

**POLICY ISSUE**  
**(INFORMATION)**

September 28, 2011

SECY-11-0134

FOR: The Commissioners

FROM: R. W. Borchardt  
Executive Director for Operations

SUBJECT: ANNUAL REVIEW OF THE LESSONS-LEARNED PROGRAM

PURPOSE:

The purpose of this paper is to provide the Commission with the annual update and review of the Lessons-Learned Program (LLP). This paper does not address any new commitments.

BACKGROUND:

At a Davis-Besse Lessons-Learned Task Force Recommendations Commission briefing on December 8, 2004, the staff proposed to develop and implement the LLP. In a Staff Requirements Memorandum (SRM) dated December 15, 2004, the Commission approved the proposal and requested to be kept apprised of the LLP's status. Since February 2007, the Commission has been kept apprised of the LLP semiannually. On August 15, 2007, in its SRM (ML072270124) to SECY-07-0121 (ML071780197), the Commission approved the Lesson-Learned Oversight Board (LLOB) recommendation to provide annual updates of the LLP beginning in August 2008.

Management Directive (MD) 6.8, "Lessons-Learned Program," sets out the processes, procedures, and oversight designed to collectively ensure that significant agency deficiencies are identified and corrected in such a way that they do not recur. This goal is accomplished by using a rigorous process to identify significant lessons learned, develop detailed corrective action plans, subject those plans to formal review and approval, and ensure that the plans have been effective and did not result in any unintended consequences. Each corrective action plan must include an explanation of what actions will be taken to institutionalize the knowledge gained through the identification of a lesson learned to help prevent recurrence of the deficiency resolved by the corrective actions. Because deficiencies entered into this program are expected to require significant resources to correct and because the agency has many corrective action

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mechanisms that function at the office level and below, a high threshold has been established for entering deficiencies into the LLP.

In accordance with MD 6.8, the LLOB screens issues for relevancy with respect to the LLP criteria, provides LLP oversight, performs an independent review and approval of proposed corrective action plans for issues that meet the LLP criteria, and reviews the long-term effectiveness of corrective actions. The LLOB is composed of senior managers nominated by the Office Directors and the Regional Administrators and appointed by the Executive Director for Operations (EDO). On September 20, 2010, the EDO issued a memorandum to the designated representatives on the LLOB to announce changes that were made as a result of the recent reassignment of Senior Executives (ML102310180). At the end of December 2010, James Lyons, Deputy Director of RES and Chairman of the LLOB, retired. Jennifer Uhle assumed the role of RES Deputy Director and chair of the LLOB and continues to maintain the oversight and management of the LLP as described in MD 6.8.

#### DISCUSSION:

##### Lessons-Learned Criteria

MD 6.8 specifies that a candidate lessons-learned item must meet all of the following criteria to be designated a lessons-learned item:

1. The item has significant organizational, safety, security, emergency preparedness, or generic implications.
2. A need exists to institutionalize corrective action for this item because the failure to do so would reasonably be expected to challenge the ability of the agency to meet any of the strategic outcomes designated in the Strategic Plan or the corrective action would substantially improve the safety or security of NRC employees.
3. A root cause exists or can be identified.
4. The apparent resolution is actionable.

The LLOB found that many of the candidate items did not meet the criteria. One of the principal attributes of the LLP is criteria that are high enough to ensure that only the most important issues will be considered. The high threshold was also based on a desire to maximize the impact of the agency resources expended and to focus senior management on the most important lessons learned. Because of the high profile associated with items that meet the criteria for inclusion into the LLP, the Commission or staff senior management will most likely have already approved the corrective action plans prior to LLOB review. The LLP process will ensure that the potential for important items to be missed will be lessened and that any items that pass the screening criteria will receive the appropriate attention of senior management throughout the implementation and closeout of the corrective action plan and the subsequent effectiveness review.

### Lessons-Learned Items

On December 9, 2010 (ML112200654), and February 15, 2011 (ML112201032), the LLOB met to discuss recommendations from various internal and external investigations/reports (e.g., Office of the Inspector General [OIG] and internal/external events).

