

Callaway Benchmark question regarding Nuclear Safety Culture Monitoring processes for PA.1 and WP.4 sent on May 22, 2023.

What considerations are made to determine whether data falls into PA.1 Standards: Individuals understand the importance of adherence to nuclear standards, OR WP.4 Procedure Adherence: Individuals follow processes, procedures, and work instructions?

I typically look at CAP items for procedure non-adherence items, and I also try to capture CAP items that are related to procedure enhancements or errors (assuming that someone caught an error during work activities). My concern is that it is difficult to know if procedure adherence is being encouraged (or discouraged!) in any way, and whether or not the procedure non-adherence items were simply human error, or someone just not opening the procedure even if required.

So how do you determine the data that goes into either of these Attributes?

Station	Response
Wolf Creek	I try to look at the input from an individual behavior perspective or a behavior around a specific process (a process behavior). The reason I take this approach is due to the three categories listed in the front of the INPO 12-012. Beyond that, I typically reach out to the folks involved to get their input using the 12-012 for additional insights and understanding. I really put a lot of weight on the behavioral examples provided in the 12-012.
Columbia	NA – have comparable questions.
TVA	We do not have anything written to distinguish them, but here are a few examples of how I have seen them categorized differently. PA.1 Standards: Rework Housekeeping / job site ownership Quality of work package preparation / walkdowns Use of HU tools WP.4 Procedure Adherence: CAP/issue resolution procedure requirements not met Engineering change package closeouts untimely or missed steps

Dominion	At Dominion Energy, we do not have specific considerations other than the descriptions in Traits handbook. The attribute selected is based on discussion among the panel members to determine the best fit.
D.C. Cook	I think this is a question we have all asked ourselves at one time or another. At Cook we do not have anything written to distinguish them, but we use the best possible standard that fits the event. At times we will discuss it between the team members to make sure it is in the best bin possible. Our way of thinking is very similar to Victoria's reply from TVA PA.1 Standards: Rework Housekeeping / job site ownership Quality of work package preparation / walkdowns Use of HU tools WP.4 Procedure Adherence: CAP/issue resolution procedure requirements not met Engineering change package closeouts untimely or missed steps
Palo Verde	We have no set criteria outlined in a formal document. However, we monitor events and CAP items for applicability to both PA.1 and WP.4. In some instances, these could be one or the other or both. In most examples of procedure non-compliance (even when HU errors are involved) we still classify these as an input to WP.4. Instances where workers are not following strict procedural guidance is our focus. Where we can better categorize these during our NSCMP discussions is distinguishing them from Individual Commitment to Safety (NP.1 which includes PA) verses Management Systems (OR.1 which includes WP) using INPO 20-004 for guidance. Are events identified as being individual error or more organizational in nature.
Duke Energy	I am not aware of any particular documents that specifically outlines data inputs to the NSCMP and what Trait/Attribute they belong to. However, during the discussion portion, the panel hashes out their thoughts on the reason for the procedural non-compliance (i.e., infrequent evolution, new to the task, poor

	procedure language, HU, etc.). I think this is where the rich discussions come from. That being said, at least at Duke, procedural non-compliance may be bucketed in a number of different traits or attributes. Sorry for cagey answer, but I am not sure there is a direct correlation to one or the other every time.
Entergy	We used to use a culpability model to try and determine if an issue belonged in PA.1 or WP.4. Sometimes the issue belongs in both Attributes. In this model we looked at whether not the individual had knowledge of the procedure, and whether or not they used it, and if not, we would classify this in PA.1. If there was an error and it was determined that the procedure was incorrect, or was not clear, then we determined that it belonged in WP.4. Same thing for work packages or other instructions, if there was an error in the documents but the person followed them, it would be classified as WP.4. Also, we try to look at whether or not the situation was because of an individual's actions (belonging more to PA.1), or whether the issue was programmatic such as work instructions or faulty procedures or instructions (belonging more in WP.4). It's still subjective in nature, much like all of the binning in NSCMP. We have had several discussions about these attributes as well.
Constellation	This has been a topic of discussion for us as well. When the issue is event based, we tend to rely heavily on HR input or HURB results (documented in CAP) to determine if there was a knowledge gap, performance gap or combination of both. It's not uncommon for us to tag a SC input with multiple traits. As you know, the process is highly subjective, so I don't think there's a right or wrong way. In my opinion, success is getting the committee to have a discussion, and align on appropriate traits.