



Memorandum from the Office of the Inspector General

September 21, 2016

Joseph P. Grimes, LP 3R-C

**REQUEST FOR FINAL ACTION – EVALUATION 2016-15396 – WORK ENVIRONMENT
FOR OPERATORS AT SEQUOYAH NUCLEAR PLANT**

Attached is the subject final report for your review and final action. Your written comments, which addressed your management decision and actions planned or taken, have been included in the report. Please notify us when final action is complete. In accordance with the Inspector General Act of 1978, as amended, the Office of the Inspector General is required to report to Congress semiannually regarding evaluations that remain unresolved after 6 months from the date of report issuance.

Information contained in this report may be subject to public disclosure. Please advise us of any sensitive information in this report that you recommend be withheld.

If you have any questions or wish to discuss our findings, please contact me at (865) 633-7373 or Gregory R. Stinson, Deputy Assistant Inspector General, Evaluations, at (865) 633-7367. We appreciate the courtesy and cooperation received from your staff during the evaluation.

David P. Wheeler
Assistant Inspector General
(Audits and Evaluations)
ET 3C-K

HRK:FAJ
Attachment
cc (Attachment):

TVA Board of Directors
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OIG File No. 2016-15396



Office of the Inspector General

Evaluation Report

To the Executive Vice
President and Chief
Nuclear Officer,
Nuclear Power Group

WORK ENVIRONMENT FOR OPERATORS AT SEQUOYAH NUCLEAR PLANT

Evaluation Team
Heather R. Kulisek
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Evaluation 2016-15396
September 21, 2016

ABBREVIATIONS

AUO	Assistant Unit Operator
CAP	Corrective Action Program
ECP	Employee Concerns Program
NRC	Nuclear Regulatory Commission
OCC	Outage Control Center
SQN	Sequoyah Nuclear Plant
TVA	Tennessee Valley Authority
VP	Vice President

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MEMORANDUM DATED SEPTEMBER 16, 2016, FROM JOSEPH P. GRIMES,
TO DAVID P. WHEELER



Evaluation 2016-15396 – Work Environment for Operators at Sequoyah Nuclear Plant

EXECUTIVE SUMMARY

Why the OIG Did This Evaluation

The Nuclear Regulatory Commission (NRC) expects licensees to establish a safety-conscious environment where employees are encouraged to raise concerns and where such concerns are promptly reviewed, given the proper priority based on their potential safety significance, and appropriately resolved with timely feedback to employees. In March 2016, the NRC issued a Chilled Work Environment Letter for Watts Bar Nuclear Plant. The NRC concluded a “chilled work environment”ⁱ existed in the Operations Department because of a perception that operators were not free to raise safety concerns using all available avenues without fear of retaliation. As a result of the Chilled Work Environment Letter issued to the Tennessee Valley Authority, we initiated evaluations of the work environments for operators at Sequoyah and Browns Ferry Nuclear Plants and the Nuclear Oversight group. This report summarizes our review of the work environment for operators at Sequoyah Nuclear Plant (SQN).

What the OIG Found

In summary, we found employees interviewed within the Operations Department at SQN generally felt free to raise concerns without fear of retaliation. All but one employee reported feeling free to report nuclear safety, quality, or technical concerns without fear of retaliation. Also, most employees were comfortable reporting nuclear safety or quality concerns through multiple avenues. However, 11 percent indicated there could be retaliation when expressing concerns. Even though the potential retaliation may not currently impact their decision to report concerns, it could in the long term.

Our interviews with the operators identified other issues that could impact employees’ willingness to report concerns in the future, including: (1) the Outage Control Center (OCC)ⁱⁱ and management overriding and pressuring employees, (2) employees’ distrust of management, and (3) the Corrective Action Program and Employee Concerns Program are not always considered to be effective. According to the NRC’s Policy Statement for Nuclear Employees Raising Safety Concerns Without Fear of Retaliation, “A reluctance on the part of employees to raise concerns is detrimental to nuclear safety.” Therefore, it is important to be aware of

ⁱ According to the NRC Inspection Procedure 93100, “a ‘chilled work environment’ is one in which employees perceive that raising safety concerns to their employer or to the NRC is being suppressed or is discouraged and can occur because of an event, interaction, decision, or policy change.”

ⁱⁱ The OCC is staffed by site management to address issues that arise during an outage.



