and correlates to the characteristics of a high performing organization.

### COMMITMENT:

1. Based on the additional insight identified in the OIG survey, the staff intends to: a) conduct additional analysis to fully understand issues which the task force did not identify or include in the scope of its activities, and b) develop appropriate actions to facilitate continuous improvements in these areas. The staff will also continue the implementation of the original set of task force recommendations. In conducting these activities, the staff will follow the guidance from SRM M090527B.
2. The staff will begin to conduct a comprehensive assessment of the agency's OCWE, as described in Enclosure 4, within 1 year after the OIG makes the final results from the next OIG Safety Culture and Climate Survey available.

### RESOURCE:

The FY 2010 enacted budget for OE includes 1 full-time equivalent (FTE) and \$500K for this effort. OE has requested 1 FTE and \$500K in the FY 2011 Performance Budget for this effort.

The Commissioners

COORDINATION:

The Office of the General Counsel has reviewed this package and has no legal objection. The Office of the Chief Financial Officer has reviewed this Commission paper for resource implications and has no objections.

*/RA Martin Virgilio for/*

R. W. Borchardt  
Executive Director  
for Operations

Enclosures:

1. Review of the Internal Safety Culture Task Force Results and Recommendations with the Office of the Inspector General (OIG) 2009 Safety Culture and Climate Survey Results
2. Status of Internal Safety Culture Task Force Recommendations
3. Summary of Benchmarking Review
4. Plan for New Open Collaborative Working Environment (OCWE) Assessment

## **Review of the Internal Safety Culture Task Force Results and Recommendations with the Office of the Inspector General (OIG) 2009 Safety Culture and Climate Survey Results**

Staff reviewed the Internal Safety Culture Task Force (SECY-09-0068, "Report of the Task Force on Internal Safety Culture," dated April 27, 2009) results in comparison with the Office of the Inspector General (OIG)'s 2009 Safety Culture and Climate Survey results. The methodology and results of the review are described below.

### Review Methodology

The OIG survey had a wider scope of focus than the Internal Safety Culture Task Force. The OIG survey contained questions on both the safety culture as well as climate of the agency. The OIG report defines safety culture and climate as the following (from OIG report 09-A-18, <http://www.nrc.gov/reading-rm/doc-collections/insp-gen/2009/oig-09-a-18.pdf>):

Safety Culture [as it relates to the agency] refers to the complex sum [or whole] of the mission, characteristics, and policies of an organization, and the thoughts and actions of its individual members, which establish and support nuclear safety and security as overriding priorities.

Climate refers to the current work environment of the agency. Climate is like a snapshot in time and can affect culture.

In its final report (Agencywide Documents and Access Management System (ADAMS) Accession No. ML090990129) the task force described safety culture as the following:

The NRC's Safety Culture is comprised of the *characteristics* of our programs and *attitudes* shared by all NRC employees that ensure the agency's mission is always at the forefront of all work activities.

The two definitions of safety culture are very similar, but the OIG survey also explored general work environment issues related to the organizational climate.

In addition to this difference in scope, the OIG and the task force used different methodologies. The task force derived its results mainly from focus groups and interviews, supported by benchmarking activities (both internal and external) to the agency and inputs through a public meeting and internal Web site entry form. These methods provided qualitative information. The OIG contractor conducted some focus groups and interviews to support the design of the overall survey. However, the OIG based the majority of the findings and conclusions on the actual survey results, which provide quantitative information. In addition, the OIG survey captured demographic information, such as office, grade level, tenure, and job function. This allows the data to be explored for various groups within the agency. The task force recorded its data at a more general level and did not break down the information by demographic categories. The OIG survey and the task force activities also differed in focus areas. The task force focused its efforts and data collection on areas for improvement. The OIG survey had a larger scope that evaluated the work environment at a broader level and provides information regarding both strengths and areas for improvement. In addition, the task force activity was the first time the agency had conducted such assessment efforts, so there is not comparable data available for trending. In contrast, the OIG survey has been conducted several times and thus allows for trending.