During this period, the LLOB reviewed 59 items as potential lessons-learned items and addressed them in its December 9, 2010, meeting. The LLOB determined that 57 of the items did not meet the criteria for entrance into the LLP and further concluded that each item can be addressed adequately by the appropriate program offices. In addition, the LLOB decided that the remaining two items merited its further review because of numerous potential agency implications. Finally, the LLOB requested a presentation from the Office of Federal and State Materials and Environmental Management (FSME) Programs to provide clarification of the issues outlined in the two reports pertaining to the lessons-learned items before making a final determination.

The LLOB discussed internal LLP issues including the methodology for identifying potential lessons-learned items and coordination of meetings. The LLOB decided that any recommended items for discussion should have a representative from the office available to present their perspective to the LLOB. In addition, the LLOB discussed how LLOB members and senior managers could be a resource for submitting potential lessons-learned items to the LLP project manager (LLPM) for review.

On February 15, 2011, representatives from FSME presented two potential lessons-learned items to the LLOB:

- Department of Veterans Affairs Lessons-Learned Task Group – Final Report (ML102740140).
- National Institute of Standards and Technology (NIST) Lessons-Learned Working Group Report – Contamination Event at Boulder, CO. (ML101960297)

The LLOB determined that both FSME potential lessons-learned items did not meet the threshold for consideration as an agency lessons-learned item.

A brief discussion took place regarding the “Report to the President from the National Commission on the BP Deepwater Horizon Oil Spill and Offshore Drilling.” The LLOB was informed that the Office of Enforcement (OE) is reviewing the report as a safety culture case study. The LLOB decided that the LLPM will monitor the status of OE’s review and will advise the LLOB of any progress at the next LLOB meeting.

The enclosure lists the 59 potential lessons-learned items addressed during LLOB meetings.

Other Lessons-Learned Oversight Board Activities

LLOB members participated in the agency's efforts related to the Fukushima Daiichi accident and task force work. Therefore, no LLP meetings were scheduled from March through August 2011.

The lessons learned from Fukushima Daiichi are being systematically reviewed by the staff in response to Commission direction. As a result, the LLOB does not currently have a role in ensuring that appropriate actions are being taken. The LLOB will consider if it should take on any role in the near future at the next LLOB meeting scheduled for November 2011.

The LLP's knowledge management system—known as SharePoint Executive Lessons-Learned System (SPELLS)—is a Web-based interface that is used for tracking, searching, archiving, and documenting LPP information and activities. A project has begun to replace the SPELL application with the ADAMS P8 case management tool that streamlines the lessons-learned process by eliminating additional data entry on the part of the NRC user and creates a lessons-learned knowledge management area within ADAMS. The data from SPELLS will be moved to the new ADAMS P8 lessons-learned system, and this system will be piloted by the end of the first quarter of 2012.

RESOURCES:

RES budgets 0.3 FTE annually for staff support to the LLP.

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 package for financial implications and has no objection.

***/RA by Michael F. Weber for/***

R. W. Borchardt  
Executive Director  
for Operations

Enclosure:

[Potential Lessons-Learned Items Presented  
to the LL Oversight Board 09/10 – 2/11](#)

Potential Lessoned-Learned Items Presented to the Lessons-Learned Oversight Board  
September 2010- February 2011

