Chockie Group International, Inc.

Management of Contractors at Nuclear Power Plants

New Challenges for Regulatory Oversight

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Oversight of Licensees Management of Contractors

Contractors

- An important & integral part of business
- <u>Contractor-related accidents and incidents</u>
 - shown serious weaknesses with implementation of contract management processes
- New challenges
 - aging of the workforce, staffing, cost saving efforts
- Proactive steps are required
 - to address existing problems and new challenges

Contract Management Process

- Tailored to meet licensees specific needs & requirements
- The issue is not the contract management process itself
- Problems are due to weaknesses in the <u>implementation</u> of the process



Implementation Problems



Lack of supervision

1 contributing factor



Design changes

 Not recognizing safety significance of changes or informing others of changes

Lack of training

 Incorrect assumptions about skills & knowledge



Implementation Problems

1 contributing factor

Lack of supervision



- Deficiencies in quality assurance programs of company & contractor
- Incomplete or insufficient documentation
- Lack of review of vendor information
- Inadequate monitoring upon completion of work

Implementation Problems

- Design changes
 - Not recognizing potential safety significance of changes
 - Not informing others of changes
 - Not following quality assurance procedures

Implementation Problems

Lack of training

- Insufficient or ineffective training of contractor, subcontractor, & company personnel
- Incorrect assumptions about skills & knowledge
- Lack of specific knowledge about equipment or facility
- Lack of awareness of safety significance of task
- Not being informed about quality assurance procedures

Implementation Problems

Other common weaknesses

- Excessive trust in the contractor
- Underestimating the safety consequences of a project or task
- Lack of adequate procedures
- Emphasis on schedule and production over safety

Impending Challenges

Nuclear industry is facing challenges due to:



Aging work force

(both within licensee & contractor organizations)

Increased demand for skilled personnel

Cost saving initiatives

Aging Work Force



- Many key personnel reaching retirement age
 - Loss of most experienced, skilled, & knowledgeable staff
 - Loss of institutional memory at licensee & contractor
 - Need for more oversight when those most experienced in contract management & oversight are departing

Aging Work Force



- Aging of the individual worker
 - Many contracted tasks put high demand on memory, vision, strength, range of motion, & reaction capabilities
 - Mental & physical capabilities decline with age

Demand For Skilled Personnel

- Lack of qualified skilled personnel to replace retiring staff
 - Long term issue of fewer & fewer students entering science and engineering programs
 - Many supporting job positions will likely be difficult to fill
- Loss of nuclear contractors
 - Leaving the business or consolidating

Cost Saving Initiatives

- Increased outsourcing
 - Ranging from outsourcing tasks to entire department operations
 - Once major department operations are outsourced few companies plan to take the work back in-house
 - Benefits found when contractor is integrated into company's culture and objectives clearly defined & communicated

Cost Saving Initiatives

- Reductions of company personnel
 - Remaining staff must have technical & managerial skills to properly plan, coordinate, & oversee contractor work
- Mergers among contractors
 - Creating safety culture difficulties

New Responsibilities for Contractors

- Need for more structured & formal assessment of safety & economic nature of work
- Not all tasks have same safety or economic significance
 - Importance may change over time

New Responsibilities for Contractors

- Benefits of formal risk assessment
 - Document risk assumptions
 - Inform relevant parties
 - Basis for scope and timing of oversight/supervision

Formal Project Risk Assessment Process

- 1 Identify Safety Hazards
- 2 Identify Harm or Damage
- 3 Evaluate Risks
- 4 Document Findings
- 5 Review & Revise

Increased Responsibilities for Licensees

- Need to be an "intelligent customer"
 - Technical & managerial competence
 - to determine safety implications
 - to effectively oversee work activities
 - either in-house or from a 3rd party

Increased Responsibilities for Licensees



- Integrate contractor
 into licensee safety culture
 - Contractor should be considered part of the licensee organization & work to same safety & quality standards

Increased Responsibilities for Licensees

- Continuous communication
 - At all phases of the contract management process
 - More effective use of contractor skills/experience to assess risk and recognize safety significance of changing situations

Proactive Steps for Regulatory Oversight



- Need to ensure licensees are taking proactive steps to address 3 key issues:
 - 1) Proper Planning
 - Effective Communication throughout the work process
 - 3) Continuous Safety awareness by all parties
- 1) SKI Regulatory Guidebook Management of Contractors



Conclusions

Contractors, licensees, & regulators need to:

- Recognize the existing and future contract management situations they face
- 2) Understand the safety implications
- 3) Begin to take proactive actions
- 4) Continue to refine the actions as the situations change
- 5) Stay abreast of actions/programs that others are developing that might be appropriate for their situation