Evaluation 2016-15396 – Work Environment for Operators at Sequoyah Nuclear Plant

EXECUTIVE SUMMARY

and be proactive in addressing these issues to help ensure operators at SQN continue to be willing to report concerns.

What the OIG Recommends

We recommend the Executive Vice President and Chief Nuclear Officer:

- Identify opportunities to build trust between management and employees.
- Increase the awareness of the Employee Concerns Program's roles and responsibilities to the site.
- Communicate the expectations for management, the OCC staff, and operators on their roles, responsibilities, and acceptable behaviors with an emphasis that operators have the ultimate decision on operating the plant.

TVA Management's Comments

TVA management stated they accepted the evaluation conclusions and recommendations provided in the report and provided planned actions to address the recommendations.

BACKGROUND

Sequoyah Nuclear Plant (SQN) is one of three Tennessee Valley Authority (TVA) nuclear plants. It sits beside the Chickamauga Reservoir near Soddy Daisy, Tennessee, and consists of two pressurized-water reactors that produce more than 1,160 megawatts of electricity each.

The Nuclear Regulatory Commission (NRC) expects licensees to establish a safety-conscious environment where employees are encouraged to raise concerns and where such concerns are promptly reviewed, given the proper priority based on their potential safety significance, and appropriately resolved with timely feedback to employees. According to the NRC, a safety conscious work environment is an environment in which “employees feel free to raise safety concerns, both to their management and to the NRC, without fear of retaliation.” Retaliation for raising concerns is unacceptable and unlawful. Even a perception that raising concerns has resulted in retaliation can generate a chilling effect among workers that may discourage them from raising concerns.

TVA’s Standard Programs and Processes 11.8.4, Expressing Concerns and Differing Views, states TVA is committed to ensuring a safety conscious work environment that encourages employees to feel free to raise concerns and/or offer opinions without fear of retaliation. The procedure sets forth the expectation that all employees have a duty to be aware of circumstances that may pose a threat to the safety and health of the public and TVA employees, to operations, or of circumstances that are unethical, illegal, or in violation of compliance standards. Employees have the right to have their concerns or points of view heard by management when they consider the issue significant and their view differs from a management decision. Differing views may be voiced to any management level at any time. It is TVA policy that every responsible view is valuable and should be heard and appropriately considered in the decision-making processes.

In March 2016, the NRC issued a Chilled Work Environment Letter for Watts Bar Nuclear Plant and requested TVA develop a plan of action to address the NRC’s findings. The NRC concluded a “chilled work environment”¹ existed in the Operations Department because of a perception that operators were not free to raise safety concerns using all available avenues without fear of retaliation. As a result of the Chilled Work Environment Letter issued to TVA, we initiated evaluations of the work environments for operators at Sequoyah and Browns Ferry Nuclear Plants and the Nuclear Oversight group. This report summarizes our review of the work environment for operators at SQN.

¹ According to the NRC Inspection Procedure 93100, “a ‘chilled work environment’ is one in which employees perceive that raising safety concerns to their employer or to the NRC is being suppressed or is discouraged and can occur because of an event, interaction, decision, or policy change.”

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of this evaluation was to determine if the work environment for operators at SQN is conducive to raising concerns without fear of retaliation. The scope of the evaluation was limited to the current perceptions of employees obtained through interviews we conducted during May and June 2016.

To achieve our objective, we (1) conducted interviews with Operations Department employees and managers using prescribed questions to determine if the work environment is conducive to raising concerns without fear of retaliation and (2) for issues identified, performed additional follow-up review of documentation and conducted additional interviews to understand the issue.

In total, we interviewed 123 Operations Department employees at SQN, including 107 assistant unit operators (AUO), reactor operators, and senior reactor operators; 3 outage and 4 work control employees; and 9 managers, including shift managers, the Director of Nuclear Plant Operations, and Superintendent of Nuclear Plant Operations.

This evaluation was performed in accordance with the Council of the Inspectors General for Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

FINDINGS

In summary, we found employees interviewed within the Operations Department at SQN generally felt free to raise concerns without fear of retaliation. All but one employee reported feeling free to report nuclear safety, quality, or technical concerns without fear of retaliation. Also, most employees were comfortable reporting nuclear safety or quality concerns through multiple avenues. However, 11 percent indicated there could be retaliation when expressing concerns. Even though the potential retaliation may not currently impact their decision about whether to report concerns, it could in the long term.

