Annex I

ROLE OF ORGANIZATIONAL STRUCTURES AND COMPETENCIES

I–1. ROLE OF THE ORGANIZATIONAL STRUCTURE

Structure describes the way a business is organized, how work is designed and how responsibilities are assigned. Successful organizations maintain a flexible structure that promotes ownership and communication. Typically, they have few layers of management and limited support personnel. They are often organized around products and processes, instead of functions.

The IAEA, in The Management System for Facilities and Activities, adopts as a key concept that work may be structured and interpreted as a set of interacting processes, and that the management system comprises a number of interacting processes.[1] This is consistent with the evolution of many modern organizations, from a functional to a process oriented structure. A process transforms a set of inputs to an output. The output may become the input to another downstream process or be a product or service provided to a customer.

The interface between processes is an important boundary to ensure good process management. Organizations with a process oriented structure are characterized by a focus on horizontal as opposed to vertical flows of work. The change from a functional to a process orientation can be gradual.

A process orientation is consistent with the principles of quality assurance, quality management and integrated management systems, where attention is paid to ensuring that the product or service meets its intended purpose and the requirements or needs of stakeholders. This concentrates attention on both the front and back end of any process — the inputs, outputs and stakeholders or interested parties. The emphasis is not on detecting errors in the output, but on making sure that the inputs, the process, and outputs are capable of meeting the requirements of stakeholders. The goal is prevention of error and satisfaction of stakeholders rather than detection.

The flexible structures of organizations with a process orientation make them more amenable to change than those organized around functions. A functional approach tends to encourage the formation of rigid organizational ‘silos’ or ‘stovepipes’ with a high resistance to change.

I–1.1. Problems with traditional organizational design

Restructuring is often management’s first choice as a change strategy. Organizational boxes, divisions, departments and groups are created or eliminated, centralized or decentralized; names are changed. Often, the intention is to reduce costs. One assumption underpinning the traditional organizational design is that bigger is better. Managers can easily confuse apparent economies of scale on paper with actual results. Communication lags and organizational interface problems can be obscured when the focus is merely on costs. A second assumption is that employees with similar skills should be put together, resulting in functional organizations. This structure leads to stovepipe organizations, where issues must rise to the top before they can filter down to other departments. This preference for a functional structure has resulted in the rise of support functions. Quality assurance and safety become support departments, as if the functions they represent were not integral to manufacturing the product or delivering the service. As their power and specialization

[1] INTERNATIONAL ATOMIC ENERGY AGENCY, The Management System for Facilities and Activities, IAEA Safety Standards Series No. GS-R-3, IAEA, Vienna (2006).

increase, these support departments can have a tendency to adopt a policing rather than support role.

I–1.2. Problems with traditional job design

The design of jobs within the organizational structure can be just as important as the larger scale structure. Rigid job classifications and corresponding job evaluation systems box people into positions that restrict what individuals can contribute to the organization.

Some organizations have operated on Frederick Taylor's Principles of Scientific Management of separating the thinking about work from the doing, i.e. managers were responsible for making decisions and solving problems, whereas other employees did the actual physical work. One of the benefits of his principles was making adequate use of everyone's energy of any type that is expended.

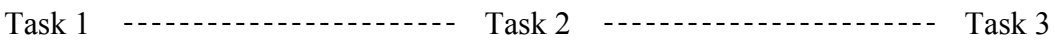
I–1.3. Designing an organizational structure

The most appropriate organizational structure will vary among businesses and there is no single recommended organizational template. However, there are criteria for determining which tasks and people should be formed into subunits at each level of the organization's hierarchy. The concept of task flows — how the performance of one task depends on the results of another — is very helpful in deciding the design of an organization's subunits.

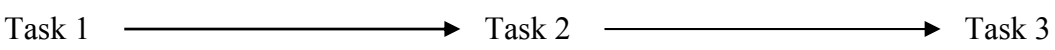
Three types of task flow can be defined: pooled, sequential, and reciprocal. Pooled flows occur when two or more people can perform tasks independently of one another and then, at any time, the results can be added together to produce useful output. Sequential flows occur when one person must complete a task before another person can proceed with his or her task in order to produce useful output. Reciprocal flows occur when frequent interactions and exchanges must take place among people in order to produce useful output. Figure I–1 illustrates the three types of flow.

Each type of task flow will vary in the cost of managing it — which is determined primarily by the amount of time spent in coordinating related activities. Pooled flows are the least costly to manage. Sequential flows are more costly to manage than pooled flows, since more time for planning and scheduling is required to ensure the proper sequence of activity. Reciprocal flows are the most costly to manage, since considerable time is spent on back and forth adjustments among people as each one influences, and is influenced by, the other.

Pooled task flow



Sequential task flow



Reciprocal task flow

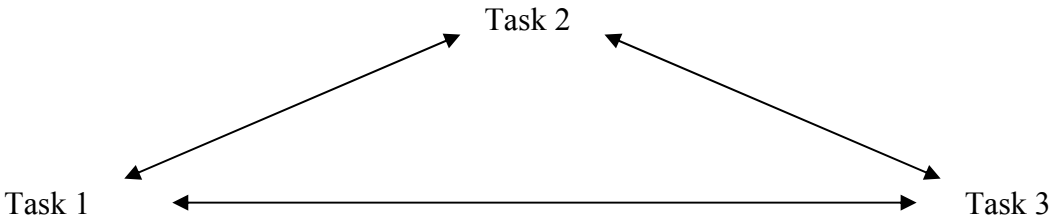


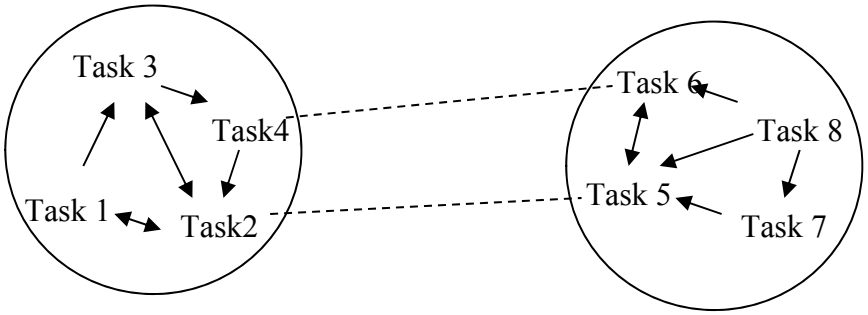
FIG. I–1. Types of task flow.

How can an organizational structure be designed to minimize the cost of managing all the work? Placing the more costly task flows within subunits, and placing the less costly flows between subunits can reduce the costs of managing the work.

Figure I–2 illustrates the ideal case and the worst case for designing subunits. The ideal case shows that only pooled flows (dashed lines) are placed between subunits, while all sequential flows (single arrows) and reciprocal flows (double arrows) are placed within subunits. The worst case shows that reciprocal and sequential flows are placed between subunits, while only pooled flows are placed within units.

The closer an organization's subunits are to the ideal case, the lower the cost of managing all the work. In essence, coordinating task flows within a subunit is facilitated by the physical proximity of its members and peer support. The reward system can function more clearly because control is within the subunit. Coordinating task flows between subunits is made difficult by communication problems, and difficulties in fairly allocating reward.

Correct boundaries (Ideal case)



Incorrect boundaries (Worst case)

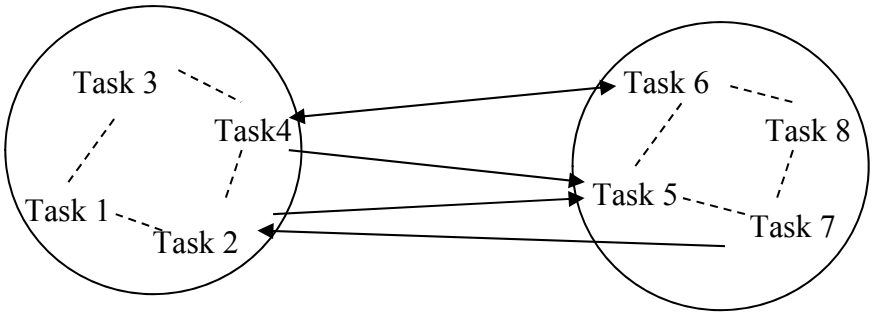


FIG. I–2. Designing subunits.

I–1.4. Designing jobs

Just as poor organization design can limit the performance of groups, poor job design can limit individuals. The following principles should guide job design:

- Organize to maximize customer satisfaction and quality. Maximize employee ownership of the quality of the product or service and establish links to customers, internal or external. Avoid fragmenting work that can prove emotionally dissatisfying to employees.
- Put interdependent people together. Make sure that those who work together on a regular basis are on the same team and working towards the same goals. This may lead to significant changes in organizational structure and role definition for specialists like engineers, quality assurance staff, and maintenance workers.
- Provide meaningful feedback. One of the advantages of organizing teams around a piece of work is that it facilitates performance feedback. To the degree a work group completes a product, process or project, the members receive better information about the quality of their work.
- Team members should be multi-skilled where possible and manage themselves. In traditional organizations, employees work within narrowly defined job classifications. Skills can be increased horizontally (learning what co-workers do) as well as vertically (learning some management tasks). In most cases, the flexibility and performance that comes from this cross training more than offsets the cost. Cross training does not mean that everyone should do all jobs. Some positions require so much additional training or experience that cross training in all functions does not make sense. Some positions are so labour intensive that self-management is not practical. These are the

jobs where people are being used as if they were machines. In time they will evolve into positions that use the capabilities that people possess. Possible solutions are to free up some time by providing extra help or designing the process to eliminate the need for constant human action. Before this free time is created, pushing people towards self-management will only cause frustration.

I–1.5. Establishing an organizational culture that supports projects

Projects are becoming a critical part of organizational success, yet a significant proportion of projects fail to achieve the intended goal. The typical problems are being over-budget, late delivery or cancellation prior to completion. The nuclear industry has traditionally been involved with projects, many of which are large in scale and technically complex.

The industry will continue to be involved in large projects, such as the design and construction of new plants, and, more recently, large scale decommissioning projects. These projects will be technically complex, but because multiple organizations may be involved (e.g. consortia) there will also be organizational complexities. It is important for involved organizations to address the cultural challenges to ensure that the projects in which they are involved are successful.

Some decommissioning projects will extend over prolonged timescales, in some cases over many decades, so there will be challenges in maintaining clarity of purpose and motivation of persons involved during the project's lifetime. Some of these decommissioning projects will have the potential for significant socioeconomic impacts on the communities in the vicinity of the facility being decommissioned. For major decommissioning projects the range of stakeholders will be broad and there will be a need to involve them in planning of the project at an early stage, and to ensure good communications during the progress of the project.

In attempting to implement project management, some organizations are embarking on large scale training programmes, hiring project management consultants, and setting up project offices, but they are not achieving the results they had expected. The reason is that they have not created the environment necessary for project management to grow and flourish. Most organizations are vertical bureaucracies. Project management cuts across this vertical structure, placing authority and accountability for project results in the hands of a project manager. This has an impact on the power of functional managers.

Shifting power from a vertical hierarchy to a cross-functional, temporary organization requires preparation with nothing less than an organizational culture change. This entails establishing a whole set of new behaviours, starting at the top. In a project culture functional managers provide resources to project teams. The project managers must be empowered to make decisions and secure resources.

Management should create a project management methodology that defines the project life cycle and process. This is necessary to ensure consistent repeatable performance across the organization. Senior management must insist on consistent application of the methodology and reward successful project behaviour.

Having the right organizational culture that incorporates project management provides a number of benefits:

— Projects will be aligned with organizational strategies, ensuring that business objectives are met;
— Projects are completed on time;
— Projects come in on budget;
— Projects meet stakeholder expectations;

— Project teams are more effective and efficient.

The characteristics of an organization that is adept at successfully managing projects include:

— *Reporting.* Having the right reporting structure for projects.
— *Prioritization*. Having project prioritization systems to align projects with the organization's strategies and business objectives.
— *Accountability.* Having the right performance management systems to recognize work performed on projects.
— *Integration.* Integrating project management best practices for all projects.

Organizational culture plays perhaps the biggest role in whether an organization is successful in executing projects. If an organization has difficulties in completing projects successfully, the project managers cannot be blamed. They may be working hard within a culture that is not supportive of their efforts. Managers, particularly senior managers need to evaluate the project culture, because until those changes, project managers will consistently struggle to be successful.

I–2. LEADERSHIP

The IAEA has stated that the fundamental safety objective is to protect people and the environment from the harmful effects of ionizing radiation. The fundamental safety objective applies for all facilities and activities, during the lifetime of a facility or radiation source, including planning, location, design, manufacturing, construction, commissioning and operation, as well as decommissioning and closure. This includes the associated transport of radioactive material and management of radioactive waste.

Ten safety principles have been formulated, in order to achieve the fundamental safety objective. The safety principle relevant to leadership and management for safety is Principle 3: Leadership and management for safety, which states:

> "Effective leadership and management for safety must be established and sustained in organizations concerned with, and facilities and activities that give rise to, radiation risks."[2]

Leadership in safety matters has to be demonstrated at the highest levels in an organization. Safety has to be achieved and maintained by means of an effective management system. This system has to integrate all elements of management so that requirements for safety are established and applied coherently with other requirements, including those for human performance, quality and security, and so that safety is not compromised by other requirements or demands. The management system also has to ensure the promotion of a safety culture, the regular assessment of safety performance and the application of lessons learned from experience.

Many day to day aspects of a change effort can be delegated, including gathering information for analysis, developing ideas for new methods and procedures, and designing training materials. However, leadership of a change effort cannot be delegated. To ensure the

2 EUROPEAN ATOMIC ENERGY COMMUNITY, FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS, INTERNATIONAL ATOMIC ENERGY AGENCY, INTERNATIONAL LABOUR ORGANIZATION, INTERNATIONAL MARITIME ORGANIZATION, OECD NUCLEAR ENERGY AGENCY, PAN AMERICAN HEALTH ORGANIZATION, UNITED NATIONS ENVIRONMENT PROGRAMME, WORLD HEALTH ORGANIZATION, Fundamental Safety Principles, IAEA Safety Standards Series No. SF-1, IAEA, Vienna (2006).

success of an organizational change effort, the key people in an organization — from senior executives, middle managers and frontline supervisors — must lead the change process with commitment and skill. Once they are committed to making a change effort successful, managers must acquire and use the attributes they need to make the changes happen. That is, they must change their own behaviour. The behavioural aspects of leading a change initiative, is one of the most difficult to achieve and demands effective leadership. This section describes the attributes change leaders must develop and outlines how leadership behaviour might be developed to acquire these attributes. The process of developing change leadership attributes should start at the beginning of any proposed organizational change and continue through all stages of the change management process.

I-2.1. Transactional and transformational leadership

The difference between these two forms of leadership can be described as the difference between a leader and a manager. Transactional leadership can be viewed as a contractual exchange based on self-interest, whereas transformational leadership seeks to satisfy the higher needs of employees — to encourage employees to transcend their own self-interest for the good of the organization. Managers simply implement the leader's vision. This function, of course, is important — but it is not leadership.

A list of some of the differences is shown below:

- Leaders are interested in the future, whereas managers focus on the present;
- Leaders are interested in change, while managers prefer stability;
- Leaders tend to be long term oriented, while managers focus on the short term;
- Leaders devote much attention and thought to vision, while managers focus on instruction;
- Leaders deal with the why, while managers deal with the how;
- Leaders know how to empower subordinates, while managers tend to control;
- Leaders know how to simplify, while managers enjoy complexity;
- Leaders use their intuition, while managers rely on logic;
- Leaders have a wide outlook that encompasses social concerns, while managers are more preoccupied by organizational and corporate concerns.

The perceived relationship between employees and their managers and leaders is important if there is to be successful organizational change. The decision to pursue organizational change is always, to a greater or lesser extent, imposed on employees, who experience the necessity of change as an effect of the power relationship that exists between them and their managers. Support for change is encouraged if the organization has an overall purpose with which everyone can identify. Employees can then be involved in change without feeling that they are simply submitting to management power. If the only motive for change is to increase profitability there are many who will refuse to identify with it.

The way that the need for change is communicated and explained must take into account the need to associate it with an overall purpose acceptable to all. The relationship pattern may range from adversarial to partnering. It is unlikely that people with an adversarial relationship can work together effectively.

Traditionally, managers told their employees to get a job done and the employees usually did it with no questions asked. Managers thus held a position power over their employees. Management's position power was reinforced by hierarchical organizational structures, rules and policies, and general management practice.

Today, people have more access to information and their attitudes have changed. There has been a flattening of organizational structures and adoption of new management models. Employees, today, no longer accept without question management's edicts as they did before. The extent of this tendency varies throughout the world and is influenced by the national culture.

Today's managers must rely much more on relationships that are based on the characteristics of leadership than relying on mere position power. This is especially true when dealing with organizational change. Management based on relationship power requires employee involvement and motivation rather than unquestioned acceptance. Managers who use relationship power build a more committed workforce, elicit stronger loyalty, and create more motivated and highly performing teams that strive to meet goals and achieve results. In order to develop relationship power, managers need to possess the key attributes of effective change leaders.

In summary, management is a set of processes that can keep a complicated system of people and technology running smoothly. Leadership is a set of processes that create organizations in the first place or adapts them to significantly changing circumstances. Leadership defines what the future should look like, aligns people with that vision, and inspires them to make it happen despite the obstacles.

I–2.2. Key attributes for leading change

The behaviours of the leaders in an organization — that is, what they say and do — has a tremendous impact on whether employees place a high value on making change a success. Managers can send positive messages about change. Figure I–3 illustrates six leadership attributes that managers in any organization at any level can embody to promote the process of change. Effective leaders all possess the six attributes shown and have the skill to apply them effectively to create significant lasting change in their organizations. When applied to a change process, the attributes identified in Fig. I–3 will enable managers to instil the belief in the workforce that change is important, that it will be successful, that it will benefit the whole organization (including the employees themselves), and that it will last.

FIG. I-3. Key attributes for leading change.

Creativity. This is the first key attribute of change leaders, and includes openness to the creativity of others. Certain actions demonstrate a change leader's creativity such as developing innovative training processes and offering new incentives that demonstrate that the change is different and important. Far more critical to the change effort is a leader's openness to considering and trying new ideas that others suggest during the change process. Openness to the creativity of others provides strong motivation for employees to make a change initiative work.

Team orientation. Team orientation demonstrates a manager's reliance on the help of others to make change happen. The process of organizational change dictates that managers cannot make change happen alone. They must enlist others, most often by creating teams. Although the way a leader interacts with teams may vary, all leaders who use teams during a change process must allow the teams to work on tasks without interference and criticism. Change leaders often demonstrate the importance that they place on teamwork by attending some team meetings and regularly letting team members know that the work that they are doing is important.

Listening. This is the attribute that communicates to others that their opinions are valued. Often during a change effort, the communication plan concentrates on a one-way flow of information from leaders down to employees. To be optimally effective during change, however, communication must be two way. People need to know that what they say is heard and valued. Accepting input from employees does not mean decision-making by the masses. It means that people can voice their opinions. Managers need to listen to concerns, suggestions, and comments. Although comments are not always positive, leaders of a change effort often find that people in the organization are not as negative as feared.

Coaching. This may be the most powerful attribute for effecting change. Coaching for performance based on the goals and measures that have been established for the change effort is essential for successful change at all levels of the organization. Coaching helps influence the "people variable" in the change process, the variable that is the most unpredictable and, in the end, the one that will have the most impact on the success or failure of the change effort.

Accountability. Accountability in the context of change means taking personal ownership for the success of the effort. Some managers when confronted by change stand back and observe the changes taking place. This approach places change in the context of something done by others. By standing back and observing, and often criticizing the changes, managers become role models for this kind of behaviour. Another approach managers can take is to participate in and support the change process — take ownership of it. Managers who own the changes, support change with positive input, provide ideas to improve upon it, and offer innovative solutions to the obstacles that inevitably occur during a change process. This helps create and reinforce a culture of organizational learning and growth.

Recognition of people's efforts. Leaders of change should recognize the efforts of employees to make the changes successful. Sometimes recognition of effort when employees are struggling to implement the change can make the difference between failure and eventual success. Expressions of appreciation often cost nothing and take little time, however, it is important that the appreciation is genuine and sincere.

I–2.3. Behaviour change for leaders

Managers must take active steps to acquire and develop the attributes and skills needed to become effective leaders who have the ability to transform organizations. The attributes can be learned but it requires practice and reinforcement. A model for behavioural change is shown in Fig. I–4.

The first step in the behavioural change process is raising awareness, that is, the recognition by a manager that he or she can improve a particular behaviour or acquire a

needed skill. Managers must next develop the desire to change. Several factors can create this desire, including feedback from employees or colleagues. Managers can reflect on the impact of their current behaviour on the people with whom they work. The third step is to acquire new skills. The learning of these skills and other leadership skills can be initiated through practical training for managers that focuses on skill development, experience, and practice rather than management theory. Managers have then to apply the new skills once they have learned or improved them. Learning new skills only begins behavioural change. Applying them daily on the job reinforces what has been learned. Managers like employees need the reinforcement of feedback as they practise their skills. Feedback can be obtained from supervisors, peers, and employees via 360^{o} surveys — an approach currently gaining popularity in many organizations. Forming new habits is the final step in the behavioural change model. New habits are formed when a manager has practised and refined a skill to the point where it is used automatically rather than through conscious effort or thought.

The leadership attributes that can be acquired through a process of behavioural change are complex. If too many behavioural changes are attempted at once, a manager may find his or her efforts to change behaviour become overwhelming. The behavioural change will ultimately fail. Managers who work on acquiring or improving one or two skills at a time will keep the task manageable and stay focused on it. Restricting efforts to one or two skills at a time does not mean that the others will be neglected. The skills required for leading a change are closely interrelated. Coaching skills, for example, are integrally linked to listening skills, team skills, and working relationship skills. Therefore, while focusing on one or two skills, a manager will, at the same time, be strengthening others.

