

Kingston Report

Lessons Learned:

**Improving Accountability and
Performance**

Missed Opportunities

Although the actions below were not required, they were opportunities to improve accountability and performance

Examples:

Failure to adopt the Dam Safety Program to evaluate coal combustion wet storage ponds

Failure to revisit engineering assumptions

Failure to employ more conservative design criteria and safety factors

Failure to address all observations and recommendations

Failure to fully document justification when engineering commitments were revised

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Observations

Ensure stability is verified for all storage facilities to be built

Institute rigorous structural analysis of all coal combustion product storage facilities

Demonstrate self-assessments to promote objective fact-based inspections and reporting

Ensure that safety-related risks are given highest priority

Standardize engineering philosophy, design and construction

Standardize management procedures and processes for coal combustion products handling, storage and disposal operations

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Areas of Improvement

Improving Accountability and Performance in four areas:

- Management and Culture
- Standardized Programmatic Processes and Procedures
- Structural, Physical and Technical Performance Levels
- Organizational Structure Issues

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Actions Already Taken

- Initiated a thorough investigation and analysis of all Coal Combustion Product facilities
- Completed an extensive geotechnical analysis of the Kingston failure
- Completed a preliminary reassessment of the potential hazard classification of all Coal Combustion Product impoundments using Dam Safety criteria
- Initiated development of a comprehensive plan for conversion from wet to dry storage

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Actions Already Taken

- Embarked on implementation of an ambitious enterprise-level Risk Management program
- Instituted several organizational structure changes to complement the desired culture:
 - Consolidation of all Coal Combustion Product Management
 - Consolidation of Environmental Permitting and Compliance functions
 - Established a stand-alone Communications SVP reporting to CEO
 - Initiated an agency-wide organizational effectiveness effort focused on accountability and performance

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Management and Culture

TVA must revise organizational structures and issue guidance to ensure:

- Clear accountabilities, roles and responsibilities
- Robust problem reporting
- Strong governance and oversight
- Values-based culture with individual ownership for compliance

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