



Memorandum from the Office of the Inspector General

August 13, 2020

Eynus C. Ellis

REQUEST FOR MANAGEMENT DECISION – EVALUATION 2019-15570 –
ORGANIZATIONAL EFFECTIVENESS – WATTS BAR NUCLEAR PLANT SITE
SECURITY

Attached is the subject final report for your review and management decision. Your written comments, which addressed your management decision and actions planned or taken for four of the recommendations, have been incorporated into the report. Please advise us of your management decision in response to the remaining recommendation within 60 days from the date of this report.

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.

A handwritten signature in black ink that reads "David P. Wheeler".

David P. Wheeler
Assistant Inspector General
(Audits and Evaluations)

ARM:KDS
Attachment
cc (Attachment):

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OIG File No. 2019-15570



Office of the Inspector General

Evaluation Report

To the Senior Manager,
Watts Bar Nuclear Plant
Site Security

ORGANIZATIONAL EFFECTIVENESS – WATTS BAR NUCLEAR PLANT SITE SECURITY

Auditor
A. Rebecca McCarter

Evaluation 2019-15570
August 13, 2020

ABBREVIATIONS

BRE	Bullet Resistant Enclosures
CFR	Code of Federal Regulations
CR	Condition Report
FSR	Facilities Service Request
FY	Fiscal Year
NPG	Nuclear Power Group
NRC	Nuclear Regulatory Commission
PI	Performance Indicator
SPP	Standard Programs and Processes
SS	Site Security
SVP	Site Vice President
TVA	Tennessee Valley Authority
WBN	Watts Bar Nuclear Plant

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Evaluation 2019-15570 – Organizational Effectiveness – Watts Bar Nuclear Plant Site 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) *FY 2019 Strategic Business Unit/Business Unit 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 Watts Bar Nuclear Plant's (WBN) Site Security (SS) organization. WBN SS is responsible for maintaining physical security at WBN through the execution of its security plans. In addition, WBN SS is responsible for interfacing with federal, state, and local agencies on security-related matters. As of October 23, 2019, WBN SS had 176 employees, including management. The objective of this evaluation was to identify strengths and risks that could impact WBN SS's organizational effectiveness.

What the OIG Found

We identified strengths related to (1) organizational alignment, (2) positive interactions within WBN SS, (3) first-line management support, and (4) positive ethical culture. However, we also identified risks that could impact the effectiveness of WBN SS to achieve its responsibilities in support of the Nuclear vision and TVA mission. These risks included (1) communication deficiencies, (2) safety concerns, (3) perceptions of

ⁱ "Workforce strategy and management risks include failure to manage board and c-suite transition, inability to identify and attract talent, ineffective development and retention of talent, and performance management shortfalls," TVA, *FY 2019 Strategic Business Unit/Business Unit Risk Assessment Summary*, May 7, 2019, p.2.

ⁱⁱ "Workplace environment risks include lack of accountability, lack of organizational adaptability, lack of inclusion and employee engagement, inappropriate workplace behaviors, and unethical decisions/behaviors," TVA, *FY 2019 Strategic Business Unit/Business Unit Risk Assessment Summary*, May 7, 2019, p.2.



Evaluation 2019-15570 – Organizational Effectiveness – Watts Bar Nuclear Plant Site Security

EXECUTIVE SUMMARY

inadequate staffing, (4) reporting of performance data, and (5) ineffective relationships with support organizations.

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

- Alignment risk is rated low based on the alignment of management and employee goals, which supported the Nuclear vision and TVA mission.
- Engagement risk is rated low. While some employees cited inadequate communication from senior management, most employees indicated teamwork, support from first-line supervisors and a positive ethical culture as strengths.
- Execution risk is rated medium based on safety concerns, perceptions of inadequate staffing, reporting of performance data, and relationships with some support organizations.

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

What the OIG Recommends

We recommend the Senior Manager, WBN SS, address risks related to (1) communication, (2) safety concerns, (3) staffing levels, (4) reporting of SS performance indicators, and (5) relationships with support organizations.

TVA Management’s Comments

WBN SS Management described actions planned or taken to address four of our five recommendations. However, management did not provide planned actions to address some of the safety concerns we identified. See Appendix B for management’s complete response.