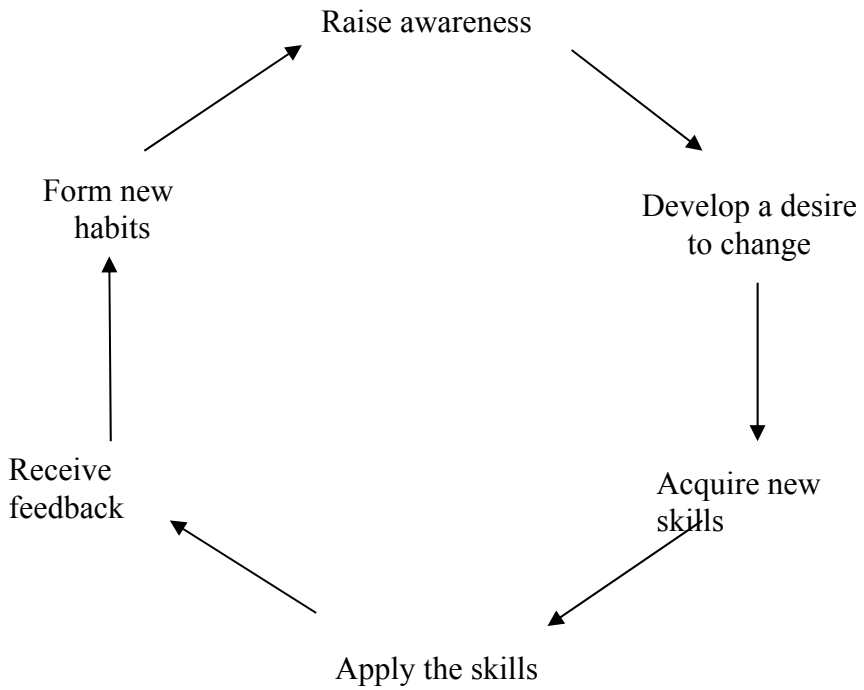


FIG. I–4. Behavioural change model.

I–2.4. Commitment and change

Because leaders cannot lead without the commitment of others, understanding commitment in its various forms is central to their purposes.

The four forms of commitment are:

— *Political:* Commitment to something in order to gain something else;
— *Intellectual:* Commitment of the mind to a good idea;
— *Emotional:* Commitment that arises out of a strong feeling;
— *Spiritual:* Commitment to a higher purpose.

These four forms of commitment combine in various ways to make up a four tiered hierarchy from the shallowest to the most profound. Political commitment is at the lowest level, intellectual or emotional commitment at the next level, and spiritual commitment at the highest level. The least amount of human energy is generated when commitment is purely at the political level, more energy becomes available when either intellectual or emotional commitment is inspired, more still when intellectual and emotional commitment are both inspired, and the greatest amount of energy when spiritual commitment is inspired.

Political commitment involves committing to ideas or actions when we have little or no drive to follow through because our motives have less to do with the object of our commitment, and more to do with what we might gain or avoid by offering the commitment itself. Political commitment is the basic fuel of most organizations and is usually enough when only lower order change is needed. Whenever a change is viewed as a necessary and normal part of the job, political commitment suffices. It can lack the vigour to achieve a challenging common purpose.

A leader calls for intellectual commitment by asking people to support a purpose because they are logically convinced of its value. In order to convince people the leader needs

to create a vision of the future that serves as a focus for a journey to achieve certain goals but also recognizes that they may face resistance or obstacles that have to be overcome. Intellectual commitment in combination with political commitment can accelerate lower order change.

A leader's call for emotional commitment is an appeal to feelings that compel people to act. Where intellectual commitment is about convincing people, winning emotional commitment is about moving them. Just as lower order change can be accelerated by combining intellectual commitment with political commitment, so too, can change be accelerated by combining emotional commitment with political commitment.

However, both intellectual and emotional commitments have limitations. The intellectually committed may not be able to move beyond thought and into action. The emotionally committed, lacking broad perspective, may not fully understand the goals to which they are committing themselves and so may engage in action that is off target. However, gaining both intellectual and emotional commitment — winning both minds and hearts — in the service of the same purpose offers the promise of great results. For sustained change of any kind, other than that of the lowest order, the combination of intellectual and emotional commitment is the minimum commitment needed.

The fourth form of commitment — the most profound form — is spiritual commitment. This form of commitment is rarely seen in organizational life unless the organization is inherently spiritual. The term 'spiritual' is used here not necessarily in the sense of 'religious' but in the sense of a calling from some source larger than one's self. The call may be religious, but might be from some other entity such as a community, a family, a set of ideals or values, or those who are in need. Spiritually committed people give of themselves selflessly and with fervour.

Unlike political commitment, the three higher forms — intellectual, emotional, and spiritual — cannot be bought or sold. Spiritual commitment comes from a deeper source than most people bring to their day to day work.

The kind of commitment leaders will attract depends on the depth at which they articulate their ideas. If they are competent at articulating an idea in a compelling way, then they will draw people with an intellectual commitment. If they are competent at articulating their idea in a way that also comes from the heart, then they will draw people who can offer emotional commitment. If they are competent at articulating an idea that comes from the spirit then they will draw spiritually oriented people who can offer the highest level of commitment. The kind and degree of commitment that a leader draws depends upon his or her competence.

I–3. APPRECIATIVE INQUIRY

Appreciative inquiry **(**AI) is an organizational development process or philosophy that engages individuals within an organizational system in its renewal, change and focused performance. AI is now a commonly accepted practice in the evaluation of organizational development strategy and implementation of organizational effectiveness tactics.

AI is a particular way of asking questions and envisioning the future that fosters positive relationships and builds on the basic goodness in a person, a situation, or an organization. In so doing, it enhances a system's capacity for collaboration and change. It utilizes a four stage process focusing on:

- *Discover:* The identification of organizational processes that work well.
- *Dream:* The envisioning of processes that would work well in the future.
- *Design:* Planning and prioritizing processes that would work well.
- *Destiny* (or *deliver*): The implementation (execution) of the proposed design.

The basic idea is to build organizations around what works, rather than trying to fix what does not. It is the opposite of problem solving. Instead of focusing on fixing what is wrong, AI focuses on how to create more of what is already working. The approach acknowledges the contribution of individuals, in order to increase trust and organizational alignment. The method aims to create meaning by drawing from stories of concrete successes and lends itself to cross-industrial social activities. It can be enjoyable and natural to many managers, who are often sociable people.

There are a variety of approaches to implementing AI, including mass mobilized interviews and a large, diverse gathering called an 'appreciative inquiry summit'. Both approaches involve bringing very large, diverse groups of people together to study and build upon the best in an organization or community.

AI has been used extensively to foster change in businesses (a variety of sectors), health care systems, social profit organizations, educational institutions, communities, local governments, and religious institutions.

I–4. LEVELS OF CHANGE

Organizational change can be thought of in terms of three concentric circles. As shown in Fig. I–5, the inner circle represents systemic change. Systemic change affects the norms, values, and power relationships throughout an organization. To effect long term, meaningful change, leaders need to focus on systemic change. Systemic change usually involves reframing rather than refining. Reframing refers to fundamental changes in something an organization does, and can involve major shifts in thinking. Refining consists of minor changes such as minor process improvements.

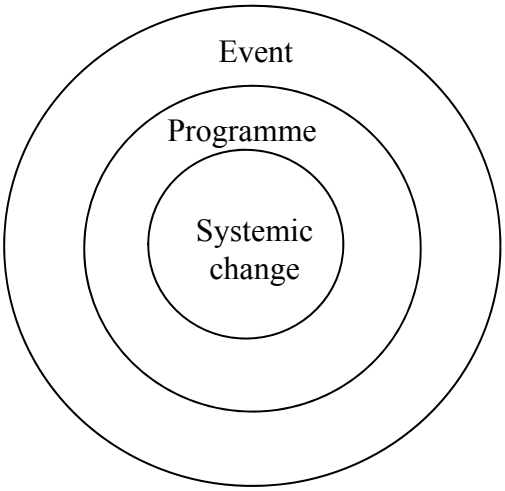


FIG. I–5. Levels of change.

The next layer of change is programme change. This level of change affects the norms and values of parts of the organization without having a major impact on all of it. In many instances, programme change is the result of intended systemic change that never was successfully implemented across the entire organization.

The outer layer of the concentric circles is event change. This level of change has no lasting impact on the norms, values, or power relationships in any part of the organization. Many attempts at systemic change result only in event change. People in the organization continue to operate as they always have.

In summary, systemic change is what leaders most often strive for and expect because this level of change has the greatest impact on the organization's norms, values, and power relationships. It is insufficient to change strategies, structures and systems unless the thinking that created those strategies, structures and systems also changes. Peter Senge referred to this as profound change. Profound change combines "inner" shifts in people's values, aspirations, and behaviours with "outer" shifts in processes, strategies and systems. Profound change builds capacity for doing things in a new way — it builds capacity for ongoing change. In profound change there is learning. Most of the time, however, change initiatives do not go beyond the programme or event level, falling short of the hopes of those committed to stretching the organization to new heights through the change process. The purpose of this publication is to assist the leaders and managers of organizations to implement systemic change successfully.

I–5. ASSESSING WHETHER AN ORGANIZATION IS READY FOR CHANGE

Before a change is being implemented it is recommended to check whether an organization is ready for the change. This could be done by using a simple method as presented by Stewart.[3] Or check the readiness by circling the number that best represents the opinion about the organization being evaluated.

TABLE I–1. EXAMPLE TO ASSESS WHETHER AN ORGANIZATION IS READY FOR CHANGE

No.	Question	Yes	Partly	No
1	Is the sponsor of the proposed change effort a senior level executive?	3	2	1
2	Are all levels of management committed to the change?	3	2	1
3	Does the organizational culture encourage innovation?	3	2	1
4	Does the organizational culture encourage and reward continuous improvement?	3	2	1
5	Has senior management clearly communicated the need for change?	3	2	1
6	Has senior management presented a clear vision of a positive future?	3	2	1
7	Does the organization use measures to assess performance?	3	2	1
8	Will the change effort support other major activities going on in the organization?	3	2	1
9	Has the organization benchmarked itself against other organizations?	3	2	1
10	Do all employees understand the needs of customers of the organization?	3	2	1
11	Does the organization reward individuals and/or teams for being innovative and for identifying root causes of organizational problems?	3	2	1
12	Are employees flexible and cooperative in their work?	3	2	1

3 STEWART, T.A., Rate your readiness to change, Fortune (7 February 1994).

13	Does management effectively communicate with all levels of the organization?	3	2	1
14	Has the organization successfully implemented other change projects?	3	2	1
15	Do employees take personal responsibility for their behaviour?	3	2	1
16	Does the organization make decisions quickly?	3	2	1
	Total score			

Arbitrary norms are as follows: 40–48 = High readiness for change; 24–39 = Moderate readiness for change; 16–23 = Low readiness for change.

I–6. PROVIDING RECOGNITION AND AWARDS

Organizations offer people rewards in exchange for the results that they produce. These rewards can be sorted into two types: intrinsic and extrinsic. Intrinsic rewards are the positive feelings a person gets while performing his or her job. If the job is interesting, exciting, and challenging, the person experiences pleasure just by doing what the job entails. The organization gives extrinsic rewards rather than the rewards just occurring naturally in the work setting. Salary, bonuses, paid leave, awards, and promotions, all come to employees from the organization rather than the job itself.

The opportunity to experience intrinsic rewards increases if the organizational culture encourages the development of trustworthy and good interpersonal relationships (both within and between work groups). Leadership and management skills ensure that employees will be treated with respect by their superiors and will have the skills to tackle challenging problems. Team building provides each employee with a cohesive and disciplined work group that pursue objectives aligned with organizational goals. A well designed organizational structure creates subunits where employees have a reasonable degree of autonomy, and can control their work and see the results of their efforts.

Without interpersonal skills, managers cannot effectively conduct face to face performance reviews. Defensiveness producing styles of communication prevent employees from hearing the performance message. For similar reasons, managers cannot provide effective counselling sessions to help employees improve their performance. A well functioning reward system requires that all managers are skilled at both communications and listening so that they can motivate employees.

Without effective teams, managers and employees in their team are reluctant to engage in open discussion on performance and the issue of distribution of rewards that will allow discussion about different team members' contribution to their individual and group objectives. During organizational change it is important that those employees who make a positive contribution to the implementation of the change are recognised and rewarded

Without a well designed organizational structure where there are significant reciprocal task flows between subunits, it is virtually impossible to establish an objective measure of performance other than for the whole organization. When several interrelated subunits are formed into a more encompassing unit, it is much easier to construct objective measures.

Elements of rewards

There are five main elements with regard to rewards:

— Compensation;
— Benefits;

— Work–life;
— Performance and recognition;
— Development and career opportunities.

The reward strategy is the art of combining these five elements into packages designed to achieve optimal motivation. For a reward strategy to be successful, employees must perceive monetary and non-monetary rewards as being valuable. Details about the main elements are given below:

— *Compensation.* This is the pay provided by an employer to an employee for services rendered (i.e. time, effort and skill). Compensation can comprise fixed pay, variable pay, short term incentive pay and long term incentive pay.
— *Benefits.* Benefits are programmes that the employer uses to supplement the monetary compensation that the employee receives. Examples are medical insurance, retirement pensions, and pay for time not worked such as vacations.
— *Work–life.* This concerns organizational practices, policies and programmes that actively support efforts to help employees at both work and home. Examples are workplace flexibility, caring for dependents and community involvement.
— *Performance and recognition.* Performance is a key component of organizational success. The alignment of organizational, team and individual performance is assessed in order to determine what was accomplished.

Recognition acknowledges or gives special attention to employee actions, efforts, behaviour or performance. It meets an intrinsic psychological need for appreciation for one's effort and can support organizational change by reinforcing certain behaviours that contribute to the successful implementation of the change. The awards can be money or non-money (e.g. verbal recognition, certificates, plaques, etc.). Recognition:

— Reinforces the value of performance improvement;
— Fosters continued improvement although it is not guaranteed;
— Formalizes the process of showing appreciation;
— Provides positive and immediate feedback (depends on the bonus system);
— Fosters communication of valued behaviour and activities;
— Development and career opportunities.

Development involves providing learning experiences designed to enhance employee skills and competencies. Career opportunities involve planning for an employee to advance their own career goals and it may include advancement into a more responsible position in the organization. Development and career opportunities include:

— Tuition assistance;
— New technology training;
— Attendance at external seminars, conferences, etc.;
— Self-development support;
— On the job learning and assignments at a progressively higher level;
— Coaching and mentoring.

The above examples of reward options should provide sufficient information to allow the selection of a portfolio of rewards that can be used to encourage employees to contribute positively to the success of an organizational change effort.

Annex II

EXAMPLE OF A PROCESS FOR MANAGING ORGANIZATIONAL CHANGE

IAEA Safety Standards Series No. GS-R-3 requires that:

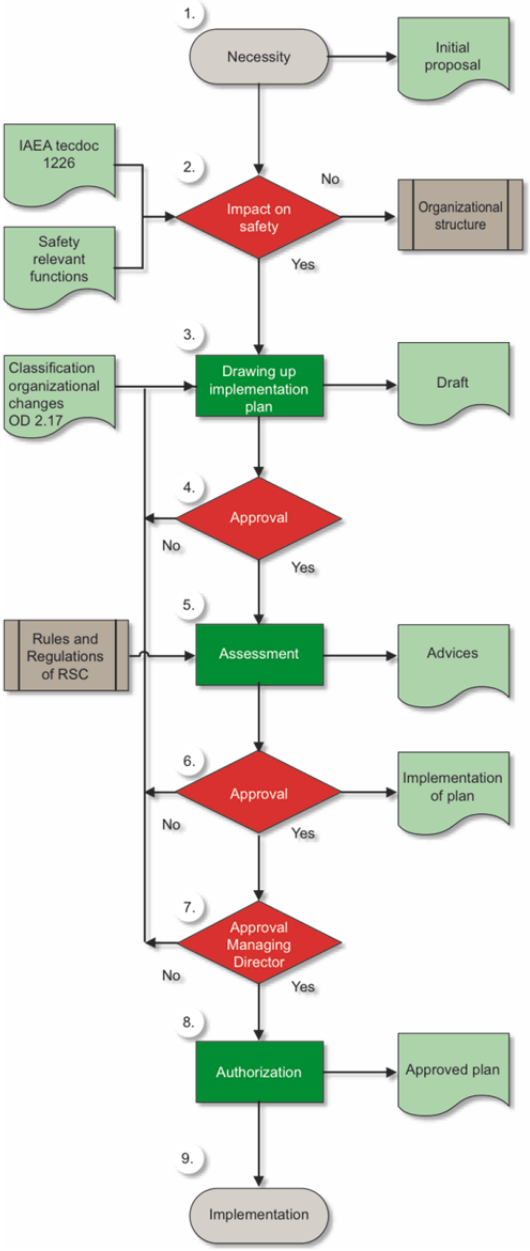
> "Organizational changes shall be evaluated and classified according to their importance to safety and each change shall be justified. The implementation of such changes shall be planned, controlled, communicated, monitored, tracked and recorded to ensure that safety is not compromised." [4]

Additional guidance that has been developed to provide a means of implementing this requirement is contained in IAEA Safety Standards Series No. GS-G-3.1.[5]

The following flow chart, together with the supporting document OD 2.17, presents an example of the tasks and responsibilities to manage organizational changes and to identify possible safety consequences. OD 2.17, presented verbatim, provides the table of contents for an "Implementation Plan of Safety-Relevant Organizational Changes", the definition of safety classes used in the procedure, and the review and approval requirements for this example.

4 INTERNATIONAL ATOMIC ENERGY AGENCY, The Management System for Facilities and Activities, IAEA Safety Standards Series No. GS-R-3, IAEA, Vienna (2006).

5 INTERNATIONAL ATOMIC ENERGY AGENCY, Application of the Management System for Facilities and Activities, IAEA Safety Standards Series No. GS-G-3.1, IAEA, Vienna (2006).



1. ***Responsible Manager***
- Identifies necessary organizational changes.
- Draws up initial proposal.

2. ***Division Manager***
- Assesses proposal.
- Appoints drafters and internal reviewers if the subject is safety related.

3. ***Drafter***
- Draws up draft implementation plan.
- Proposes classification.
- Processes comments.

Reviewers
- Provide initial assessment.

4. ***Division Manager***
- Approves proposal.
- Starts an RSC* assessment, if necessary.
- Requests advice, if necessary, from Manager, Human Resources, Manager, Quality Safety and Environment, and Radiation Protection Supervisor.

5. ***RSC***
- Performs assessment and prepares advice.

Manager Human Resources
- Requests, assessment from Management Team and Staff Council, if necessary.
- Prepares advice.

Radiation Protection Supervisor
- Prepares advice.

Manager, Quality, Safety and Environment
- Prepares advice.

6. ***Division Manager***
- Assesses advices.
- Adjusts, if necessary, the implementation plan.

7. ***Head of Operating Organization***
- *Decides between conflicting views and informs staff involved.*
- Requests approval of the regulatory body if necessary.

8. ***Head of Operating Organization***
- Authorizes implementation plan.

9. ***Division Manager***
- Ensures that implementation take place.

*RCS: Reactor Safety Committee, or equivalent.

OD-2.17/15.02.2012

Classification and Implementation Plan of Safety Relevant Organizational Changes

Change proposal, implementation plan and review requirements
The following should be included in change proposals. The level of detail and format of the documentation may vary depending on the significance, but should be sufficient to justify the grade and assist any assessor.

Table of Contents of the Implementation Plan
- Objective
- Intended change
- Staff and organizational consequences
- Identification and:
  - Evaluation of risk;
  - Possible risks;
  - Consequences;
  - Impact on safety;
  - Probability of risk;
  - Ranking;
  - Possible mitigation actions.
- Impact on safety culture (management);
- Modifications in procedures/instructions;
- Modifications in safety analyses report, operational limits and conditions, licensing documentation, safety assessment documentation, or in supporting documentation;
- Implementation scheme with milestones.

TABLE 1. DEFINITION OF CHANGE CLASSES

Class A[6]	A change that meets the definition of Class B, below, and that will involve a change in organizational structure, resources or functions that will affect the operational limits and conditions or the licensing documentation.
Class B	A change in organizational structure, resources or functions which, if incorrectly interpreted or implemented, could jeopardize safe operation or that could compromise fulfillment of the license requirements, the operational limits and conditions or the licensing documentation.
Class C	A change in organizational structure or resources which, if incorrectly interpreted or implemented, could reduce the ability of the organization to work safely or could reduce the ability to comply with the license requirements, the operational limits and conditions or the licensing documentation.
Class D	All changes with conventional safety aspects for which it has been proved that nuclear safety is not compromised.

6 If the license is affected, then a relicensing process should be initiated

TABLE 2. REVIEW AND APPROVAL REQUIREMENTS

Class	**Review**	**Approval**	
A[7]	Manager, Quality Safety and Environment; Manager, Human Resources; Reactor Safety Committee; Radiation Protection Supervisor.	Head of the operating organization.	Approval of implementation plan and the revised operational limits and conditions by the regulatory body.
B	Manager, Quality Safety and Environment; Manager, Human Resources; Reactor Safety Committee; Radiation Protection Supervisor.	Head of the operating organization.	Approval of implementation plan by the regulatory body.
C	Manager, Quality Safety and Environment; Manager, Human Resources; Reactor Safety Committee; Radiation Protection Supervisor.	Head of the operating organization.	Implementation plan to be send to Regulatory Body for information.
D	Manager, Quality Safety and Environment; Manager, Human Resources.	Head of the operating organization.	

Overview of safety relevant functions

- Division Manager, Nuclear Facilities.
- Reactor Manager.
- Manager, Nuclear Facilities.
- Manager, Quality Safety and Environment.
- Radiation Protection Supervisor

7 If the license is affected, then a re-licensing process should be initiated

Annex III

EXAMPLE OF RISK IDENTIFICATION AND ASSESSMENT

Section 1: Organisational change description	**Change no:**
Business unit: Department:	
Brief description of the proposed change (where appropriate, attach reference documents giving full details, e.g. detailed risk assessment, business case, organisational chart etc.). Proposed implementation date:	

Having completed Section 2 (Risk identification and assessment) I confirm that, in my opinion:- *the proposed change will have no effect/negligible effect on nuclear safety, radiological safety or compliance with the conditions and limitations contained in the company's radioactive waste disposal authorisation. ☐ Or *the proposed change could have an effect on nuclear safety, radiological safety or compliance with the conditions and limitations contained in the company's radioactive waste disposal authorisation. This risk has been assessed as minor/significant/major. A Management of Change submission is attached in support of this risk assessment and categorisation form. ☐			
Name: (Proposing manager)	Job title:	Signature:	Date:
Organisational Change Committee (OCC) categorisation:- Cat A (requires regulator agreement) ☐ Cat B (requires submission to regulator 28 days prior to implementation) ☐ Cat C (approved by OCC Chairman) ☐ Cat D (approved by OCC Secretary) ☐			
OCC approver's name:	Position held on OCC:	Signature:	Date:

Section 2 Risk identification and assessment							
Please identify the risks associated with the organisational change by answering *Yes* or *No* to the questions below. Where the answer to the question is *Yes,* please assess the risk as 'Negligible', 'Minor', 'Significant' or 'Major' by ticking the relevant column. Guidance is provided in Site Procedure number XX.							
Factors	**Description**	**Yes/No**	**Negligible**	**Minor**	**Significant**	**Major**	**Justification**
Operational risks (including maintenance)	Could lead to a deterioration in safety due to changes to how the operation is performed.						
	Could lead to a deterioration in safety due to changes to who undertakes the operation.						
	Could lead to a deterioration in safety due to changes to when the operation is performed.						
Emergency response risks	Could/will result in the loss of individual(s) who has an emergency response role.						
	Could affect the ability to respond to a nuclear emergency (e.g. Devonport site accident or reactor accident).						
	Could affect fault recovery on plant, system or equipment.						
Control and supervision risks	Could have an adverse effect on the ability to control and supervise.						
	Could result in a reduction in safety performance due to additional supervisory burden arising from inexperienced staff or increases/decreases in personnel.						
Management and organisational risks	Could affect safety due to a transfer of responsibilities.						
	Could result in deterioration in safety due to conflict of interest (e.g. commercial pressures)						

Factors	Description	Yes/No	Negligible	Minor	Significant	Major	Justification
Management and organisational risks (continued)	Could affect safety due to work being outsourced or contracted out that was previously undertaken 'in house'.						
	Could affect the interfaces between functions/departments both internal and external to the company.						
	Could result in an increase workload for the department/function leading to a drop in performance.						
	Scope/complexity of changes could result in a safety or waste management issue not being captured, understood or addressed.						
	Could adversely affect safety because the time between initial awareness of change and the change being fully implemented is lengthy and the exposure to additional risk during the change is prolonged.						
	Could adversely affect safety because the timetable for the change is excessively short.						
People related risks	Could result in an increase to individual(s) workload that will affect safety.						
	Could result in lack of understanding of individual roles and responsibilities and reporting lines.						
	Could affect the interfaces between individuals both internal and external to the company.						