Our interviews with operators identified other issues that could impact employees' willingness to report concerns in the future, including: (1) the Outage Control Center (OCC)² and management overriding and pressuring employees, (2) employees' distrust of management, and (3) two avenues for addressing concerns are not always considered effective.

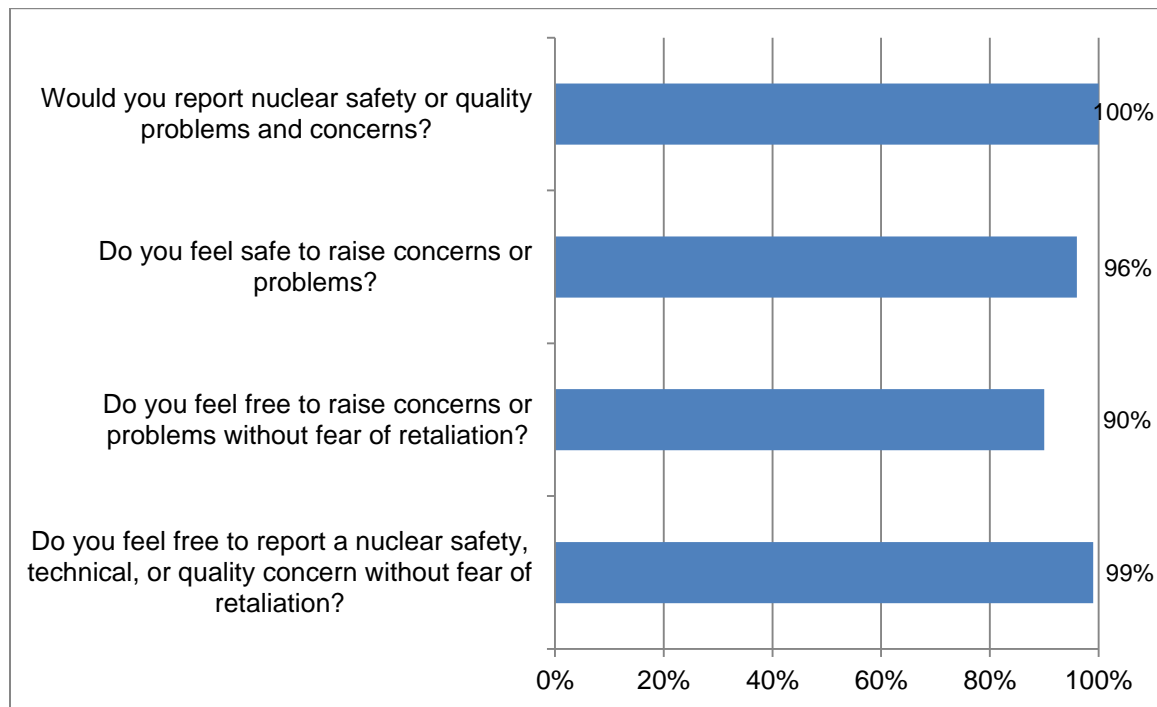
² The OCC is staffed by site management to address issues that arise during an outage.

