



Memorandum from the Office of the Inspector General

July 17, 2019

Christopher E. Glover, LP 1A-C

REQUEST FOR FINAL ACTION – EVALUATION 2018-15572 – ORGANIZATIONAL EFFECTIVENESS – NUCLEAR SECURITY

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.

If you have any questions or wish to discuss our findings, please contact A. Rebecca McCarter, Senior Auditor, at (423) 785-4831 or Lisa H. Hammer, Director, Evaluations – Organizational Effectiveness, at (865) 633-7342. We appreciate the courtesy and cooperation received from your staff during the evaluation.

David P. Wheeler
Assistant Inspector General
(Audits and Evaluations)
WT 2C-K

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Attachment
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OIG File No. 2018-15572



Office of the Inspector General

Evaluation Report

To the Director,
Nuclear Security

ORGANIZATIONAL EFFECTIVENESS – NUCLEAR SECURITY

Evaluation Team
A. Rebecca McCarter
Amy R. Rush

Evaluation 2018-15572
July 17, 2019

ABBREVIATIONS

CR	Condition Report
FY	Fiscal Year
NOM	Nuclear Operating Model
NRC	Nuclear Regulatory Commission
TVA	Tennessee Valley Authority

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Evaluation 2018-15572 – Organizational Effectiveness – Nuclear Security

EXECUTIVE SUMMARY

Why the OIG Did This Evaluation

Organizational effectiveness, as defined in this evaluation, is the ability of an organization to achieve its mission and goals. To achieve and sustain organizational effectiveness, there should be alignment between strategy, team engagement, and operational performance. Specifically, values and behaviors that drive good performance should be embedded throughout the organization's business processes and exemplified by the individuals that manage and work in the organization. The Tennessee Valley Authority's (TVA) 2018 Risk Assessment Summary recognized that (1) workforce strategy and management risksⁱ and (2) workplace environment risksⁱⁱ could negatively affect the performance environment.

Due to the importance of alignment between strategy, team engagement, and operational performance, the Office of the Inspector General is conducting organizational effectiveness evaluations of business units across TVA. This evaluation focused on the Nuclear Security organization, which includes Access Services. Nuclear Security's responsibility is to provide oversight and technical support to TVA's Nuclear organization in the area of security. In addition, within Nuclear Security, Access Services responsibilities include granting, certifying, maintaining, suspending, terminating, revoking, or denying unescorted access authorization, and providing overall direction for the Nuclear Access Authorization and Fitness for Duty programs. Nuclear Security also interfaces with federal agencies on security-related issues and regulations and participates in industry working groups to assess TVA Nuclear's security operations. The objective of this evaluation was to identify strengths and risks that could impact Nuclear Security's organizational effectiveness.

What the OIG Found

We identified strengths related to (1) organizational alignment, (2) teamwork, (3) ethical culture, and (4) front-line management support. However, we also identified risks that could impact the effectiveness of Nuclear Security to achieve its responsibilities in support of the Nuclear vision. These included (1) alignment risks related to achievement of the Nuclear vision and (2) risks to effective execution of responsibilities.

ⁱ Workforce strategy and management risks include failure to maintain key leadership positions, ineffective talent management, and performance management shortfalls.

ⁱⁱ Workforce environment risks include lack of organizational adaptability, lack of inclusion and employee engagement, and inappropriate workplace incidents.



Evaluation 2018-15572 – Organizational Effectiveness – Nuclear Security

EXECUTIVE SUMMARY

Based on our findings and using TVA’s Business Operating Model, we assessed Nuclear Security’s level of risk in the areas of alignment, engagement, and execution. As summarized in the table below:

- Alignment risk is rated medium based on issues with the standardization of security procedures across the fleet and the clarity of the governance and oversight role of Nuclear Security. According to Nuclear Security management, they are executing a plan to standardize procedures that is expected to be completed in January 2021.
- Engagement risk is low. Most employees cited teamwork within their respective departments, trust and good relationships with front-line management as a strength.
- Execution risk is rated medium based on issues related to performing job responsibilities and interactions with business partners.