Factors	Descriptions	Yes/No	Negligible	Minor	Significant	Major	Justification
People related risks (continued)	Changes will adversely affect moral or individual commitment (e.g. resulting from redundancies, outsourcing, changes in shift patterns, working conditions, income or job satisfaction).						
	Could have an adverse effect on safety culture.						
Technical capability risks	Could result in loss of knowledge of the facilities, NSRP and their associated hazards.						
	Could result in the loss of skills to operate/maintain plant and facilities.						
	Could affect the company's ability to act as an intelligent customer.						
	Could result in vulnerabilities due to age profiles, or lack of robust succession and contingency plans.						
	Could affect performance due to the reliance on external support.						
	Will result in training requirements for existing or new staff.						
Documentation and compliance risks	Could affect the ability to comply with company or legal requirements as defined in safety case(s), or other documentation.						
	Could affect the ability to produce safety case(s), documents or other documentation.						
	Could/will result in the need to change the relevant safety case(s), documents or other documentation.						

Factors	Descriptions	Yes/No	Negligible	Minor	Significant	Major	Justification
Other risks	Any other factor which is judged to have a safety or waste management impact but is not covered by one of the factors described above.						
	Changes that affect the legal basis of the licence.						

Comments:			
Name: (OCC Secretary)	**Job title:**	**Signature:**	**Date:**

Annex IV

Management and Control of Organizational Change

Nuclear Generation Limited

Company Specification

Management and Control of Organisational Change

Originated by: Jackie Graham
MoC & Policy Development Consultant
Date: October 2011

Reviewed by: MoC Peer Group
Date: December 2011

Approved by: Andy Hobbs
HR Manager, OD,P&R
Date: February 2012

Revision	Amendment	Impact level	Date
001	Scope of document amended to cover management of all organisational change including changes to structures, resource levels, processes and working practices. Changes are not marked. Incorporates BE/SPEC/HR/MOC/100 which is withdrawn. BEG/FORM/HR/MOC/004 is withdrawn.	Moderate	February 2012

Contents

1 Purpose

The purpose of this company specification is to set out the arrangements for managing and controlling organisational change within Nuclear Generation to ensure effective implementation of change whilst remaining focused on safe, reliable operation.

It sets out our arrangements for compliance with Nuclear Site Licence Condition 36 (Ref 1), Occupational Health & Safety Standards (Ref 2) and Environmental Legislation (Ref 3), some of which requires permitting:

- the Environmental Permitting (England and Wales) Regulations 2010 (EPR10), as amended, which covers Radioactive Substances, Pollution Prevention & Control and Water Resource activities for NGL sites in England,
- the Radioactive Substances Act 1993 (RSA93), as amended, which covers Radioactive Substances activities in Scotland,
- the Pollution Prevention and Control (Scotland) Regulations 2000 (PPC00), as amended,
- the Marine (Scotland) Act 2010 and
- the Marine Licensing (Exempted Activities) (Scottish Inshore Region) Order 2011.

Reference 3 should be consulted for a full list of environmental legislation that might have implications for managing change within Nuclear Generation.

2 Scope

This company specification is relevant for managing all organisational changes including changes to structures, resource levels, processes and working practices. The process for managing and controlling organisational change is outlined in Figure 2. However, changes to the organisational structure or resources which have the potential to impact on nuclear safety (LC36) or compliance with environmental legislation will be subject to additional rigour and scrutiny as detailed in the process outlined in Figure 3

For the purposes of this document, nuclear safety means nuclear and radiological safety, security of nuclear materials and protection of the environment from radioactive discharges/disposals as defined in the Nuclear Industry Code of Practice – Nuclear Baseline and the Management of Organisational Change (Ref 4).

This company specification does not apply to engineering changes; these are covered by LC22, the procedure for which is described in BEG/SPEC/DAO/020 – Modification Process (Ref 5).

3. Responsibilities

3.1 Change Proposer

Recognises the need for change and is responsible for:

- driving the change through all stages to implementation ensuring that this company specification is followed
- undertaking Post Implementation Review (PIR) following implementation, to confirm that the change is complete, to confirm that the objectives of the change have been achieved, to confirm that the risks have been adequately managed, to assess the effectiveness of the change and to identify any lessons learned.

3.2 Change Assessor (for LC36 changes)

Responsible for:

- providing an independent assessment of nuclear safety related changes
- monitoring the application of the process through inspection, review and audit.

Change Assessors should consult the relevant experts in support of their assessment or ensure that such consultation has taken place during the production of a change plan/MoC proposal.

3.3 Change Approver

Responsible for:

- approving the change plan/MoC proposal
- ensuring the adequacy of the change plan/MoC proposal and that appropriate resources and responsibilities are allocated to manage the change
- ensuring that the Change Proposer undertakes a quality review of the change in a timely manner.

3.4 LC36 Process Owner

Responsible for:

- ensuring an effective process exists that meets the requirements of LC36 and directing the organisation, as required, on LC36 matters and associated documentation
- ensuring interfaces between MoC and other processes (internal and external) are correctly identified and referenced
- providing appropriate training and a focal point for all relevant queries and issues from both a technical and compliance perspective
- proactively improving the process and ensuring it is reviewed and updated at the appropriate intervals
- ensuring modifications to the process are correctly documented and records maintained of any change
- reviewing whether the activities required by the process have been properly resourced and conducted by SQEPs
- maintaining an overview for consistency, cumulative effects, latent organisational conditions, cultural changes and ‘salami-slicing’.

3.5 Corporate MoC Co-ordinator

Responsible for:

- maintaining a database of change proposals (MoC Register)
- maintaining copies of change proposals and PIRs for central changes
- ensuring organisational changes are categorised/graded and assessed by an appropriately authorised person or body
- maintaining lists of those authorised to perform roles within the MoC process

- verifying that all organisational changes are satisfactorily closed-out
- liaising with the Secretary of the Nuclear Safety Committee to ensure the appropriate process is followed for major change proposals (grades A* and A)
- liaising with the Office for Nuclear Regulation (ONR) in relation to major change proposals (grades A* and A).

3.6 Station Directors/Heads of Functions

Responsible for:

- ensuring that line managers and staff, within his/her remit, manage change in accordance with this company specification
- ensuring that individuals who perform duties under LC36 are suitably qualified and experienced and have undergone the necessary training as outlined in Appendix G.

3.7 Station/Function HR Managers

Responsible for:

- monitoring the application of this company specification through the accountability process with the Station Director/Head of Function and through the normal arrangements for audit
- directing the station/function, as required, on LC36 matters and associated documentation.

3.8 Station/Function MoC Co-ordinators

Responsible for:

- liaising with the Corporate MoC Co-ordinator to register any new changes on the MoC Register (Function Co-ordinators)
- registering any new changes on the MoC Register (Station Co-ordinators)
- co-ordinating the training of relevant individuals as outlined in Appendix G
- maintaining the station/function MoC Register
- ensuring signed change proposals and Post Implementation Reviews are submitted to the Corporate MoC Co-ordinator (Function Co-ordinators)
- producing monthly reports on changes in progress (Awaiting Approval, Live and Awaiting PIR)
- arranging quarterly steering group meetings - producing agenda for Chairman approval, sending out all relevant paperwork, producing notes of meeting for Chairman approval
- co-ordinating the production of the Baseline Statement and reviews
- supporting the station/function, as required, on LC36 matters and associated documentation.

3.9 Organisational Change Steering Group

Responsible for:

- providing governance and oversight of all organisational change to ensure that change is being adequately considered and implemented
- considering the cumulative effect of changes on the station/department
- ensuring that the location is compliant with LC36 and environmental legislation.

3.10 Nuclear Safety Committee

Responsible for providing consideration and advice in relation to the control of significant change to the organisational structure or resources (i.e. solely those graded A* and A) such that:

a) changes achieve their objectives with any associated risks properly considered and reduced so far as is reasonably practicable

b) compliance with Licence Condition 36 is maintained on changes which may impact nuclear safety.

3.11 Nuclear Generation Limited Board

Responsible for:

- ensuring that changes to company organisation, resources and processes are properly justified and managed so as to achieve their objectives and minimise any associated risks
- monitoring Nuclear Generation's organisational structure and approving modifications, where appropriate, in the light of experience and changing circumstances
- reviewing periodically the company's management of change arrangements and changes on the Corporate MoC Register to ensure organisational change is being managed effectively and in a controlled and co-ordinated manner with no adverse effect on the safe operation of business.

4. Practice

4.1 Introduction

Change is an essential part of business improvement, but it is also an error trap. As a nuclear licensee we would not expect, nor ask an engineer to modify a piece of plant without undertaking the appropriate risk assessment and managing the change systematically. Similarly, changes to the organisational structure, resource levels, processes and working practices should be given the same rigour to avoid error traps and organisational drift.

Ill-conceived or poorly implemented change can have a major impact on both safety and business performance as illustrated by the many serious accidents and events that have occurred over the years, e.g. BP Texas City disaster. In a significant number of cases, events have been caused or made more severe by inadequate consideration of the safety implications of the organisation's structure, such as staffing and management of change arrangements.

Often changes are planned in isolation and this approach can result in conflicts, duplications, gaps or overlaps of responsibilities. Properly managed change can enhance nuclear safety, legal compliance, organisational effectiveness and cost competitiveness. Inappropriately managed change is an error trap as it creates error-likely situations. Any proposed change to structure, resource levels, personnel or processes, needs to be reviewed in the wider context of the business, other business units, trades union implications, communications and also in relation to licence conditions 10, 12 & 36 where these apply.

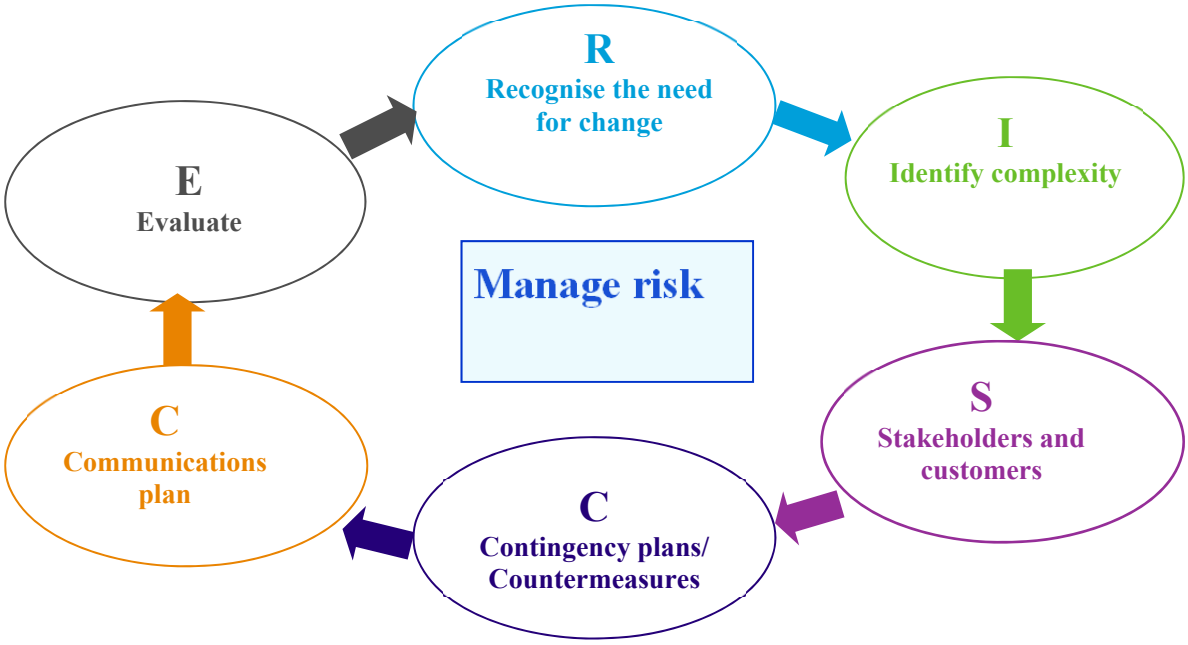
The undernoted organisational design principles should be considered when making changes to the organisation's structure.

- Span of Control
  This relates to the number of people directly answerable to a leader. A leader cannot effectively manage too many subordinates. Span of control generally varies with level (typically 4-8 for upper levels and 8-16 for lower levels) but this depends on the nature of the work and the capabilities of subordinates.
- Levels of Hierarchy
  EDF Energy operates with a relatively flat structure. The intent behind this is to make the organisation leaner, fitter, more flexible and thus better able to cope with change. A general principle within EDF Energy is that the number of layers between staff and senior management should be minimised so far as possible.
- Clear roles and responsibilities (including authorities for decision making)
  The roles and responsibilities of leaders, individuals and teams must be clearly identified and described with appropriate accountability.
- Decision making
  Decisions should be delegated to the lowest practicable level to minimise bureaucracy, speed up processes and develop people, providing leaders equip and train their team members appropriately.
- Functional structure
  Functional as well as hierarchical lines should be considered.
- Customer focus
  The expectations of customers and stakeholders should be given appropriate priority throughout the change process.
- Maintenance of capability
  The functions or authorities accountable for maintaining capability should be defined.

4.2 Developing a Change Plan/MoC Proposal

The following 6-step model shall be used when developing a change plan/MoC proposal – although the degree of consideration against each of these will depend on the scale and size of the change being considered and the potential impact of the change on nuclear safety and legal compliance.

Figure 1 6-step model



- **R**ecognize the need for change and develop a clear picture of the desired end point.
- **I**dentify the level of complexity and risk and hence determine the scope of change plan required.
- **S**takeholders/Customers - identify key stakeholders and customers and ensure the change plan includes relevant actions to ensure appropriate and adequate consultation.
- **C**ontingency Plans/Countermeasures – identify appropriate contingency arrangements/ countermeasures for inclusion in the change plan.
- **C**ommunication – develop a clear, targeted and timely communication plan.
- **E**valuate the effectiveness of the change to determine whether the objectives have been met and to identify any lessons learnt.

4.2.1 Recognising the need for change and planning ahead

Recognition begins when drivers (internal and external) shift, modify or adjust some aspect or element of organisation, work processes or the commercial needs of the business. Change is an essential part of business improvement which prevents the organisation becoming complacent and stimulates improvement.

Examples of drivers that signal the need for change are:

- Personnel changes – such as attrition, refreshment, secondments, transfers, disability or motivation as indicated by employee surveys.
- Structural changes – re-engineering and reorganisation initiatives.
- Role or responsibility changes – either caused by a restructuring or created as a need for individual development.
- Existing work processes and reviews produce change as a normal by-product, e.g. condition reports (CR), operational experience (OPEX), feedback and learning, procedure revisions, corrective action review bodies, event panels etc.

- External parties can create pressure to change, e.g. market pressures, changes in regulation etc.
- Process owners' reactions to external influence must balance the needs of internal and external customers.
- Financial restrictions can be imposed on organisations to improve efficiency.

It is not always necessary to introduce wholesale change to address some of the factors identified above. There may be other ways of addressing issues. The following questions should be considered.

- Why are we doing this?
- What do we want to achieve with this change?
- What are the consequences of not changing?
- What are the options?
- Which would be the simplest?
- Which would minimise risks (particularly those which may impact nuclear safety or compliance with environmental legislation)?

Planning ahead can make the implementation phase of any change programme run more smoothly. Thus taking time out at the beginning to consider all eventualities can be a worthwhile investment and speed up the process later on, or even avoid having to start again.

There are a variety of ways in which this 'design' phase of change can be undertaken. Certain changes need to be determined by a small group of interested parties, before wider engagement is undertaken. Alternatively, it may be more appropriate to use a small group to determine a set of principles for the change, but then, to gain greater buy-in to the change, develop the details of the change through involving a wider group of people, thus ensuring their buy-in to the change.

It is recommended that for more complex changes an 'optioneering' workshop is held with appropriate attendees. There are often many ways to 'skin a cat' and the best way of determining the most appropriate solution is through identifying all the potential options, determine the strengths, weaknesses, benefits and risks of each approach and determine the appropriate best fit solution. Beware of jumping to solutions too quickly based on past experiences or 'what I have done before'.

Consider the following questions.

- What is changing? Is it clearly defined?
- Is there any information from previous changes/change programmes available to support you in making this change?
- Are there other people from across the business who have relevant experience/expertise to help you in making this change?
- Is the basis/reason for the change clear such that it can be relayed to all customers and stakeholders?
- Could the change impact nuclear safety or compliance with environmental legislation?
- If the change involves a significant change in business practices, has appropriate legal and regulatory advice been sought from the Legal Department?

- What will it look like when you get there (i.e. end state) and how will you know when you are there (identify success criteria)?
- What steps will you need to take to get there?
- What resources do you need to implement the change?
- How much of the change can you achieve yourself, and what parts of the change do you need help with?
- Do you need/have senior level sponsorship for the change?
- If the change involves a change to organisational structure, does the end state align to the organisational design principles described in section 4.1?
- When are you going to do this? Are there any deadlines/constraints to consider?

If the above work has been undertaken, the basis of the change plan/MoC proposal, will already have been produced, thus should not be an additional nor onerous task.

4.2.2 Identify level of complexity and risk

Identify elements of high risk or high complexity within the change. Consider the following questions.

- What are the risks associated with this change?
- What might go wrong?
- What is the likelihood and severity?
- Does the change impact nuclear safety or legal compliance?

In identifying potential risks, the change proposer shall involve all appropriate stakeholders. Many of the risks will be self-evident, but some judgement is needed to determine the level of risk. Seek advice from local HR or from Safety & Regulation Division (SRD).

The risk assessment needs to:

- consider both the long and short term risks
- consider the change itself and the implementation
- consider any interaction with other ongoing changes
- state how the identified risks are to be managed through ‘enablers’ (to prevent the risk materialising) and countermeasures/contingency plans (to mitigate the consequences)
- describe how the effectiveness of the change will be monitored and reviewed through (where appropriate) the use of performance indicators.

The Organisational Change Risk Assessment and Categorisation Form (Ref 6) shown in Appendix A shall be completed to determine whether the change has the potential to impact nuclear safety or compliance with environmental legislation and if so, what category of change the proposal should be (LC36 changes).

Guidance on risk assessment and categorisation is contained in Appendix B.

If it is determined that the proposed organisational change has the potential to impact nuclear safety or compliance with environmental legislation, the additional steps outlined in Figure 3 shall be followed to ensure compliance with LC36 and environmental legislation.

Where the release of staff results in a loss of post(s) and it is deemed this has the potential to impact on nuclear safety or legal compliance, the Staff Release Forms (Ref 7) shown in Appendix F shall be used. Please note that changes involving complex or multiple staff

moves, (e.g. an office closure), may also need to be considered and justified. Changes like these can affect safety or the business in unexpected ways.

4.2.3 Stakeholders and customers

Who (define groups, departments, individuals) will this change touch and where do they stand in terms of support for the change? Consultation and explanation of the proposed change, including its rationale, should be given to stakeholders (including staff/trades unions, regulators, suppliers and customers as appropriate) at the earliest opportunity and at relevant points throughout the process. Consider the benefits for the groups you are talking to and relay the changes in a way that they can relate to. It is essential that you seek to explain the change to those affected as it needs to be understood, and managed in a way that people can cope effectively with it. Change can be unsettling, so leaders need to be a settling influence.

It is important to understand the impact of changes so that appropriate resources (including financial) can be obtained to ensure effective implementation.

Careful consideration needs to be given to the timing of any announcements regarding proposed changes as getting this wrong can have a negative impact on the people involved and can be detrimental to the implementation of the change. The effect of a change starts to become real once it has been announced therefore announcing changes 'subject to MoC' should be avoided where possible.

4.2.4 Contingency plans/countermeasures

Identify error likely situations/human performance traps etc. that this change may create and develop contingency plans/countermeasures.

Consider the following questions.

- What countermeasures do you need to put in place in case the enablers are not effective or there are unexpected events?
- What human performance traps could be created by this change?
- What indicators do you need to monitor the change and identify if issues are arising that need to be addressed? i.e. how will you know if things are going wrong?
- What are your fall back plans, if things start to go wrong?

4.2.5 Communications plan

It is important to ensure that communications with affected parties ensure that the reasoning behind the change is understood. Whilst the affected parties may have bought into the concept of the change, concerns and issues may arise once implementation of the change begins. It is therefore important to ensure that communication takes place throughout all stages of the change.

When developing a communications plan consideration needs to be given to the audiences and the messages to be delivered so that the most appropriate style, format, and medium are used for each audience.

Consider the following questions.

- Have you identified all the audiences and their key issues?
- Is the change goal understood?

- What does the change look like?
- What is the value/benefit to the organisation/function/individual?
- What do you want your audience to know?
- What do you expect them to do?
- When can they expect to see the change happen? Do you have a timeline?
- Has a mechanism for feedback to/from senior management been established?
- What involvement do you want/need from senior management in communicating this change?
- Have you identified what the appropriate level of consultation is required for the people who are likely to be affected by the change?

4.2.6 Evaluate

For all changes, it is necessary to undertake a review at the end of the change to determine whether you have achieved what you set out to, i.e. objectives of the change have been achieved and also to ensure that any risks have been adequately controlled.

In addition, particularly for complex changes or those that will take place over an extended period of time, it is important that oversight is provided during the implementation stage of the change. Thus progress can be tracked, adjustments made as necessary, and countermeasures can be deployed as appropriate.