EMPLOYEES FELT FREE TO RAISE CONCERNS WITHOUT FEAR OF RETALIATION

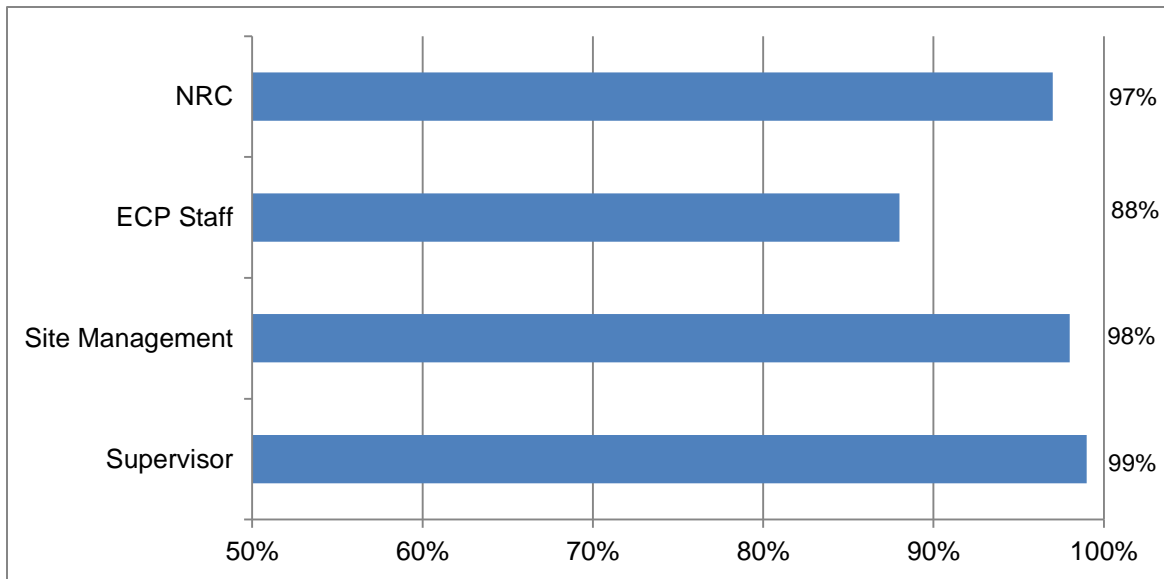
We found employees generally felt free to raise concerns without fear of retaliation. All but one employee felt free to report nuclear safety, quality, or technical concerns without fear of retaliation. Without considering retaliation, every employee indicated they would report nuclear safety or quality problems and concerns. Most employees felt comfortable reporting concerns through multiple avenues.

Figure 1 shows the percentage of employees that responded “yes” when asked if they (1) would report nuclear safety or quality problems and concerns, (2) felt safe to report concerns, (3) felt free to report concerns or problems without fear of retaliation, and (4) felt free to report nuclear safety, technical, or quality concerns without fear of retaliation.

Figure 1: Responses Related to Reporting Concerns



Employees were also asked about their willingness to report concerns using different avenues. Most employees were comfortable reporting nuclear safety or quality concerns through multiple avenues as shown in Figure 2 on the following page. The Employee Concerns Program (ECP) staff was the avenue that employees felt the least comfortable using to report concerns. Reasons employees stated for not using the ECP included they (1) do not feel the ECP is effective, (2) do not think the ECP is the proper avenue for nuclear safety concerns, or (3) have had limited interaction with the ECP personnel.

Figure 2: Reporting Avenues

POTENTIAL RETALIATION COULD INHIBIT WILLINGNESS TO REPORT CONCERNS

While most employees said they felt free to raise concerns or problems without fear of retaliation, 11 percent indicated there could be retaliation for expressing concerns. Seventeen percent of employees interviewed said they had either personally experienced, or were aware of others who had experienced, some form of retaliation. Some examples of retaliation given by employees included beratings and personal reputational damage. Regardless of whether the instances have actually occurred or are perceived to have occurred, the potential for retaliation could inhibit employees' willingness to report concerns in the future.

OTHER ISSUES COULD IMPACT EMPLOYEES' WILLINGNESS TO REPORT CONCERNS

Responses in our interviews with employees in the Operations Department indicate there were other issues that could impact employees' willingness to report concerns in the future. These areas include: (1) the OCC and management overriding and pressuring employees, (2) employees' distrust of management, and (3) the Corrective Action Program (CAP) and the ECP are not always considered to be effective.

The OCC and Management Overrides and Pressures Employees

Eighteen percent of employees interviewed reported the OCC and management had overridden or pressured operators in the control room. There was also one member of management who agreed that management had overridden operators in the control room on one occasion. Additionally, 24 percent of employees interviewed reported management had overridden a concern they had raised.

The most commonly cited events that were provided as examples of operators being overridden or pressured were a water hammer³ event and a voltage regulator⁴ event.

