POLICY ISSUE
(Information)

September 29, 2010   SECY-10-0126

FOR: The Commissioners

FROM: R. W. Borchardt
                              Executive Director for Operations

SUBJECT: ANNUAL REVIEW OF THE LESSONS-LEARNED PROGRAM

PURPOSE:

The purpose 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, 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 (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 that are 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 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

CONTACT: James E. Lyons, RES
                   301-251-7400

already 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 Office Directors and Regional Administrators and appointed by the Executive Director for Operations as specified in a memorandum (ML102310180).

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 a 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 first and/or second criterion. 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 have likely already approved the corrective action plans prior to LLOB review. The LLP process will ensure 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, close-out of the corrective action plan and the subsequent effectiveness review.

Lessons-Learned Items

The LLOB met on January 7, 2010 (ML100290453), and August 9, 2010 (ML102300757), to discuss recommendations from various internal and external investigations/reports (e.g., Office of the Inspector General (OIG) and internal/external events).

During this period, 32 items were reviewed as potential lessons-learned items. Five of these items were addressed in the January 7, 2010, LLOB meeting and the remaining 27 items in the August 9, 2010, meeting. The LLOB determined that none of the items met the criteria for entrance into the LLP and further determined that each item can be addressed adequately by the appropriate program offices.

The potential lessons-learned items addressed during LLOB meetings are summarized in the Enclosure.

Lessons-Learned Oversight Board Activities

During the month of March 2010, the LLOB members also discussed the SharePoint Enterprise Lesson Learned (SPELL) application, the various aspects of communicating about the LLP to the agency, and the status of launching SPELL. The SPELL application provides the agency with the ability to submit potential lessons-learned items, search metadata or keywords for items of interest, and navigate the collection via familiar Windows folder structures. The briefings informed the new members and ensured that the vision and SPELL application are still aligned with the current agency needs.

On May 13, 2010, the staff provided the Inspector General with an update on the status of the three recommendations in OIG-10-A-03, "Audit of NRC's Management Directive 6.8, Lessons Learned Program" (ML101170410). The update contained the actions that have been taken to address the OIG recommendations to 1) develop and implement a strategy for communicating agencywide lessons learned and program activities to agency staff; 2) implement the plan to release SPELL for agency use; and 3) reaffirm and communicate management's support for the program.

The SPELL Web-based interface that will be used for tracking, searching, and archiving LPP information was launched on April 30, 2010. A May 7, 2010, network announcement rolled out the LLP as a knowledge management program centered on SPELL. On May 25, 2010, an opportunity was provided for agency staff to learn more about the SPELL application through a presentation that included an informative question and answer session. During the session, the participants provided some suggestions for improvements on the SPELL application and they also stated that they intend on utilizing the SPELL application in the future. Additional enhancements to SPELL will continue to be identified and implemented as needed.

Consequently, in a June 17, 2010, memorandum, OIG closed out the three recommendations.

Management Directive and Handbook 6.8 is being revised to incorporate the experience gained in implementing the program as well as considering any needed revision as a result of the OIG audit recommendations.

RESOURCES:

The Office of Nuclear Regulatory Research budgets 0.3 FTE annually for staff support to the LLP.

COORDINATION:

The Office of the General Counsel 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 by Michael F. Weber for/

R. W. Borchardt
Executive Director
  for Operations

Enclosure:
Potential Lessons-Learned Items Presented
to the LL Oversight Board 5/09 – 8/10