- Consider the following questions.
    - How will you evaluate the effectiveness of the change – both during the change and post implementation?
    - Have performance indicators been established to track the effectiveness of the change?
    - Have specific review dates been established?
    - Is there a process in place to track/measure progress of the change and report on its status?
- For complex changes, performance measures shall be established and reviewed at regular intervals during the change. Examples of performance measures are:
    - costs
    - number of condition reports
    - human performance events
    - error/defect rate
    - progress against training plan
    - customer satisfaction
    - sickness absence levels
    - staff turnover
    - overtime levels
    - feedback from affected personnel – written or verbal.

The Organisational Change Steering Group has a responsibility to ensure effective governance and oversight of changes. The Steering Group shall meet on a regular basis, quarterly as a minimum. This may be a stand alone meeting or may be included as a standing agenda item on a regular management meeting. Membership shall consist of:

- Station Director/Head of Central Support Function (CSF)
- Lead Team
- Local MoC Co-ordinator
- NIO Evaluator.

As a minimum the Station Director/Head of CSF (or deputy), MoC Co-ordinator and any manager (or deputy) who has changes in progress shall be in attendance.

As a minimum, review the following items at the Steering Group meetings.

- Review the current changes i.e. awaiting approval, live and awaiting PIR
- Review completed changes. The Post Implementation Review Forms will be reviewed to enable the Steering Group to assess the quality of PIRs being produced and that the review demonstrates objectives have been achieved and risks adequately controlled.
- Review of corporate changes which have been identified as relevant to stations. An assessment shall be made by the Steering Group as to what actions are required of the station i.e. the writing of a local MoC proposal or simply noting the change
- Identification of future changes
- Review of other organisational changes (non-LC36)
- Training requirements.

Minutes of the meetings shall be recorded and saved on the V drive under Management of Change/Minutes of Steering Group Meetings. An example template form (ref 8) is shown in Appendix I and may assist with the recording of the minutes. However an alternative format may be used if required.

4.3 Content of the Change Plan/MoC Proposal

The proposal shall include an outline plan for implementation that addresses the actions necessary to enable the change to be taken forward and implemented. This implementation plan can be included in the change plan/MoC proposal or can be a stand alone document.

The change plan/MoC proposal shall include:

- Title of Change
- Unique Reference Number (changes which may impact nuclear safety or compliance with environmental legislation only)
- Categorisation/Grade (changes which may impact nuclear safety or compliance with environmental legislation only)
- Reason for the change
- Options considered and the rationale for the selected option
- Description of what will change (including clear start and end points)
- Risks (what could go wrong)
- Enablers (activities needed to make the change happen)
- Contingency plans/countermeasures (what can be done if something goes wrong)
- Monitoring and review requirements (including performance measures where appropriate)

- Implementation Date
- Post Implementation Review Date.

A change plan/MoC proposal form (Ref 9) is shown in Appendix D. Please note that this format may not be appropriate for change proposals that require a lot of detail. In these circumstances, it is recommended that the change proposal is produced in a report format, but as a minimum, keeping the same content

It is essential that all enablers are identified before implementation of the change. Enablers are the specific activities that need to be completed to ensure delivery of the change and/or avoid any identified potential risk. These enablers shall be SMART – specific, measurable, achievable, realistic and timely.

As highlighted above enablers can be included in the overall change plan/MoC proposal or can be covered in a stand alone document (enabler/implementation plan). They typically include mitigating actions to address risk, e.g.:

- conducting of handovers where individuals change post/role
- review and completion of training
- completion of communication plans
- arrangements to monitor the effect of the change
- contingency planning
- completion of administrative forms
- access to systems, e.g. Passport, SAP etc.
- review and updating of relevant documents e.g. department manual, procedures, post/training profiles
- timing and requirements for post-implementation review, feedback and close-out.

Suitable contingency plans/countermeasures need to be identified in case the change fails, does not progress adequately or there is a negative impact on nuclear safety or compliance with environmental legislation. These shall be identified in the change plan/MoC proposal and must be realistic/easily implemented.

Examples of countermeasures may include:

- temporary suspension of the change
- reallocation of responsibilities
- provision of addition resources
- reverting to the original structure (this may not be practicable).

The change plan/MoC Proposal (Ref 9) shall be signed off by both the change proposer and approver. Change proposals which are subject to formal assessment shall also be signed off by the Assessor (where appropriate). See Figure 3 for process flow chart and Appendix C Table 2 for Assessment and Approval Routes.

Whilst ‘like for like’ personnel changes do not require a change plan, there is a need to ensure effective handover of duties/responsibilities. An enabler/handover plan shall be used in these circumstances. A template (Ref 10) is provided and shown in Appendix E.

4.4 Post Implementation Review

A post implementation review shall take place (normally 6 or 12 months after implementation depending on the scale and type of change) irrespective of the perceived progress and status of the change. The Post Implementation Review (PIR) Form (Ref 11) shown in Appendix H shall be used to document the outcome.

The outcome of the review shall include lessons learnt from the change and where appropriate this information shall be fed into the CAP (Ref 12) and OPEX (Ref 13) processes.

If the review finds the change was poorly conceived or implemented, additional actions may be required to address any issues identified. This may prompt a further review, further change plan/MoC proposal or even a reversal of the change.

The Organisation Change Steering Group shall review the completed PIRs to ensure that the PIR process is being effectively deployed and any actions identified are progressed.

The PIR process is outlined in Figure 4.

5. Definitions

Nuclear Safety	Nuclear and radiological safety, security of nuclear materials and protection of the environment from radioactive discharges/disposals
Salami-slicing	Where a larger (more significant) change is split into a series of smaller (less significant) changes, with the result that the combined impact of the overall change is not properly considered.
Organisational Drift	Where change leads to a gradual degradation of processes and organisational capability
SQEP	Suitably Qualified Experienced Personnel
NSC	Nuclear Safety Committee
ONR	Office for Nuclear Regulation

6. References

1	BEG/ICP/HR/MOC/001	Licence Condition 36(LC36) Control of Organisational Capability – Compliance Arrangements
2	OHSAS 18001	Occupational Health & Safety Standards
3	BEG/SPEC/SHE/ENVI/002	Register of Environmental Legislative, Regulatory and Other Policy Requirements
4	Nuclear Industry Code of Practice (NICoP)	Nuclear Baseline and the Management of Organisational Change
5	BEG/SPEC/DAO/020	Modifications Process
6	BEG/FORM/HR/MOC/005	Organisational Change Risk Assessment & Categorisation Form
7	BEG/FORM/HR/MOC/003	Staff Release Forms A&B
8	BEG/FORM/HR/MOC/007	Organisational Change Steering Group Record of Minutes Form
9	BEG/FORM/HR/MOC/002	Change Plan/MoC Proposal Form
10	BEG/FORM/HR/MOC/006	Enabler/Handover Plan Form
11	BEG/FORM/HR/MOC/001	Post Implementation review (PIR) Form
12	BEG/ICP/OPSV/CAP/001	Corrective Action Programme and Self Assessment
13	BEG/ICP/OPSV/OPEX/001	Implementing Effective Operating Experience (OPEX) Process
14	BEG/ICP/QUA/006	Records

7. Records

The principal method of recording change information, both centrally and at stations, is through an electronic Change Register. This shall hold details of each change and associated documentation (Change Proposals, Staff Release Forms and Post Implementation Review (PIR) Forms) which will be scanned electronically onto the Register. The Register is owned and maintained by the HR Department for Station changes and Organisational Design, Performance & Reward for central changes as part of their responsibility for LC36 and the implementation of this Specification.

All permanent records associated with this Specification shall be controlled, stored and archived in accordance with the requirements of BEG/ICP/QUA/006 (Ref 14).

Figure 2 Process flow chart for the management and control of organisational change

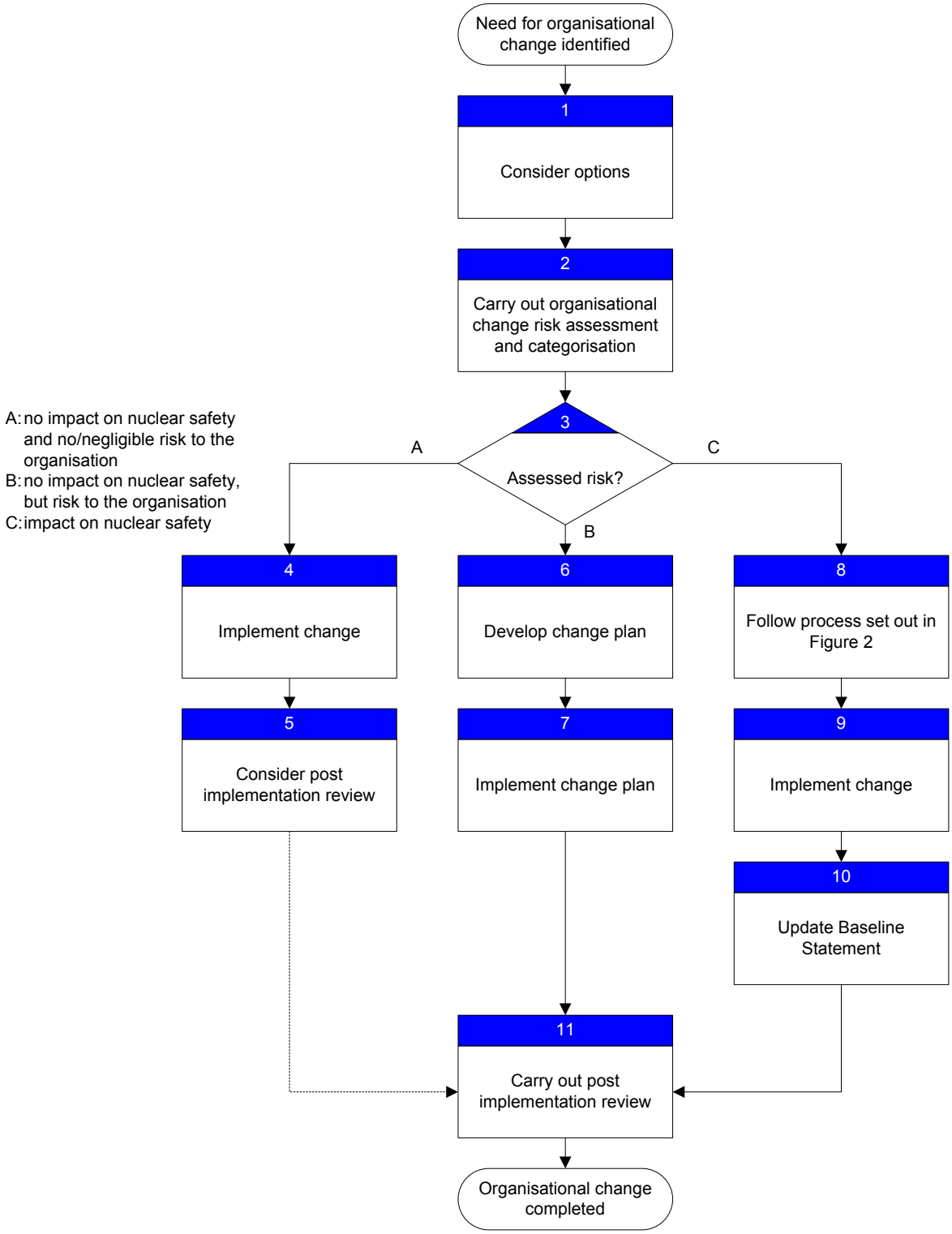
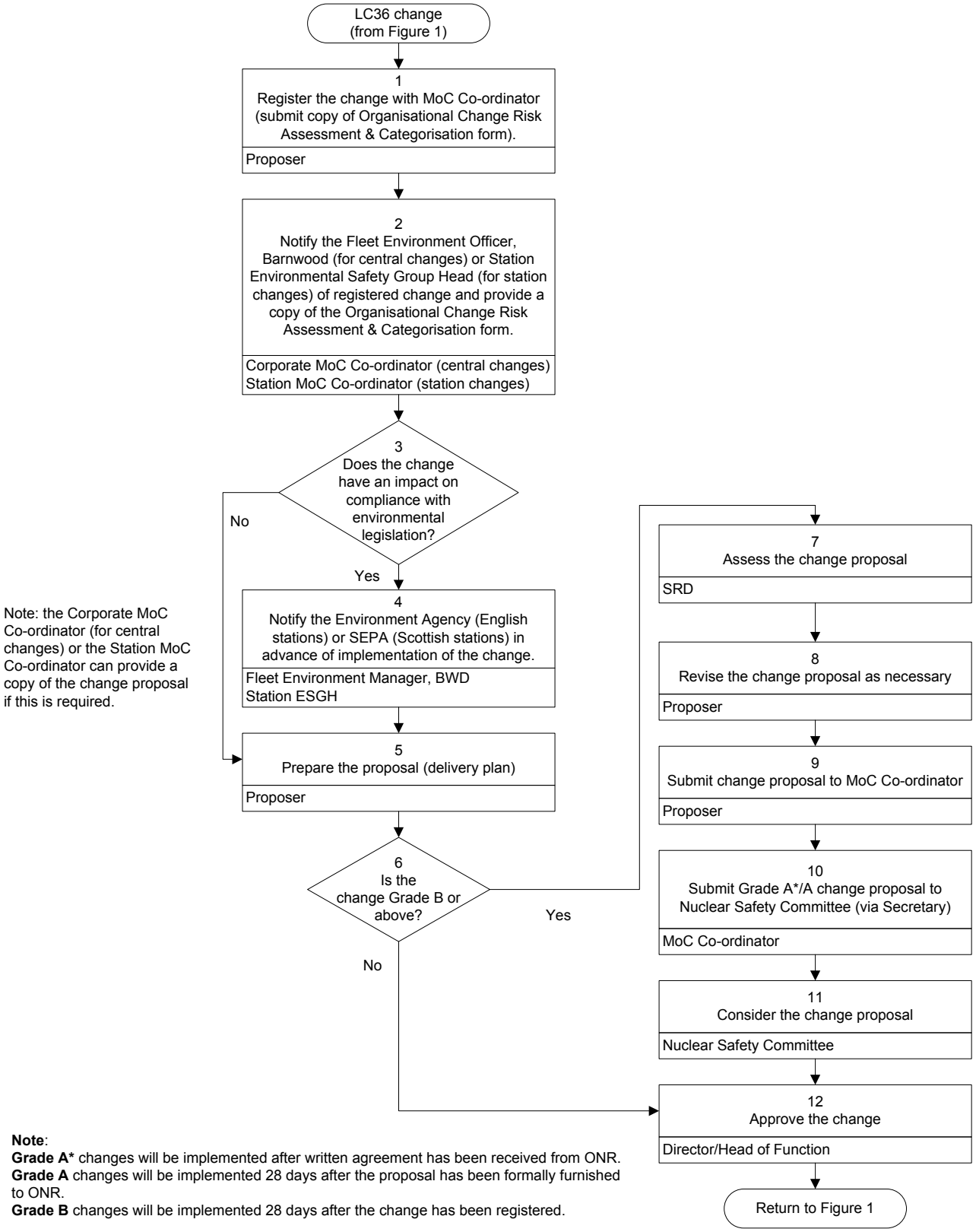


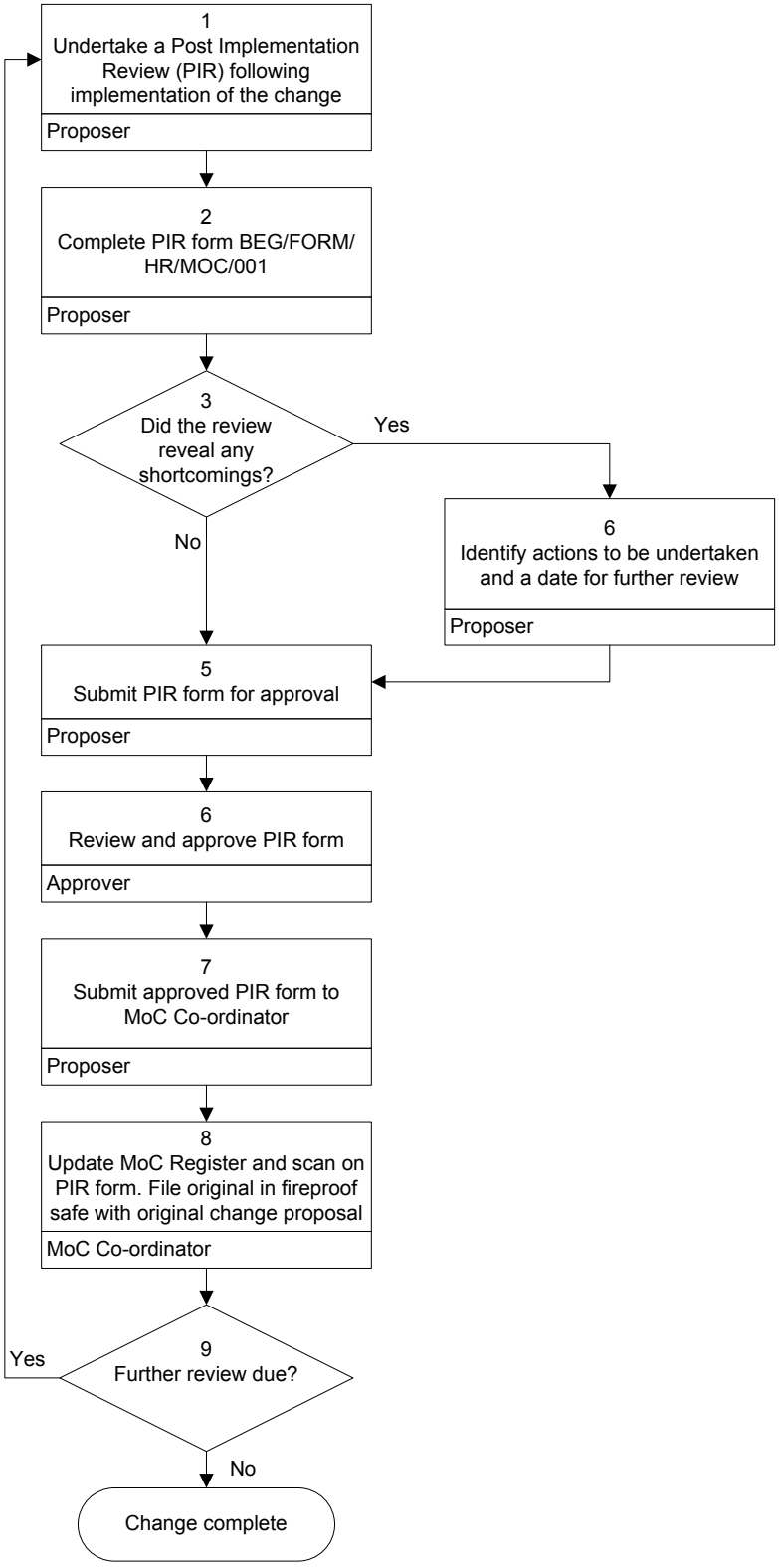
Figure 3 Process flow chart outlining additional steps which may impact nuclear safety (LC36) or compliance with environmental legislation



Note: the Corporate MoC Co-ordinator (for central changes) or the Station MoC Co-ordinator can provide a copy of the change proposal if this is required.

Note:
Grade A* changes will be implemented after written agreement has been received from ONR.
Grade A changes will be implemented 28 days after the proposal has been formally furnished to ONR.
Grade B changes will be implemented 28 days after the change has been registered.

Figure 4 Process flow chart for the evaluation/review of organisational change (Post Implementation Review)



Appendix A Organisational change risk assessment and categorisation form

Organisational Change Risk Assessment and Categorisation Form

SECTION 1: ORGANISATIONAL CHANGE DESCRIPTION

DEPARTMENT: LOCATION:

Brief description of the proposed change

SECTION 2: RISK ASSESSMENT

Please identify the risks associated with the organisational change by answering yes or no to the questions below. Where the answer is yes, please assess the risk as 'Minor', 'Significant', 'Major' or 'Major+' by ticking the relevant column.

Factors	Description	Yes/No	Minor	Significant	Major	Major+
Compliance with Nuclear Site Licence	Could affect the legal basis of the Site Licence?					
	Could affect the company's ability to comply with Site Licence conditions?					
Operational Risks (including Maintenance)	Could lead to a deterioration in safety due to changes in how the work is perform… who does the work, when/how the … done?					
Emergency Response Risks	Could result in the loss of indi… …s) an emergency response…					
	Could affect the ability to … nuclear emergen…					
Technical Capability Risks	Could result in loss… …ed… …e plant desi… …d sa…					
	Could re… …in the los… …kills to operate/… … facilities?					
	Could affect the co… …any's ability to act as an intelligent … …er?					
	Could affect performance due to the reliance on external support?					
	Could result in training requirements for existing or new staff?					
Documentation and Compliance Risks	Could affect the ability to comply with company or legal requirements as defined in safety case(s) or other documentation?					
	Could affect the ability to produce safety case(s) or other documentation?					
	Could result in the need to change the safety case(s) or other documentation?					
Control and Supervision Risks	Could have an adverse effect on the ability to control and supervise operations?					
	Could result in a reduction in performance due to additional supervisory burden (e.g. inexperienced staff or increases/decreases in personnel)?					

Factors	Description	Yes/No	Minor	Significant	Major	Major+
Management and Organisational Risks	Could affect safety due to a transfer of responsibilities?					
	Could result in deterioration in safety due to conflict of interest (e.g. commercial pressures)?					
	Could affect safety due to work being outsourced or contracted out that was previously undertaken "in house"?					
	Could affect the interfaces between functions/departments both internal and external to the company?					
	Could result in an increased workload for the department/function leading to a drop in performance?					
	Could adversely affect safety because the time between initial awareness of change and the change being fully implemented is lengthy (prolonged exposure to additional risk) or is excessively short?					
People Related Risks	Could result in an increase to individual(s) workload that will affect safety?					
	Could result in lack of understanding of individual roles and responsibilities and reporting lines?					
	Could affect the interfaces between individuals both internal and exter[illegible] th[illegible] company?					
	Could adversely affect mo[illegible] commitment (e.g. chang[illegible] redundancies, outsourcin[illegible] shift patterns, wo[illegible] cond[illegible]?					
	Could threaten su[illegible] result in [illegible]					
	Could h[illegible] culture?					
Environment Related Risks	Could require [illegible] permits under [illegible]					
	Could affect the company's ability to comply with permit conditions (e.g. number of SQEP individuals)?					
	Could require notification to Environment Agency or SEPA in advance of implementation?					
Other Risks	Any other factor which is not covered by one of the factors described above Please detail:					

Additional Comments:

Having completed Section 2 (Risk Identification & Assessment) I confirm that, in my opinion:-

*the proposed change will have no impact on nuclear safety and the risk assessment has identified no/negligible risk to the organisation therefore the change can be implemented with no further action. ☐

Or

*the proposed change will have no impact on nuclear safety however the risk assessment has identified a number of risks to the organisation therefore a change plan will be produced (see BEG/SPEC/HR/MOC/001 for further information). ☐

Or

*the proposed change could have an impact on nuclear safety and therefore a change proposal will be produced in accordance with Management of Change arrangements (LC36) (see BEG/SPEC/HR/MOC/001 for further information). ☐

Proposed categorisation for LC36 changes:-

Note: The category of the change will be determined by the assessment given on the form e.g. if the majority of risk factors are identified as minor however one or more of the risk factors is identified as significant then the category of the change will be significant i.e. grade B.

