



NouvEON Leads Change Management Effort to Successfully Implement Regulatory Changes at Large Utility

■ ■ ■ ■ INTRODUCTION

The U.S. Nuclear Regulatory Commission (NRC) issued 10 CFR Part 26, Subpart I (the fatigue rule) in March 2008. The fatigue rule is designed to enhance safety by mandating work hour limits, minimum break requirements and minimum days off. The intent of the fatigue rule is to improve the safety of workers at nuclear sites and the surrounding community. The effective date of the fatigue rule was October 1, 2009, which provided utilities 18 months to prepare for implementation.

The NRC requires licensees to record time worked by each covered individual to demonstrate compliance. A leading national utility, along with two-thirds of all U.S. nuclear licensees, purchased EmpCenter, a time tracking software application developed specifically to meet the fatigue rule requirements. The software application and supporting processes were implemented successfully at all three nuclear sites in August 2009.

The company tapped NouvEON to lead the dedicated change management effort, which was designed to prepare the leading national utility's Nuclear Generation Department (NGD) employees and contractors for the people, process and technology changes necessary to achieve fatigue rule compliance by October 1, 2009. The team led key change activities across the business with support from site implementation teams, which included new processes, training and communications and updates to the nuclear systems directive to manage

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The fatigue rule represented a major change management challenge for the leading national utility's three nuclear sites as it required substantial people, process, and technology changes; changes, which could potentially be disruptive to business.

The fatigue rule constituted a major change in the way the leading national utility's NGD conducts business. Potential impacts included: staffing levels, outage duration, increased costs, and increased contractor demand while creating market forces which limit the availability of contractors. These potential impacts placed a large burden on training and communications, and created the need for detailing accounting of work hours to meet the rule requirements.

To successfully integrate these changes, the leading national utility needed to implement various people, process, and technology changes, led by NouvEON. The NouvEON team designed a change management process to minimize the impacts and to maintain a competitive position for the leading national utility.

Change Management in a Regulated Environment



SOLUTION

The NouvEON change management team developed and deployed a comprehensive change management strategy to effectively address and minimize impact to employees and contractors. In conjunction with the change management activities on the business-side, the technology team implemented EmpCenter, a tool to facilitate compliance with the rule.

NouvEON's communications and training experts leveraged current state information to identify the knowledge, skills and abilities workers would need to understand the fatigue rule and use the EmpCenter tool. A targeted communications plan was developed to raise awareness of the fatigue rule and build support for the EmpCenter to ultimately mitigate worker resistance to the rule. Additionally, NouvEON used its process excellence expertise to revise and amend organizational procedures and processes impacted by work hour rules.

The team conducted a pilot of the fatigue rule and EmpCenter at two nuclear sites. The project and technology teams used feedback collected from the dry run to prepare for the implementation and ensure a smooth transition for covered workers. Additionally, the team scheduled the implementation to be six weeks prior to the rule effective date. The transition period between implementation and the rule effective date served a dual purpose: (1) it provided covered individuals with the opportunity to become familiar with the tool and corresponding nuclear system directive and (2) it helped minimize issues after the NRC effective date, October 1, 2009. After implementation, the site implementation team continued to address emerging process and technology-related issues, to ensure these issues were resolved prior to the rule effective date. The issues encountered to date have led to several process and tool enhancements.

RESULTS

The software application and supporting processes were implemented successfully at all three nuclear sites in August 2009. Site fatigue rule compliance leads have been established to provide additional support and ensure support of the program. A dedicated change management effort, which included new processes, training and communications and a nuclear systems directive to manage the program, minimized impacts to affected supervisors and individuals.

The technology team identified the following factors as contributing to the successful implementation of EmpCenter software:

- The project team drove many activities, which supported the success of the technology implementation, such as effective communications and training, on-site support, demo days, dry runs and site implementation teams.
- Continuous communication throughout the course of the project, including targeted media and messages, contributed greatly to the success of the technology implementation.

According to preliminary results from the February 2010 survey, 88 percent of respondents agreed that EmpCenter helps track compliance to the fatigue rule. When asked what single factor was most helpful during the fatigue rule implementation, employee practice received the highest rating at 25 percent, followed by on-site support with 22 percent. In addition, 97 percent of the respondents understand the expectations of covered workers in managing work hours in compliance with the fatigue rule and 96 percent understand the consequences of non-compliance with the rule. Finally, 84 percent of respondents also demonstrated an understanding of when EmpCenter should be updated with correct work hours.

NouvEON Services Provided:

- Organizational Change Management
- Process Redesign
- Communications
- Training
- Audit and Policy-Related Updates
- Project Management
- Design of Operational Model, Controls, and Governance
- Vendor Selection
- Legal HR/Vendor Management

Technologies Used:

- Workforce Software's EmpCenter Module