

Enclosure 4: Exelon Presentation  
Meeting Summary of July 28, 2010  
Public Meeting with NEI  
**Dated August 4, 2010**



# **Braidwood Nuclear Safety Culture Pilot**

**Ron Gaston  
Regulatory Assurance Manager  
July 28, 2010**

- ✓ Site specific procedure developed based on existing Exelon practices and NEI guidance
- ✓ Braidwood implemented all three phases
  - 4 Monitoring Panel Meetings
  - 1 Semi-Annual Senior Leadership Team (SLT) Review
  - 1 Independent Nuclear Safety Culture Assessment (NSCA)
- ✓ All three phases assessed data against the INPO Nuclear Safety Culture Principles and Attributes
- ✓ NRC observed implementation of all three phases

- ✓ Consists of Plant Manager, Oversight Manager, HR Manager, Regulatory Manager, and Performance Improvement Manager
- ✓ Meetings held on a two month frequency
- ✓ Process inputs provided in advance for review and preliminary binning
  - Condition reports tagged with Safety Culture trend code
  - CAP investigations (Root Cause, Apparent Cause) and feedback
  - NRC findings and violations, referred allegations
  - Nuclear Oversight elevations, assessments and audits, concerns
  - HR investigations / disciplines and ECP cases
  - Offsite Review Committee minutes and findings
  - Selected site performance indicators

- ✓ Meeting involves process input reviews to identify issues at low level and provide oversight of corrective actions
  - Discussion of previous actions items / trend reviews
  - Collegial review of each individual input
  - Bin inputs that represent a weakness in a safety culture principle
  - Identify issues for short term actions
- ✓ Monitoring Panel provides a forum for regular reflection and assessment of safety culture health
  - Aggregate review of broad scope of inputs provided oversight and engagement on safety culture
  - Identified specific departments or plant issues influencing safety culture

- ✓ Utilized Monitoring Panel data and SLT judgment to reach consensus on site's implementation of each safety culture principle
- ✓ Identified safety culture improvement opportunities
  - Principle 3 – Organizational Trust
    - Long-term issues not being resolved
    - Communication challenges
  - Principle 5 – Nuclear is Recognized as Special
    - Cross-functional human performance issues
  - Principle 7 – Organizational Learning
    - Investigation and issue resolution weaknesses

- ✓ Independent assessment against the eight INPO principles
- ✓ Two phases: Survey (65% response) and Onsite Assessment
- ✓ Onsite Assessment
  - 74 interviews of site personnel and 4 meeting observations
  - Interview questions based on INPO safety culture principles and attributes
- ✓ 3 Positive Observations, 5 Negative Observations, and 4 General Observations

- ✓ Monitoring Panel identified safety culture weaknesses in specific departments and with specific site issues
- ✓ Monitoring Panel binning and focus areas were consistent with independent NSCA observations
- ✓ SLT review challenged sites actions / progress related to resolving NSCA negative observations
- ✓ SLT review identified Improvement Opportunity in Principle 7 – Organizational Learning
  - Consistent with Oversight / Offsite Review Board feedback of recent decline in CAP performance
- ✓ NSCA and SLT review noted effective site action and improvements in decision making – consistent with recent NRC feedback related to existing SCCI



- ✓ Monitoring Panel bin process now inputs to the safety culture attribute level
- ✓ Insights from line organization department heads presented to Monitoring Panel
- ✓ Bin positive behaviors against safety culture principles to identify areas to leverage / benchmark
- ✓ Periodic challenge of site disposition of SLT improvement opportunities / NSCA observations
- ✓ Improved communication of results to requisite levels of the organization

- ✓ The NEI 09-07 guidance provides a structured and tiered process that drives the site to own and actively monitor / improve safety culture
- ✓ Use of a broad range of process inputs allows for identification of potential safety culture issues:
  - As a leading indicator of performance
  - At the precursor / low level
  - Related to a specific department or targeted population
- ✓ Provides transparency
  - NRC observations of all three phases
  - NRC review of inputs, binning results, meeting minutes, and assessment reports
  - NRC tracking of site actions through CAP