

# INTEGRATED SAFETY MANAGEMENT SUMMIT

“SIGNS OF A FAILING QA  
PROGRAM”

8/24-27/09

# PROGRAM FAILURES

- ◆ THESE ISSUES ARE DIRECTLY RELATED TO A PLANT'S "FALL FROM NRC GRACE".
- ◆ THE PLANT HAD BEEN LISTED BY THE NRC AS ONE OF THE **TOP NUCLEAR PLANTS FOR 10 CONSECUTIVE YEARS.**

# FAILURES IN MANAGEMENT OF THE QA PROGRAM

- ◆ THE QA ORGANIZATION LACKED MANAGEMENT SUPPORT:
  - PROMOTED THE VIEW OF QUALITY AS A SECONDARY RESPONSIBILITY
- ◆ NO PROCESS FOR ESCALATING ISSUES:
  - ISSUES REMAIN UNRESOLVED
  - ISSUES DO NOT RECEIVE MANAGEMENT ATTENTION

# FAILURES IN MANAGEMENT OF THE QA PROGRAM

- ◆ NO ONE PERSON/ORGANIZATION RESPONSIBLE FOR MANAGING ISSUES TO CLOSURE:
  - ISSUES REMAIN UNRESOLVED DUE TO CONFLICTS WITH DAY-TO-DAY PRIORITIES
  - WITH NO ONE BEING HELD ACCOUNTABLE ISSUES REMAIN UNRESOLVED

# FAILURES IN MANAGEMENT OF THE QA PROGRAM

- ◆ REPORTS TO MANAGEMENT ON QUALITY WENT FROM MONTHLY TO QUARTERLY TO ANNUALLY:
  - DOES NOT PROVIDE MANAGEMENT FEEDBACK ON THE HEALTH OF THEIR ORGANIZATION

# FAILURES IN MANAGEMENT OF QA RESOURCES

- ◆ NO REPLACEMENT OF OVERSIGHT PERSONNEL AS A RESULT OF ATTRITION:
  - HAMPERS THE ABILITY OF THE ORGANIZATION TO RESPOND TO ISSUES
  - INHIBITS THE ABILITY TO IDENTIFY ISSUES IN A TIMELY MANNER
- ◆ TRAINING OF OVERSIGHT PERSONNEL WAS MARGINAL:
  - LACK OF QUALIFIED INDIVIDUALS

# FAILURES IN MANAGEMENT OF THE CA PROGRAM

- ◆ THE CORRECTIVE ACTION REVIEW BOARD (CARB) WAS INEFFECTIVE, I.E., MET INFREQUENTLY AND HAD THE INCORRECT LEVEL OF MANAGEMENT ON THE BOARD:
  - ALLOWED ISSUES TO REMAIN UNRESOLVED
  - SIGNIFICANT ISSUES WERE BEING DISPOSITIONED BY INDIVIDUALS NOT FAMILIAR WITH THE "BIG PICTURE".

# FAILURES IN MANAGEMENT OF THE CA PROGRAM

- ◆ THE PLANT HAD A CA REVIEW PROCESS:
  - INCLUDED REVIEW BY MANAGEMENT
  - MANAGEMENT TEAM REJECTED APPROXIMATELY 5% OF CA RESPONSES
  - QA REJECTED APPROXIMATELY 50% OF CA RESPONSES.
    - ◆ THE DISPARITY WAS ATTRIBUTED TO MARGINAL TRAINING FOR REVIEWERS
    - ◆ INCORRECT LEVEL OF MANAGEMENT PARTICIPATING IN THE REVIEWS

# FAILURES IN MANAGEMENT OF THE CA PROGRAM

- ◆ THE SEVERITY LEVEL OF CARs WAS DOWNGRADED REGULARLY:
  - INTRODUCES THE ABILITY TO APPLY INAPPROPRIATE RIGOR TO CARs
- ◆ GRANTING EXTENSIONS TO CA DUE DATES
- ◆ RELAXATION OF CLOSURE/RESPONSE DATES (RESPONSE TIME WENT FROM 30 DAYS TO 60):
  - ALLOW ISSUES TO CONTINUE IN AN UNRESOLVED STATUS WHICH COMPOUNDS THE OVERALL IMPACT
  - SENDS A MESSAGE FROM MANAGEMENT RELATIVE TO THE SIGNIFICANCE OF THE ISSUE

# FAILURES IN MANAGEMENT OF THE CM PROGRAM

- ◆ THE CONFIGURATION MANAGEMENT PROCESS WAS INEFFECTIVE:
  - ONE DRAWING HAD TEN (10) FIELD CHANGES ASSOCIATED WITH IT. ENGINEERING DEPARTMENT ISSUED 10 SEPARATE DRAWINGS FOR CONSTRUCTION TO WORK TO
    - ◆ **CAUSED CONFUSION IN THE FIELD WHICH RESULTED IN ERRORS DURING ERECTION**

# MANAGEMENT FAILURES

- ◆ ACKNOWLEDGEMENT AND ACCEPTANCE OF THEIR NRC RECOGNIZED POSITION:
  - RESULTED IN THE PLANT NOT CONDUCTING BENCHMARKING EXERCISES
  - REMAINING ALOOF FROM COUNTERPARTS
  - ACCEPTING AND EMBRACING THE CONCEPT THAT OPERATIONS WERE BEING WELL CONDUCTED WITHOUT STRONG INDEPENDENT OVERSIGHT TO CONFIRM THEIR PERCEPTIONS.

# MANAGEMENT FAILURES

- ◆ THE PLANT CONCLUDED THEIR PROGRAM EXHIBITED:
  - ◆ A HIGH LEVEL OF ARROGANCE
  - ◆ A HIGH LEVEL OF ISOLATIONISM
  - ◆ A HIGH LEVEL OF COMPLACENCY