1. Department of Veterans Affairs Lessons-Learned Task Group-Final Report.
2. Enclosure: Lessons Learned from Implementation of the NRC Construction Inspection Program at the LES NEF Self Assessment from July 1, 2006, thru June 10, 2010.
3. National Institute of Standards and Technology Lessons Learned Working Group Report.
4. Notice of Meeting with Duane Arnold and Calvert Cliffs Force-on-Force Exercises to Discuss Lessons Learned from the Recent Triennial Force-on-Force Exercises at Duane Arnold and Calvert Cliffs.
5. Notice of Meeting with Byron and Dresden to Discuss Lessons Learned from the Recent Triennial Force-on-Force Exercises.
6. Meeting Handout US-APWR DCWG ITAAC Improvement Effort.
7. Presentation from License Renewal Meeting between the U.S. NRC Staff and the Nuclear Energy Institute to Discuss Current License Renewal Topics and Process Improvements.
8. Advisory Committee on Reactor Safeguards Review of the Draft Standard Review Plan for License Renewal Applications and the Generic Aging Lessons Learned Report (Revision 2).
9. Generic Aging Lessons Learned Aging Management Program AMPM41 Buried Piping = Structural Integrity Comments.
10. Generic Aging Lessons Learned Update for Advisory Committee on Reactor Safeguards: Consideration of Revision 2 Changes on Current Applications Presentation.
11. Generic Aging Lessons Learned Update for Advisory Committee on Reactor Safeguards: Main Presentation.
12. Generic Aging Lessons Learned Update for Advisory Committee on Reactor Safeguards: Small Bore Piping Aging Management Program Presentation.
13. NUREG-1801, Generic Aging Lessons Learned Report: Tracked Changes Revision 1- Revision 2 (September 23, 2010 Version to Advisory Committee on Reactor Safeguards).
14. After-Action Report for the Exercise with Babcock and Wilcox Nuclear Operations Group, Lessons Learned - Enclosure 3.
15. TPC Presentation, "Lessons Learned from Lungmen Project Digital I&C Software."
16. Audit of NRC's iLearn Learning Management System.
17. Calvert Cliffs, Unit 3, Submittal of Scope of Proposed Work for Restoration of an Unnamed Tributary to the Chesapeake Bay in the Vicinity of Camp Conoy and to Evaluate Potential Impacts or Improvements to Puritan Tiger Beetle Habitats.
18. CNWRA - Intermediate Milestone 14002.01.441.104 Lessons Learned About Media Used in Conveying Information to the Public-Letter Report.
19. DMSSA/FSME E-mail dtd 8/16/210, Subj: FW: Program Improvement Plan (PIP) with Attachment.
20. Donald C. Cook, Units 1 and 2 - Application for Technical Specification Improvement to Eliminate Requirements for Hydrogen Recombiners and Hydrogen Monitors Using the Consolidated Line Item Improvement Process.
21. Dresden, After Action Report/Improvement Plan, August 10, 2010, Radiological Emergency Preparedness (REP) Program.
22. Accounts Payable Data Call Lessons Learned.
23. EPRI/NRC-RES Fire PRA Methodology: Integration, Lessons Learned, and Insights.
24. FEMA Grand Gulf Nuclear Station After Action Report/Improvement Plan, Drill Date - September 28, 2010, Radiological Emergency Preparedness (REP) Program.
25. FEMA River Bend Station After Action Report/Improvement Plan, Drill Date - June 8, 2010, Radiological Emergency Preparedness (REP) Program.
26. FEMA Wolf Creek Generating Station After Action Report/Improvement Plan, Drill Date - September 22, 2010, Radiological Emergency Preparedness (REP) Program. G20100487/EDATS: OEDO-2010-0644 - EDO Request and Responses Re: February 2010 Snow Storm and Office Closings - Lessons Learned
27. Impending Publication of NUREG/CR-XXXX, "Lessons, Learned in Detecting, Monitoring, Modeling, and Remediation of Radioactive Ground-Water Contamination."
28. ITAAC Quality & Inspectability Lessons Learned Meeting Handout.

Potential Lessoned-Learned Items Presented to the Lessons-Learned Oversight Board  
September 2010- February 2011

