

POLICY ISSUE INFORMATION

September 25, 2012

SECY-12-0128

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, "Semiannual Update of the Lessons-Learned Program and Annual Lessons-Learned Program Review," dated July 25, 2007, (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

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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 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).

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 ensures 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 February 28, 2012, and with follow-up meetings on March 29, 2012 (ML120950309), and on July 5, 2012 (ML122000438), 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 such as the Department of Energy lessons-learned reports) as well as LLP process type issues.

During this period, the LLOB reviewed 38 items as potential lessons-learned items and addressed them within the 3 mentioned meetings. The [enclosure](#) lists the 38 potential lessons-learned items addressed during LLOB meetings. The LLOB determined that none of the lessons-learned items met the criteria for entrance into the LLP and further concluded that each internal lessons-learned item can be addressed adequately by the appropriate program offices.

Regarding the process issues, the LLOB reviewed the threshold criteria for the LLP as described in MD 6.8 and discussed program scope. After deliberations, which included perspectives from both long-serving members and new members, the LLOB continues to believe the threshold is adequate. The high threshold continues to provide an efficient use of agency resources in directing the LLP to only select major issues as an agency lessons-learned item. Otherwise, the LLP could overlap with lessons-learned activities that are being addressed adequately under other office programs.

With regard to the LLP scope, the Board, which consists predominantly of Deputy Office Directors, discussed the merits of expanding its role to include referring selected issues/topics, for which a lessons-learned review had not been conducted and consequently, no report issued, to the appropriate program office for further review/evaluation in the context of any potential lessons-learned. This would include identifying issues that operating experience indicates should have been previously evaluated or more fully followed-up on by the staff. The Board concluded that this expanded role would be a valuable addition to the LLP, and is consistent with the Board's responsibility as outlined in Section V of the LLOB handbook, to provide recommendations to the EDO for improvements in the LLP. By way of collaboration, the Board would first reach out and engage the potential lead office before recommending that that program office perform a lessons-learned review. The Management Directive 6.8 will be modified in its next update to describe this expanded role of the Board.

As an update to a comment made in the 2011 LLP annual report regarding monitoring the status of the safety culture case study by the Office of Enforcement (OE) on the "Report to the President from the National Commission on the BP Deepwater Horizon Oil Spill and Offshore Drilling," OE has informed the Lessons Learned Program Manager (LLPM) that this study has not yet been issued. The LLPM will continue to monitor the status of OE's review and will advise the LLOB of its progress at the next LLOB meeting.

Other Lessons-Learned Oversight Board Activities

Regarding the LLOB's level of involvement in reviewing lessons learned from the accident at Fukushima, the OEDO directed the Board to perform effectiveness reviews on the Near-Term Task Force recommendations. The earliest item listed in the recommendations has a due date

of September 2013. The LLOB will interact with the responsible offices and discuss steps to keep the Board apprised of recommendation milestones reached for the purpose of initiating the individual effectiveness reviews in a timely and efficient manner. For the purpose of knowledge management, the LLOB plans to include the provided information in the Agency Lessons Learned Tracking System.

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 SPELLS 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 completion of system tests and production environment deployments are slated for the first quarter of fiscal year 2013 and the second quarter of fiscal year 2013, respectively.

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/
R. W. Borchardt
Executive Director
for Operations