Because of these differences in scope and approach, the staff could not make a one-to-one comparison of the results. Instead, the review focused on comparing general topic areas evaluated by both the OIG survey and the task force. For each theme or general insight from the task force results, the staff reviewed applicable questions from the OIG survey. The survey results were analyzed from several perspectives, including consideration of the raw response rates, comparisons with previous survey results to identify trending information where available, and comparisons against the external benchmarking norms where available. In addition, the staff reviewed the data to identify general trends in demographic differences (e.g., by office, grade level, tenure, job function, etc.). This review did not focus on any office specific differences or trends, because most offices have efforts underway to analyze the data for their organization and to develop continuous improvement plans. This review focused on agencywide trends and insights. Due to the broader scope of the OIG survey, the staff identified some additional results and insights which the task force did not explore or identify; those are noted in the discussions below.

In addition to this comparison review, the HR's Division of Training and Development (HRTD) conducted a review of the survey results from an organizational development perspective using the high-performing companies framework. The elements of this framework are as follows:

- a) Highly Engaged Employees
- b) Belief in Leadership
- c) A Connection to Company Strategy
- d) Accountability and Emphasis on Achievement
- e) An Innovative Culture

Where applicable, results of HRTD's review were incorporated into the comparison review. In general, the insights from the organizational development review validated the results from the comparison review.

## Review Results

### *Positive Trends*

Overall, the 2009 OIG survey had a very high response rate of 87 percent, which was a significant increase from the 2005 survey at 71 percent response. All but one of the survey categories had statistically significant increases in positive response rates from 2005 (with six categories having double digit increases). The increases are even more significant when compared with the 2002 and 1998 results. The results also compare very favorably against the external benchmarking norms. Compared against the U.S. Research & Development norm, NRC had statistically more positive response rates in all the survey categories (with seven categories having double digit differences). When compared against the U.S. High Performance norm, NRC had statistically more positive response rates in 12 out of the 17 survey categories.

Overall, there were strong positive results in job satisfaction in terms of staff feeling fulfilled and considering their jobs to be important. This supports the task force's finding of staff having pride in their work and being proud of their personal accomplishments. In addition, the agency also had strong positive results in the area of engagement, (e.g., belief in the organization's goals, pride in being part of the agency, willingness to go the extra mile). This also supports the task force finding of employees feeling connected to and support for the mission.

### *Comparison with Overall Task Force Themes*

Based on its review of the data collected, the task force identified several high-level themes as areas where the agency should continue or further increase its focus. Most of the themes were developed based on converging supporting information from multiple data sources. For each theme, staff analyzed related questions or categories of questions from the OIG survey. This section provides a summary of each theme followed by a discussion of the results of the comparison with the applicable OIG survey results.

#### Theme 1: Lack of clarity and confusion about the concept of safety culture

*Theme description:* In general, the task force found that there was some lack of clarity and confusion about what the agency means by the concept of safety culture. There was no broad, consistent level of understanding about how individuals fit into the agency's safety culture, why safety culture is important, or the agency's expectations for safety culture. During the focus groups, staff with technical responsibilities was most aware of the concept of safety culture (although knowledge levels varied), but most nontechnical staff were not certain what the term meant or if safety culture applied to them. Results from management interviews generally demonstrated an understanding of safety culture and what supports a strong internal safety culture.

*OIG survey results comparison:* There was only one question related to this area, which was regarding employees having a clear understanding of NRC's safety culture. The results were overall very positive (88 percent positive response rate). No trending information was available since it was a new question for 2009. This information does not necessarily support the task force's finding of there being lack of clarity and confusion regarding what is meant by safety culture. However, since there was only one question without any followup questions to explore employees' level of understanding and interpretation of safety culture, there is also not enough data to refute the task force finding. The task force delved much deeper into this issue by asking individuals to explain what the concept meant to them. Therefore, the OIG survey results in this area in general were inconclusive for supporting or not supporting the task force's overall theme.

However, there were group differences from the OIG survey results that do support the task force finding among those groups. For example, on the OIG survey, staff in engineering positions and senior residents had more positive response rates than those in scientific and administrative/support positions on this question. In addition, senior management had more positive responses rates overall than other levels. These insights generally support the task force finding regarding differences in levels of understanding between technical and nontechnical staff and greater understanding from management.

