

CLOSED PREDECISIONAL ENFORCEMENT CONFERENCE SUMMARY

Individual: Chad Chaffain

IA No.: IA-19-005

On May 14, 2019, Mr. Chaffain met with U.S. Nuclear Regulatory Commission (NRC) personnel in Emporia, Kansas to discuss an apparent deliberate violation identified in NRC letter dated April 2, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession ML19092A436). The conference was held at the request of the Region IV staff.

The NRC provided opening remarks, described the enforcement process, and the apparent deliberate violation. Mr. Chad Chaffain, who at the time of the apparent violation was a supervisor in the maintenance department at the Wolf Creek Generating Station, presented a summary and timeline of the events leading up to the apparent violation, causes of the apparent violations, and corrective actions for the apparent violations.

The attendance list, and Mr. Chaffain's presentation are attached to this summary.

If the NRC concludes that enforcement action should be issued to Mr. Chaffain, a copy of this summary will be made publicly available either electronically for public inspection in the NRC Public Document Room or from the NRC's ADAMS accessible from the NRC's website at <http://www.nrc.gov/reading-rm/adams.html>.

Enclosures:

1. Attendance List
2. Chad Chaffain Presentation

ATTENDANCE LIST

PREDECISIONAL ENFORCEMENT CONFERENCE

Chad Chaffain

April 14, 2019

Anton Vogel	NRC Region IV
David Cylkowski	NRC Region IV
John Kramer	NRC Region IV
Chad Chaffain	Individual
Amy Roma	Legal Counsel - Individual

Chad Chaffain Presentation

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Predecisional Enforcement Conference

Chad Chaffain

May 14, 2019



Upfront Notes and Objectives

- I know that your objective is to uncover the truth, so in that spirit I want to explain through this PEC—
 - I am a good person, and a strong worker. I never expected I would be in this room sitting with you. I care about the safety of the plant and our Wolf Creek family.
 - I know I did not deliberately or knowingly violate any procedure or put down inaccurate information in the WO.
 - I admit I was confused during my OI interview:
 - When I was brought into my OI interview, I had no idea of the topic. I had not thought about this WO for two years. I only worked on it just once at the end of the outage. I have now had a chance to look over the WO and associated documents that I was asked about.
 - While I was doing my best to answer the questions asked during my interview, I also felt like I was not given the chance to explain what happened, and I was asked confusing questions. So I would like to take this opportunity here to more fully explain what happened.

What the Work Order Concerned

- RF21 in Fall 2016 began 2 weeks early.
- It was my first outage as a Fix-It-Now (FIN) team Supervisor.
 - I was made a Supervisor in May 2016.
 - I was not a qualified Supervisor at the time of the outage.
- The plant had extensive CRDM boric acid contamination from a spraying leak.
- The list of CRDMs to be removed changed many times during the outage, as did the process for cleaning the boric acid.
- WO #16-417262-015 was generated for Electrical to oversee boric acid cleanup off the pulled CRDMs.
 - The WO instructions were to “remove boric acid from [CRDMs] under Electrical guidance.”
 - Another group was originally supposed to provide CRDM clean up oversight, but it was moved to Electrical because Electrical oversaw removal of electrical equipment just prior to CRDMs being pulled.
 - Electrical was not supposed to do any of the actual cleanup, this was done by contractors under Electrical supervision.

Work Order Timeline

- **10/13/2016:** Work on the WO began.
 - Four people from Electrical provided oversight of the CRDM cleanup under the WO.
- **Sometime Before 10/31/2016:** The CRDMs were reinstalled.
- **10/31/2016:** I was assigned to close out the WO—BUT:
 - I was not expected to “remove boric acid from [CRDMs] under Electrical guidance,” which was the WO directed.
 - All the CRDMs were already reinstalled.
 - If there was missing information in the WO with respect to the CRDM cleaning, it was impossible for me to do the inspection myself, or ask someone else to. Instead, I needed to talk to the people who performed the oversight and cross-check what they said against the working documents associated with this activity.
 - E.g., WO #16-417262017, the WO to remove the CRDMs and DPRIs, which I referenced against this WO to confirm the list of pulled CRDMs.
- **There was no applicable procedures for this situation.**

What Happened on 10/31/16

- The WO came to me to close out on 10/31/2016.
- I reviewed it, and found numerous places where information was missing.
- I gave it back to the Electrical craft to complete and send back to me to review.
- They had the WO for at least two shifts—a day shift and a night shift.
- Sometime the next day it—during the day shift—it was left on my desk and it was still missing information.
- At the end of shift, I pulled together both my day and night shift team—which included the people who worked on this WO overseeing the inspections--and asked: “Did everything that got pulled get cleaned?”
 - The answer was “Yes.”
 - There were about 4-6 people there, and they will confirm this information.
- I then checked WO #16-417262-017, the WO to remove the CRDMs and DPRIs, against this WO to confirm the list of pulled CRDM’s were the same.
 - The answer to this was, again, “Yes.”
- So I believed, when I filled in the information in the Fall 2016, that what I was inserting was correct and that I had taken the appropriate steps to confirm this information.