Auditor’s Response

We agree with management’s planned actions and actions taken.

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.¹ 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) *FY 2019 Strategic Business Unit/Business Unit Risk Assessment Summary* recognized that (1) workforce strategy and management risks,² and (2) workplace environment risks,³ 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. Watts Bar Nuclear Plant (WBN) Site Security (SS) is responsible for maintaining physical security at WBN through the execution of its security plans. The organization supports TVA's core safety value⁴ as well as TVA's Nuclear Operating Model and Nuclear vision to achieve and sustain top industry performance. In addition, WBN SS is responsible for interfacing with federal, state, and local agencies on security-related matters.

The Nuclear Regulatory Commission (NRC), whose primary responsibility is to regulate commercial nuclear power plants through licensing, inspection, and enforcement of its requirements, regulates nuclear security functions. TVA's overall Nuclear Security Program is driven by the regulatory requirements laid out in Title 10, Code of Federal Regulations (CFR), Part 73 (10 CFR 73), *Physical Protection of Plants and Materials*, and 10 CFR 26, *Fitness for Duty Programs*.

¹ Organizational effectiveness attributes were derived from the TVA business-operating model and business management documentation.

² "Workforce strategy and management risks include failure to manage board and c-suite transition, inability to identify and attract talent, ineffective development and retention of talent, and performance management shortfalls." TVA, *FY 2019 Strategic Business Unit/Business Unit Risk Assessment Summary*, May 7, 2019, p.2.

³ "Workplace environment risks include lack of accountability, lack of organizational adaptability, lack of inclusion and employee engagement, inappropriate workplace behaviors, and unethical decisions/behaviors." TVA, *FY 2019 Strategic Business Unit/Business Unit Risk Assessment Summary*, May 7, 2019, p.2.

⁴ 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."

In general, 10 CFR 73 sets forth obligations for establishing and maintaining a physical protection system for the purpose of protecting, among other things, special nuclear material and the nuclear power plants where those special nuclear materials are used. Specific relevant requirements included in 10 CFR 73 and its appendices relate to:

- Physical protection systems, subsystems, components, and procedures.
- Access of persons, vehicles, and materials into material access areas and vital areas.
- Activities and conditions within protected areas, material access areas, and vital areas.
- Implementation of a physical security plan for establishing, maintaining, and executing NRC security requirements.
- Implementation of the Security Training and Qualification Plan.
- Reporting of events that represent an attempted, threatened, or actual breach of the security system or a reduction of operational effectiveness of that system.
- Minimum qualifications and training requirements for security personnel.
- Medical examinations and physical fitness qualifications, which at WBN are tested through a TVA developed program based on the MicroFit system.⁵

The NRC's Fitness for Duty program in 10 CFR 26 describes certain obligations to provide reasonable assurance that individuals are able to safely and competently perform duties commensurate with maintaining public health and safety. TVA plant SS, along with TVA's Nuclear Security (who provide oversight and technical advice to plant SS), are responsible for compliance with applicable requirements in 10 CFR 73 and 10 CFR 26. TVA's method for addressing these NRC requirements is proceduralized through Nuclear Power Group (NPG) policies and procedures.

For calendar year (CY) 2019, WBN SS tracked key performance indicators (PI), including (1) security-related loggable events,⁶ (2) intrusion detection system compensatory hours,⁷ (3) Occupational Safety and Health Administration recordable injuries, (4) shift vacancies, (5) some security equipment failures, and (6) various human performance events. According to TVA, WBN SS provides PI information on a monthly basis to Nuclear Security.

⁵ The MicroFit system is "a comprehensive fitness assessment lab system with ergonomic bike and treadmill testing protocols that are monitored and controlled by MicroFit's HealthWizard software" as defined in Government Recreation & Fitness, *Assessing Fitness*, March 2016.

⁶ Security events that require documentation on the security event log within 24 hours of discovery.

⁷ Hours expended in posting a security officer as required compensation for intrusion-detection system unavailability because of degradation or defects.