#### Theme 2: Importance of communications, specifically in terms of feedback, expectations, and bases of decisions

*Theme description:* This theme centers on the importance of communications, in a variety of formats. First, input from staff indicated they strongly want consistent and timely feedback from their supervisors and managers on their personal performance and information on the results and contribution of their efforts. In addition, internal input collected from all employee levels supported the need for providing clearer expectations. Staff wants to understand the expectations and standards for their performance in their current work environment. In addition,

the staff want to understand the bases of decisions, particularly where they have expressed differing views during the decision-making process.

*OIG survey results comparison:* There were a number of OIG survey questions related to understanding the goals and objectives of the organization, and there were fairly high positive response rates (in the 80-90's percentage range). There were also a couple of questions regarding office/regional management communicating matters affecting the agency and decisions made by the agency, which, even though improved from 2005, had room for improvement (positive response rates in the 70-80's percentage range). Similarly, another area for improvement is the communications of resolution of differing views by supervisors, which only had a 50 percent positive response rate. Finally, there were a number of questions related to performance management that had overall lower positive responses rates (some in the 50-70's percentage range), even though the results were generally improved from 2005 and better than the norms. The OIG contractor indicated that performance management is typically an area where organizations tend to have less positive responses rates. Overall the results show improvements in this area, but there is an opportunity for continued focus. These results in general support the task force insights in this area.

### Theme 3: Leaders modeling safety culture behaviors

*Theme description:* This theme was derived based on insights from the external benchmarking process. Agencies and organizations that had a focus on safety culture described having strong leaders throughout the organization who modeled safety culture behaviors and were engaged and present. In addition, their organizational systems, processes, and goals were aligned with the organization's safety culture principles.

*OIG survey results comparison:* Because this theme was based on external information and not internal data, there was no direct relation to the OIG survey. However some questions in the area of management and leadership were reviewed for general insights. Overall, there were fairly positive responses (overall positive response rate for the category was 74 percent), with improvements from 2005 and generally at comparable levels with the high performance norm. However, there is room for improvement identified regarding office/regional management communicating matters affecting the agency and decisions made by the agency, as discussed under the previous theme. Another area for continued focus is in trust by management in employees (71 percent positive response rate), which improved from 2005 but is lower than the high performance norm. In addition, staff in administrative/support functions and in lower grade levels had lower positive responses rates in this area.

### Theme 4: Effectiveness of differing views processes

*Theme description:* The inputs gathered from the task force showed indications of questions on the effectiveness of the agency's differing views processes (e.g., Open Door Policy, Non-Concurrence Process, and the Differing Professional Opinions (DPO) Program). The data indicated continuing perceptions that engaging in these processes may lead to some form of adverse consequences in the workplace (e.g., being excluded or viewed negatively). Managers interviewed stated continued support for using those processes. In general, the input from staff indicated the desire to understand the basis of outcomes of issues entered into these systems.

*OIG survey results comparison:* The OIG survey questions showed significant improvements in awareness of the Non-Concurrence Process and Open Door Policy, and some improvements in awareness of the DPO Program. However, when asked about perspectives on the

effectiveness of the programs (new questions for 2009), the positive response rates were fairly low (40's-50's percentage range). The survey results showed that while 70 percent of employees would be willing to use the DPO Program if necessary, only 37 percent believe the program would not have a negative effect on their career. In addition, there was a very high "?" rate (47 percent) for this question.

Regarding general comfort level in raising and communicating issues, there were improvements from 2005. The survey results also showed that the comfort levels in expressing differing views generally decreased as interactions go up levels of the organization (i.e., from coworker, to supervisor, to office/regional management, and to senior management), even though the results were improved generally from 2005, particularly for the office/regional management and senior management levels. In addition, there were generally less positive response rates from administrative/support function employees in this category of questions. Additional insights from the survey results warranting continued focus were in the communications of resolution of differing views by supervisors (only 50 percent positive response rate) and positively recognizing employees for raising differing views (58 percent positive response rate, with no change from 2005). Regarding negative reaction for raising differing views, the survey results showed definite room for improvement (positive response rates only in the 60's percentage range).

Overall, these survey results support the task force's theme that there are continuing questions on the effectiveness of the differing views processes (even though awareness has increased); there still being perceptions of potential negative consequences for engaging in these processes; and improved communications on resolution of differing views being needed.