	Low Risk	Medium Risk	High Risk
Alignment		X	
Engagement	X		
Execution		X	

What the OIG Recommends

We recommend the Director, Nuclear Security, (1) address alignment risks related to the governance and oversight role of Nuclear Security and continue standardizing procedures across the fleet, and (2) address execution risks pertaining to job related responsibilities and interactions with business partners.

TVA Management’s Comments

TVA management described actions planned to address our recommendations. See Appendix B for TVA management’s complete response.

Auditor’s Response – We agree with management’s planned actions.

BACKGROUND

Organizational effectiveness, as defined in this evaluation, is the ability of an organization to achieve its mission and goals. To achieve and sustain organizational effectiveness, there should be alignment between strategy, team engagement, and operational performance. Specifically, values and behaviors that drive good performance should be embedded throughout the organization's business processes and exemplified by the individuals that manage and work in the organization.

In recent years, the Tennessee Valley Authority (TVA) has faced internal and external economic pressures and implemented cost-cutting measures in an attempt to keep rates low and reliability high while continuing to fulfill its broader mission of environmental stewardship and economic development. TVA's 2018 Risk Assessment Summary recognized that (1) workforce strategy and management risks¹ and (2) workplace environment risks² could negatively affect the performance environment.

Due to the importance of alignment between strategy, team engagement, and operational performance, the Office of the Inspector General is conducting organizational effectiveness evaluations of business units across TVA. This evaluation focused on the Nuclear Security organization, which includes Access Services. In cooperation with other involved organizations, the security organization develops, prepares, coordinates, administers, and revises the security program and site physical security plans to meet Nuclear Regulatory Commission (NRC) requirements. In addition, within Nuclear Security, Access Services is responsible for granting, certifying, maintaining, suspending, terminating, revoking, or denying unescorted access authorization and providing overall direction for the Nuclear Access Authorization and Fitness for Duty programs. Nuclear Security also interfaces with federal agencies on security-related issues and regulations and participates in industry working groups to assess TVA Nuclear's security operations. Through these responsibilities, the organization supports TVA's core safety³ value as well as Nuclear's vision of achieving and sustaining top industry performance.

¹ Workforce strategy and management risks include failure to maintain key leadership positions, ineffective talent management, and performance management shortfalls.

² Workforce environment risks include lack of organizational adaptability, lack of inclusion and employee engagement, and inappropriate workplace incidents.

³ The safety value is described as "a professional and personal commitment to protect the safety of our employees, our contractors, our customers, and those in the communities that we serve."

Nuclear Security is responsible for providing oversight and technical support to TVA's Nuclear organization, which includes site security who report to nuclear plant management. They also serve as Nuclear expert and final authority in nuclear security regulatory issues as well as provide strategic guidance to corporate and site managers on a range of issues including security operations and industry codes and standards. Nuclear Security personnel duties include:

- Managing the nuclear security program.
- Managing and directing the Information Security Program.
- Providing governance and oversight of overall physical protection and security of nuclear plants.
- Providing governance and oversight of the Nuclear Security Training and Qualification Plan.
- Assisting with the implementation of the defensive strategy program.
- Managing the nuclear security Force-on-Force program.⁴
- Providing oversight, governance, standardization, and maintenance of the fleet security systems.
- Reviewing site procedures and instructions to ensure alignment with higher tier documents and fleet standardization.

Within Nuclear Security, Access Services is comprised of a team of personnel security representatives, a business support representative, and a Fitness for Duty program manager.⁵ These individuals, along with the manager, are responsible for directing and managing the Nuclear Plant Access Authorization Program, background investigation activities, and Nuclear Fitness for Duty Program. Access Services personnel duties include:

- Investigating the backgrounds of candidates for employment and current employees for the purpose of initial employment clearances and/or special clearances for access to nuclear power plants, program integrity, emergency response, and safeguards information.
- Ensuring compliance with procedures that implement the background screening and suitability determination for unescorted access clearances to nuclear power facilities.
- Issuing clearances on completed investigations.