Enclosure:
As stated

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

1. GAO-11-830 "DOD Financial Management: Marine Corps Statement of Budgetary Resources Audit Results and Lessons Learned [Reissued on October 17, 2011]."
2. Nuclear Waste: Disposal Challenges and Lessons Learned from Yucca Mountain GAO-11-731T, June 1, 2011.
3. Commercial Nuclear Waste: Effects of a Termination of the Yucca Mountain Repository Program and Lessons Learned GAO-11-229, April 8, 2011.
4. Defense Acquisitions: Application of Lessons Learned and Best Practices in the Presidential Helicopter Program GAO-11-380R, Mar 25, 2011.
5. Recovery Act: Use of Transportation Funds, Outcomes, and Lessons Learned GAO-11-610T, May 4, 2011.
6. 2010 Census: Preliminary Lessons Learned Highlight the Need for Fundamental Reforms, GAO-11-496T, Apr 6, 2011.
7. DOE-Inadvertent Shotgun Discharge - From Office of Health, Safety and Security Lessons Learned Database. Lesson ID: SEC-Y12-201108-LL-68.
8. DOE-Technical Safety Requirements Implementation- From Office of Health, Safety and Security Lessons Learned Database. Lesson ID: 2011-ID-AMWTP-0003.
9. DOE-Perceived Schedule Pressure affects Worker Involvement- PMLL Identifier: PMLL-2011-SPRU-ARRA-H2-0002.
10. DOE-Need for a Strong Conduct of Operations Program PMLL Identifier: PMLL-2011-SPRU-ARRA-H2-0004 (Source: User Submitted).
11. DOE-Failure to Accept Mistakes Prohibits Learning and Continuous Improvement Lesson ID: INL-BEA-ID-2011-665.
12. DOE-Solving One Problem Can Lead to Another Problem Lesson ID: L-2009-OR-BWY12-0805.
13. DOE- Avoid Accidents by Performing Safety Checks on Hydraulic Liftgates Lesson ID: 2011-LL-PNNL-0005 (Source: User Submitted).
14. DOE-Unattended Water Bath Boils Dry, Causes Paper Towel to Smolder Lesson ID: 2011-LL-PNNL-0004.
15. Memorandum Report: Review of NRC's Implementation of the Federal Managers' Financial Integrity Act for Fiscal Year 2010 (OIG-11-A-07).
16. Audit of NRC's Implementation of 10 CFR Part 21, Reporting of Defects and Noncompliance (OIG-11-A-08).
17. Audit of NRC's Implementation of HSPD-12 Phase 2 (OIG-11-A-09).
18. Audit of NRC's Oversight of ISFSI Security (OIG-11-A-10).
19. Audit of NRC's Shuttle Service (OIG-11-A-11).
20. Audit of NRC's Oversight of Independent Spent Fuel Storage Installations Safety (OIG-11-A-12).

Enclosure

21. GI-204 Upstream Dam Failures And Associated RG 1.159 (Discussion on required charter changes to allow LLOB to recommend this and future items for staff to perform a lessons learned review- No report).
22. Safety Culture and Configuration Management Improvement Oversight Panel's "Lessons Learned" for Nuclear Fuel Services, Inc. (March 9, 2011).
23. Submittal of Public Version of Department of Veterans Affairs Lessons Learned Task Group Final Report (March 15, 2011).
24. Closed Meeting to Discuss FOF Lessons Learned with Browns Ferry, Oconee, and Millstone on May 6, 2011 09:00 to 11:00 - Enclosure 2 (March 28, 2011).
25. Lessons Learned from Public Outreach Meetings (April 7, 2011).
26. Lessons Learned From Implementation of Title 10 of the Code of Federal Regulations Part 50, Appendix R for Nuclear Power Stations (April 27, 2011).
27. NUREG/CR-7029, "Lessons Learned in Detecting, Monitoring, Modeling and Remediating Radioactive Ground-Water Contamination" (April 30, 2011).
28. Fire Protection Lessons Learned Since Appendix R - May 2011 Draft (May 5, 2011).
29. Lessons Learned on Inadvertent Release of Security-Related Information on May 19, 2011 (June 17, 2011).
30. B&W Lessons Learned Presentation per Reference 2 Memorandum and Order (June 20, 2011).
31. The July 20, 2011, Summary of Meeting re: Documenting Lessons Learned and Planned Improvements from the 2011 Agency Action Review Meeting (July 21, 2011).
32. The Value of a Mature, Stable, and Transparent Regulatory Framework in Facilitating ER Programs - Lessons Learned in Decommissioning of Uranium Recovery and Other Facilities in the USA (August 1, 2011).
33. Intermediate Milestone 14002.01.441.159 - A Center for Nuclear Waste Regulatory Analyses Perspective on Adoption Determination Review of the U.S..Department. of Energy's Environmental Impact Statement for Proposed Geologic Repository at Yucca Mountain, Nevada (July 5, 2011).
34. Lessons Learned from the June 7, 2011, Response to Alert Due to Fire Affecting Safety-Related Equipment at Ft. Calhoun Station (September 9, 2011).
35. Lessons Learned from the June 26-30, 2011, Response to Flooding at Ft. Calhoun Station (September 9, 2011).
36. Memo: Lessons Learned - Perry Special Inspection, IR 2011-013 (September 26, 2011).
37. Lessons Learned on Inadvertent Release of Sensitive Unclassified Non-Safeguards Information (November 22, 2011).
38. Nuclear Security and Incident Response submission of lessons-learned item, "Planned Headquarters (HQ) Power Outage, Communications Transfer, and COOP Network Test on August 5-7, 2011: Regions IV Observations and Lessons Learned."