

Fuel Cycle Facility Corrective Action Program Criteria

A. Policies, Programs, and Procedures

1. The licensee has established a Corrective Action Program (CAP) that is resourced and managed to ensure timely and effective correction of safety and security issues to prevent their recurrence. The licensee establishes CAP programs, procedures and controls to segregate security related information as necessary to ensure the protection of safeguards and classified information. The licensee CAP is implemented uniformly across licensed activities.
2. Licensee senior management receives frequent updates on the status of safety and security issues to ensure adequate management and staff oversight of the CAP and to make adjustments to resources assigned to resolution of CAP issues as necessary to ensure adequate priority is given to the most significant issues.
3. The licensee has established CAP policies, programs and procedures that clearly describe roles and responsibilities, align the organization to effectively implement the CAP, and clearly express management's expectations regarding implementation of the CAP.
4. The licensee's senior management actively encourages management, supervisors and staff to identify and report safety and security issues.
5. The licensee provides initial and periodic refresher CAP training to management, supervisors and staff that includes training on CAP policies, programs and procedures. During the training the licensee senior management reinforces their commitment to the CAP, encourages its use by management, supervisors and staff, and clearly stipulates that managers, supervisors and staff will not be subject to discrimination as a result of their reporting of safety and security issues.
6. The licensee has established and implemented procedures describing the formal process that management, supervisors and staff must follow to ensure safety and security issues are timely and appropriately identified, reported, documented, tracked, trended, assessed for significance, and evaluated for causal factors, and that corrective actions are developed, tracked, implemented and assessed for completeness and effectiveness. The licensee has also established procedures for conducting periodic, independent assessments of the CAP. The licensee issues and manages these procedures as required by its procedure control program.

B. Identification and Reporting of Safety and Security Issues

1. The licensee CAP encourages and requires management, supervisors, and staff to identify and report safety and security issues related to human performance, facility and equipment conditions, programs and procedures, and similar activities or conditions from personal observation, information received from others, licensee audits and self-assessments, safety committees, licensee event reports and investigations, NRC-identified issues, NRC and industry operating experience, and other relevant sources.
2. The licensee CAP reporting process includes several methods, such as verbal, written or electronic reporting, for individuals to provide a description of the scope and nature of

each safety or security issue. Each reporting method includes collection and documentation of the type and quantity of information necessary to assess the issue's significance and support the follow-up of the issue as part of the causal factors evaluation. The licensee CAP program also includes a means of making anonymous reports of safety and security issues.

3. The licensee CAP procedures and methods of reporting safety and security issues are comprehensive, clearly define what issues should be reported and how to report them, readily available, and easily understood. The licensee CAP will establish an appropriate threshold for issue identification. The procedures emphasize the reporting of issues at the lowest level and as soon as possible to ensure the resolution of the issues before they become more significant.
4. The licensee documents each reported safety and security issue and all the relevant information associated with the assessment of its significance, facts and circumstances related to the event, immediate response actions, causal factor evaluation method and results, corrective action determination and implementation, and confirmation of the completeness and effectiveness of the corrective action. The documentation method provides for the tracking of issues such as significance, status, elapsed time since first reported, individuals responsible for follow-up, causal factor analysis, and corrective action determination and implementation. The documentation process also provides for the trending of the issues such as their origin, scope, nature, significance and number, timeliness of resolution, and number and nature of corrective actions.
5. The licensee's CAP reporting and documentation process includes procedures for the communication of information regarding the safety and security issues, to include the status of resolution and implementation of corrective actions, to organizations and individuals affected by the issues, those within the organization responsible for assessing and correcting the issues, and the individuals who initially reported the issues.

C. Significance Assessment and Causal Evaluation of Safety and Security Issues

1. After the report of a safety or security issue, the licensee performs an initial assessment of the actual or potential significance of the issue to determine if immediate corrective action is warranted to prevent or mitigate an actual or potential unacceptable consequence and to determine reportability.
2. The licensee's significance assessment procedure describes how to assess the safety or security issues significance, assign a significance category or level to the issue, assign the level and priority of the response required to follow-up and evaluate the causes of the issues based on significance, and document the significance determination results in the CAP document system. Issues with a more direct, significant health, safety or security impact on the public, workers or the environment are assigned the highest significance category or level. The licensee reassesses and amends the significance of an issue if the information collected during the follow-up and causal evaluation indicates that the initial significance designation was not correct.
3. Based upon the issue's significance, the licensee uses a graded approach, to determine the level and priority of the follow-up response to an issue and the scope and nature of the causal evaluation. For those issues assigned the lowest significance category or level, the focus may be on correcting the immediate or most apparent cause based upon

the known facts related to the issue without conducting an in depth causal evaluation and root cause determination. The issue and its resolution is documented in the CAP document system and trended so that similar problems are recognized and additional corrective actions are identified and implemented to prevent recurrence. A more formal causal evaluation is performed to identify the causal factors and root causes of the more significant safety and security issues.