#### Theme 5: Balancing the focus of quality and production/timeliness

*Theme description:* The challenge in communicating and demonstrating the appropriate focus in meeting the potentially conflicting goals of quality and production or timeliness appeared as a common theme from the task force focus group results and was supported by insights from management interviews and some employee inputs. The focus group results indicated there was a perception among some participants that the agency may be too "metrics" oriented, versus "quality-driven," in the production of deliverable work products.

*OIG survey results comparison:* Under the Quality Focus category, the OIG survey results showed significant room for improvement (positive response rates only in the 40's to 50's percentage) on questions related to not sacrificing the quality of work to meet established metrics or to satisfy a personal or political need, although these results were improved from 2005. When asked whether the quality of the work performed in the individual's work unit is excellent, 91 percent responded positively. Additional analysis could provide insights on this difference in positive response rate regarding the high quality of the work within the individual's work unit and potential factors for sacrificing the quality of the work. The results generally support the task force theme about the importance of continuing to focus on the balance between quality and timeliness/metrics.

#### *Additional Focus Group Insights*

In addition to the themes described above, the task force also identified two issues from its focus group results that were supported by the OIG survey results. The first area is in knowledge management, where the task force results indicated concerns about capturing and transferring knowledge from people leaving the agency or their position. The survey results

showed significant improvement in the positive response rate on this question (40 percent) as compared to 2005 (23 percent), but there was still much room for improvement.

The task force focus groups also indicated concerns about turnover rates in supervisors. On the OIG survey, management responded much more positively than staff on this topic. In addition, there was no improvement from the 2005 results (59 percent overall positive response rate), which is an interesting insight when considering that there were improvements in general on all the survey categories and on the majority of the questions.

#### *Additional Trends and Insights from OIG Survey*

As discussed under the review methodology section, the OIG survey had a broader scope than the task force activities. As such, the OIG survey contained additional results and insights that the task force did not identify based on its activities. These are described below.

1. Employees being held to same standards of ethical behavior

There was variance in the positive response rates among offices and some differences by job functions. There would be benefit in better understanding on how the question was interpreted, which would provide clarification on what insights the results from this question are indicating in order to use this information effectively.

2. Concerns about the future of the nuclear industry

On this topic, there were some differences in positive response rates (i.e., not having such concerns) among offices, between management and staff, and between staff with different lengths of tenure with the agency. Additional information would be useful regarding what specific issues regarding the future of the industry concerns are of concern and who has those concerns.

3. Having the computer systems support needed to carry out job functions

Administrative/support functions had higher positive response rates to this question. Also, in its results presentation to the staff, the OIG survey contractor indicated there were some mixed results on this topic from the focus groups that were conducted to help develop the questions. Further analysis would assist in understanding how the staff interpreted this question in terms of what types of computer systems support they had in mind when responding to this question.

4. Empowerment of staff

The series of questions in this area include topics such as being able to challenge traditional ways of doing things, innovative ideas being able to fail without penalty, and not being afraid to make mistakes. While the positive response rates (in the 50's and 60's percentage range) has increased from 2005, there is still room for improvement. In addition, administrative/support functions and lower grade levels had lower positive response rates in this category. It should be noted that the task force's external benchmarking results highlighted the importance of empowering front line staff and giving them ownership.

5. Availability of classes and workload interfering with training

Disagreeing with the questions on these topics would be a positive response, meaning that availability of classes or workload did *not* interfere with training. Such positive response rates were low (approximately 30 percent), and there was actually a decrease in the positive response rates from 2005. In addition, there were differences in the results by group (e.g., supervisors had less positive response rates than the overall agency average; newer employees with less than one year of experience had much more positive response rates than the overall agency average; and engineering and scientific job functions had less positive response rates than administrative/legal). The use of focus groups could help illuminate how staff perceive class availability or workload as barriers to training.

#### 6. Perceptions of effectiveness of various communication tools

This area showed mixed results. For example, questions regarding the effectiveness of the NRC public Web site (69%), Agencywide Documents Access and Management System (ADAMS) (42%), and the Executive Director for Operations (EDO) updates (66%) had the same or a decrease in the positive response rates when compared to 2005. Some other tools, such as NRC announcements, office/regional Web sites, and the NRC internal Web site, had more positive response rates than in 2005.