**Potential Lessons-Learned Items Presented to the Lessons-Learned Oversight Board
from May 2009 through August 2010**

1. NRC Office of the Inspector General (OIG) 09-A-10, "Audit of the Regional Counsel Role in the Enforcement Process." (See Note 1)
2. OIG-09-A-11, "Information System Security Evaluation of the Technical Training Center – Chattanooga, TN." (See Note 1)
3. OIG-09-A-12, "Audit of NRC's Force-on-Force Inspection Program." (See Note 1)
4. OIG-09-A-13, "Information System Security Evaluation of Region II - Atlanta, GA." (See Note 1)
5. OIG-09-A-14, "Information System Security Evaluation of Region IV - Arlington, TX GA." (See Note 1)
6. OIG-09-A-15, "Office of the Inspector General Information System Security Evaluation of Region III - Lisle, IL." See Note 1)
7. OIG-09-A-16, "Audit of NRC's Grant Management Program OIG-09-A-16." (See Note 1)
8. OIG-09-A-17, "Audit of NRC's Oversight of Construction at New Nuclear Facilities." (See Note 1)
9. OIG-09-A-18, "2009 NRC Safety Culture and Climate Survey." (See Note 1)
10. OIG-09-A-19, "Audit NRC's Material Control and Accounting Security Measures for Special Nuclear Materials at Fuel Cycle Facilities." (See Note 1)
11. OIG-09-A-20, "Office of the Inspector General Information System Security Evaluation of Region I King of Prussia, PA." (See Note 1)
12. OIG-09-A-21, "Inspector General's Assessment of the Most Serious Management and Performance Challenges Facing NRC." (See Note 1)
13. OIG-10-A-01, "Audit of NRC's Physical Security Inspection Program for Category I Fuel Cycle Facilities." (See Note 1)
14. OIG-10-A-02, "Audit of NRC's Quality Assurance Planning for New Reactors." (See Note 1)
15. Availability of Final License Renewal Interim Staff Guidance LR-ISG-2007-02: Changes to Generic Aging Lessons Learned Report Aging Management Program XI.E6, Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirement. (ML091940093)
16. FCIX 2009: LES Construction Lessons Learned (Stephen Cowne). (ML091690051)
17. FCIX 2009: Lessons Learned in License Renewal (Robert Link). (ML091690061)
18. Availability of Final License Renewal Interim Staff Guidance LR-ISG-2007-02: Changes to Generic Aging Lessons Learned Report Aging Management Program XI.E6, Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirement. (ML091940076)
19. Lessons Learned - Turkey Point Hostile-Action Based Drill, June 24, 2009-Enclosure 3. (See Note 2)
20. License Renewal Interim Staff Guidance LR-ISG-2007-02 Changes to Generic Aging Lessons Learned Report Aging Management Program XI.E6, "Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements." (ML091940105)
21. Liquid Radioactive Release Lessons Learned Task Force (LLTF) Final Report. (See Note 1)
22. Memo to E. W. Brach re: Lessons Learned From the Review of the MAGNASTOR Cask System (Certificate of Compliance No. 72-1031). (See Note 2)

23. Models for Adoption of TSTF-508, Revision 1, "Revise Control Room Habitability Actions to Address Lessons Learned from TSTF-448 Implementation" for Publication in the Federal Register (TAC No. MD9433). (See Note 2)
24. NLE 09 AAR Lessons Learned - Enclosure 3. (See Note 2)
25. Response to April 17, 2009 Request for Additional Information Regarding TSTF-508, Revision 0, "Revise Control Room Habitability Actions to Address Lessons Learned from TSTF-448 Implementation." (ML091690643)
26. S. Cohen's Presentation at 7/1/09 NMA/NRC Uranium Recovery Workshop, "Lessons Learned - New Facility Applications." (ML092220404)
27. SECY-09-0156 - Status of Applying Lessons Learned from Pressurized-Water Reactors to Emergency Core Cooling System Suction Strainer Performance for Boiling-Water Reactors. (ML092600377)
28. E-mail regarding lessons learned from the Turkey Point stuck control rod emergency Technical Specifications amendment telephone miscommunications. (ML102720866)
29. Lessons Learned and Planned Improvements for Agency Action Review Meeting and Supporting Process. (ML092220388)
30. Lessons Learned Regarding Initial Use of eTravel and Summary of Expedited Travel Approval. (ML092321008)
31. E-mail regarding linking the Executive Committee on Internal Controls with the LLP reviews. (ML102720855)
32. E-mail regarding Budget Execution Lessons Learned. (ML102720875)

Note 1: All publicly available OIG Reports are accessible through the NRC's Web site at: http://www.nrc.gov/reading-rm/doc-collections/insp-gen/.
Note 2: Document is not publicly available.