- Several employees attributed the water hammer event to the OCC pressuring or overriding the control room by not allowing adequate time for a procedure to be performed. The procedure normally takes up to 24 hours to perform, but the control room was only given a couple of hours to complete it. However, the root cause analysis stated some of the operations crew did not understand the risk of water in the main steam lines while warming the lines. Also, the unexpected main steam line water level was not communicated to the reactor operators responsible for warming the lines.
- Employees attributed the voltage regulator event to management pressuring or overriding operators into a decision they were not comfortable with. The root cause analysis states that Operations did not challenge Engineering or the OCC to determine the cause of the oscillations before continuing power ascension. However, it also states that “some Operations crew interviewed mentioned that there was some perceived senior management influence for the decision” that led to the unit trip. In discussions with management, they stated an analysis was performed to look at their own senior manager behavior. A review of this analysis found that “leadership has weaknesses in some leadership and team effectiveness attributes.” Specifically, the attributes were related to coping with risk, making effective decisions and appropriately managing risk, and team decision making and effective conflict resolution. According to the site Vice President (VP), members of the OCC will be attending a 2-day leadership training prior to the next outage.

Other concerns expressed by employees that could be viewed as the OCC and management pressuring employees included chain of command communications by the OCC and “operator shopping.”

- Employees cited instances where the OCC contacted AUOs or reactor operators to direct work rather than going to the shift manager or senior reactor operator, which is normal procedure. Since shift managers and senior reactor operators are responsible for operating the unit, bypassing their chain of command could be viewed as putting undue pressure on employees.
- Several employees expressed concerns about the OCC and management going from one operator to another until they got what they wanted when operators did not feel safe completing a task. This was referred to by operators as operator shopping. An example provided was operators

³ A water hammer is the unexpected release and associated shock wave of high-pressure steam/condensate. It can cause death, severe injury, and extensive property damage. On May 13, 2015, Unit 1 was starting-up from a refueling outage and in the process of warming the main steam line headers, a water hammer occurred in the main steam line damaging the main steam line supports and snubbers.

⁴ On July 27, 2015, Unit 1 was starting-up from an automatic reactor trip on July 24, 2015. The reactor experienced a trip due to the actuation of the generator backup protective relay when the voltage regulator was switched to manual control.

requesting a ladder or scaffolding to complete a job, and instead of providing the safety equipment, management found an operator willing to perform the work without a ladder or scaffolding.

Circumventing procedure and operator shopping could give the perception to employees that schedule is more important than safety. If employees feel as though schedule takes priority over safety and their concerns are overlooked, then this could lead to morale issues, reluctance to raise concerns, and could impact safety.

Employees' Distrust of Management

Generally, employees trusted their direct supervisors. However, some employees expressed distrust above their direct supervisor, with 15 percent distrusting middle managers (managers up to the site VP) and 18 percent distrusting upper management (site VP and above). Additionally, 2 of the 9 managers interviewed did not feel employees fully trusted management. Some of the stated circumstances that have led to the mistrust included:

(1) inconsistent accountability, (2) the Up or Out program implementation, and (3) field office conditions for AUOs.

- Inconsistent Accountability – When asked if management was fair in the actions they take to hold employees accountable, 23 percent of employees said they did not think so. In addition, 19 percent of employees did not think management was held accountable. Accordingly, employees may not feel everyone is held to the same standard, which could lead to trust issues.
- Up or Out Program – The implementation of the Up or Out program diminished trust in management with several employees due to how the program was implemented with the first class. The Up or Out program gives AUOs in the reactor operator training program two chances to pass the tests before they lose their jobs. The implementation of this program affected a group of AUOs who were already in the training program and coming to the end of the training when the program began. They were informed shortly before a test that they needed to contact their union to encourage them to agree to the program or they would be fired. These AUOs signed up for the training program without knowing they could lose their jobs if they did not pass. One employee said the lack of trust resulting from the Up or Out program had a chilling effect.
- Field Office Conditions for AUOs – Some interviewees expressed concerns with field office conditions for AUOs stating the field office had a sewage smell and a planned kitchen had not been completed. Employees stated they had been told there has not been enough money to remedy the condition of the field office; however, there is a rumor that the site VP has redecorated his office. The perception that management is treated differently than employees could result in a less cohesive work environment and lead to distrust.

Trust could be an important factor in how comfortable an employee feels to raise a concern.

The CAP and the ECP Are Not Always Considered to Be Effective

The employees interviewed at SQN indicated two avenues for addressing concerns—the CAP and the ECP—are not always considered to be effective.

- CAP – When asked about the effectiveness of the CAP, 46 percent of the employees interviewed felt the CAP was not fully effective. Two of the main issues identified with the CAP included:
 - A backlog of issues that are not being resolved. In addition, there was a team that cleared out condition reports in the backlog that may have not been resolved.
 - Employees felt issues are not being resolved correctly due to the lack of knowledge of those reviewing CAP items.