⁴ A force-on-force inspection is a two-phased, performance based inspection that is designed to verify and assess the ability of licensees' physical protective systems and security organizations to provide high assurance that activities involving special nuclear material are not inimical to the common defense and security of the facilities, and do not constitute an unreasonable risk to public health and safety.

⁵ Responsible for managing Nuclear's Fitness for Duty Program, including alcohol and drug screening services and medical laboratory testing services.

- Interfacing with other TVA organizations in completing program requirements necessary to maintain security clearances.
- Managing Nuclear's Fitness for Duty Program, including alcohol and drug screening services and medical laboratory testing services.
- Gathering, organizing, and compiling business and technical information.

Nuclear Security has performance indicators for tracking TVA Nuclear's security performance monthly. For calendar year 2018, performance indicators included (1) department clock resets,⁶ (2) Occupational Safety and Health Administration recordable injuries, (3) security equipment failure, and (4) NRC identified violations.

As of August 10, 2018, Nuclear Security had 16 employees, including management. Nine of the employees were within Access Services, and 5 of the employees reported directly to the Nuclear Security director. The management structure included one Nuclear Security Director and one Access Services Manager.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of this evaluation was to identify strengths and risks that could impact Nuclear Security's organizational effectiveness. We assessed Nuclear Security operations as of April 2019 and culture as of the date of our interviews, which occurred in September and October 2018. We did not assess compliance with nuclear security-related Code of Federal Regulations in this evaluation. To achieve our objective, we:

- Reviewed TVA business plans for fiscal year (FY) 2017 through FY2019 and FY2018 through FY2020, Nuclear business plans for FY2017 through FY2021 and FY2018 through FY2022, Nuclear Security's Excellence Plan draft, and the Nuclear Operating Model⁷ (NOM) to gain an understanding of goals, initiatives, and priorities.
- Reviewed TVA values and competencies (see the Appendix) for understanding of cultural factors deemed important by TVA.
- Conducted interviews with 16 employees and managers and analyzed the results to identify themes related to strengths and risks that could affect organizational effectiveness.

⁶ A department clock reset occurs when an event takes place as a result of (1) an initiating action (error) by an individual or group of individuals, (2) an initiating action (not an error) by an individual or group of individuals during an activity conducted as planned – (Event resulted from a flawed defense or Latent Organizational Weakness created within the last 18 months), or (3) any event meeting the site human performance clock reset criteria.

⁷ TVA's NOM is a document defining the structure, management controls, and accountability for Nuclear and the delineation of strategic nuclear focus areas. The purpose of the document is also to (1) clarify the governance, execution, oversight, and support roles and (2) create alignment between leadership, teamwork, and the principles of a strong nuclear culture.

- Selected 142 individuals identified as working with Nuclear Security or receiving Nuclear Security’s services based on suggestions from Nuclear Security personnel and auditor judgment. Sent electronic surveys to 139 individuals and conducted phone interviews with the remaining 3 individuals to obtain feedback related to services provided by Nuclear Security. We received feedback from 62 of the 142 individuals.
- Reviewed performance management documentation for all managers and employees in Nuclear Security and analyzed the documentation for alignment with TVA’s Values and Competencies, the TVA mission and the Nuclear vision, and the NOM.
- Examined Nuclear Security regulatory requirements as set forth in 10 Code of Federal Regulation Parts 10, 11, 25, 26, 73, and 95, and reviewed select standard programs and processes and the nuclear standard department procedure for security organization, expectations, and standards to gain an understanding of processes.
- Reviewed operational information, including Access Services related condition reports (CR)⁸ for FY2015 through April 2, 2019, and performance indicators for calendar year 2018⁹ to gain additional understanding of strengths and/or risks within Nuclear Security.
- Assessed the overall effectiveness of Nuclear Security in the following areas, as included in TVA’s Business Operating Model:
 - Alignment – How well the organization coordinates the activities of its many components for the purpose of achieving its long-term objectives—this is grounded in an understanding of what the organization wants to achieve, and why.
 - Engagement – How the organization achieves the highest level of performance from its employees.
 - Execution – How well the organization achieves its objectives and mission.

