



# Best Practice for Issue Escalation

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# Objective

Establish and Communicate a formal **step-wise** escalation process seeking the common goal of issue resolution at the **lowest level** practical.

# Issue Escalation Process

- Drives streamlined resolution of issues at the lowest level
- Resolution is based on objective information and sound regulatory principles.
- “Parallel” escalation: both sides agree on the need to escalate, as well as the salient points of concern

# What does “good” look like?

## Five Principles:

1. All parties agree when escalation becomes necessary
2. Due diligence, including all relevant facts, is applied at every step
3. Escalation occurs systematically one level at a time
4. Basis for final decision is fed back to all levels
5. Lessons learned are captured for organizational or process improvements

# Recommended Approach

- **DEFINE THE GAP:** After all relevant information has been presented by all parties and a robust and candid dialogue occurs, all parties recognize specific points of disagreement and the escalation is warranted
- **DOCUMENT AND ELEVATE:** Using the recommended template and after an impartial assessment of the facts, each party elevates the issue internally (Template become the 'traveler' for the issue)
- **RESOLVE:** Template is updated at each step of elevation to include new information or insights gained as well as any decisions
- **CLOSE THE LOOP:** Document and feed back the final decision, decision makers, and the basis for the decision

# Desired Behaviors

## CURRENT COMMON BEHAVIORS:

- “We don’t agree with this finding”
- “If the finding is included in the inspection debrief, we will be contesting”
- “The Site VP will be contacting the Regional Administrator”

## DESIRED BEHAVIORS:

- “We believe we do not have a common understanding and escalation may be warranted to increase how this issue is understood”
- “We believe this issue should be escalated based on our remaining concern with these specific points ...”
- “We recommend that you escalate the issue to your management and explain where we disagree as we intend to do the same.”
- “Would you like to schedule a follow up with our managers or should we schedule?”

# Implementation

- NEI has provided the issue escalation process to licensees as a best practice
- Licensees are encouraged to compare their current approach to the best practice, and conform their approach to the best practice as much as practical
- NRC feedback to NEI or licensees is encouraged and welcome