Cat A* Major+ (requires Regulator agreement) ☐ Cat A Major (requires submission to Regulator 28 days prior to implementation) ☐

Cat B Significant ☐ Cat C Minor ☐

Name: (Proposer)	Position:	Signature:	Date:
Name: (Approver)	Position:	Signature:	Date:

Please return the completed form to your local MoC Co-ordinator.

Appendix B Guidance on risk assessment and categorisation

Organisational change shall be planned in advance and the relevant assessment undertaken to determine whether the change has the potential to impact nuclear safety or legal compliance.

The following provide examples of when the nuclear safety or legal compliance aspects should be considered through the LC36 MoC process.

- Permanent changes to, or having an impact on, Nuclear Baseline posts or roles.
- New programmes and processes introducing changes to posts or roles, competencies or training requirements.
- Changes to processes which support nuclear safety or legal compliance.
- New projects requiring the introduction of new posts, roles or processes.
- New initiatives, which could significantly increase individual workloads, e.g. new tasks placed on individuals, new IT system.
- Temporary changes, e.g. sick leave, maternity leave, secondment, sabbaticals, career breaks that have an impact on nuclear safety or legal compliance arrangements.
- Changes to core capabilities that might affect the ability to conduct business in a safe and controlled manner.
- Contractorisation of any of the organisation's activities. This should prompt consideration of risks associated with failure to provide the service and level of Intelligent Customer capability required.
- Changes in reporting lines.
- Medium or long term changes to the workload.
- Significant changes to shift/working patterns.

Risk Identification

A number of risk factors are listed in the Organisational Change Risk Assessment and Categorisation Form (Appendix A). The change proposer shall assess each risk factor to identify whether or not there is the potential to impact nuclear safety or legal compliance, in the event that the change is inadequately conceived or executed. The following guidance is provided to assist you with completing this form.

Compliance with Nuclear Site Licence

Could the change affect the legal basis of the Site Licence or the organisation's ability to compliance with Site Licence conditions?

Operational Risks (including maintenance)

Could changes to how, when or who performs operations lead to a deterioration in safety performance? Changes to who performs or how the operations are performed could affect competencies, interfaces or boundaries and consequently affect safety. Changes to when the operation is performed such as shift or working pattern changes could affect the operators sleep patterns which could lead to a drop in safety performance.

Emergency Response Risks

Could the change affect the ability to respond to a Nuclear Emergency? Will an individual/function/ department no longer be available to perform their emergency response roles such that there is a need for alternatives? Will the change affect an individual/function/department's ability to respond effectively?

Technical Capability Risks

Changes that could or will result in a drop in safety performance in the short and/or long term due to:

- loss of knowledge of the plant design and safety cases
- loss of skills to operate/maintain plant and facilities
- ability to act as an intelligent customer
- increased reliance on external sources
- requirement to train existing or new staff.

Documentation and Compliance Risks

Changes that could affect the ability to:

- comply with nuclear safety or legal compliance related documentation e.g. safety cases
- produce and/or modify nuclear safety or legal compliance related documentation e.g. safety cases.

Control and Supervision Risks

Could the change have an adverse effect on the ability to control and supervise operations due to any of the following?

- Changes to roles and responsibilities that if not clearly defined could or will result in confusion, a lack of understanding of reporting lines and/or scope and limitations of authority.
- Changes to interfaces and/or boundaries both internal and external to the company.
- Reduction in resource levels resulting in increases to working hours and time needed to plan and priorities task.
- Additional supervisory burden arising from increases in resource levels, inexperienced staff or span of control.
- The need to review DAP and SQEP appointments including the need for training and formal appointment of new DAPs and SQEPs.

Management and organisational Risks

Could safety be adversely affected by new management or changes to the organisational structure due to any of the following?

- Transfer of responsibilities that if not clearly defined could or will result in confusion and a lack of understanding of the scope of the change in responsibilities.
- Transfer of responsibilities that could result in a need for training and/or detailed handover period.
- Changes to interfaces and boundaries both internal and external to the company.
- Conflicts between commercial pressures and safety considerations.
- Inadequate work scope definition, selection of contractors or control of work activities of work previously done “in house”.
- Increases in workload for the department/function.
- Complexity of changes that could result in roles/responsibilities being overlooked and subsequently not reallocated.
- Timescales for implementing change are excessively short or long and could impact on safety either during the implementation phase or after implementation.

People Related Risks

Could safety be adversely affected by any of the following?

- Increases to individual(s) workload leading to an inability to perform roles and responsibilities properly.
- Changes to roles and responsibilities that if not clearly defined could or will result in confusion, a lack of understanding of reporting lines and/or scope and limitations of authority.
- Changes to interfaces and/or boundaries both internal and external to the company.
- Reduced commitment or morale resulting from redundancies, outsourcing, changes to shift patterns, working conditions or job satisfaction.

Environment Related Risks

Could safety or compliance be adversely affected by any of the following?

- The requirement for re-permitting or additional permits under environmental legislation. This applies to various legislative instruments, *e.g.* EPR10, RSA93, PPC00. This also includes contractorisation of any of the key processes covered by a permit that might invalidate that permit, *i.e.* the contractor is neither the licensee (so cannot claim exemptions under radioactive substances), nor is he the permitted party, so may require a permit in his own right.
- The organisation's ability to comply with existing permit conditions (e.g. adequate SQEP resource).
- Failure to notify the Environment Agency (English stations) or SEPA (Scottish stations) in advance of implementation of a change in the management system, organisational structure or resources, which might have, or might reasonably be seen to have, a significant impact on how compliance with the limitations and conditions of a permit is achieved. Timescales for notification depend on the specific permit.

Risk Assessment

Where a potential risk has been identified the change proposer shall assess the risk as 'minor', 'significant', 'major' or 'major+' as described below. In making the assessment the change proposer shall consider:

- safety significant of the function/department/post/role being affected by the change
- nature of the change
- safety significant/potential impact of the change in the event that it is inadequately conceived or executed.

There are no absolute definitions of the categories/grades. This is based on the judgement of the proposer and acceptance by the approver. Broad definitions are contained in Appendix C Table 1 and an example for each is given below.

Major + (Grade A*)

- Changes to Board arrangements

Major (Grade A)

- Formation of a separate Design Authority Function

Significant (Grade B)

- Change of Shift Rota to a 12 hour Shift Pattern for Operations Staff

Minor (Grade C)

- Transfer of Equipment Reliability from Lifetime & Fleet Programmes to Engineering

NOTE: The category of the change will be determined by the highest assessment given on the Organisational Risk Assessment and Categorisation Form, e.g. if the majority of the risk factors are identified as minor however one or more of the risk factors is identified as significant then the category of the change will be significant, i.e. grade B.

Appendix C Change Grade Definitions and Assessment/Approval Routes for LC36 changes

Table 1 – Change Grade Definitions

Grade A* (Major+)	A change which **both** meets the definition of Grade A, **and** involves changes to organisational structures or resources or roles of functions, such as to represent significant change to the Licensing basis.
Grade A (Major)	A change to organisational structure or resources which, if inadequately conceived or executed, may seriously reduce the capability of the organisation to maintain safe operation and compliance with the site licence.
Grade B (Significant)	A change to organisational structure or resources which, if inadequately conceived or executed, may lead to a significant but not serious reduction in the capability of the organisation to maintain safe operation and compliance with the site licence.
Grade C (Minor)	All changes within the scope of this document for which a change proposal is judged necessary to demonstrate that it has no significant impact on nuclear safety.

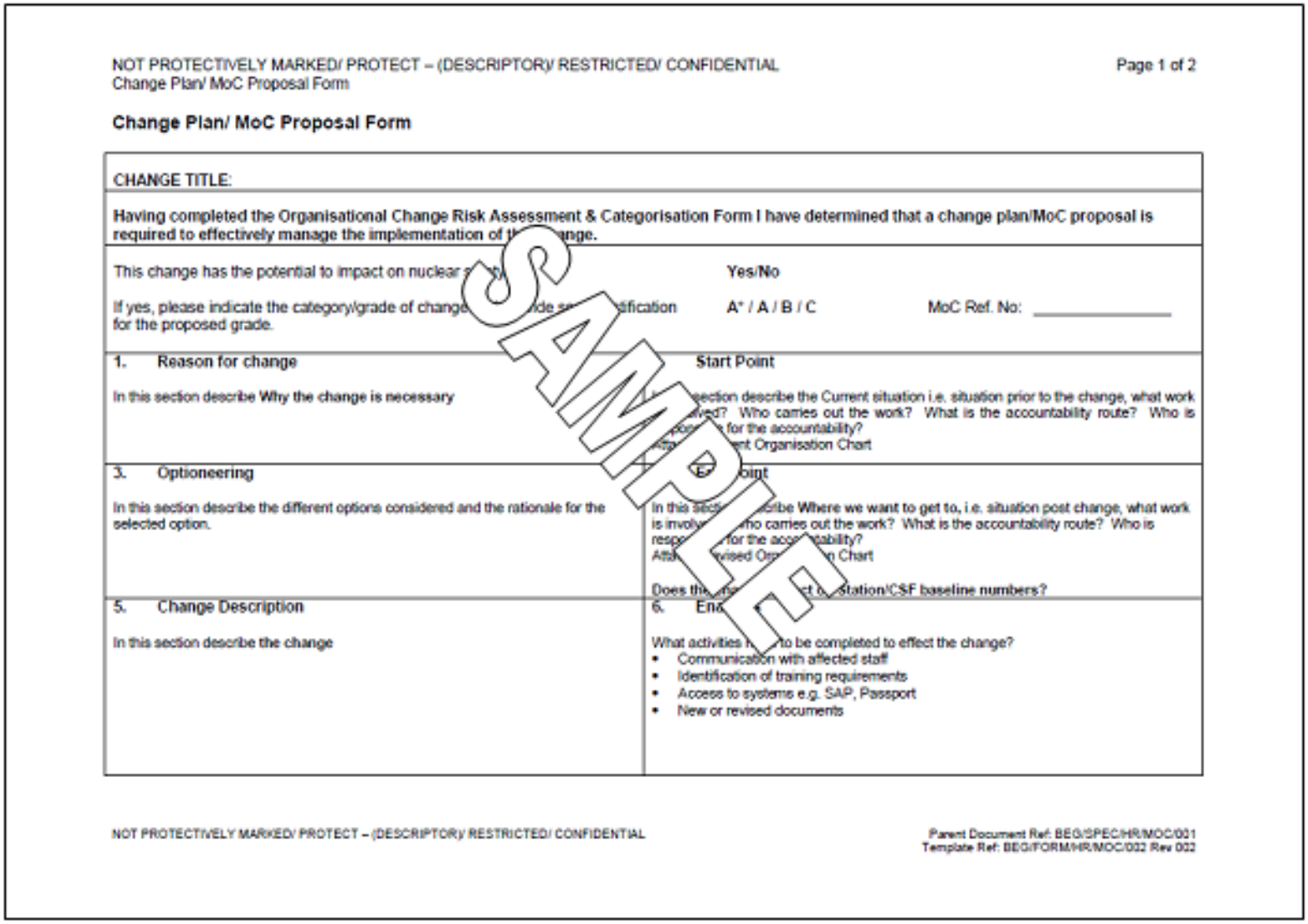
Note: There are no absolute definitions of grade; this is based on upon the judgement of the change proposer and acceptance by the approver.

Table 2 – Assessment and Approval Routes

Grade	**Assessor**	**Approver**	**ONR Involvement**
A* (Major+)	Head of SRD	Nuclear Generation Limited Board (after proposal has been submitted to the Nuclear Safety Committee for consideration and advice) Proposal to be signed by relevant NGL Board member on behalf of Board	Approved change proposal to be formally submitted to the ONR for agreement prior to implementation. Implementation will not take place until written agreement has been received from ONR.
A (Major)	Head of SRD	Nuclear Generation Limited Board (after proposal has been submitted to the Nuclear Safety Committee for consideration and advice) Proposal to be signed by relevant NGL Board member on behalf of Board	Approved change proposal to be furnished formally to the ONR 28 days before implementation. Implementation will not take place until the 28 day window has expired or earlier written agreement has been received from ONR.
B (Significant)	Head of SRD or his/her nominee	Station Director or Head of Function	Not required unless requested by the ONR
C (Minor)	Not required	Line Manager	Not required unless requested by the ONR
Note: If the change is within SRD itself, appropriate third party assessment shall be sought.			

Note: Grade A* changes will be implemented after written agreement has been received from ONR
Grade A changes will be implemented 28 days after the proposal has been formally furnished to ONR
Grade B changes will be implemented 28 days after the change has been registered

Appendix D Change plan/MoC proposal form



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Change Plan/ MoC Proposal Form

Page 1 of 2

Change Plan/ MoC Proposal Form

CHANGE TITLE:
Having completed the Organisational Change Risk Assessment & Categorisation Form I have determined that a change plan/MoC proposal is required to effectively manage the implementation of t[illegible]nge.
This change has the potential to impact on nuclear [illegible]ty Yes/No If yes, please indicate the category/grade of change [illegible]de s[illegible]dification for the proposed grade. A* / A / B / C MoC Ref. No: _____
1. Reason for change In this section describe Why the change is necessary Start Point In this section describe the Current situation i.e. situation prior to the change, what work [illegible]ved? Who carries out the work? What is the accountability route? Who is [illegible]for the accountability? Attach [illegible]ent Organisation Chart
3. Optioneering In this section describe the different options considered and the rationale for the selected option. En[illegible]oint In this sec[illegible]scribe Where we want to get to, i.e. situation post change, what work is involv[illegible]ho carries out the work? What is the accountability route? Who is respo[illegible]for the acco[illegible]tability? Att[illegible]evised Or[illegible]n Chart Does the [illegible]ct o[illegible]station/CSF baseline numbers?
5. Change Description In this section describe the change 6. En[illegible] What activities [illegible]to be completed to effect the change? • Communication with affected staff • Identification of training requirements • Access to systems e.g. SAP, Passport • New or revised documents

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Parent Document Ref: BEG/SPEC/HR/MOC/001
Template Ref: BEG/FORM/HR/MOC/002 Rev 002

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Change Plan/ MoC Proposal Form

7. Risk Areas	8. Countermeasures
Identification of potential risks. State how the identified risks are to be managed through enablers (to prevent the risk materialising) and contingency plans/countermeasures (to mitigate the consequences).	What needs to be done if something goes wrong with the implementation of the change, including: 1) Who will do what? 2) And in What circumstances? 3) What if enablers are not being delivered as expected?
9. Performance Measures These measures must be specific to the change & measurable	**10. Pre Implementation Review Date** Pre-implementation review - ensure the relevant enablers have been adequately deployed prior to implementation. Consider the need for an Implementation Plan, this can help with: • Identifying the Programme – Who will do what and when? • Review Points — Are we on programme? – Is anything going wrong? Pre-implementation review date _____
11. Implementation Date What is the proposed date for implementation of the change i.e. expected ef… point? Implementation date _____	**Post Implementation Review Date** …entation review - did we get where we wanted to be? Complete the PIR Re… – BEG/FORM/HR/MOC/001 …ntation review date _____

Prepared by:	Name:	Signature:	Date:
Proposed by:	Name:	Signature	Date:
Assessed by: (if applicable)	Name:	Signature:	Date:
Approved by:	Name:	Signature:	Date:

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Template Ref: BEG/FORM/HR/MOC/002 Rev 002

Appendix E Enabler/Handover Plan

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Enabler/Handover Plan

Page 1 of 1

Enabler/Handover Plan

Name:	**Job Title:**
Department:	**Location:**

SQEP (S), Knowledge (K), Workload (W) and Roles including Emergency Scheme (R)		Description	Enabl	Target Date	Measure that enabler is complete	Handover sign off & date (employee)	Handover sign off & date (Grp Head/ Line Mgr)

Enabler Plan Statement	
Prepared by:	Signature & Date:
Approved by:	Signature & Date:

Any change to the SQEP Register arising from a transfer of responsibility should be explicitly stated on the enabler plan and the associated SQEP Role Authorisation form completed. The 'receiving' individuals should be fully trained and meet the SQEP criteria **before** the change to a SQEP role is implemented. Should the individual being released/transferred have specific responsibility for compliance with a Licence Condition, those responsibilities must be formally transferred and the details included in the plan.

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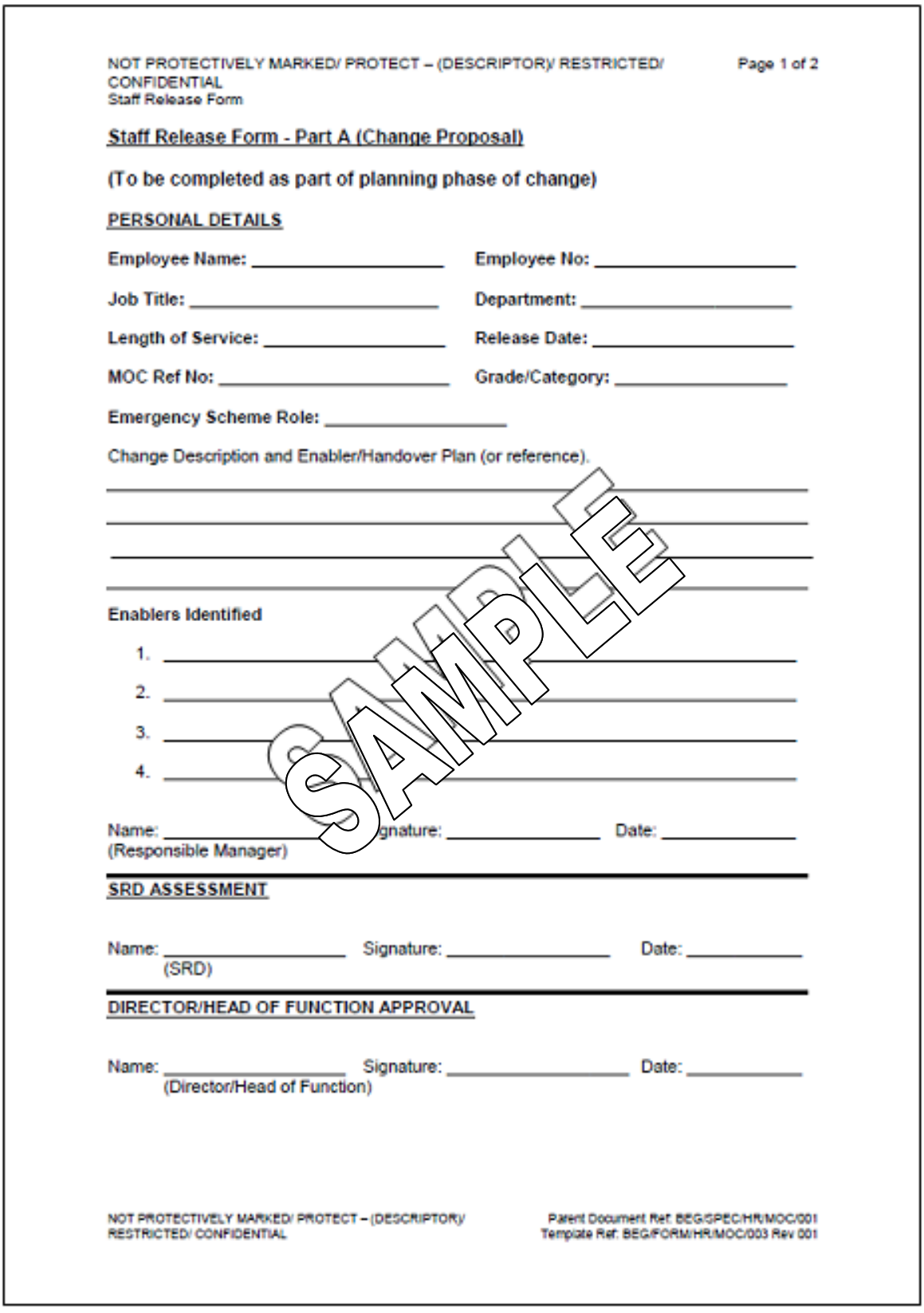
Template Ref: BEG/FORM/HR/MOC/006 Rev 000

Appendix F Staff release form



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Staff Release Form

Page 1 of 2

Staff Release Form - Part A (Change Proposal)

(To be completed as part of planning phase of change)

PERSONAL DETAILS

Employee Name: _____ **Employee No:** _____

Job Title: _____ **Department:** _____

Length of Service: _____ **Release Date:** _____

MOC Ref No: _____ **Grade/Category:** _____

Emergency Scheme Role: _____

Change Description and Enabler/Handover Plan (or reference).

_____

_____

_____

_____

Enablers Identified

1. _____
2. _____
3. _____
4. _____

Name: _____ Signature: _____ Date: _____
(Responsible Manager)

SRD ASSESSMENT

Name: _____ Signature: _____ Date: _____
(SRD)

DIRECTOR/HEAD OF FUNCTION APPROVAL

Name: _____ Signature: _____ Date: _____
(Director/Head of Function)

SAMPLE

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Parent Document Ref: BEG/SPEC/HR/MOC/001
Template Ref: BEG/FORM/HR/MOC/003 Rev 001

Staff Release Form - Part B (Pre-release Director/Head of Function's Review)

(To be completed at the time of confirmation of release to confirm that enablers have been delivered)

Employee Name: _____ **Employee No:** _____

Job Title: _____ **Department:** _____

Length of Service: _____ **Release Date:** _____

MOC Ref No: _____ **Grade/Category:** _____

Emergency Scheme Role: _____

PRE-RELEASE ENABLERS (refer to staff release form Part A and any associated enabler/ handover plan) **COMPLETED (Y/N)**

1. _____ _____
2. _____ _____
3. _____ _____
4. _____ _____

If any actions are outstanding, please quot[illegible]tive [illegible]gements here:

_____

_____

_____

I have conducted a re[illegible]a[illegible]e and confirm that the conditions for release of the above named individua[illegible]s[illegible]ory and conform with the Management of Change Process:

Name: _____ Signature: _____ Date: _____
(Manager)

APPROVED

Name: _____ Signature: _____ Date: _____
(Director/Head of Function)

I have reviewed the documented enabler review and confirm that the safety aspects have been adequately addressed.