As of October 2019, WBN SS includes two departments – SS and Security Support:

- SS primarily consists of officers who report to shift supervisors and shift managers. These individuals are responsible for the protection of WBN and its personnel by carrying out duties consistent with NRC requirements, WBN's physical security plan, and applicable security-related TVA and WBN policies and procedures. Security workforce duties include (1) processing vehicles, cargo, and individuals at the security checkpoint; (2) monitoring all patrol routes and the vehicle barrier system to detect any indications of tampering, unauthorized persons, vehicles, materials, and/or activities; and (3) successfully completing required training and requalification tasks. Additionally, SS monitors and tests security equipment to verify such equipment is operating as expected.
- Security Support is tasked with (1) implementation of WBN's Security Training and Qualification Plan; (2) development, coordination, and supervision of security drills; and (3) tracking the WBN security workforce's compliance with 10 CFR 73, Appendix B, *General Criteria for Security Personnel*, WBN's physical security plan, and other regulations.

As of October 23, 2019, WBN SS had 176 employees, including management. As of that date, WBN SS's senior management structure included two senior managers, one superintendent, and one security support manager.⁸

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of this evaluation was to identify strengths and risks that could impact WBN SS's organizational effectiveness. We assessed WBN SS (1) operations as of September 2019 and (2) culture as of the date of our interviews, which occurred October 2019 through November 2019. We did not assess compliance with nuclear security-related CFRs in this evaluation. To achieve our objective, we:

- Reviewed TVA's fiscal years (FY) 2019 through 2021 business plan summary and NPG's FY 2018 through FY 2020 and FY 2020 through FY 2022 business plans to gain an understanding of initiatives and priorities.
- Reviewed TVA values and competencies (see the Appendix) for understanding of cultural factors deemed important by TVA.
- Conducted interviews with approximately 157 employees,⁹ including security officers, shift supervisors, shift managers, security support and WBN SS

⁸ On March 18, 2019, the Site Security manager returned from a rotational assignment. On October 28, 2019, the Site Superintendent, who was acting as SS manager, transitioned back to his role as superintendent, and the individual acting as superintendent transitioned to his role as Program Manager, Protective Strategy.

⁹ Nineteen individuals were not available for interview.

senior manager and direct reports to identify themes related to strengths and risks that could affect organizational effectiveness.

- Analyzed FY 2018 performance management documentation for personnel,¹⁰ to identify alignment with departmental and organizational goals.
- Examined nuclear security regulatory requirements as set forth in 10 CFR 26 and 10 CFR 73. Reviewed select NPG standard department procedures, standard programs and processes (SPP), and WBN SS instructions to gain an understanding of processes.
- Reviewed operational information, including (1) overtime hours occurring in FY 2017 through FY 2019; (2) WBN SS condition reports (CR),¹¹ included in TVA's asset management system with a status date occurring between FY 2015 through January 7, 2020; (3) budgeted and actual spend for FY 2018 and FY 2019; (4) staffing information for FY 2017 through FY 2019 from TVA's People Lifecycle Unified Systems;¹² and (5) 11 months of CY 2019 PIs to gain additional understanding of strengths and/or risks related to WBN SS.
- Assessed the overall effectiveness of WBN SS 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

Based on our work performed, we identified strengths that positively affected the day-to-day activities of WBN SS, as a whole. However, we also identified risks that could hinder WBN SS effectiveness and its continued ability to meet its responsibilities in support of the Nuclear vision and TVA mission.

¹⁰ We excluded officers because they do not complete performance management documentation.

¹¹ CRs document the evaluation and resolution of conditions identified. These conditions may include events that have the potential to result in personnel injury, significant financial impact, loss of power generation, or detriments to employee or public safety.

¹² People Lifecycle Unified Systems is TVA's Human Capital management system.

STRENGTHS

During the course of our interviews and data analyses, we identified strengths that positively affected the day-to-day activities of WBN SS. These strengths related to (1) organizational alignment, (2) positive interactions within WBN SS, (3) first-line management support, and (4) positive ethical culture.

Organizational Alignment

Our review of FY 2018 performance management documentation revealed that performance goals were consistent with goals of the individual's senior manager as well as TVA's Values and Competencies. Senior manager goals aligned with the Nuclear focus areas, which supported the Nuclear vision and the TVA mission. Further, we determined the Nuclear vision, focus areas, and initiatives align with the TVA mission.