#### 7. Multiple headquarters locations inhibiting communication

The results to this question showed a low positive response rate (i.e., disagreeing with this statement) (26 percent).

#### 8. General trends noted for specific groups:

- Administrative/support functions and several corporate support offices had less positive response rates across multiple categories, although the results in general were improved from 2005.
- Those in the GG 1-10 grade levels and at the GG-14 grade level in particular had less positive response rates in several categories.

#### Planned Next Steps

Where there was comparable data, the OIG survey results generally supported the task force results. As such, the staff does not believe the original task force recommendations need modification. The implementation of the recommendations should appropriately consider factors and activities which may have come into play since the task force originally developed them in May 2009. For example, these include the agency's external safety culture activities for its licensees and initiatives and activities related to the subject areas of the recommendations.

Because the OIG survey identifies a number of additional trends and insights and provides a finer level of detail on some of the original task force themes, the staff intends to conduct additional analysis to fully understand these issues. The focus groups and interviews conducted by the OIG contractor to help develop the survey questions provide more insights on the additional trends and insights described above. In conducting any further analysis, the summary of insights from the interviews and focus groups that are described in the OIG contractor report should be reviewed and incorporated into followup activities as appropriate.

The further analysis could include additional engagement and discussions with employees through focus groups or other methods.

As the OIG survey contractor indicated in their presentation of the results, the high participation rate from the survey was driven in part by the staff's belief that the agency would fully consider their insights and feedback on the survey and take appropriate improvement efforts. Conducting additional analysis in order to gain full and clear understanding of the issues would directly guide the development of appropriate and effective actions for continuous improvement. This would demonstrate responsiveness to the staff, which could facilitate continued or even improved participation rates on future employee surveys and encourage further engagement on similar activities for providing employee views and feedback.

## **Status of Internal Safety Culture Task Force Recommendations**

The Office of Enforcement (OE) is leading the implementation of the Internal Safety Culture Task Force recommendations and has been coordinating and communicating with other agency staff. Activities to support all the recommendations have been underway. The status of each of the recommendations is provided below.

Recommendation 1: The task force recommended incorporating internal safety culture into the NRC's Strategic Plan and integrating safety culture elements, where appropriate, into the agency's performance management tools.

Staff with safety culture expertise are participating in the Fiscal Year (FY) 2011–2015 Strategic Plan work group; the final version of the plan is scheduled to be updated by the end of calendar year (CY) 2010. In addition, staff presented guidance for supervisors on discussing safety culture concepts and organizational values during performance discussions at a September 2009 training session for supervisors on performance management, and this information has been posted on the Office of Human Resource's (HR) site.

Once the agency completes the FY 2011–2015 Strategic Plan update, staff will assess how to most appropriately integrate the safety culture concepts into the agency's performance management tools, in alignment with the Strategic Plan.

Recommendation 2: The task force recommended the agency develop training on safety principles and expectations and develop and emphasize training to improve interpersonal skills for all employees, with particular emphasis on first line supervisors and new employees.

At the November 2009 senior leadership semiannual meeting, two subject matter experts provided training seminars on safety culture and Open Collaborative Working Environment (OCWE) to the NRC senior leadership team. In December 2009, the first offering of the new course "Culture and Values Management" for supervisors, which has been developed as part of the Leader's Academy, was conducted. This course includes significant discussion of safety culture concepts. Staff are evaluating feedback from the participants in order to improve the course. Once finalized, the course will be a regular offering as part of the Leader's Academy.

Staff is in the process of developing safety culture training focused on new employees in coordination with the agency's current onboarding and orientation activities. Once completed, this new employee safety culture training would also be available and encouraged for all employees. This training will incorporate information on related topics such as the agency's organizational values (e.g., may incorporate the 2009 Senior Executive Service Candidate Development Program (SES CDP) class's video on organizational values) and the agency's differing views programs. This new employee training is projected to be available in CY 2010. In terms of the interpersonal skills aspect of the recommendation for all employees, staff will be working to identify the specific competencies needed at different levels of the organization to support a strong safety culture. Based on the results, they will determine additional training needs and develop appropriate products.