Name: _____ Signature: _____ Date: _____
(SRD)

Appendix G Training requirements for posts at stations & central support functions

Post (Stations)	1-day essential training	1-day desirable training	2-hour essential workshop	2-hour desirable workshop
Station Director				✓
Plant Manager				✓
Operations Manager			✓	
Shift Managers (5)				✓
Operations Services Group Head				✓
Maintenance Manager			✓	
TAG Group Head				✓
Maintenance Group Head				✓
Work Management Manager			✓	
Work Management Group Head				✓
Fuel Route Manager			✓	
Supply Chain Manager			✓	
Strategic Outage Manager			✓	
Outage Group Head				✓
Head of Security			✓	
System Health Manager			✓	
Reactor Systems Group Head				✓
S&R Group Head				✓
P&E Group Head				✓
Component and Programme Group Head				✓
Fuel Route Group Head				✓
Design Engineering Group Head				✓
TSSD Manager		✓	✓	
Nuclear Safety Group Head			✓	
Quality Group Head				✓
Env Safety Group Head				✓
Training Manager			✓	
Technical Training Group Head				✓
Operations Group Head				✓
Finance Manager				✓
CI Manager	✓			
NP Lead				✓
HR Manager	✓			
HR Advisor (MOC Coordinator)	✓			
HR Advisor		✓	✓	
HR Assistant				✓

Post (Central Support Functions)	1-day essential training	1-day desirable training	2-hour essential workshop	2-hour desirable workshop
Managing Director				✓
Safety & Technical Director			✓	
Chief Technical Officer			✓	
Chief Nuclear Officer (3)			✓	
CI & Operational Support Director			✓	
HR Director		✓	✓	
Finance Director				✓
Head of SRD			✓	
Nuclear Safety Manager			✓	
Nuclear Inspection & Oversight Manager			✓	
Nuclear Inspection & Oversight Site Mgr (2)			✓	
Nuclear Inspection & Oversight Central Mgr			✓	
Nuclear Inspection & Oversight Evaluators			✓	
Business Improvement Manager			✓	
Head of Nuclear Fuel & Liabilities			✓	
Head of Health, Safety & Environment Support			✓	
Business Interface Group Head				✓
Head of Quality			✓	
Engineering Director			✓	
Engineering Branch Managers (6)			✓	
Engineering Improvement Manager			✓	
Engineering Support Manager			✓	
Head of Design Authority			✓	
Safety Case Managers (2)			✓	
Safety Case, Lifetime & Strategy Manager			✓	
Graphite & PSR Manager			✓	
Central System Health Manager			✓	
Head of Asset Management				✓
Head of Supply Chain			✓	
Head of Projects, TSG & Strategic Spares			✓	
Head of Lifetime & Fleet Programmes			✓	
Head of Fleet Critical Programmes			✓	
Head of Corporate Security			✓	
Head of Central Technical Training			✓	
Head of Organisational Learning			✓	
Head of Operational Improvement			✓	
HR Manager, Organisation, Performance & Reward	✓			
Regional Lead		✓	✓	
HR Manager		✓	✓	
HR Advisor		✓	✓	
HR Assistant				✓
Generation Finance Controller			✓	
Head of Intelligent Customer			✓	

Post (Central Support Functions)	1-day essential training	1-day desirable training	2-hour essential workshop	2-hour desirable workshop
Finance Region Manager			✓	
CTO and S&T Finance Manager			✓	
Department MoC Co-ordinators		✓	✓	

Appendix H Post implementation review form

Post Implementation Review Form

MoC Ref. No.	Title of Change	MoC Grade
Originating Site	Originating Business Unit	
Proposer	Approver	Approval Date

Overview of Change

Please give a brief overview of the change

Date of Review	Date of Further Review (if required)

Post Implementation Review

The purpose of the review is to demonstrate that objectives have been achieved, enablers and performance measures implemented and adequately controlled. This review shall include an assessment on human performance issues.

Please answer the following questions

1. Have the requirements of the change been met? YES/NO
   Describe the outcome of the change

2. Have the objectives been achieved? YES/NO
   List the objectives and demonstrate how achieved

3. Have the enablers and performance measures been implemented? YES/NO
   List the enablers and detail how implemented

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Page 2 of 2

Post Implementation Review Form

4. Have the risks been adequately controlled? List the risks identified in proposal and explain how controlled	YES/NO
5. Has it been necessary to deploy any countermeasures? If yes, provide further details	YES/NO
6. Have any human performance errors been identified? If yes, provide further details	YES/NO
7. Was any remedial action necessary? If yes, provide further details	YES/NO
If answer to 5, 6 or 7 is yes, please raise a CR and record the number below: CR No. _____	

Name (Proposer)	Signature	Date
Name (Approver)	Signature	Date

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Parent Document Ref: BEG/SPEC/HR/MOC/003
Template Ref: BEG/FORM/HR/MOC/001 Rev 002

Appendix I Organisational Change Steering Group – Record of minutes form

Organisational Change Steering Group – Record of Minutes Form

Organisational Change Steering Group Meeting	
Date:	Chair:
Attendees:	Apologies:
Review of Changes Current (awaiting approval, live and awaiting PIR) Complete Post Implementation Review Forms should be reviewed in order to assess the quality of PIR's being produced and ensure that the review demonstrates objectives have been achieved and risks adequately controlled. Corporate	Actions
Identification of Future [illegible]ges	Does this require Change Plan/MoC Proposal - Yes/No?
Update on Normal Business Changes	Actions
Training Requirements	Actions

Annex V

SRD ASSESSMENT OF LC36 CHANGE PROPOSALS

British Energy Generation

Safety & Regulation Division (SRD) Branch Procedure

Nuclear Inspection and Oversight (NIO)

SRD assessment of LC36 change proposals

Originated By:	Malcolm Forshaw NIO Evaluator	Date:	Sept 2010
Reviewed By:	Graham Anderson	Date:	Sept 2010
Approved By:	Mark Treasure NIO Branch Manager	Date:	Sept 2010

REVISION	AMENDMENT	IMPACT LEVEL	DATE
005	Updated for change to NIO, removal of KPI requirements and restructuring of text	Minor	Sept 2010

CONTENTS

1. PURPOSE

To define the Safety and Regulation Division (SRD) independent assessment process for LC36 Management of Change (MoC) proposals of Grades A*, A and B, as required by the licence compliance arrangements described in BEG/SPEC/HR/MOC/001 (Ref. 1). The management of change process is intended to ensure that any changes to the organisation or resources do not adversely affect nuclear safety.

2. SCOPE

This Procedure is applicable to the Independent Assessment process for LC36 Management of Change submissions carried out by SRD or other appointed persons.

3. RESPONSIBILITIES

Nuclear Inspection and Oversight organisation and managerial responsibilities are defined in the Nuclear Inspection and Oversight (NIO) Branch Manual SRD/MAN/IO/001 (Ref.2). In addition to the responsibilities defined in the Branch Manual, the following posts or roles have responsibilities under this procedure:

Head of SRD

The Head of SRD or their delegate is required to review the assessment reports for Grade A* and A changes to confirm that the outcome of the assessment process is satisfactory.

Nuclear Inspection and Oversight Central Manager (NIO Central Manager)

The NIO Central Manager is responsible for:

- Authorisation of personnel to the role of LC36 assessors.
- Selection and nomination of suitable external change proposal assessors for those changes where SRD independence is compromised or where external input is judged to add value.
- Provision of advice, support, training, assessment and monitoring regarding the control of organisational change.

LC36 Assessment Lead – Central

The LC36 Assessment Lead is responsible for

- Allocation of authorised LC36 assessors for those LC36 assessments to be performed within SRD
- Informing the NIO Central Manager if a proposed change requires additional assessment by an individual external to SRD or where external input is judged to add value.

The LC36 Assessment Lead may also perform the role of LC36 Assessor if authorised.

LC36 Administrator (Central Admin)

The LC 36 Administrator is responsible for maintaining MoC assessment information held in the BE MoC database, supporting the Assessment Lead and preparing documents/folders.

LC36 Change Assessors

Authorised LC36 Change Assessors are responsible for:

- Providing formal assessment of grade A*, A or B proposals, as directed by the Assessment Lead, and updating the MoC database accordingly,
- Following the assessment process defined by BEG/SPEC/HR/MOC/001 (Ref. 1) and this procedure,
- Monitoring in-progress changes in the Central Support Functions and, in conjunction with the station-based NIO Evaluators, at the stations, to provide assurance that compliance with the LC36 arrangements is achieved and risks to safety are adequately controlled.
- Maintaining an auditable electronic file for each assessment.

NIO Site and Central Evaluators

Under this procedure, NIO Site Evaluators are responsible on their individual sites for:

- Monitoring LC36 arrangements at the station to ensure that Grade A*, A and B change proposals are submitted to the LC36 Assessment Lead for independent assessment before implementation.
- Monitoring in-progress changes at the stations, in conjunction with LC36 change assessors, to provide assurance that compliance with the LC36 arrangements is achieved and risks to safety are adequately controlled.

NIO Evaluators may be allocated responsibility for reviewing station or central LC36 arrangements and, if authorised, reviewing specific Grade A*/A and B proposals.

4. PRACTICE

Assessments are to be carried out by suitably qualified and experienced people within SRD authorised and appointed by the NIO Central Manager. Where the independence of the assessment might be compromised or external input may add value, (for example, changes originating within SRD or where the change is novel), the LC36 Assessment Lead will identify this to the NIO Central Manager who may nominate appropriate external independent assessors.

Change proposals which require independent assessment shall be submitted to the Assessment Lead by the change proposer. Proposals will have an initial grading allocated by the change proposer, usually after discussion with the Assessment Lead or an assessor. This is reviewed as part of the assessment process. The Assessment Lead will nominate an assessor who will agree:

a) to undertake the independent assessment and

b) timescales for assessment.

This will be formally documented by memo (Ref. 3).

For changes originating at or affecting stations, it is expected that station personnel will seek advice regarding proposals from an NIO Evaluator before submission for assessment, particularly regarding grading of changes. Likewise, the change assessor(s) should, where practical, consult the relevant station NIO Site Evaluator(s) for advice and guidance.

Assessment Process

The process for assessment of Grade A or A* changes is given in Table 1 and of Grade B changes in Table 2. In assessing the adequacy of change proposals assessors should confirm, or otherwise, that the proposed grading is acceptable, taking account of all risks to safety which might arise if the change is inadequately conceived or executed. Guidance for MoC assessors is given in BEG/SPEC/HR/MOC/001 (Ref. 1).

Initial Comments

A preliminary review is carried out where initial comments, queries and concerns are raised with the proposal author, and this may result in revision or rewriting of the proposal. These may be given using the SRD/FORM/020 - Management of Change Assessment - LC36 - Initial comments (Ref. 4) or informally if the comments are minor, trivial or editorial. This initial review is carried out against the same criteria as the assessment.

Proposals of unacceptable quality may be rejected, in which case the 28-day ‘clock’ allowed for the assessment process for Grade B and above submissions is effectively reset.

Assessment

Assessment is carried out on the final draft of the proposal, after any revisions agreed from the initial comments have been included. This assessment is made against the criteria in Appendix A.

The outcome of the assessment shall be recorded using the Management of Change Assessment Report - LC36 (Ref. 5), which shall be sent to the change proposer under cover of a memo (Ref. 6).

The agreement of the Head of SRD shall be obtained before issuing the assessment report for Grade A or A* changes.

Every effort should be made to achieve agreement with the proposer of the change, to allow SRD agreement to the change as described in the proposal. If this cannot be achieved then the issue should be escalated using the process in BEG/ICP/SHE/022 (Ref.7). The report will identify how the adequacy of implementation will be assured (e.g. monitoring carried out as part of the follow-up process).

A generic change proposal may be prepared for a change to be implemented at a number of sites. The individual site MoC sponsors may use this as the basis for a local MoC proposal. Alternatively, the generic proposal may be used to control and authorise the implementation of a common change at a number of sites, and individual implementation plans prepared for each location or department affected; this shall be identified in the proposal. Assessment reports should be produced in the usual manner for generic papers.

Post Implementation Assessment and Review

The assessor may review or monitor progress of the change to ensure compliance or may arrange for this to be carried out locally by an NIO Evaluator. This may include review of any items identified in the report or memo. The post-implementation review may also be subject to review.

5. DEFINITIONS

Independent assessment	Assessment carried out independently of the line management of the affected department(s).
Proposal	A document justifying the safety of an organisational change prepared in accordance with the arrangements for compliance with Nuclear Site Licence Condition 36.

6. REFERENCES

1. BEG/SPEC/HR/MOC/001 – Management of Changes relevant to LC36 – Organisational Change
2. SRD/MAN/NIO/001 – Nuclear Inspection and Oversight Branch Manual
3. SRD/FORM/021 – LC36 - Request for SRD Assessment memo
4. SRD/FORM/020 – Management of Change Assessment - LC36 - Initial comments
5. SRD/FORM/019 – Management of Change Assessment Report - LC36
6. SRD/FORM/022 – LC36 - SRD Assessment memo
7. BEG/ICP/SHE/022 – Regulatory Assurance within BEGL
8. BEG/ICP/QUA/006 – Records
9. BEG/ICP/SHE/010 – Interactions with the Nuclear Installations Inspectorate
10. BEG/FORM/HR/MOC/002 – Change Proposal Template Form

7. RECORDS

LC36 Change Assessors are responsible for maintaining an electronic assessment file for each assessment, or group of assessments on the shared network drives, containing draft versions of the proposal, the issued version of the assessment report, file notes of discussions with proposers and authors, and details of any background documentation reviewed. These records defined are Non-Permanent records and shall be retained for a minimum of three years.

Copies of assessment reports shall be attached to the MOC database. Other pertinent documents may also be attached.
The requirement for permanent records is described in BEG/SPEC/HR/MOC/001 Section 7 (Ref. 1), in compliance with BEG/ICP/QUA/006 - Records (Ref. 8). All such documents for grade A*, A and B grade changes provide a record of the satisfactory completion of the independent assessment process in that they are signed by the independent assessor.

8. TABLES

Table 1–Assessment Process – Grade A / A*

Action	Who	Step	When
Submit Final Draft Proposal for assessment	Proposer	Send to Assessment Lead.	After addressing initial comments and before formal approval.
Assign Assessor	Assessment Lead	Discuss scheduling/resource issues with Assessor.	Within 1 week of receipt by NIO
Issue document to Assessor	Assessment Lead	Use standard covering memo Update MoC database	Within 1 week of receipt by NIO
Agree target date for implementation	Assessor	Agree with Proposer. Inform Administrator. Update MoC database	Within 1 week of receipt by NIO
Review proposal and issue initial comments or requests for information	Assessor	Raise initial comments, queries and concerns with Proposer and maintain auditable records of discussions and correspondence in assessment file.	By agreed timescale indicated in request for assessment memo
Carry out assessment and agree outcome with Head of SRD	Assessor	- Raise queries and concerns with Proposer - Maintain auditable records of discussions/correspondence in the assessment file. - Consult NIO Site Evaluators at affected sites as required. - Report the assessment and agree with Head of SRD, copy to file.	By agreed target date, as re-negotiated during assessment if necessary. Generally, a minimum of 28 days should be allowed for the assessment process (from submission of document to NIO to the issue of an assessment report).
Sign Proposal and Assessment Memo	Assessor (or Head of SRD)	Signed MoC proposal is returned to Proposer with Assessment Memo and copy of assessment report. Copies of all documents held in assessment file	When Head of SRD has agreed outcome of the assessment.
Maintain assessment file	Assessor	Records of correspondence and supporting documentation (Section 7, Records)	From the initiation to the completion of the assessment process.
Maintain MoC database.	Assessor (assisted by Central Admin)	Assessors to provide the Central Admin with the information to populate the database and documents to attach.	
Furnish / Submit proposal to NII	Proposer using Ref. 9.	For Grade A* Proposals seek NII agreement, Grade A for information	Front sheet signed by the Assessor and the Approver.
Implement Change	Proposer	See Ref.1 for restrictions concerning the timing of the implementation of A* and A grade proposals and NII approval/review.	Changes shall not be implemented until 28 days after assessment and approval, unless specifically agreed with NII (Ref.1). Grade A* changes shall not be implemented until NII agreement has been received.

* If a change assessment is undertaken by a third party, Central Admin shall maintain file on their behalf.

Table 2 – Assessment Process – Grade B

Action	Who	Step	When
Submit Final Draft Proposal for Assessment	Proposer	Send to Assessment Lead	After addressing initial comments and before formal approval.
Assign LC36	Assessment Lead	Discuss scheduling/resource issues with	Within 1 week of receipt by

Assessor		Assessor.	NIO
Issue document to Assessor	Assessment Lead (supported by Central Admin)	Use standard covering memo Update MoC database	Within 1 week of receipt by NIO
Agree target date for implementation	Assessor	Agree with Proposer. Inform Administrator. Update MoC database	Within 1 week of receipt by NIO
Review proposal and issue initial comments or requests for information	Assessor	Raise initial comments, queries and concerns with Proposer and maintain auditable records of discussions and correspondence in assessment file.	By agreed timescale indicated in request for assessment memo
Carry out Assessment	Assessor	Raise queries and concerns with Proposer, maintaining auditable records of discussions/correspondence in the assessment file. Consult NIO Site Evaluators at affected Sites as required. Report the assessment and agree with Head of SRD, copy to file.	By agreed target date, as re-negotiated during assessment if necessary. Generally 28 days to be allowed for the assessment process (from issue of document to NIO to the issue of an assessment report).
Sign Proposal and Assessment Memo	Assessor	Signed MoC proposal to be returned to Proposer with Assessment Memo (Appendix B) and copy of assessment report. Copies of all documents held in assessment file.	When assessment complete
Maintain assessment file	Assessor (assisted by Central Admin*)	Files to hold records of correspondence and supporting documentation (section 7, Records).	From the initiation to the completion of the assessment process.
Maintain information held in MoC database.	Assessor (assisted by Central Admin*)	Assessors to update database and attach documents or provide the Central Admin with the information to populate the database and documents to attach.	On receipt of information.
Inform Proposer when change proposal is authorised for implementation	Assessor	Confirmation should be sought from Site Evaluators where relevant.	Changes are not to be implemented until after NIO assessment and approval and must be registered 28 days before implementation (Ref.1), unless specifically agreed with NII.

* If a change assessment is undertaken by a third party, Central Assessment shall maintain file on their behalf.

Appendix A - LC36 Assessment Guidance

An LC36 change proposal must, as a minimum, include the elements listed on the suggested format BEG/FORM/HR/MOC/002 (Ref. 10). Additional points such as those suggested in the alternative format for more significant changes may also be included. The assessment should include a judgement as to which format should be used. Changes proposed using BEG/FORM/HR/MOC/002 should typically be a maximum of two sides plus figures or organisation charts and if this exceeded then the alternative format should be recommended. Additional guidance for assessors is provided below:

Reason for Change
For Grades A*, A or B changes, this section should demonstrate that the benefits of the proposed structure as it may affect Nuclear Safety should be sufficient to outweigh any detriment.

Start Point
The start point must accurately reflect the actual structure and resourcing of the business unit. It must not assume a generic structure or the planned structure at the end of an incomplete change.

End Point
Unless the change proposal explicitly places a time limit on the duration of the end point (for example a fixed term secondment) the end point should be a structure and level of resources that can be sustained indefinitely.

Optioneering
This should adequately describe the different options considered and outline the risks, mitigating actions and countermeasure, and demonstrate that the selected option is appropriate.

Change Description
This should give a clear description of the change. Any intermediate states of the organisation between the start and end point should be described and justified.

Risk Areas (Nuclear Safety)
This section of the proposal should clearly state which aspects of nuclear safety are at risk and all potential nuclear safety risks to be identified. A list of critical risks which may be relevant is given in Appendix C of BEG/SPEC/HR/MOC/001. This list is not exhaustive and other risks should be considered and may be identified by the proposer.

Enablers
This section should list the actions that will be taken in order to implement the change and reduce the probability of nuclear safety being adversely affected by the change. Where there are dependencies between enablers it should be made clear how such dependencies will be managed. It must be clear from the LC36 change proposal which enablers are required at each stage of the implementation process; in particular, it should be clearly stated which enablers are required before implementation.

Countermeasures
This section should provide a list of actions to be taken if the change fails to progress satisfactorily or one or more of the risks identified have an adverse affect upon nuclear safety. Ensure that these are correctly identified and are not confused with enablers or part of the change process. Countermeasures should be included to address the risks, should be realistically capable of being implemented and should lead to a defensible position in terms of nuclear safety.

Performance Measures
For each significant risk identified there should be a performance measure that is capable of detecting the manifestation of that risk during implementation. The key issues are:

- Specificity – the measure(s) chosen should, as far as possible, allow the effect of this change to be distinguished from other factors.
- Responsiveness – the measure should be capable of detecting any important deterioration quickly enough for action to be taken.

For these reasons if the standard indicator sets used at Company level (e.g. AFR, UATR etc.) are listed these will almost always need to be supplemented by more specific local measures. Measures must be specific and measureable. It should be clear how decisions will be made about the success or

otherwise of a change or part of a change and under what circumstances countermeasures will be deployed.
To address the two bullet points above, performance measures may include non-numerical 'softer' measures such as obtaining and reviewing feedback from those people directly affected by the change.

Justification for Grading
This section should also consider all risks associated with the 'if inadequately conceived or executed' principle. The justification should take into account the number of different layers of defence-in-depth that may be threatened by the change in each area of nuclear safety support. The justification should address why the change is not of a higher grade (for all but Grade A* changes), as well as justifying why a lower grade would not be more appropriate (for all but grade C changes).

Accountability
This section should clarify the 'project management' arrangements for the change – who is accountable to whom for delivering what?

Approval of the Change
In accordance with BEG/SPEC/HR/MOC/001 (Ref. 1).