Positive Interactions within WBN SS

The majority of employees and management interviewed provided positive comments pertaining to teamwork within their departments or squads, with other departments inside the TVA SS organization, and with other organizations (i.e., plant personnel). Specifically, most employees indicated they trust each other to do their job. A few employees also noted that they look out for or help each other out and do peer checks.

First-line Management Support

For most WBN SS employees, the shift supervisor or shift manager is their first-line leader. Most WBN SS employees indicated having positive relationships with their first-line leadership. Specifically, most employees provided positive comments in the areas of communication, trust, accountability, and employee recognition. In addition, many employees indicated they felt positive about reporting concerns or sharing a differing opinion with their first-line management.

Positive Ethical Culture

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. The majority of employees interviewed indicated there is a positive ethical culture.¹³ A few individuals also commented that they believe their coworkers do the right things.

RISKS

We identified risks that could impact the effectiveness of WBN SS to achieve its responsibilities in support of the Nuclear vision and TVA mission. These risks included (1) communication deficiencies, (2) safety concerns, (3) perceptions of

¹³ 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.

inadequate staffing, (4) reporting of performance data, and (5) ineffective relationships with support organizations.

Communication Deficiencies

According to TVA's Values and Competencies, leaders are expected to inspire trust and engagement by building a positive environment that motivates others. Many employees interviewed commented negatively on communication and trust with senior management, while others indicated having positive relationships. For instance, a few employees indicated management does not communicate well or there is a lack of communication and provides inconsistent messages and/or is dishonest or untrustworthy. Further, when asked about morale, some employees indicated communication and trust of senior management negatively impacted morale.

In April 2019, WBN SS created a CR documenting that Corporate Nuclear Security advised that WBN SS leadership had not effectively communicated important issues and key operational decisions in a clear, straightforward, and timely manner to all stakeholders. In response, WBN SS management created a communication plan that focused on communication gaps between management and employees. According to WBN SS management, monthly newsletters for July 2019 through March 2020 were distributed to security personnel. We reviewed these newsletters and noted they contained information on various topics, including TVA's medical program and staffing updates.

Safety Concerns

TVA's value of safety is defined 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." Some employees interviewed described safety concerns related to security posts, such as lighting and rotating posts in inclement weather. Further, a review of CRs showed concerns with leaks in the bullet resistant enclosure's (BRE) glass from inclement weather and rusting floors.

Some night shift employees also expressed concerns with their training and qualification program being conducted during the day instead of on their night schedule. According to 10 CFR, Part 73, Appendix B, *General Criteria for Security Personnel*, training and qualification programs should simulate the conditions the individual would usually experience in performing their duties and responsibilities. Some employees indicated this disruption of their sleep creates a safety issue with handling a firearm while training. One employee indicated training conducted during the day for night shift employees fails to provide them with training under the same conditions as they would normally experience.

Perceptions of Inadequate Staffing

While most employees indicated they have the necessary tools and training to complete their work, several individuals expressed concerns with staffing levels. Some individuals indicated overtime worked may be the result of inadequate staffing. Further, a couple of individuals commented that shift supervisors have

been forced to perform officer duties. In addition, we identified a CR that indicated staffing concerns had resulted in required responsibilities not being performed

We obtained headcount data for the period of FY 2017 through FY 2019 and found staffing had decreased from 187 employees in FY 2017 to 167 employees in FY 2019. We also obtained overtime data from TVA's Financial Operations and Performance group for the same timeframe and determined 81,726 overtime hours were worked by SS in FY 2019 compared to approximately 71,319 overtime hours worked in FY 2017, an increase of approximately 15 percent.¹⁴ As shown in Figure 1 below, the amount of overtime increased as the level of staffing decreased.



Figure 1

Additionally, a few employees expressed concerns about SS employees being placed on the Duty Restriction List, which impacts the number of individuals available to work.

Internal Reporting of Performance Data

WBN SS personnel provided Microsoft Excel spreadsheets containing monthly PIs for CYs 2018 and 2019. PIs included in the spreadsheets related to compensatory hours, Occupational Safety and Health Administration recordable injuries, shift vacancies, some security equipment failures, and various human performance events. According to TVA, Corporate Nuclear Security uses the PIs to identify areas of improvement for the various SS organizations.