Management's answers also noted the same issues with the CAP.

- ECP – As shown in Figure 2 on page 4 of this report, 88 percent of the employees interviewed stated they would report a nuclear safety or quality concern to the ECP staff. Reasons employees stated for not using the ECP included they do not feel the ECP is effective, they do not think the ECP is the proper avenue for nuclear safety concerns, or they have had limited interaction with the ECP. Also, 33 percent of the employees interviewed did not know if the ECP was independent of management with the most common reason being limited interaction. An additional 14 percent of employees did not think the ECP was independent of management. In addition, 22 percent of management interviewed did not think the ECP protected the identity of people who use the program.

If management and employees do not feel that some of the avenues available for addressing concerns are effective, there may be hesitation to use those avenues that could result in concerns not being raised. In addition, ineffective avenues could result in issues not being addressed in a timely and appropriate manner.

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In summary, employees could be less willing to report concerns in the future if (1) employees feel concerns are overridden or pressure from the OCC or management, (2) there is distrust of management, or (3) avenues for addressing concerns are not considered to be effective. According to the NRC's Policy Statement for Nuclear Employees Raising Safety Concerns Without Fear of Retaliation, "A reluctance on the part of employees to raise concerns is detrimental to nuclear safety." It is important to be aware of and be proactive in addressing these issues to help ensure operators at SQN continue to be willing to report concerns.

RECOMMENDATIONS

We recommend the Executive VP and Chief Nuclear Officer:

- Identify opportunities to build trust between management and employees.
- Increase the awareness of the ECP's roles and responsibilities to the site.
- Communicate the expectations for management, the OCC staff, and operators on their roles, responsibilities, and acceptable behaviors with an emphasis that operators have the ultimate decision on operating the plant.

TVA Management's Comments – TVA management stated they accepted the evaluation conclusions and recommendations provided in the report and provided planned actions to address the recommendations. Some of the actions planned by management include:

- Establish expectations to use senior leadership and employee interface meetings as a forum to communicate site priorities with the number one focus of nuclear safety, and monitor the effectiveness of these meetings through the Nuclear Safety Monitoring Panel.
- Republish/discuss avenues for raising concerns using a variety of outlets including All-Hands meetings, site bulletins, and signage.
- Establish expectations during outages for OCC directors and Operations management to periodically reinforce the message regarding expectations for management, the OCC staff, and operators on their roles, responsibilities, and acceptable behaviors.

See the Appendix for TVA's complete response.

September 16, 2016

David P. Wheeler, ET 3C-K

**SEQUOYAH AND BROWNS FERRY RESPONSES TO REQUEST FOR COMMENTS ON
DRAFT EVALUATION 2016-15396 AND 15397, RESPECTIVELY – WORK ENVIRONMENT
FOR OPERATORS AT SEQUOYAH AND BROWNS FERRY NUCLEAR PLANTS**

Per your request, we have reviewed the subject draft reports and accept the evaluation conclusions and recommendations.

We find the report recommendations appropriate to promote actions that will address the concerns expressed in the conclusions of the report. The proposed actions for each recommendation for both Browns Ferry and Sequoyah are presented in the attachment with owners and due dates. These actions will be tracked as well and made available for follow-up assessment by your organization.

We place a high value on strong principles of a healthy Nuclear Safety Culture and, in particular, a Safety Conscious Work Environment. Your report findings have identified an opportunity for further improvements in Sequoyah and Browns Ferry's work environment with these principles.



Joseph P. Grimes
Executive Vice President and
Chief Nuclear Officer
LP 3R-C

JPG:LAT

Attachment

cc: M. A. Balduzzi, LP 3R-C
G. A. Boerschig, LP 3R-C
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S. M. Bono, NAB 2A-BFN
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R. D. Dickens, WT 4D-K
S. M. Douglas, LP 3-R-C
R. L. Gambone, LP 3R-C
W. D. Johnson, WT-7-K
D. K. Lanier, MR 6D-C
C. G. Pardee, WT 7-K
C. Schwarz, OPS 4A-SQN
J. W. Shea, LP-3R-C
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S. A. Vance, WT-6A-K
K. T. Walsh, LP 3R-C