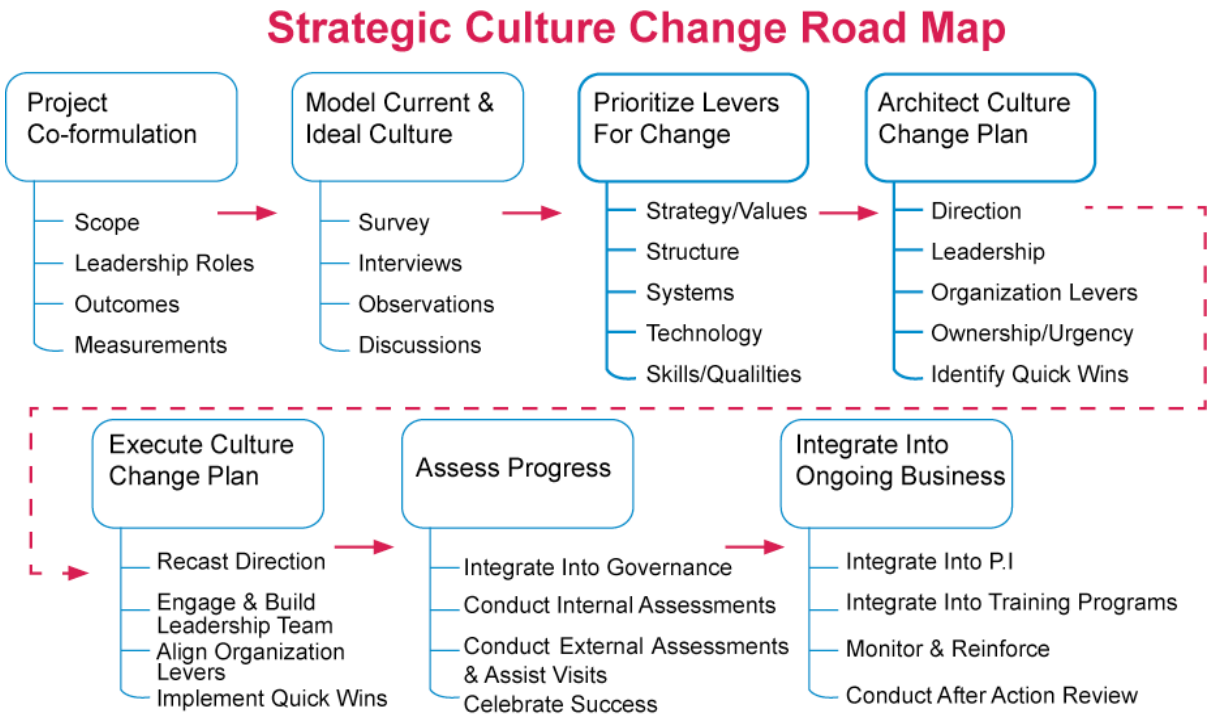
Implementation Date
The forecast date for implementation of a change and target for completion of the change (the Assessor is not responsible for ensuring that the proposer achieves the target completion date). Implementation date is the date at which the change starts, but significant enablers may need to be completed before this date. The completion date is usually the date when the changes in organisation or resources are fully effective, but may not include any post implementation reviews.

Pre- and Post-Implementation Review Dates
MoC papers should contain commitments to perform reviews to ensure that the necessary enablers are in place before each stage of the implementation of a change. There should also be commitments to perform reviews of performance measures at appropriate points during the implementation to determine if countermeasures are required. In addition, a post-implementation review should be specified for 6 to 12 months following implementation of a change (as appropriate). It should be clear when these reviews are to take place, who will conduct them and what records will be kept.

Assessed By
Assessors shall sign against this entry for grade A*, A and B LC36 submissions when the Assessor is satisfied that the change proposal is fit for purpose.

Annex VI

MODEL OF CHANGE USED IN SPAIN BY TECNATOM TO CHANGE ORGANIZATIONAL CULTURE



Original from Tosan, Inc.

Označenie/Designation:	**SE/SM-141**	**Číslo kópie**
Vydanie č./Edition No:	**1**	**Copy number**

SMERNICA/DIRECTIVE

Riadenie organizačných zmien v SE, a.s. / Organizational Changes Management in SE, a.s.

Záväznosť pre/Binding upon:	SE, a.s.
Účinnosť od/Effective from:	15. 6. 2010

Nahrádza/Supersedes:	SE/1/SM-001.01 Riadenie organizačných zmien v SE, a.s. / Organizational Changes Management in SE, a.s.; 3. vydanie

Plní požiadavky noriem/Standard fulfilment:		
EN ISO 9001:2008	EN ISO 14001:2004	OHSAS 18001: 2007
☒ 5.5.1	☒4.4.1	☒ 4.4.1

Číslo útvaru držiteľa/ Holder Unit Number	

Approval List

Funkcia/Position	Meno/Name	Podpis/Signature	Dátum/Date
Vypracoval/Prepared by			
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Zodpovedný/Responsible			
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Odporučil/Recommended by			
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Manažér ISM / IMS Manager	Richard Bíro		
Riaditeľ úseku výroby / Operation Director	Ignác Pňaček		
Riaditeľ úseku ľudských zdrojov / Human Resources Director	Lucia Bohunická		
Riaditeľ úseku rozvoja spoločnosti / Company Development Director	Branislav Duboš		
Schválil/Approved by			
Generálny riaditeľ / General Director	Paolo Ruzzini		

Table of Contents

1. Purpose

This Directive defines procedures, responsibilities and powers in managing organizational changes within SE, a.s., in compliance with valid regulations of the Slovak legislation and based on the best international practises in the field of organizational changes management with a potential impact on nuclear safety.
The main purpose of this Directive is to define such requirements and conditions for responsible units of SE, a.s., so to avoid implementation of such organizational changes that could negatively influence the nuclear safety. The Directive is part of measures for permanent increasing of the nuclear safety in SE, a.s.

2. Scope of application

2.1 The Directive shall be applied to all organizational changes related to:

- Organizational structure and definition of responsibilities and powers
- Human resources and their deployment.

2.2 The Directive is binding upon all units entering the process of organizational changes management within SE, a.s.

3. Definitions of Terms and abbreviations

3.1 Defined terms

3.1.1 Organizational Change
Any change in the organization related to:
creation/cancellation/transfer of a work position
creation/cancellation/transfer of activities among the units
creation/cancellation/transfer of an organizational unit, except for working groups
a change of name of any organizational unit, except for working groups

3.1.2 Organizational Change Request
Identified and recorded need for making an organizational change together with its detailed specification and reasoning (filled out part A and if needed also part B of the form Organizational Change Record).

3.1.3 Organizational Changes Register
A list, which contains an overview of all organizational changes implemented within SE, a.s., in the prescribed structure that enables their unequivocal identification and monitoring of their lifecycle and that provides a feedback from organizational changes evaluation.

3.1.4 Approver
An employee with the position as per Annex VII\G – Approvers' Matrix, in case of any significant organizational change, both the Board of Directors and the Supervisory Board of the company are approvers.

3.1.5 Applicant
A director or a manager of the GD dpt.

Note: The above terms are used solely for the purpose of this Directive.

3.2 Abbreviations

NS	Nuclear Safety
M-NS&RP	Manager of Nuclear Safety and Radiation Protection
M-ChM	Manager of Changes Management
M-NSO	Manager of Nuclear and Safety Oversight
M-L&CA	Manager of Legal and Corporate Affairs
OCh	Organizational Change
OChR	Organizational Changes Register
OChRc	Organizational Change Record

Note: The above abbreviations are used solely for the purpose of this Directive.

4. Definition of the Process

Process decomposition:
1.4 Changes Management
1.4.1 Organizational Changes Management

5. Competences

All managers and directors of SE, a.s. are responsible for observing provisions of this Directive.

Competence of R-SE:
The Manager of Changes Management shall be held responsible for preparing and updating of this Directive.
The following responsibilities and powers are defined in Chapter 6:

- Managers and Directors (in the role of an applicant for an OCh)
- Director of Company Development dpt.
- Director of Operation dpt.
- Director of Nuclear Power Plant Operations
- Director of Human Resources dpt.
- Manager of Changes Management
- Manager of Nuclear Safety and Radiation Protection
- Manager of Nuclear and Safety Oversight
- Manager of Legal and Corporate Affairs
- Head of Organization Management

Competence of the plant:
Chapter 6 contains definition of responsibilities and powers of Directors and Managers of plants (in the role of applicants for an OCh)

6. Procedures
6.1 Organizational changes – general provisions

6.1.1 The M-ChM is responsible for the process of managing organizational changes in SE, a.s.

6.1.2 Applicants for OCh are responsible for proposing and implementation of such a change in accordance with the plan of implementation, if included in the OChRc.

The M-ChM has a duty to provide consulting to an applicant and an approver of a change and to ensure that:

- the process of the OCh management is followed;
- the OCh is appropriate in terms of legal and regulatory requirements;
- in the stage of planning, the key necessary conditions are stated clearly, any risks, countermeasures and performance/success indicators of change are identified, and that more complex changes contain comprehensible plan of implementation covering all affected areas;
- before implementation of any OCh, the check of meeting all necessary conditions was performed, and during/after implementation, the check of important aspects of a change was performed (e.g. utilization and effect of countermeasures, reaching change success indicators, etc.).

6.1.3 The basic procedure of organizational changes management in SE, a.s., is shown in the process diagram in **Annex VII\A**. The process diagram also contains important inputs and outputs for each activity of the process.
Description of activities of the process and responsibilities can be found in Chapter 6.2 and is structured in a manner so to correspond to the steps shown in the process diagram.

6.1.4 From the point of potential impact of a OChs on the NS (significance of the OCh) and procedure of their assessment and approvals, the following levels of the OChs are defined:

- **Level A** An OCh concerns those activities that have **direct impact on the NS**.

  Examples of activities having the direct impact on the nuclear safety are listed in **Annex VII\B.**

- **Level B** An OCh concerns activities defined by the organization that have **impact on the NS**.

  Examples of activities having the impact on the nuclear safety are listed in **Annex VII\C.**

- **Level C** An OCh (mostly of the fundamental nature), which is not

characterized as A or B, but if implemented, it can influence providing for activities with direct impact and/or impact on the NS (e.g. activities related to human resources management, services or procurement management, etc.). For such OCh it has to be **proved that it will not have impact on the NS**, by preparing the detailed plan of implementation of the change (please see **Annex VII\E – OChRc, Part B: Implementation Plan)**.

- **Level D** An OCh of a **more complex nature without any impact on the NS,** which do not concern any activity related to peace utilization of the nuclear energy.
- **Level E** An OCh **without any impact on the NS**, the so-called **simple** changes meeting the following conditions:
  - The OCh has impact only on activities within one unit,
  - The OCh does not include lowering the number of employees,
  - The OCh does not have impact on the IMS documentation from the level of a Directive (including) and higher.

  Note:
  An example of the simple change can be creation of a position in accordance with the plan of personal costs, or transfer of a position within a unit without any impact on activities of the unit, etc.

6.1.5 Organizational changes in SE, a.s. are usually made **4-times a year**. Exceptions are as follows:

- OChs proposed by the General Director and directors of units of SE, a.s. are made as per the required dates, however while respecting the time limits listed in Chapter 6.2, description of activity No.1.
- Simple changes of E level, which can be made anytime during a year.

6.1.6 In order to comprehensively assess the OCh impact in terms of its possible impact on the NS, the **"Committee for Organizational Changes Assessment"** has been established (hereinafter referred to as the „Committee“).
The Statute of the Committee including its composition and main principles of its sittings can be found in **Annex VII\D**.

6.1.7 All OChs are recorded into the **"Organizational Changes Register"** (hereinafter referred to as the „OChR“), serving for registration of the OChs. The OChR is available at Intranet of SE, a.s. (http://intranet.seas.sk/, Organizational Structure tab).

6.1.8 In case of the OCh aimed at **creating a job**, the input initiating beginning of the process of the OCh management is represented by a filled out form named EMPLOYEE REQUEST. An applicant shall obtain this form at the Human

Resources dpt. The Head of the Management Organization shall provide for creation of a work position (in the form of issuing of an internal managing act in accordance with the matrix stated in **Annex VII\G**), if the following conditions are met:

1. the created job is in accordance with the catalogue of work positions in SE, a.s.,
2. the scope of activities of the work position is in accordance with activities of an organizational unit defined in the Organizational Rules of the company,
3. creation of the work position will not result in exceeding the specified number of employees of the unit,
4. creation of the work position was appraised by the M-NS&RP as a change of D category or E category.

If conditions of points 1 to 4 are not met, the applicant is obliged to draw the OChRc.

Note:
When creating work positions at the managerial levels (please see SE/SM-140 Organizational Rules of SE, a.s. – General Principles), the rule shall be applied that the vertical structure of the organizational units can have 4 levels at most, with the exception of the Operation dpt. that can have max. 6 such levels, while the first and the top level is the General Director.

6.1.9 Complex and extensive changes in SE, a.s., shall be managed based on the project management.

6.2 Description of the Process of Organizational changes management

NAME OF ACTIVITY / DESCRIPTION OF ACTIVITY	PERSON RESPONSIBLE
1. DEFINITION OF REQUEST FOR OCh The applicants are obliged to identify the below data in defining a request for an OCh: Reason for the change Goals of the change and expected benefits of the change Assumed risks and counter-measures (examples of risks in the area of NS, which need to be appraised, are listed in **Annex VII\F**) Performance/ Success indicators of the change List of affected units (employees). The request of the OCh shall be prepared in accordance with **Annex VII\E – OChRc, Part I: Request for OCh.** The M-ChM provides the applicants with the consulting support in preparing the OChRc. Note: *The original of the form „Organizational Change Record – parts I, II, III and IV" stated in Annex VII\E is available in electronic version of the approved Directive in the Lotus Notes application in the „Process documentation" part.*	**APPLICANT**
2. PROVIDING FOR OPINION OF THE AFFECTED UNITS In case of OChs concerning multiple units/plants, including centralized units, an applicant shall cooperate with head employees of the affected units/plants in preparing the OChRc, and is obliged to provide for their approving opinion on the OChRc (up to the level of the manager, inclusive – please see **SE/SM-140 Organizational Rules of SE, a.s. – General Principles**). The approving opinion has the form of signature of the relevant persons on the OChRc.	**APPLICANT**
3. SUBMISSION OF REQUEST FOR OCh The applicant shall submit the „Request for OCh" to the M-ChM. The requests for changes are submitted in a manner so to take all the steps of the procedures defined by this Directive, well in advance before the assumed effective date of the request: OChs of the A and B levels and changes related to reducing of the staff need to be submitted at least 90 days before the assumed effective date of the change. Other OChs need to be submitted at least 30 days before the assumed effective date of the change. The filled out „Request for OCh" consulted and approved by the M-ChM and with the confirmed level of the change by the M-NS&RP shall be considered successful submission of the request for OCh.	**APPLICANT**

NAME OF ACTIVITY / DESCRIPTION OF ACTIVITY	PERSON RESPONSIBLE
4. RECORDING OF REQUEST FOR OCh AND SUBMISSION OF REQUEST FOR APPRAISING CHANGE LEVEL After receiving a request for OCh from an applicant, the M-ChM shall assign the identification number to the request and shall register it in the OChR. Then, the M-ChM shall submit the request for independent assessment of the change level by the M-NS&RP. Note: If the change concerns only the conventional power plants (water and thermal power plants), so it is clear that it does not have any impact on nuclear safety, assessment of the change level is not performed (except for Hydropower Plant Madunice).	**M-ChM**
5. ASSESSMENT OF CHANGE LEVEL The M-NS&RP shall appraise a request for OCh and shall approve or revise the change level with the applicant and shall submit his/her opinion to the M-ChM.	**M-NS&RP**
6. UPDATING OF PROPOSED CHANGE LEVEL If the change level was corrected, the M-ChM based on the opinion of the M-NS&RP shall update the OChRc and the OChR.	**M-ChM**
7. PREPARATION OF OCh IMPLEMENTATION PLAN After receiving the opinion of the M-NS&RP on the change level, the applicant shall prepare the „Implementation Plan“ of the OCh in accordance with **Annex VII\E – OChRc, Part II: Implementation Plan**. The M-ChM provides the applicant with the consulting support in preparing the plan. The applicant shall submit the „Implementation Plan“ to the M-ChM. Note: The Implementation Plan for the OCh does not need to be drawn in cases of the so-called „simple change“ of the E level defined in Chapter 6.1. The M-ChM shall submit the simple changes directly for internal approval.	**APPLICANT**
8. SUBMISSION OF REQUEST FOR OCh FOR INDEPENDENT ASSESSMENT The M-ChM shall submit a request for OCh (part I, or part II of the OChRc form) for changes levels **A, B** and **C** for independent assessment to the M-NSO. Note: The OChs of D and E levels, which do not have any impact on the NS, need not be submitted for independent assessment of the M-NSO.	**M-ChM**
9. INDEPENDENT ASSESSMENT OF REQUEST FOR OCh The M-NSO shall assess the request for OCh, while s/he shall appraise the following points: suitability of the chosen level of the OCh in terms of its impact on NS;	**M-NSO**

NAME OF ACTIVITY / DESCRIPTION OF ACTIVITY	PERSON RESPONSIBLE
potential of the OCh impact on the NS, i.e. the OCh risks, and whether the chosen counter-measures are sufficient for decreasing the probability of their occurrence or their elimination; performance/success indicators of the change in terms of their ability to show the impact on the NS. The M-NSO shall notify the M-ChM of his/her opinion and shall present it at the sitting of the Committee.	
10. SUBMISSION OF REQUEST FOR OCh TO THE COMMITTEE The M-ChM shall submit for negotiating over and recommendation to the Committee the request for the OChs: of **A, B** or **C** change level of **D** change level solving fundamental changes within the conventional power plants; solving interfaces between R-SE and plants; concerning multiple plants or departments. As for other prepared changes (not falling into one of the above categories), the M-ChM shall notify the Committee. ***Note:*** The M-RZ shall also submit to the Committee for negotiating over examinations after implementing changes of the A, B or C level (part IV OChRc) as needed, in order to evaluate success of the organizational changes already implemented.	**M-ChM**
11. NEGOTIATION OVER THE REQUEST FOR OCh The Committee shall discuss over and recommend or not recommend the changes submitted by the M-ChM for internal approval at its sitting. *The areas of assessment of the OChs are in details specified in the Statute of the Committee in **Annex VII\D**.*	**COMMITTEE**
12. REVISION / AMENDMENT OF A REQUEST FOR OCh If the members of the Committee express any comments or requirements for amending or revising the request for OCh, the applicant shall revise it or amend it and the M-ChM shall resubmit it for recommendation of the Committee.	**APPLICANT**
13. NOTIFICATION OF THE APPLICANT OF NON-RECOMMENDING THE OCh AND UPDATING OF THE OChR If the Committee does not recommend the OCh proposed for internal approval, the M-ChM is obliged to inform the applicant of this fact and to update the OChR.	**M-ChM**

NAME OF ACTIVITY / DESCRIPTION OF ACTIVITY	PERSON RESPONSIBLE
14. REQUEST FOR ASSESSMENT OF THE SIGNIFICANCE OF THE OCh ADDRESSED TO THE M-L&CA After the Committee has recommended the OCh for internal approval, the M-ChM shall ask the M-L&CA, in case of ambiguity, for assessing the "significance" of the OCh in terms of the need of the statutory bodies of the company approving it.	**M-ChM**
15. DECISION ON SIGNIFICANCE OF OCh Upon request of the M-ChM, the M-L&CA shall decide whether the OCh is or is not significant in terms of necessity of its approval by the statutory bodies. S/he shall send its opinion to the M-ChM.	**M-L&CA**
16. SUBMISSION OF REQUEST FOR OCh FOR INTERNAL APPROVAL The M-ChM shall pass the request for OCh for internal approval. If the OCh is pursuant to Statute of the company considered "significant", the M-ChM shall recommend to the General Director of the company to submit the request for OCh for approval also to the Board of Directors and Supervisory Board of the company.	**M-ChM**
17. MEETING OF NECESSARY CONDITIONS FOR IMPLEMENTING OCh The applicant shall provide for meeting all the necessary conditions, as stated in the OChRc, by the date of implementing the OCh.	**APPLICANT**
18. INTERNAL APPROVAL OF THE REQUEST FOR OCh Requests for OChs, depending on their levels, are approved by the form of order of the General Director, or instruction of the Director of the Company Development dpt. in accordance with the matrix stated in **Annex VII\G**. Note: If a request for OCh is to be submitted for approval also to the Nuclear Regulator Authority of the Slovak Republic (ÚJD SR), the Director of the Company Development dpt. shall discuss the request with the General Director within the scope of internal approving, while the order of the General Director is only issued after approving of the request by ÚJD SR.	**Responsible persons according to the Matrix of Approvers**
19. PREPARATION OF REASONING FOR REFUSING REQUEST FOR OCh If a proposal for OCh is not approved internally, the relevant approver (or any representative delegated by the approver) shall be responsible for preparing the reasoning of refusing the request for OCh and its sending to the M-ChM.	**Responsible persons according to the Matrix of Approvers**
20. NOTIFICATION OF THE APPLICANT OF DISAPPROVING OCh After receiving the reasoning of internal disapproval of the proposed change from	**M-ChM**

NAME OF ACTIVITY / DESCRIPTION OF ACTIVITY	PERSON RESPONSIBLE
the relevant approver, the M-ChM shall notify the applicant of this fact.	
21. PREPARATION OF DOCUMENTATION FOR ÚJD SR In case of internal approval of the OCh of the **A** or **B** level, before sending the internally approved change to ÚJD SR, the M-ChM shall coordinate preparation of the necessary documentation in close cooperation with the relevant director/manager of the affected organizational unit (or other affected units).	**M-ChM**
22. SUBMISSION OF OCh FOR APPROVAL TO ÚJD SR AND RECEIVING OF DECISION The M-NS&RP shall submit the OCh of level **A** or **B**, including any relevant documentation, for approval to ÚJD SR within the deadlines as per valid legislation. S/he shall proceed in a standard manner in compliance with licensing rules and rules of contact with supervision.	**M-NS&RP**
23. NOTIFICATION OF DECISION OF ÚJD SR After receiving a decision from ÚJD SR regarding the OCh of level **A** or **B**, the M-NS&RP shall notify the M-ChM, the applicant and all affected persons of this decision.	**M-NS&RP**
24. MEETING OF CONDITIONS OF THE ÚJD SR DECISION If the internally approved OCh of level **A** or **B** was: • approved by ÚJD SR with comments, or • approval was interrupted and its continuation is conditioned by meeting the defined comments, the OCh can be implemented only after meeting all the conditions of the decision, or if needed also by changing or amending the request for OCh.	**APPLICANT**
25. NOTIFICATION OF ÚJD SR OF APPROVED CHANGE In case of the **C** change level, the M-NS&RP shall submit the internally approved OCh before its implementation to ÚJD SR for information.	**M-NS&RP**
26. CHECK BEFORE IMPLEMENTATION OF OCh AND UPDATING OF OChR The M-ChM shall provide for execution of the control before implementing the OCh as per **Annex VII\E – Part III: Examination of the Change Before Implementation** for all change levels **A, B, C** or **D**. This check is aimed at finding out whether necessary conditions for implementing the OCh were met, as stated in the OChRc, or whether all the conditions of the	**M-ChM**

NAME OF ACTIVITY / DESCRIPTION OF ACTIVITY	PERSON RESPONSIBLE
ÚJD SR decision were met. The M-ChM shall then update the OChR. Provided all necessary conditions were not met, the date of change implementation shall be postponed until they are met. Note: *If meeting of any necessary conditions need to be checked to the day of internal approval of the proposal for the OCh, the M-ChM shall provide for execution of this check within the deadline necessary (e.g. the necessary conditions related to reducing the staff, services outsourcing, technology changes, etc.).*	
27. IMPLEMENTATION OF CHANGE In implementing the approved OCh, the applicant shall be responsible for fulfilling the tasks within his/her unit (as stated in the implementation plan, if included in the request for OCh). If the implementation of the OCh requires cooperation also with units other than the unit of the applicant, this cooperation shall be coordinated by the M-ChM. Moreover, the applicant shall monitor occurrence of possible risks during the change implementation and shall be responsible for timely adoption of the defined counter-measures. S/he shall assess their course in evaluation of the change success.	**APPLICANT** **M-ChM**
28. CHECK AFTER IMPLEMENATION OF CHANGE In implementing any changes of level **A**, **B** or **C**, the M-ChM shall monitor the scheduled date of examination of performance/success indicators of the change (stated in part I OChRc) and shall ask the applicant within the given deadline to perform the check after the change. Not later than within 2 weeks from receiving this call, the applicant shall evaluate, in accordance with **Annex VII\E – Part IV: Examination of Change After Implementation,** whether the goals of the change and the defined indicators were reached. The applicants shall deliver results of the check to the M-ChM. ***Note:*** *If any faults are found during the check, their reasons need to be analyzed, necessary remedy measures need to be proposed and implemented, and the lessons to be learnt for the future need to be drawn, so that the situation would not repeat. No change can be considered definitely completed, unless the examination after its implementation is done.*	**APPLICANT** **M-ChM**
29. UPDATE OF OChR The M-ChM shall update the OChR.	**M-ChM**
30. INDEPENDENT ASSESSMENT OF OCh IMPLEMENTATION The Committee can ask the M-NSO to check the selected OChs after	**M-NSO**

NAME OF ACTIVITY / DESCRIPTION OF ACTIVITY	PERSON RESPONSIBLE
evaluation of the change by the applicant. For this purpose, the M-ChM shall provide the evaluation of the change by the applicant to the M-NSO immediately as received. Not later than within 2 months after evaluation of the change by the applicant, the M-NSO shall execute the control and shall submit the evaluation report to the Committee for negotiating over.	

