

## POLICY ISSUE

(Information)

September 26, 2014

SECY-14-0101

FOR: The Commissioners

FROM: K. Steven West, Chairman  
Lessons Learned Oversight Board

SUBJECT: ANNUAL REPORT ON THE LESSONS-LEARNED PROGRAM

### PURPOSE:

This paper provides the Commission with the annual report of the Lessons-Learned Program. The report covers the period from August 1, 2013, through July 31, 2014. This paper does not contain any new commitments.

### BACKGROUND:

At a Davis-Besse Lessons-Learned Task Force Recommendations Commission briefing on December 8, 2004, the staff proposed the Lessons-Learned Program (LLP). In a Staff Requirements Memorandum (SRM) dated December 15, 2004, the Commission approved the proposal and directed the staff to keep it apprised of the LLP's status. Beginning in February 2007, the staff provided semiannual status reports to the Commission. 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 staff's recommendation to provide annual LLP reports.

Management Directive (MD) 6.8, "Lessons-Learned Program," describes the LLP and 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. The LLP ensures that existing agency processes are effective by reviewing both internal and external lessons learned documents for potential agency applicability.

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The above goals are 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 includes 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.

In accordance with MD 6.8, the Executive Director for Operations designates the Lessons Learned Oversight Board (LLOB) to provide an independent review and approval of proposed corrective action plans and their eventual closeout. The LLOB is comprised of senior managers nominated by office directors and regional administrators to provide oversight to the LLP. Currently, the deputy director of the Office of Nuclear Regulatory Research (RES) chairs the LLOB, and RES provides the Lessons Learned Program Manager (LLPM) for staff support.

## DISCUSSION:

### Lessons-Learned Criteria

Deficiencies entered into the LLP are expected to require significant resources to correct. In addition, the agency has other corrective action processes that function at the office level and below. Therefore, a high threshold has been established for entering deficiencies into the LLP. This threshold consists of four criteria, as specified in the MD 6.8, to ensure that only the most important issues will be considered, maximizing the impact of agency resources and focusing senior management on the most important lessons learned. The candidate lessons-learned item must meet all four 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.

Because of the high profile associated with items that meet these criteria, the Commission or senior management will most likely have approved the corrective action plans before the LLOB review. The LLP process reduces the likelihood that important items will be missed and ensures 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 any subsequent effectiveness review.

### Review of Potential Lessons-Learned Items

Between August 2013 and May 2014, the LLPM screened 210 items as potential lessons-learned items and identified seven items for review by the LLOB. In a meeting held on July 1, 2014, the LLOB determined that none of the seven potential lessons-learned items met the criteria for entrance into the LLP. The seven items included four NRC lessons learned reports, two audit reports from the Office of the Inspector General, and one lessons-learned report from the U.S. Department of Energy. Enclosure 1 lists these seven potential lessons-learned items.

During the above meeting, the LLOB discussed other LLOB issues such as new potential lessons-learned sources or items for review. One potential source discussed is Abnormal Occurrences reports, and an item for possible future consideration for review is the staff actions lessons learned during the 2013 government shutdown. Another topic discussed was the applicability of the lessons-learned recommendations resulting from the review of the June 25, 2008, medical event that occurred at the Executive Boulevard Building (EBB) to the new Three White Flint (3WF) building. This item is further discussed below.

#### Other Lessons-Learned Oversight Board Activities

The LLOB directed the LLPM to ascertain the status regarding the completion of the 21 recommendations made in the lessons-learned report (Accession No. ML082970070) to address the June 25, 2008, EBB medical event and its applicability to the 3WF building.

The information provided by the project manager (PM) responsible in the Office of Administration indicates that the various recommendations given in the lessons learned report have been appropriately addressed at all Headquarters buildings. Moreover, the PM indicated that the relevant recommendations would be revisited to ensure that they have been successfully implemented in the 3WF building. The LLOB Chairman accepted this planned staff action. This completed LLOB activity on this item.

With regards to LLP administrative activities, the LLOB is in the final steps of revising MD 6.8. On August 20, 2014, the subject MD was submitted to the Office of Administration for editing and issuance.

Some of the key changes to the LLP process included allowing more latitude in asking offices to consider an item for a lessons-learned review and permitting an SES representative to participate in an advisory role to the LLOB regarding issues relevant to their office.

On another topic of interest, the Office of Enforcement (OE) updated an item included in the 2011 LLP annual report regarding its monitoring of the status of the safety culture case study on the "Report to the President from the National Commission on the BP Deepwater Horizon Oil Spill and Offshore Drilling." OE informed the LLPM that it will continue to not issue the case study because of the ongoing pending litigations involved in the accident. The LLPM will continue to monitor the status of OE's review and will advise the LLOB once the OE staff issues the subject report.

The LLP's knowledge management system—known as SharePoint Executive Lessons-Learned System (SPELLS)—was a Web-based interface used for tracking, searching, archiving, and documenting LPP information and activities. This system was retired in August 2013 and replaced with the Agency Lessons Learned Tracking System (ALLTS). ALLTS is an 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 system tests have been completed, and ALLTS was placed in the production environment on April 26, 2013. Enhancements requested by the LLPM were successfully demonstrated during an August 7, 2014, review.

The release of ALLTS for agency use is planned for the early part of the second quarter of FY 2015. The LLOB with support from the Office of Information Services is developing the necessary training for the staff to effectively use the system and will implement the training prior to the system being activated for agency use. The staff is considering appropriate communication tools to inform the staff of the availability of the ALLTS.

COORDINATION:

The Office of the General Counsel has reviewed this package and has no legal objection. The Office of the Chief Financial Officer (OCFO) has reviewed this package for financial implications and has determined that OCFO concurrence on this report is not necessary because it is informational and does not request any budgetary resources.

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K. Steven West, Chairman  
Lessons Learned Oversight Board

Enclosure:  
As stated

## **Potential Lessons-Learned Items Presented to the Lessons-Learned Oversight Board**

**August 2013 - May 2014**

1. Audit Report, "Audit of NRC's Safety Training and Development for Technical Staff," OIG 13-A-14 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML13073A183, March 14, 2013).
2. Lessons Learned Work Loss Injury (ADAMS Accession No. ML14133A273, December 23, 2014).
3. Lessons Learned Server Room Power Outage (ADAMS Accession No. ML14086A631, January 7, 2014).
4. Nuclear Fuel Services, Inc. Lessons Learned Team Report (ADAMS Accession No. ML13323B261, November 19, 2013).
5. Review of Lessons Learned From the San Onofre Steam Generator Tube Degradation Event (ADAMS Accession No. ML14028A028, March 20, 2014).
6. Audit Report, "Audit of NRC's Oversight of Active Component Aging," OIG-14-A-02 (ADAMS Accession No. ML13301A638, October 28, 2013).
7. Importance of Verifying that All Items Are Removed before Dispositioning for Reuse (Not permitted in ADAMS, Department of Energy Lessons ID. SEC-LLNL-07-25-2013, July 25, 2013).

Enclosure