Upon initial review of the CY 2019 spreadsheet, we noted data for two fields were missing for June and all of July. We obtained a revised version of the spreadsheet and, upon comparison with our original version, noted several discrepancies. We discussed these discrepancies with WBN SS personnel who were unable to

¹⁴ We did not validate the overtime data provided by Financial Operations and Performance.

provide a reason for the discrepancies. These discrepancies pose an increased risk that Corporate Nuclear Security cannot accurately assess the security organization at WBN and identify improvement areas.

We obtained a listing of accounts with access to the PI spreadsheet from IT personnel at TVA and identified 268 accounts, including 193 with read and edit access. Access from numerous individuals increases the risk that Corporate Nuclear Security could use incorrect data in assessing site performance.

Ineffective Relationships with Support Organizations

While most individuals expressed positive comments when asked about relationships within the WBN SS organization and with other plant personnel, some individuals expressed negative comments regarding their interactions with organizations outside of SS. Specifically, some individuals indicated:

- Actions by WBN plant personnel indicated they did not respect their role within WBN.
- Their belief that Nuclear Security invokes “mass punishment” by changing procedures across all sites based on an error at a single site.

In addition, concerns were expressed about TVA’s medical program and a general distrust of TVA’s medical personnel that administer the program. For example, employees described concerns with the accuracy of blood pressure readings and other medical tests performed by medical personnel and the refusal by medical personnel to accept testing from employees’ personal physicians.

CONCLUSION

WBN SS is responsible for maintaining physical security at WBN through the execution of its security plans. Although the organization is not directly tasked with generation responsibilities, it is accountable for protecting the assets necessary for electricity generation, supporting plant personnel when needed, and protecting the general public.

While we identified strengths related to organizational alignment, positive interactions within WBN SS, first-line management support, and positive ethical culture, we identified risks related to communication deficiencies, safety, perceptions of inadequate staffing, internal reporting of performance data, and ineffective relationships with support organizations. Addressing factors contributing to these inadequacies could further improve WBN Site Security’s support of the Nuclear vision.

Based on our observations and using TVA's Business Operating Model, we assessed WBN SS's level of risk in the areas of alignment, execution, and engagement. We determined:

- Alignment risk is rated low based on the alignment of management and employee goals, which supported the Nuclear vision and TVA mission.
- Engagement risk is rated low. While some employees cited inadequate communication from senior management, most employees indicated teamwork, support from first-line supervisors and a positive ethical culture as strengths.
- Execution risk is rated medium based on safety concerns, perceptions of inadequate staffing, reporting of performance data, and relationships with some support organizations.

RECOMMENDATIONS

We recommend the Senior Manager, WBN SS:

1. Assess current communication methods and determine whether additional avenues for information sharing are needed.

TVA Management's Comments – WBN SS management stated they are performing the following actions: (1) routinely attending shift briefings and performing engagements with shift personnel, (2) providing weekly corrective action program communication reports, (3) providing "On Target" newsletters to WBN SS shift personnel with updates of current and future items of interest, (4) conducting training review committee meetings each trimester, (5) conducting twice weekly security team alignment meetings, and (6) performing quarterly 2C's meetings with shift personnel to allow an open forum of discussion as it relates to compliments and concerns for WBN Security.

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

2. Take actions, as appropriate, to address safety concerns related to lighting, post rotations, and night shift training.

TVA Management's Comments – WBN SS management stated that safety concerns related to post lighting are addressed by generating a CR. A facilities service request (FSR) is generated and related to the CR. Facilities then performs the work and WBN SS personnel track the FSR to closure, providing updates during security-team alignment meetings. This process is communicated through the weekly corrective action program communication report. Currently, there are zero open FSRs associated with the related conditions.

Regarding inclement weather, WBN SS management stated that shift supervision has the ability to evaluate environmental/weather conditions and suspend/modify post rotations at their discretion. A member of security staff is contacted to discuss the decision, and a CR is generated to document the post suspension/modification accordingly.