4. The licensee's procedure for the conduct of a more formal causal evaluation states that the evaluation will begin as soon as possible to preserve evidence and data and to reduce the deterioration or loss of information. The individuals who perform causal evaluations have the technical experience and qualifications necessary to evaluate the safety and security issues and identify the causal factors and root causes of the issues. The information and evidence collected to establish the facts associated with the issues is analyzed and validated for accuracy and documented in the CAP document system and preserved for future reference. The staff performing the causal evaluations identifies the causal factors that contributed to the issues and the root causes that caused the issue and that, if corrected, will prevent its recurrence. The licensee documents the causal factors and root causes in the CAP document system.
5. The licensee's formal causal evaluation will also include an evaluation of the relevance of the safety and security issues and their causes to other areas of the facility. These additional evaluations will include an evaluation of the extent-of-condition, extent-of-cause, or other generic implication evaluations as the licensee deems appropriate.

D. Development and Implementation of Corrective Actions for Each Issue

1. The licensee develops, prioritizes, approves, tracks, and completes all corrective actions in a timely manner to effectively resolve and prevent recurrence of each safety and security issue. For the more significant issues, the corrective actions specifically address the contributing factors and root causes identified from the causal evaluation.
2. The licensee prioritizes the implementation of the corrective actions based upon the significance of the safety and security issues. The licensee may use a graded approach based upon the issues significance and complexity of the corrective actions to assess the priority of the corrective actions.
3. The licensee assesses the efficacy of each corrective action and its impact on other facilities, operations, equipment and personnel to ensure the corrective action does not result in an undesired consequence.
4. The licensee develops corrective actions that are achievable, measurable, and closeable. The licensee assigns responsibility for its implementation, and establishes a schedule for initiating, completing and implementing each corrective action. If a corrective action will take an extended period of time, the licensee develops interim, compensatory measures to reduce the probability of recurrence or mitigate the consequence of the safety or security issue should it recur.
5. The licensee develops a formal corrective action plan to address the correction of the more significant safety and security issues that require numerous, complex and/or long term corrective actions. Senior management reviews and approves the corrective action plan and receives periodic briefings on its status.

6. The licensee records a clear and comprehensive description of each corrective action in the CAP document system and uses this information to track and trend corrective action status, completion and effectiveness.
7. The licensee routinely monitors corrective action status and periodically reports the status to management until the corrective actions are complete and fully implemented. The licensee maintains a systematic approach for tracking and reporting the status of corrective actions that is readily accessible and which provides sufficient data to appraise, analyze, and report the status of corrective actions.

E. Assessment of Corrective Action Program Effectiveness

1. Once the licensee has fully implemented a corrective action, it implements measures to verify the completion of the corrective action and assess the effectiveness of the corrective action in successfully resolving all apparent contributing and root causes and preventing recurrence of the associated safety or security issue. The nature and scope of the corrective action effectiveness assessment may be determined by a graded approach based on the complexity and significance of the safety or security issue and corrective actions. If the licensee determines that a corrective action was ineffective, it reassesses causal factors analysis and identifies additional corrective actions necessary to successfully resolve the issue and prevent recurrence. The licensee also determines the reasons the original causal factor evaluation or corrective action determination process failed to identify and implement an effective corrective action and determines if the these processes should be amended to improve their performance.
2. The licensee tracks and trends identified safety and security issues and their associated causes to assist in the identification of repeat occurrences, generic issues and CAP problems, such as corrective action determination and implementation timeliness, that impact its effectiveness. The trending process should be applied at the lowest level to identify trends that may lead to more serious safety and security issues. The trend data is periodically reviewed, analyzed, and summarized in a report, and disseminated throughout the licensee's organization to assist in review and follow-up.
3. The licensee performs assessments of the CAP effectiveness in identifying and documenting safety and security issues, assessing the significance of safety and security issues, responding to the issues and conducting follow-up and causal factors evaluations, developing and implementing corrective actions, confirming completion and assessing the effectiveness of corrective actions, and tracking and trending the information contained in the CAP document system to ensure the overall effectiveness of the CAP. The licensee establishes a formal assessment process that describes the CAP elements and processes to be assessed and has clearly defined acceptance criteria for determining effectiveness of the elements and processes reviewed. The licensee may perform routine CAP effectiveness assessments using properly qualified staff within the CAP organization; however, the licensee periodically has an independent assessment performed by individuals who are not a part of the local organization. The licensee develops a corrective action plan that ensures the timely and effective correction of CAP issues that impact the programs ability to prevent recurrence of safety and security issues.