Recommendation 3: The task force recommended that the agency conduct an evaluation of its current set of problem identification, evaluation, and resolution processes to identify areas for improvement.

A contract to conduct this evaluation has been put in place, and the contractor has initiated evaluation activities. The contractor will complete this evaluation in CY 2010, and staff will review the results and recommendations from the analysis to identify areas of improvement to implement.

Recommendation 4: The task force recommended establishing clear expectations and improved accountability for policies and procedures, at the office or lower levels, to be kept current and for maintaining their quality.

The staff is currently in the process of evaluating options for accomplishing this in the FY 2011 operating plans and SES performance plans, as appropriate.

Recommendation 5: The task force recommended the agency establish a dedicated advisor or organization to lead and coordinate internal safety culture efforts.

OE created the senior safety culture program manager (SCPM) position and permanently filled it in October 2009. The SCPM has already initiated coordination with a range of agency groups, some of which are described above. For example, the SCPM has coordinated with OCFO on the Strategic Plan update, HR on performance management and training, the SES CDP class on their organizational values project, and the OEDO on various agencywide activities, including taking actions in response to the Office of the Inspector General (OIG) Safety Culture and Climate Survey results. In addition, the SCPM has been coordinating within OE to ensure alignment with internal agency OCWE and external safety culture activities. Coordination with external safety culture activities (i.e., focused on licensees) is especially important for the agency to be consistent in its communications internally within the agency and externally with its licensees and stakeholders. In addition to the position of the SCPM, OE will hire additional safety culture support staff in FY 2010.

In developing the overall agency program, the staff will review the supporting details under this original recommendation to identify additional actions to be taken. These additional actions could include assisting employees in selecting and using the most appropriate avenue for registering differing views, making suggestions, or addressing mission/work related concerns, and acting as a liaison to external organizations. In addition, staff plans to develop a strategic framework for guiding the agency's efforts in the safety culture area, including identifying the appropriate goals, strategies, activities, and outcomes.

## Summary of Benchmarking Review

As part of its data collection activities, the Internal Safety Culture Task Force conducted benchmarking within the agency as well as at external agencies and organizations. In its report and appendices (Agencywide Documents Access and Management System (ADAMS) accession number ML090990129 and ML091100108, respectively), the task force suggests that offices review the internal good practices (described in Appendix H, "Internal Benchmarking Results") and insights developed from the external benchmarking efforts (described in the "Results and Insights" section on pages 16-17 of the main report) for supporting a strong safety culture and consider adopting applicable practices. By letter dated July 2, 2009 (ML091770022), NRC offices were asked to review the task force's internal and external benchmarking results for potential application to their office. A summary of office responses is described below.

### Responses

Most offices reemphasized the best practices their offices currently engage in which had already been collected by the task force. Some offices mentioned specific practices from other offices that they would be interested in applying. Several offices indicated that they would identify additional areas to focus on or could provide better responses after reviewing the results of the 2009 Office of the Inspector General (OIG) Safety Culture and Climate Survey. Offices consistently cited the following best practices as ones they currently engage in or that may be applicable to their organization:

#### 1. Communication

- Communicating expectations regarding the agency's focus on safety and security
- Communicating to administrative staff regarding their role in the agency's mission and their value to that mission (i.e., empowering the staff)
- Using procedures, office instructions, or clarification guidance as tools to define expectations of the office and roles and responsibilities of the staff
- Providing consistent and timely feedback to staff on their performance
- Providing timely and appropriate feedback regarding how staff's views were considered in decisions, particularly when staff has expressed a differing view involving a safety-related issue
- Holding routine meetings with staff to ensure that work processes are on track and resources are appropriate
- Holding routine meetings with management
- Holding brown bag lunches with the entire office staff

#### 2. Demonstrating support from management

- Managers periodically discussing agency-level programs such as the Differing Professional Opinions Program (DPO), Non-Concurrence Process, and the Open Door Policy
- Upper management practicing the Open Door Policy
- Managers actively listening to and responding to differing views
- Management focusing on the quality of work, and not necessarily metrics
- Management making decisions in consideration of the agency, office, and division needs