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

OBSERVATIONS

During the course of our evaluation, we identified strengths that positively affected the day-to-day activities of Nuclear Security personnel and performance. However, we also identified risks that could impact Nuclear Security’s effectiveness and its continued ability to meet its responsibilities in support of Nuclear’s vision.

⁸ CRs are created to record how problems are found, analyzed, and solved.

⁹ Performance indicators included data for each of the three nuclear sites. Data for December 2018 was only provided for one of the three sites.

STRENGTHS

During the course of our interviews and data analyses, we identified strengths related to (1) organizational alignment, (2) teamwork, (3) ethical culture, and (4) front-line management support.

Organizational Alignment

Our assessment of performance management documentation for Nuclear Security personnel revealed that performance goals aligned with those of management and with TVA's values and competencies. According to TVA's NOM, Nuclear Security is to maintain a consistent and cost effective security program to be implemented at each nuclear facility to sustain regulatory excellence and (1) protect nuclear facilities against radiological sabotage and theft of nuclear material, (2) control access to nuclear facilities and certain types of information, and (3) maintain a drug and alcohol policy that meets industry commitments for Fitness for Duty. Since Nuclear Security had no stated mission, we compared the organization's purpose, as stated in the NOM, to the job description for the Nuclear Security Director, and noted that alignment existed. We also noted that goals aligned to Nuclear's vision and TVA's mission.

Teamwork

The majority of employees interviewed provided positive comments pertaining to teamwork within their respective departments and with TVA groups outside of their organization. Specifically, some employees stated they collaborate or work well together. Additionally, all employees indicated they trust each other to do their jobs well.

Ethical Culture

Because integrity is one of TVA's values, employees and management are charged with conducting business according to the highest ethical standards and seeking to earn the trust of others through words and actions that are open, honest, and respectful. All of the employees and management interviewed in Nuclear Security indicated there is an ethical culture.¹⁰

Front-line Management Support

Most employees indicated they have good working relationships with their managers. Most employees expressed trust in their managers, felt comfortable reporting concerns, and had no fear of retaliation. Most employees also indicated that they are provided the tools, training, and or certifications (if applicable) necessary to do their jobs.

RISKS

We identified risks that could impact the effectiveness of Nuclear Security to achieve its responsibilities in support of the Nuclear vision. These risks included

¹⁰ Ethical culture is the "shared concept of right and wrong behavior in the workplace that reflects the true values of the organization and shapes the ethical decision making of its members" as defined in S. P. Robbins & T. A. Judge, *Organizational Behavior*, 18th edition, 2019.

(1) alignment risks related to achievement of the Nuclear vision and (2) risks to effective execution of responsibilities.

Alignment Risks Related to Achievement of the Nuclear Vision

While Nuclear Security employee performance goals aligned with those of management and with TVA's values and competencies, we identified a risk related to alignment between Nuclear Security and security at the sites. Specifically, the risk pertains to how Nuclear Security is carrying out its governance and oversight roles that could affect fulfillment of the Nuclear vision and sustainability of top industry performance.

According to the NOM, organizational alignment includes eliminating conflicts arising from "what gets done" and "how things get done." Nuclear Security directly affects alignment of the security function within Nuclear as its role is to provide governance and oversight to site security personnel who report to Nuclear plant management. Not effectively executing the governance role could affect the success of the site security organizations in moving towards top industry performance and can affect the amount of time Nuclear Security spends executing their oversight responsibilities.

Nuclear's Standard Department Procedure No. 4 reflects that Nuclear Security governance responsibilities include ownership of fleet standard processes and facilitation of changes to security procedures. This provides guidance to site security and aids in aligning security at each of the nuclear sites with NRC regulations. Several business partners indicated there is a need for standardized procedures and increased alignment across the fleet. Currently, site security uses some procedures that are site specific and may differ from other sites. Lack of standardization may increase site execution risk since these procedures aid in the direction and control of security at the sites. For example, the root cause analysis related to a recent security issue at one plant cited weak site specific guidance and lack of alignment of roles and responsibilities with all three sites as contributing factors. Standardized procedures may have prevented this particular issue. According to Nuclear Security management, they are executing a plan to standardize procedures that is expected to be completed in January 2021.