7. References

7.1 Source Documentation

7.1.1 SE/SM-140 Organizational Rules of SE, a.s. – General Principles
7.1.2 SE/MNA-120.01 IMS Documentation
7.1.3 SE/SM-700 Human Resources Management
7.1.4 SE/SM-171 Nuclear Safety
7.1.5 Act of the Slovak National Parliament No.541/2004 Coll. on Peace Utilization of the Nuclear Energy (Nuclear Act) and referring decrees of ÚJD SR
7.1.6 Act No. 71/1967 Coll. on Administration Proceedings (Administrative Procedure Code)
7.1.7 IAEA-TECDOC-1226 Managing Change in Nuclear Utilities, July 2001

7.2 Consequent Documentation

7.2.1 SE/MNA-140.02 Job and Work Positions System

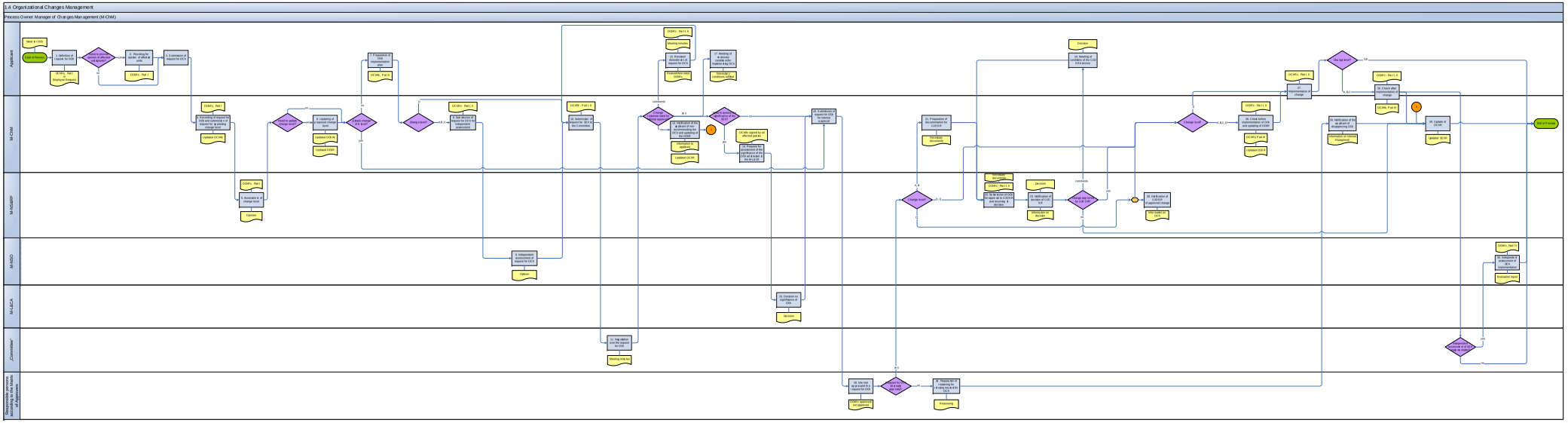
8. Records

Track. No.	Name of the record	Place stored	Reg. No.	ZH-LU
1.	Organizational Change Record	M-ChM	**A1.8**	5
2.	Minutes from the sitting of the Committee	M-ChM	**A1.8**	5
3.	Reasoning of refusing a request for change	M-ChM	**A1.8**	5
4.	Organizational Changes Register	M-ChM	**A1.8**	5

9. List of Annexes

Annex VII\A Process of Organizational Changes Management
Annex VII\B Examples of Activities With the Direct Impact on the Nuclear Safety
Annex VII\C Examples of Activities With the Impact on the Nuclear Safety
Annex VII\D Statute of the Committee
Annex VII\E Organizational Change Record
Annex VII\F Examples of Critical Risk Areas
Annex VII\G Approvers Matrix

Annex VII\A Process of organizational changes management



Annex VII\B
EXAMPLES OF ACTIVITIES WITH DIRECT IMPACT ON NUCLEAR SAFETY

Description of activities	**Job positions performing the activities**
Manipulation at the main control room and emergency control room, including separate shut-down of the reactor, management and control of commissioning and management and control of operation of the entire nuclear facility.	Shift Engineer
Manipulation at the main control room and emergency control room, including separate shut-down of the reactor, management and control of commissioning and management and control of one reactor unit operation.	Head of the Reactor Unit
Manipulation at the main control room and emergency control room, including separate shut-down of the reactor, management and control of commissioning and management and control of operation of the primary part of the reactor unit.	Primary Circuit Operator
Manipulation at the main control room and emergency control room, including separate shut-down of the reactor, management and control of commissioning and management and control of operation of the secondary part of the reactor unit.	Secondary Circuit Operator
Management of performing the tests of physical and energy commissioning at the main control room of the reactor unit.	Supervisory Physicist
Management and control of handling of each fuel unit inside the reactor unit, except for the new fuel node.	Supervisory Physicist

Annex VII\C.
EXAMPLES OF ACTIVITIES WITH THE IMPACT ON THE NUCLEAR SAFETY

Tr. No.	Facility and type of activity	Area						
		Planning	Changes and modifications	Operation *	Maintenance	Technical support	Quality Assurance	Preparation of employees
		a	b	c	d	e	f	g
1.	Primary part of the nuclear installation							
2.	Secondary part of the nuclear installation							
3.	Electric equipment							
4.	Technological information systems							
5.	Nuclear fuel handling							
6.	Measurement and regulation							
7.	Control of chemical regimes							
8.	Dosimetry and radiation protection							
9.	Fire protection							
10.	Metrology, diagnostics and revisions							
11.	Storing, processing and depositing of RAW							
12.	Decontamination							
13.	Physical protection of nuclear installation							
14.	Emergency planning and preparedness							
15.	Feedback from operational experience							
16.	Other equipments with possible impact on the nuclear safety							
17.	Other activities with possible impact on the nuclear safety							

** Including commissioning*

Note: *Not the entire scope of some of the above equipment or types of activities has to be necessarily related to the nuclear safety (e.g. in case of measurement and regulatory equipments, equipments of the secondary part of the nuclear installation, electric equipment, etc.). When classifying the activities in terms of their impact on nuclear safety, the equipment must be considered in relation to its importance in terms of nuclear safety.*

Annex VII\D
STATUTE OF THE COMMITTEE

STATUTE OF THE COMMITTEE FOR ORGANIZATIONAL CHANGES ASSESSMENT

The Committee for Organizational Changes Assessment is a collective body, whose task consists of complex assessment, recommendation and control of organizational changes within SE, a.s., in particular from the point of possible impact of organizational changes on the nuclear safety.

The Committee shall assess the following areas of organizational changes:
Chosen level of changes in terms of its impact on the nuclear safety
Risks of changes and relevant counter-measures
Implementation plan of changes
Performance/Success indicators of changes
Compatibility in terms of company needs.

The Committee has seven permanent members:

- Director of Company Development
- Director of Operation
- Director of Nuclear Power Plant Operations
- Director of Human Resources
- Manager of Nuclear Safety and Radiation Protection
- Manager of Changes Management
- Manager of Nuclear and Safety Oversight (observer)

An applicant, or directors or GD dpt. managers of units affected by a change shall be invited for the sitting of the Committee.

Note:
If needed or if justified, an external member (such as an expert for the certain specific area, etc.) may be invited for the sitting of the Committee.

The Director of the Operation, the Director of the Company Development and the Director of Nuclear Power Plant Operations can be deputized if not present at the sitting of the Committee only upon the condition that only one of the three stated members is not present. Other members can be deputized at the sitting of the Committee, however, at most two members of the Committee can be deputized.

The Committee can hold the discussions and reaches a quorum on the condition that the members of the Committee or their representatives are present as per the above conditions.

The member not present shall submit a written opinion before the sitting of the Committee or any comments on the documents discussed. These will be presented by his/her deputy at the

sitting of the Committee. Comments raised after the sitting of the Committee will not be accepted.

At its sitting, the Committee discusses over examinations after implementing changes of the A, B or C level (part IV OChRc) as needed, submitted by the Manager for Changes Management, in order to evaluate success of the organizational changes already implemented.

Organization and course of the Committee's sitting:

1. The sittings of the Committee are called by the M-ChM..
2. The M-ChM shall send to all the members who are to participate in the sitting documents for the sitting not later than within five working days before the day of the Committee's sitting.
3. The sitting of the Committee is chaired by the Director of Company Development. If not present, the sitting is chaired by the Director of Operation.
4. The M-NSO shall present the opinion of the independent assessment of the submitted OCh in terms of safety to the Committee.
5. The Committee can give its comments on the assessed areas of the OCh, if needed, it can re-assess also the specified level of the OCh in terms of its impact on the nuclear safety based on the consensus.
6. The Committee shall decide by consensus on recommending or not recommending an OCh for internal approval.
7. The Committee can ask the M-NSO to check implementation of the selected OChs after evaluation of the change by the applicant. Not later than within 2 months after evaluation of the change by the applicant, the Committee shall negotiate over the evaluation report submitted by the M-NSO. Based on the report, it shall draw lessons to be learnt for the future or remedy measures.
8. Conclusions from the sitting are recorded. The M-ChM shall draw the minutes from each sitting, containing:
   - names of the persons present (attendance list);
   - subject of the sitting (subject of the proposal for change);
   - all important conclusions, including measures or tasks;
   - results – recommendations for a proposal for organizational change.

   The M-ChM shall pass the minutes to all members of the Committee or their deputies, who were present at the sitting of the Committee, for commenting and shall provide for distribution of the minutes to the persons present.
9. All formal (permanent) members of the Committee shall respect the following points in evaluation of an OCh:
   - They shall put the nuclear safety as their highest priority.
   - They shall proceed in accordance with the Code of Ethics of SE, a.s., and valid documentation of the Integrated Management System of SE, a.s.
   - They shall take account of priorities and needs of the organization or their owners.

Annex VII\E
ORGANIZATIONAL CHANGE RECORD

ORGANIZATIONAL CHANGE RECORD
PART I: ORGANIZATIONAL CHANGE REQUEST

Identification number: | |

(to be filled out by the Changes Management Dpt.)

Change level: [1]	**A**	**B**	**C**	**D**	**E**

Change level assessed by: [1]	
	Date:

Name of the change: [1] (brief description)	
Initial status: [1] (current situation)	
Target status: [1] (situation after completion of the change)	
Assumed date of implementing the change: [1]	

Description of the change: [1]
(please, provide the brief description of what is to be changed, if needed, please insert the text file)

Reason for the change: [1]

(please, also provide references to the goals stated in the process documentation and any links to other proposals for organizational change)

[1] *Data that is to be filled out for the so-called "simple change" of E level*

Preconditions:

(what needs to be done so that the change could be implemented – please select what preconditions relate to the proposed change, unsuitable alternatives are to be deleted, please add other points if necessary)

I. Communication

- *Communication of the change within the company (impact of the change on multiple units)*
- *Communication of the change within the unit*
- *Communication of the change to the affected employees*

II. Organizational matters

- *Update of the Organizational Rules**
- *Preparation of the description of the new type job positions, including qualification requirements*
- *Update of the description of the type job positions*
- *Concluding of supply contracts for outsourced activities*
- *Changes in the structure of the costs centres and transfer of adequate finances within the units affected by the organizational change*
- *Changes of limits and conditions*
- *Approval of the defined approving body of the company, if the role in the SAP Nuclear is/is to be bound to the job*

III. Integrated management system (IMS)

- *Update of the Directive*
- *Update of the IMS Manual*
- *Impact on the Stage Quality Assurance Programmes of EBO, EMO*
- *Update of the process model*
- *Preparation of the update scheduling of the related managing documentation*

VI. Personal matters

- *Negotiating over the change with a trade union (if the change concerns more than five employees or reducing the staff)*
- *Training of employees regarding the job positions affected by the organizational change / new job positions*
- *Redistribution of activities among other employees*
- *Update of employment contracts of employees affected by the organizational change*
- *Selection of employees for the new job positions***
- *Takings steps related to impacts on employees, whose job positions were cancelled*
- *Reassessment of salaries for those employees, whose activities are to be broadened*

***V. Others** (please add if necessary)*

* *If updating of the Organizational Rules is a precondition of the change, the applicant shall attach the new wording of the affected part of the Organizational Rules with marked changes to the OChRc.*

** *If the organizational change concerns more than 10 job positions, the scheduling of the recruitment of employees for the new job positions shall be prepared.*

Risk areas: (please provide the areas as per Annex VII F to SE/SM-141, or identify also other risks, please add the lines if necessary)	**Counter-measures:** (activities that need to be done in case of occurrence of the risk during implementation of the change, including the deadline and the person in charge – if necessary)
1.	
2.	
3.	
…	

Performance indicators: (the measurable indicators, according to which the success of the change will be evaluated, including indicators showing the fact that the OCh did not have any negative impact on the nuclear safety; these indicators can by quantitative or qualitative; please provide their current value before implementation of the change – if measured; the indicators are determined based on the existing indicators that are monitored in the company at various levels and that are evaluated within the defined dates, or the new indicators are defined – in such case the applicant has to ensure data collection necessary for their monitoring and evaluation)	
Scheduled date of examination of indicators after implementation of the change: (recommended date of examination of indicators after implementation of the change is at least 6 months and at most 12 months after implementing the change)	

Date:

Prepared by: (Applicant)	Name and Surname	Position	Date	Signature
Assessed by: (M-NSO)	Name and Surname	Position	Date	Signature
Approved by[2]:	Name and Surname	Position	Date	Signature
Recommended by[3]:	Name and Surname	Position	Date	Signature

[2] *In case of OChs related to multiple units/plants, including the centralized ones, the applicant shall ensure the approving opinion of these units/plants, in the form of signature of all affected employees at managerial levels on the OChRc (up to the level of the manager inclusive – please see SE/SM-140 Organizational Rules of SE, a.s. – General Principles)*

[3] *The approving entity is assigned according to the change level in accordance with Annex VII G to SE/SM-141".*

Organizational Change Record
Part II: Implementation Plan

Implementation Plan:

(who will do what and when – task, person in charge, date; check points – milestones, such as the scheduled date of the official approval of the OCh, so as it would be effective as of the intended date; please add lines as necessary)

1.

Person responsible: ---------- **Deadline:** ----------
Title, Name, Surname

1.

Person responsible: ---------- **Deadline:** ----------
Title, Name, Surname

2.

Person responsible: ---------- **Deadline:** ----------
Title, Name, Surname

3.

Person responsible: ---------- **Deadline:** ----------
Title, Name, Surname

Communication Plan:

(specification of the key involved parties and communication with such parties – including communication with ÚJD SR by unit 10600 or 70000 – as necessary, i.e. what is to be communicated, to whom, when and in what form)

Updating plan of the affected related documentation:

(these can be methodical guide, working procedures, or other working documentation, including specification of persons in charge and dates)

Organizational Change Record
Part III: Examination of the Change Before Implementation

Status of meeting necessary conditions before implementation of the change:
(as per the list of necessary conditions stated in part I of the OChRc)

Examined by: ---------- **Date:** ---------- **Signature:** ----------
Name, surname

Organizational Change Record
Part IV: Examination of the Change After Implementation

Evaluation of the change – performance indicators and efficiency of counter-measures:
(in this part, the applicant shall compare the status of the quantitative or qualitative performance indicators before and after implementing the change (if available) within the deadline agreed upon in part I of the OChRc. Based on this comparison, s/he shall evaluate success and fulfilment of the goals of the change, as well as the risk management and introduction and efficiency of the chosen counter-measures. If the examination reveals any faults, the applicant shall analyze their causes, shall provide the remedy measures that are to be adopted and the date of the follow-up control).

Completion date of examination after the change:	
Date of the following examination:	

Examined by: ---------- **Date:** ---------- **Signature:** ----------
Name, surname

Annex VII F
EXAMPLES OF CRITICAL RISK AREAS

Examples of critical risk areas, which due to the proposed change can influence activities important in terms of safety:

1. **Insufficient human resources for ensuring activities important in terms of safety, such as:**
   - Increasing of a possibility of human failure
   - Loss of motivation of employees for ensuring safety
   - Unfavourable working regime (cumulation of activities, overloading, stress…)
   - Insufficient number of staff
   - Undefined or insufficiently defined work load or non-provided own or supplier's resources for fulfilling the tasks

2. **Decreasing of efficiency and transparency of management of activities important in terms of safety, such as**
   - Insufficient maintenance and implementation of safety policies and specification of safety objectives and requirements, or keeping of their mutual links
   - Unclear responsibility for activities important in terms of safety as a result of the organizational change or decreasing of the ability of maintaining the efficiency and transparency of management during own organizational changes or outsourcing
   - Lowering of the ability of units management, in particular due to dislocation in various localities
   - Lowering of the ability of independent control and independent safety assessment (in terms of scope and periodicity)
   - Lowering of the ability of quality assurance
   - Weakening of awareness of observing the basic requirements and principles of safety culture – cautious approach, conservative decision-making, communication
   - Possible occurrence of "communication barriers" during quick problems resolving

3. **Decreasing of the level of security of the activities important in terms of safety, such as:**
   - Decreasing of ability of internal control or self-assessment of the unit
   - Decreasing of resistance of barriers and efficiency of protection levels
   - Decreasing of the ability to prevent from and mitigate consequences of breakdowns, including worsening of the breakdown readiness
   - Decreasing of ability to report and analyze operational events – both internal and external – and to determine and fulfil remedy measures
   - Decreasing of ability to keep irradiation of the staff at the level that can be reasonably reached
   - Decreasing of the ability to prevent from losses of radioactive and nuclear materials and leakages of radioactive substances into the surroundings
   - Decreasing of the ability to meet legislative requirements, requirements of supervising bodies or necessity to ask for a change of conditions
   - Decreasing of ability to monitor and fulfil international recommendations

4. **Loss of knowledge and abilities important for ensuring activities important in terms of safety, such as:**
   - Lowering of abilities of creation, monitoring of observance, assessment and updating of the operational rules
   - Lowering of ability to keep the facility in the safe state and to document its data and parameters, increased risk of facilities that are not able to function
   - Lowering of ability to keep the configuration of the power plant or to keep the documentation of the real status
   - Decreasing of the personnel qualification
   - Decreasing of the training level
   - Decreasing of the ability to understand and to keep the knowledge of project bases, to keep and to understand the history of the power plant and verified technical procedures, insufficient records and worsening of archiving of the history of operation of the NPP and individual systems
   - Decreasing of the ability of supervision and operational safety control, of awareness of the risk and consequences of incorrect activities
   - Decreasing of ability to monitor, evaluate, document and ensure compliance with "licensing" requirements and conditions (in particular documentation approved by the supervision or forming basis for issuing permits, decisions, etc.)
   - Insufficient capacity and quality of the staff for performing internal safety audits
     Worsening of ability to provide for and organize external evaluations of safety (partners' inspections, missions), inadequate benchmarking

Annex VII G
APPROVERS MATRIX

	Assessed by in terms of impact on employees	Independent assessment of a request for OCh	Change recommended by (the OChRc approved by)	Approved by (internal managing act issued by)	ÚJD SR
Level A	Director 60000	Manager 10600 (1)	Director 70000	General Director	approving
Level B	Director 60000	Manager 10600 (1)	Director 70000	General Director	approving
Level C	Director 60000	Manager 10600 (1)	Manager 10100 (2) *for Head Office Functions*	Director 70000 (2)	notification
Level D	Director 60000	not necessary	Manager 10100 (2) *for Head Office Functions*	Director 70000 (2)	-
Level E	Director 60000	not necessary	Manager 10100 (2) *for Head Office Functions*	Director 70000 (2)	-

Note:
In accordance with the company Statute, some changes, depending on their nature or complexity, may be approved by the Board of Directors of SE, a.s., or by the Supervisory Board.

Explanation:

(1) If the applicant is Manager 10600, the request for OCh is assessed by Manager 22100.

(2) This is valid if the following conditions are observed:

i. Implementation of the change will not lead to exceeding the defined number of job positions within the dpt. or the plant.
ii. The organizational change below the manager level is concerned.
iii. This is not a change of the number of job positions (including their cancellation) within the dpt. or the plant by more than 30% of the total number of job positions within this dpt. or plant, within the calendar year.
iv. This does not concern implementation of any unscheduled decreasing of the number of staff or any mass reducing of the staff.

If the above conditions are not met, the approving process shall be applied as for levels A, B.

DISTRIBUTION LIST

Oboznámenie vykonal
Notification performed by:

Meno ***Name***	**Funkcia** ***Job position***	**Podpis** ***Signature***
[name]	[job]	

Dolu podpísaní zamestnanci svojím podpisom potvrdzujú, že boli s dokumentom v plnom rozsahu oboznámení. *The undersigned employees hereby confirm that they are acquainted with document.*

Zároveň potvrdzujú že požiadavkám a postupom uvedeným v dokumente porozumeli a sú im jasné povinnosti z nich vyplývajúce pre ich prácu. *At the same time employees confirm that they understand requirements and procedures in the document and their duties resulting from the document.*

Por. č. ***No.***	**Meno zamestnanca** ***Employee's name***	**Prac. zaradenie – funkcia** ***Job position***	**Dátum** ***Date***	**Podpis** ***Signature***
1.	[name]	[job]		
2.				
3.				
4.				
5.				
6.				
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8.				
9.				
10.				
11.				
12.				
13.				

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