### 3. Continuous learning environment

- Continuing the development of Communities of Practice in the agency's Knowledge Center
- Encouraging formal and informal mentoring as well as on-the-job training
- Providing specific training on safety culture including an introduction to the basic tenets of safety culture, particularly for new employees
- Ensuring that staff are getting the appropriate opportunities for growth and development, including rotations at all levels of the office
- Providing training specifically related to leadership, interpersonal skills, and communications
- Conducting activities related to knowledge management:
  - Matching junior and senior staff
  - Ensuring that questions and solutions are tracked and kept in a knowledge base
  - Reinforcing the use of existing reference tools by ensuring that staff is aware of these documents and where to find them

### 4. Identification, evaluation, and resolution of problems

- Emphasizing the need for staff initiatives to document precedent-setting technical positions
- Establishing or enhancing the use of corrective action programs at the office level

## **Plan for New Open Collaborative Working Environment (OCWE) Assessment**

### Background

Management Directive 10.159, "NRC Differing Professional Opinions Program," directs staff to perform both an annual in-depth as well as periodic reviews of the Differing Professional Opinions (DPO) program. On April 30, 2009, NRC's Executive Director for Operations (EDO) approved combining the current multiple review requirements of the DPO Program into a single review for efficiency and effectiveness (Agencywide Documents Access and Management System (ADAMS) accession number ML090920526). This approval eliminates the need to perform the annual review.

To implement this new review, the staff is planning an approach that combines the goals of the current annual DPO program review, review of the Non-Concurrence Process, and the periodic in-depth assessment and insights from the Office of the Inspector General (OIG) Safety Culture and Climate Survey, to provide a comprehensive assessment of the agency's OCWE. OCWE is an open collaborative working environment which (1) ensures individuals/groups can come together to solve problems, (2) values input and feedback that may differ from the prevailing view, (3) encompasses the entire staff, where administrative and corporate support personnel, as well members of the technical staff, work together, (4) encourages trust, respect, and open communications to foster and promote a positive work environment. A comprehensive assessment that goes beyond the DPO program will provide valuable insights on areas for continuous improvement.

### Description of OCWE Assessment

Staff plans to accomplish the comprehensive OCWE assessment through a multifaceted approach. The Office of Enforcement (OE) staff will lead an assessment team composed of diverse individuals from across the agency, including those with specific expertise in conducting assessments. The assessment team will consider a combination of the following activities, as appropriate:

- reviewing existing processes that could be used to address differing views informally
- evaluating formal processes for differing views
- reviewing information from various documents dealing with differing views
- conducting multiple facilitated discussions with selected senior managers
- conducting focus groups on the barriers and improvements to an OCWE
- conducting interviews of DPO and Non-Concurrence Process participants
- soliciting recommendation from offices on how to recognize DPO and Non-Concurrence Process participants
- benchmarking similar agencies on their programs and practices in this area, including any processes utilized to address retribution
- soliciting feedback from staff
- reviewing applicable results from the OIG survey

This assessment will directly support implementation of the recommendations from the Internal Safety Culture Task Force. One of the task force's recommendations was for the agency to establish a dedicated advisor or organization to lead and coordinate internal safety culture

efforts. In the details of this recommendation, the task force described activities this position or organization should conduct related to OCWE, including the following:

- assessing the overall organization climate related to OCWE
- addressing potential barriers to maintaining an OCWE
- developing improvements to the current processes for raising differing views
- evaluating existing agency-level efforts to address perceptions that raising differing views could have a negative impact on employee's career

This comprehensive OCWE assessment would explore and consider these aspects described above. The team will collect and assess the data gathered and document its results in a report to the EDO. The report would include recommendations in the following potential areas:

- mitigating potential barriers to an OCWE
- addressing perceptions of retribution for raising differing views
- addressing processes for differing views (could include revisions to existing processes)
- proposing new (informal/formal) processes to address differing views
- enhancing training and performance plans
- identifying practices to support an environment where exchange of ideas are encouraged and appropriately discussed in a respectful manner

The OIG conducts the Safety Culture and Climate Survey every 3–4 years; the staff plans to conduct this OCWE assessment within 1 year after each OIG survey. This timeframe will allow the staff to use the OIG survey insights to inform the assessment and identify trends or focus areas to further explore.