Oversight responsibilities, as defined by the NOM, include evaluating the "conduct of execution to verify that the programmatic standards, expectations, and goals are met." When asked about services provided by Nuclear Security, several business partners acknowledged or indicated the role of Nuclear Security personnel is to provide governance and/or oversight, but several business partners believe Nuclear Security is trying to step outside of their roles and/or "micromanage" their sites. While Nuclear Security is responsible for security-related governance and oversight, Nuclear Standard Department Procedure No. 4 states that site security management is responsible for "ensuring personnel meet regulations and procedure requirements." Because Nuclear Security governance and oversight roles and site security management's

execution role are closely related, this causes role confusion as indicated by business partner comments.

Risks to Effective Execution of Responsibilities

During the course of our evaluation, we identified risks that impacted Nuclear Security and Access Services execution of responsibilities within Nuclear Security and Access Services. These included issues related to performing job responsibilities and interactions with business partners.

Most employees indicated having the necessary tools, training, and certifications, where applicable; however, some Nuclear Security and many Access Services personnel discussed concerns related to their job duties. While Nuclear Security is responsible for providing technical support and strategic guidance to corporate and site managers, some Nuclear Security personnel indicated an issue with either the amount of time spent providing instruction related to regulations at the sites or facilitating changes in procedures. Some Nuclear Security personnel also indicated concerns related to nuclear site security personnel's knowledge of procedures.

Many Access Services personnel also indicated workload issues as a result of understaffing and/or the security screening information system. Between April 1, 2018, and July 31, 2018, the manager of Access Services¹¹ and two additional employees left the organization. According to some Access Services personnel, decreased staffing has negatively affected their workload. In addition, several individuals mentioned concerns with the security screening information system, which is used to document and track the information necessary to grant and maintain nuclear access authorization, including requesting nuclear access, completion of the background screening process, and removal of unescorted access. Several individuals indicated the software does not work as expected resulting in increasing the time it takes to perform certain job responsibilities. We examined CRs and determined there were 13 CRs written in relation to the system. According to the new Access Services manager, he is addressing the system issues.

Additionally, we obtained feedback from 62 business partners related to Nuclear Security and Access Services' (1) products and services and (2) responsiveness. Some business partners indicated the need for governance, such as having standardized security procedures and/or the need for support, including communication, from Nuclear Security. Additional comments from some business partners indicated limited and/or no response or action when individuals contacted Nuclear Security. Several business partners indicated issues related to products and services and/or responsiveness negatively affected their specific job responsibilities in relation to their own timeliness and workload.

¹¹ The manager of Access Services was unavailable for several months prior to leaving the organization. A new manager was hired in July 2018.

CONCLUSION

Nuclear Security plays an important role in developing, preparing, coordinating, administering, and revising the security program and site physical security plans to meet NRC requirements. The organization is accountable for providing oversight and technical support to Nuclear Site Security, interfacing with federal agencies on security-related issues and regulations, and access-related activities including certifying, suspending, granting, and terminating unescorted access.

While we identified strengths related to organizational alignment, teamwork, ethical culture, and front-line management support, we also identified alignment risks related to achievement of the Nuclear vision and execution risks related to effective execution of responsibilities.

Based on our findings, we assessed Nuclear Security's level of risk in the areas of alignment, execution, and engagement. We determined:

- Alignment risk is rated medium based on issues with the standardization of security procedures across the fleet and the clarity of the governance and oversight role of Nuclear Security.
- Engagement risk is low. Most employees cited teamwork within their respective departments, trust and good relationships with front-line management as a strength.
- Execution risk is rated medium based on issues related to performing job responsibilities and interactions with business partners.