WBN SS management also addressed night training, stating that WBN SS is prohibited from the performance of night fire activities due to agreements made with neighboring property owners; however, the current report time for security training was modified based on a majority vote of night shift security personnel. Night shift security personnel voted to change the start time to 0800 hours, which was honored, excluding first trimester training due to low light qualification requirements.

Regarding safety concerns related to security flooring, WBN SS management stated that a contract was entered into in April 2020 to address those concerns. This process is ongoing and 33 percent of elevated BREs have been completed. The remaining BRE floors will be complete as funding permits.

Auditor's Response – We agree with management's actions taken related to night shift training, and BRE floors. However, management did not provide an action to address the safety concerns related to lighting and post rotations. The response provided detailed processes that were in place at the time of our interviews and employees still expressed the concerns. Identifying improvements to the process or additional actions could help alleviate the concerns.

3. Assess and address concerns related to perceptions about staffing levels.

TVA Management's Comments – In 2019, the WBN SS Manager met with the WBN Site Vice President (SVP) regarding the overtime issue. The WBN SVP authorized the WBN SS Manager to strategically over hire to address the overtime concern. Part of this discussion included analysis of the headcount trend, which was impacted by duty-restricted personnel, forecasted attrition (retiring and resignations) and terminations. Currently, WBN SS has hired ten new officers to help alleviate overtime and improve the quality of life of the officers. In addition, temporary supervisors have been hired as a short-term solution to the supervisor headcount.

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

4. Work with Corporate Nuclear Security to determine accurate performance indicators are reported and assess access controls, as appropriate.

TVA Management's Comments – In July 2020, WBN SS management discussed this recommendation with the Security Peer Team for resolution. Corporate Security determined the list of performance indicators are accurate

to determine the trajectory of fleet security and are currently evaluating appropriate actions to control access to the file.

Auditor's Response – We followed up with WBN SS management and they clarified they had determined the performance indicators are being reported accurately. Accordingly, we agree with management's planned actions and actions taken.

5. Work with support organizations to improve communication and build trusting relationships.

TVA Management's Comments – WBN SS management stated they and WBN leadership are committed to fostering an environment where every employee is treated with respect. WBN SS management implemented periodic management (nonsecurity) engagements with WBN SS personnel to improve cross-functional relationships and improve trust and respect between all organizations.

As it relates to the concern of procedure changes and the perception of mass punishment, WBN SS management stated that, when external or internal operational experience is received, it is immediately shared with the workforce. WBN SS management then performs a review of current practices/procedures to determine if WBN SS is susceptible to the same errors. If results of the review identify a gap, appropriate procedures are changed, the revised procedure is provided to all personnel for feedback/review, and the formal change management process is followed. This process is used fleet wide and any changes are vetted through the peer team for concurrence and approval.

Further, WBN SS management stated that questions/concerns raised by WBN SS personnel were provided to TVA medical to create an avenue of open dialogue between WBN SS personnel and TVA medical. TVA medical is also eliminating the use of the Microfit and has also informed security that they would no longer be conducting the physical fitness test. By removing the requirement for TVA medical to conduct the physical fitness test, and by eliminating the elements of the former Microfit program, the annual medical exam will be simplified and will only address the requirements of the regulatory-required annual medical examination.

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

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

TO: David Wheeler, Assistant Inspector General

FROM: Eynus Ellis, Senior Manager, WBN Site Security

RESPONSE TO: Organizational Effectiveness Audit of WBN Nuclear Security

These are the responses to the recommendations provided by the OIG Audit group for Evaluation number 2019-15570.

Recommendation 1:

Assess current communication methods and determine whether additional avenues for information sharing are needed.

Response:

The Security management team performed a review of the 2019 Communication Plan prior to the OIG effectiveness review, and evaluated actions taken and implemented as it relates to communication effectiveness. The following actions currently remain in place: WBN SS management routinely attends shift briefings and performs engagements with shift personnel, provides corrective action program (CAP) communication reports weekly, provides "On Target" newsletters to shift personnel with updates of current and future items of interest to WBN security, conducts training review committee (TRC) meetings every trimester, conducts security team alignment meetings twice weekly, and performs 2C's meetings quarterly with shift personnel to allow an open forum of discussion as it relates to compliments and concerns for WBN Security. Due to COVID restrictions, WBN SS management have adjusted its standard briefing platform to meet the social distancing requirements. Additionally, virtual meeting platforms are used as a means to maintain a consistent line of communications with the workforce.

