

Efficiency Opportunity



March 29, 2018

Efficiency Opportunity: 18–OA-01

Performance Based Approach to Auditing Fitness for Duty (FFD) Programs

Fitness for duty audit scopes unnecessarily exceed the minimum required program elements as identified in 10CFR26 Subpart B.

Issue: Reduction in FFD Audit Scope

Summary of Efficiency Opportunity

- Desired end-state— Reduction in both the time and the number of people it takes to perform an FFD audit by reducing the number of checklist items reviewed using a simplified checklist and a performance based approach.)
- Value proposition (vision of excellence)— Decrease in audit team size and duration. The audit scope should focus on the minimum required 10CFR26.41 program elements based upon a review of the FFD program performance/effectiveness.

Relevant Standards

- 10CFR26 Subpart B 26.41
- NEI 03-02, Program Element Based Approach to Auditing a 10CFR26 Fitness for Duty Program.

Recommended Industry Actions

- Incorporate the performance based FFD audit scope strategy into NEI 03-02. Complete - Section 19 added

Change Management Considerations

Company Actions

- NEI auditors are to familiarize themselves with the changes incorporated into NEI 03-02, Access Authorization and Fitness For Duty Program, Revision 16. Specifically, Section 19, Program Element-Based Approach to Auditing a 10 CFR 26 Fitness for Duty Program. No specific Change Management is required because Section 19 provides the guidance for use of this checklist.
- Revise utility audit procedures or template to incorporate this new methodology after verifying it does not require a change to the QA plan

- Utilize section 19 checklist for all subsequent audits for stable and mature FFD programs
- Future FFD audits should first review of the FFD program performance, and the audit should be limited to the minimum required program elements as identified in 10CFR26 Subpart B, and focus on the effectiveness of the FFD program.
 - It is the responsibility of the auditing organization to determine the scope of the audit and to determine the program elements to be reviewed upon which to make a program “effectiveness” statement.
 - Not all component parts of an element would be expected to be reviewed each audit period. If a sampled element’s review is determined to be ineffective, then all components of the element should be reviewed during the audit.

Guidelines

- Contemporary trending and monitoring of program health and effectiveness as described in Section 19 Part 1 is necessary in determining vulnerabilities that may be present.

Efficiencies Gained Evaluation

- Utilization of this performance based approach should result in a 50% reduction in the time and the number of personnel required to support this audit. As an example the vendor FFD audit (done at INPO) should be able to performed with 4 auditors vice 8 and be completed in 3 days rather than a week.

Industry Review:

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