Work Procedures Inapplicable

- The applicable procedures do not address this situation:
 - **MGE BB-005, Rector Vessel Head Coil Stack/DBRI Removal—**
 - Entirely concerns how to clean CRDMs.
 - Section 9 states to attach records, not how to fill them out.
 - **AI 16C-008, Work Order Implementation—**
 - Section 6.4.2 instructs reviewer of work orders to ensure there is documentation, and that it is accurate. But it does not explain how to complete missing information in a WO when the work cannot be re-performed or physically verified.
 - **Work Order 16-417262-015—**
 - It has a short set of instructions on how to do oversee the cleanup, but not how to verify information after clean up is completed and the CRDM were reinstalled.
- So, there is no WCNOC procedure in use or that I know of that would have told me how to verify cleaning of a CRDM after reinsertion.
 - As a corrective action WCNOC is taking, it will be revising its WO procedure to make it clear that a CR should be generated in this type of circumstance.

What I Believed at the Time

- I **believed** the CRDMs were clean.
- I **believed** I was putting in the correct information in the WO, based on what I was told and verified.
- I **believed** I had taken reasonable steps, reaching out to multiple people, multiple times, to confirm the information, and checking related work documents.
- I was given a to close out for work that was already done. I **believed** there was no other practical way to confirm the work than to take these steps.

What I Now Know: / Was Wrong

- I learned right before this OI investigation in Fall 2018 that NRC OI wanted to talk to me about this WO.
 - During my interview, I learned three CRDMs were incorrectly included in the WO.
- Based on this knowledge, which I learned in Fall 2018, and walking through how the information came to be including in the WO, I learned I need to be more vigilant in how I verify information—
 - I cannot rely on just checking in with the people who did the work and verifying against associated WO documents.
 - I have discussed lessons-learned with my fellow Electrical supervisors, and we will now more regularly check in during the work evolution to ensure WOs are being appropriately managed (e.g., paperwork is being kept up, Craft isn't confused about instructions, etc., so we avoid ending up with an incomplete WO that can no longer be completed).
- I learned that the correct way to address this situation is through a Condition Report.
- But I still know that I did not knowingly put down wrong information or act contrary to a procedure.

But, I Was Wrong, Not Deliberate

- Enforcement Manual's description of deliberate misconduct, Section 1.1.2(C):
 - A requirement exists
 - A violation of the requirement has occurred;
 - The person's actions were voluntary, as opposed to inadvertent;
 - The person committing the violation:
 - Knew a requirement existed,
 - Understood the requirement, and
 - Knew the requirement was applicable at the time; and
 - The person knew that his or her actions were contrary to the requirement.
- I did not know or understand the requirements—
 - The applicable procedures do not address what to do in this situation.
- I did not know my actions were contrary to any requirement—
 - I believed at the time that the steps I undertook to confirm the information were adequate.

Voluntary Corrective Actions

- Despite the fact that I did not act deliberately, I was still wrong and realize now I should not have inserted this information when I could not physically confirm it.
- I volunteered on my own request to go across the plant to:
 - Tell my story.
 - Explain my mistakes.
 - Reinforce the importance of understanding the full requirements of the work procedure, and asking for help in tough situations.
 - Reinforce the importance of recording the bases of any signatures:
 - **My Message -- Your Signature is Your Word.**
- I have already spoken to a number of teams already.
 - All of the Maintenance and Leadership Alignment teams, and I will talk to more groups.
 - The goal is to talk to as many people at WCNOC who handle WOs as I can.
- I have also offered to help WCNOC out in any other way they can think of to help ensure this does not happen to anyone else at the plant.
 - E.g., hosting a booth at WCNOC's new NSC initiative "Professional to the Core" expo to discuss this issue with my colleagues.
- It is easy to see how something like this could occur again, but for me sharing my own experience with others to prevent reoccurrence.
- I have dedicated myself to enforcing a safe work environment, in my team and across the plant. In addition to the above—
 - I have also met with other Electrical Supervisors to discuss lessons learned from my experience, including more proactively overseeing the management of WOs to ensure proper and timely issue resolution.
 - I have also talked with the other Electrical Supervisors and my team to make sure that the origin of all information is included in a WO.

Conclusion

- I was wrong. But I certainly did not knowingly violate procedure or put down incorrect information.
- As a first-time supervisor, things were new for me but that is no excuse for not doing the job right.
- I did not understand how to apply the work procedures in this situation, and assumed the steps I took were sufficient to validate the cleaning of the CRDMs.
- In hindsight, I now realize more vigilance was warranted in order to resolve this important safety issue, including writing a CR.
- I have taken it upon myself to explain what I have learned from this story across the plant, and apply lessons learned to both my own day-to-day Supervisor experience, and also my other Electrical Supervisors so this type of mistake does not happen again.