Recommendation 2:

Take actions, as appropriate, to address safety concerns related to lighting, post rotations, and night shift training.

Response:

Safety concerns related to post lighting are addressed through the following process: If there is a lighting deficiency on post, a condition report (CR) is generated. A facilities service request (FSR) is generated and related to the CR. Facilities then performs work based off of the FSR process. Security staff personnel track the FSR to closure and provides updates during security team alignment meetings. This process is communicated through the weekly CAP communication report. Currently, there are zero open FSR's associated with the related conditions.

Safety concerns related to post rotations during inclement weather: Shift supervision has the ability to evaluate environmental/weather conditions, and suspend/modify post rotations at their discretion. A member of security staff is contacted to discuss the decision, and a CR is generated to document the post suspension/modification accordingly.

Safety concerns related to the performance of security training on night shift: WBN Security is prohibited from the performance of night fire activities due to agreements made with neighboring property owners; however, the current report time for security training was modified based on a majority-vote of night shift security personnel. Night shift security personnel voted to change the start time to 0800 hours, which was honored, excluding 1st trimester training due to low light qualification requirements.

Safety concerns related to security flooring, previously mentioned in the effectiveness review report: A contract was established with Williams in April 2020 to address the flooring concerns. This process is on-going, and 33% of elevated bullet resistant enclosures (BREs) have been completed. The remaining BRE floors will be complete as funding permits.

Recommendation 3:

Assess and address concerns related to perceptions about staffing levels.

Response:

In 2019, the Security Manager met with the Site Vice President (SVP) regarding the overtime issue. The Site Vice President authorized the Security Manager to strategically over hire to address the overtime concern. Part of this discussion included the analysis by the Security Manager of the headcount trend, which was impacted by duty restricted personnel, forecasted attrition (retiring and resignations) and terminations. Following the SVP's approval, WBN SS management attended shift briefings to inform the workforce of the strategic over hires and approved temporary supervisor positions. Currently, Security has hired ten new officers to help alleviate overtime and improve the quality of life of the officers. Management has also hired temporary supervisors as a short term solution to the supervisor headcount.

Recommendation 4:

Work with Corporate Nuclear Security to determine accurate performance indicators are reported and assess access controls, as appropriate.

Response:

In July 2020, WBN SS management discussed this recommendation with the Security Peer Team for resolution. Corporate Security determined the list of performance indicators are accurate to determine the trajectory of fleet security; and, are currently evaluating appropriate actions to control access to the file.

Recommendation 5:

Work with support organizations to improve communication and build trusting relationships.

Response:

WBN SS management and station leadership is committed to fostering an environment where every employee is treated with respect. WBN SS management implemented periodic management (non-security) engagements with Security personnel to improve cross-functional relationships and improve trust, and respect between all organizations. Due to COVID-19 restrictions, the engagements could not be fully implemented as desired. When the restrictions are lifted, WBN SS management will fully implement the plan.

As it relates to the concern of procedure changes and the perception of mass punishment: When external or internal operational experience (OE) is received, it is immediately shared with the workforce. WBN SS management then performs a review of current practices/procedures to determine if our organization is susceptible to the same error trap. If results of the review identify a gap that needs to be addressed: appropriate procedures are changed, the revised procedure is provided to all personnel for feedback/review, and the formal change management process is followed. This process is used fleet wide and any changes are vetted through the peer team for concurrence and approval.

As it relates to the concerns expressed about TVA's medical program: Questions/concerns raised by security personnel were provided to Medical to create an avenue of open dialogue between security personnel and TVA medical. Medical information requested by security personnel (pamphlets, procedures, etc.) was provided by WBN SS management. TVA Medical is also eliminating the use of the Microfit and has also informed security that they would no longer be conducting the physical fitness test (PFT). By removing the requirement for medical to conduct the PFT, and by eliminating the elements of the former Microfit program, the annual medical exam will be simplified and will only address the requirements of the regulatory required annual medical examination. This is consistent with industry benchmarking.