Attachment
Page 1 of 3

Recommendation: Identify/Utilize opportunities to build trust between management and employees			
Action Number	Action Description	Owner	Due Date
1.0	<p>Establish expectation to use Senior Leadership and employee interface meetings as a forum to communicate site priorities with the number one focus of Nuclear Safety. Ensure expectations include using these meetings to solicit feedback from employees regarding nuclear safety concerns and reinforce the avenues available to raise these concerns. Ensure an emphasis is placed on the Employee Concerns Program's roles and responsibilities to the site, and success stories of prompt resolution of previously identified Nuclear Safety concerns are shared with employees.</p> <p>Examples of Senior Leadership and employee interface meetings include:</p> <ul style="list-style-type: none"> * All Hands Meetings * First Line Supervisor and Above (biweekly) * Department Station Update (biweekly) * NAYGN * Diversity and Inclusion Council * Employee Advisory Group (EAG) * Compliments and Concerns (2Cs) 	SQN - D. Dimopoulos BFN - P. Summers	10/14/2016
2.0	<p>Revise the agenda of the Nuclear Safety Monitor Panel to ensure the panel pulses the effectiveness of the Senior Leader and Employee interface meetings, and communicate outcomes through site messaging.</p>	SQN - D. Dimopoulos BFN - P. Summers	10/28/2016
3.0	<p>Ensure plan for upcoming Senior Leadership Team Building activities such as off-site meetings includes sessions for opportunities to build trust with employees.</p>	SQN - D. Dimopoulos BFN - B. Tidwell	Complete

Attachment
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Recommendation: Increase the awareness of the Employee Concerns Program's roles and responsibilities to the site			
Action Number	Action Description	Owner	Due Date
1.0	Re-publish/discuss avenues for raising concerns.	SQN - M. Hunter BFN - B. Tidwell	10/14/2016
2.0	Establish expectations to use the All-Hands meetings and biweekly department station update meetings to place emphasis on the Employee Concerns Program and Corrective Action Program roles and responsibilities to the site as described above.	SQN - D. Dimopoulos BFN - P. Summers	10/21/2016
3.0	Brief the site communications staff on the need for site bulletins to periodically include the avenues for raising nuclear safety concerns and the role of the Employee Concerns Program and Corrective Action Program.	SQN - M. Hunter BFN - B. Tidwell	10/21/2016
4.0	Verify signage at the site in key areas such as control rooms and the OCC are visible and describe: 1. The role of the Employee Concerns Program 2. Confidentiality of the Employee Concerns Program 3. That Employee Concerns Program also addresses Nuclear Safety Concerns	SQN - M. Babb BFN - M. Richerson	10/28/2016
5.0	Schedule a self assessment that will gauge the progress made in improving the awareness of the Employee Concern Program's roles and responsibilities.	SQN - M. Babb BFN - M. Richerson	10/28/2016

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Recommendation: Communicate the expectations for management, the OCC staff, and operators on their roles, responsibilities, and acceptable behaviors with an emphasis that operators have the ultimate decision on operating the plant.			
Action Number	Action Description	Owner	Due Date
1.0	Site VP issues written communications just prior to staffing the OCC for the Fall and Spring outages that details the expectation for management, the OCC staff, and operators on their roles, responsibilities, and acceptable behaviors with an emphasis that operators have the ultimate decision on safely operating the plant.	SQN - C. Schwarz BFN - S. Bono	4/07/2017
2.0	Establish expectation during outages for OCC directors and Operations Management periodically reinforce the message regarding expectations for management, the OCC staff, and operators on their roles, responsibilities, and acceptable behaviors with an emphasis that operators have the ultimate decision on safely operating the plant.	SQN - P. Pratt BFN - L Hughes	10/14/2016
3.0	Communicate expectations to the Senior Leadership Team for observations of OCC when staffed for outages and LCO activities to verify that communication is appropriate, meets expectations, and supports that the Shift Manager/Operations retain ultimate decisions on safely operating the plant. Consider training as a tool to reinforce these expectations.	SQN - P. Pratt BFN - L. Hughes	11/18/2016 10/07/2016
4.0	Provide a briefing to the Senior Leadership Team and First Line Supervisors that reinforces treating individuals with respect and dignity.	SQN - D. Dimopoulos BFN - P. Summers	10/28/2016