29. JCN: N6721 - MELCOR Apps & Improvements for ADV Reactors (Accepting 189 and Incremental Funding).
30. JCN: V6059- SAPHIRE 8 Code Improvements and Quality Assurance Activities- FORM 173.
31. Lesson-Learned: Improper Authorization to Perform I-131 Therapeutic Treatments.
32. Lessons Learned Presentation for 2010 Taiwan AEC Workshop Parts 1 and 2.
33. Memo From B. Cherry to M. Case and S. Richards re: FY10 Lessons Learned and Future Initiatives.
34. Memo to David Skeen Re: Continuous Improvement Communication Strategy for Waste Incidental to Reprocessing Activities Between the U.S. Nuclear Regulatory Commission and the U.S. Department of Energy.
35. Memorandum from DORL Request for Additional Information/Safety Evaluation Process Improvement Team, Preliminary Results of Assessment of the NRR Request for Additional Information and Safety Evaluation Processes (TAC No. ME2926).
36. NUREG/CR-XXXX "Lessons Learned in Detecting, Monitoring, Modeling, and Remediation Radioactive Ground-Water Contamination."
37. SFST Seminar - Overview of Process Improvement Effort for Part 72 General Licenses Review Process.
38. Public Comment and Staff Response to NRC Regulatory Issue Summary 2008-05, Revision 1: Lessons Learned to Improve Inspections, Tests, Analyses, and Acceptance Criteria Submittal.
39. Reissuance of Notice of Availability of Models for Adoption of TSTF-423, Rev 1, "Technical Specifications End States, NEDC-32998-A," for Boiling Water Reactor Plants Using the Consolidated Line Item Improvement Process.
40. Research and Test Reactor Licensing Actions Lessons.
41. Response to NRC Request for Additional Information on TSTF-508, Revision 1, "Revise Control Room Habitability Actions to Address Lessons Learned from TSTF-448 Implementation."
42. Risk-Informed Improvements to the Standard Technical Specifications.
43. Stephen Dingbaum E-mail Re: Announcement Memo: Audit of NRC's iLearn Learning Management System.
44. Summary of License Renewal Meeting Between NRC and NEI to Discuss Current License Renewal Topics and Process Improvements.
45. Updated NRC Regulatory Issue Summary 2008-05, Revision 1: Lessons Learned to Improve Inspections, Tests, Analyses, and Acceptance Criteria Submittal.
46. NSIR-08-0169 Report of the Senior Executive Review Panel (SERP) - Peach Bottom Lessons Learned - C.1.c.
47. Waterford, Unit 3, After Action Report/Improvement Plan, Drill Date - September 29, 2010, Radiological Emergency Preparedness (REP) Program.
48. OIG-10-A-2, Audit of NRC's Oversight of the Access Authorization Program for Nuclear Power Plants – September 30, 2010 – REDACTED FOR PUBLIC RELEASE 09/30/2010.
49. OIG-10-A-20, Audit of NRC's Vendor Inspection Program 09/28/2010.
50. OIG-10-A-19, Memorandum Report: Evaluation of NRC's FOIA Process 09/17/2010.
51. OIG-10-A-18, Assessment of NRC's Wireless Devices – September 17, 2010 – REDACTED VERSION 09/17/2010.
52. OIG-10-A-17, Audit of NRC's Oversight of Irradiator Security – September 2, 2010 – REDACTED VERSION FOR PUBLIC RELEASE 09/02/2010.
53. OIG-10-A-16, Audit of NRC's Deployment of the National Source Tracking System 08/30/2010.
54. OIG-11-A-06, Transmittal of the Independent Auditor's Report on the Condensed Financial Statements 02/04/2011.
55. OIG-11-A-05, Independent Auditor's Report on the U.S. Nuclear Regulatory Commission's Special Purpose Financial Statements as of September 30, 2010 and 2009, and for Years Then Ended 11/16/2010.
56. OIG-11-A-04, Results of the Audit of the United States Nuclear Regulatory Commission's Financial Statements for Fiscal Years 2010 and 2009 11/09/2010.
57. OIG-11-A-03, Independent Evaluation of NRC's Implementation of the Federal Information Security Management Act for Fiscal Year 2010 11/09/2010.

Potential Lessoned-Learned Items Presented to the Lessons-Learned Oversight Board  
September 2010- February 2011

58. OIG-11-A-02, Audit of NRC's Non-Concurrence Process 10/07/2010.
59. OIG-11-A-01, Inspector General's Evaluation of NRC's Most Serious Management and Performance Challenges 10/01/2010.