RECOMMENDATIONS

We recommend the Director, Nuclear Security:

1. Address alignment risks related to the governance and oversight role of Nuclear Security and continue standardizing procedures across the fleet.

TVA Management's Comments – TVA Nuclear Security will complete standardization of key fleet procedures. In addition, TVA Nuclear Security will fill the vacant position of Security, Corporate Functional Area Manager. See Appendix B for TVA management's complete response.

Auditor's Response – We agree with management's planned actions.

2. Address execution risks pertaining to job related responsibilities to ensure employees are equipped to perform their job responsibilities and interactions with business partners.

TVA Management's Comments – TVA Access Authorization will fully implement the upgrades to the Security Screening Information System. The

upgrades reduce redundancy in work and streamline the access process. In addition, the TVA Director, Nuclear Security and Manager, Access Services will review the Outage In-Processing Metrics following the Sequoyah Nuclear Plant Unit 1 Refueling Outage. See Appendix B for TVA management's complete response.

Auditor's Response – We agree with management's planned actions.

TVA Values	
Safety	We share a professional and personal commitment to protect the safety of our employees, our contractors, our customers, and those in the communities that we serve.
Service	We are privileged to be able to make life better for the people of the Valley by creating value for our customers, employees, and other stakeholders. We do this by being a good steward of the resources that have been entrusted to us and a good neighbor in the communities in which we operate.
Integrity	We conduct our business according to the highest ethical standards and seek to earn the trust of others through words and actions that are open, honest, and respectful.
Accountability	We take personal responsibility for our actions, our decisions, and the effectiveness of our results, which must be achieved in alignment with our company values.
Collaboration	We are committed to fostering teamwork, developing effective partnerships, and valuing diversity as we work together to achieve results.

TVA Leadership Competencies

Accountability and Driving for Results
Continuous Improvement
Leveraging Diversity
Adaptability
Effective Communication
Leadership Courage
Vision, Innovation, and Strategic Execution
Business Acumen
Building Organizational Talent
Inspiring Trust and Engagement



July 11, 2019

David P. Wheeler, WT 2C-K

RESPONSE TO REQUEST FOR COMMENTS ON DRAFT EVALUATION 2018-15572
ORGANIZATIONAL EFFECTIVENESS - NUCLEAR SECURITY

In accordance with request dated June 11, 2019, TVA has reviewed the subject draft report 2018-15572 and accepts the evaluation conclusions and recommendations.

TVA finds the report strengths, risks and recommendations appropriate to promote the effectiveness of Nuclear Security to achieve our responsibilities in support of the Nuclear Vision to Achieve and Sustain Top Industry Performance.

In the draft report, OIG made two specific recommendations. In Recommendation 1, OIG recommends Director, Nuclear Security, (1) address alignment risks related to the governance and oversight role of Nuclear Security and continue standardizing procedures across the fleet. In response, TVA's Nuclear Security Organization will complete the following actions.

- TVA Nuclear Security will complete standardization of key fleet procedures by January 2021.
- TVA Nuclear Security will fill the vacant position of Security – CFAM by November 1, 2019. The role of the CFAM is to provide consistent oversight of site compliance with fleet standard procedures.

In Recommendation 2, OIG recommended Director, Nuclear Security, (2) address execution risks pertaining to job-related responsibilities and interactions with business partners. In response, TVA's Nuclear Security Organization will complete the following actions.

- TVA Access Authorization will fully implement the upgrades to the Security Screening Information System (SSIS) by August 30, 2019. The upgrades reduce redundancy in work and streamline the access process.
- TVA Director, Nuclear Security and Manager, Access Services will review the Outage in-processing metrics following the SQN U1 R23 by November 15, 2019.

The Nuclear Security team places a high value on the effectiveness of the organization and the responsibility to effectively protect and defend the nuclear stations and to ensure effective support to the Nuclear Vision. The risks outlined in the report have identified an opportunity for improvement to align the work environment with these principles.

A handwritten signature in cursive script that reads "Christopher E. Glover".

Christopher E Glover
Director, Nuclear Security
LP 1A-C

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