

**Written Testimony to the Senate Committee on Environment and Public Works  
Subcommittee on Clean Air and Nuclear Safety**

**Delivered by Eric F. Wilson, Chief Executive Officer, Regulated Security Solutions**

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Chairman Carper, Ranking Member Voinovich, Senator Specter, Senator Casey and Members of the Subcommittee, thank you for your invitation to be here today. My name is Eric Wilson and I am the CEO of Regulated Security Solutions, or RSS, a newly formed company owned by G4S. RSS was created with the express goal of raising the bar for security providers at our nation's nuclear facilities to a new level of quality and sustainability.

Security has been the focus of my professional life – first as a member of the military where I was an Army Ranger with the 75<sup>th</sup> Ranger Regiment and later a member of the U.S. Army Special Forces. I also owned a consulting company focused on providing advanced security services for critical infrastructure, both domestically and internationally. Throughout my career, I've visited nearly all of the commercial nuclear facilities in the nation.

I was hired a little more than one year ago by Wackenhut Nuclear Services to conduct a thorough assessment of the quality of security at all nuclear facilities it served.

As you may know, Wackenhut Nuclear Services (WNS) has provided contract security services for more than 20 years and currently does so at 28 commercial nuclear power facilities across the United States. The company employs approximately 4,000 highly trained and professional nuclear security officers, many of whom currently serve, or have served, in the military or have law enforcement backgrounds. In fact, Wackenhut Nuclear Services has been one of the largest employers of our troops transitioning from the military.

Our takeaway from the assessment I was brought in to conduct was that a dramatically different approach – a new model – is necessary for contract security providers to meet the changing security needs of our nation's nuclear and other regulated facilities. And that is what ultimately led to the formation of RSS and our new strategic direction – a model that effectively responds to an ever-evolving regulatory structure in the U.S. and delivers a level of security that is both high quality and sustainable.

Before I explain this new model and its promise for the future, I want to directly address the incident at Peach Bottom Atomic Power Station that led to today's hearing.

Let me be very clear - the conduct of the Wackenhut security officers and supervisors at the Peach Bottom facility was completely unacceptable and inexcusable. The inattentiveness of the company's officers was troubling for me, but even more troubling was the inaction of their supervisors. Worse still was that the incident opened the door to the impression that the Peach Bottom facility was less safe and secure than it actually was and is.

In fact, despite the incident, Peach Bottom was safe and secure then and is today. Not only did the NRC conclude this in its own investigation, but we at Wackenhut retained highly regarded third party experts, Conner & Winters LLP, to conduct an independent evaluation of the Peach Bottom incident. I want to note that we didn't ask them to just look at the issue of inattentiveness. We asked these independent experts to scrutinize the whole operation, to identify lessons learned that could help not only prevent future problems with inattentiveness but go well beyond that to step up the overall quality and effectiveness of the security we provide – at Peach Bottom and at all facilities we safeguard.

First, in its investigation, the Nuclear Regulatory Commission (NRC) made the following observations to assess the significance of security officer inattentiveness on station security:

- 1- The inattentiveness of the security officers in question was not a result of fatigue.
- 2- All inattentive officers were inside the plant's "ready room" and were on standby at the time they were inattentive – meaning that they were not assigned at that time to surveillance or detection duties but rather were on-site and available to respond should a need arise.
- 3- Each of the identified officers satisfactorily conducted patrols and rounds, as assigned, on the dates associated with the inattentive events.
- 4- All the officers in the "ready room" carried two communication devices at all times that could be used to alert the officers, if required to respond.
- 5- If a need had arisen, these officers were near enough to defensive posts that they could arrive there in a timely manner.
- 6- The officers involved were not part of the first-responder team in place when they were inattentive; they were adding extra layers to the security force on-site as part of a layered defense-in-depth strategy.

With the creation of the new company and model, all clients are being transitioned from Wackenhut Nuclear Services to G4S Regulated Security Solutions. In the interim however, we have implemented numerous corrective actions designed to reduce the likelihood of similar events in the future. Some of these actions include:

- 1- Mandatory testing of supervisors and managers on attentiveness and their understanding of – and enforcement of – the NRC's Safety Conscious Work Environment requirement. (The SCWE requires a working environment where employees are encouraged to raise concerns about safety.) If they do not score 80% or better by their second attempt, they are removed from supervisory functions.

- 2- Meetings with all security force personnel reinforcing the expectations regarding raising concerns and resolving issues, and making sure all of them are aware of the many avenues they have to communicate concerns and do so without fear of reprisal.
- 3- Mandatory reporting of information every time a new shift comes on duty relating to inattentiveness and the Continual Behavioral Observation Program (CBOP), which provides counseling for job-related issues and unusual behavior.
- 4- Increased oversight of security management by corporate personnel and personnel from other facilities, and increased random visits to security posts by shift supervisors.
- 5- Educational communication to all security personnel, leveraging the Peach Bottom incident as a “teaching moment” to reinforce appropriate behaviors including attentiveness and reporting of issues and concerns.
- 6- Issuance of an “Immediate Corrective Actions” directive to all security personnel to drive a variety of immediate actions, including expectations for ready rooms, more observations and monitoring, reviews of communication and post checks, and post rotations, among other actions.
- 7- Issuance of a supervisory brief to the site workforce to reinforce proper behaviors regarding attentiveness and use of the reporting processes, as well as extensive personnel interviews and questionnaires to gauge their readiness to report issues to management and receiving adequate follow-up.
- 8- Review of security group work hour limitations to ensure compliance with regulations.
- 9- Improved management oversight by enhancing access to the ready room and other staging areas in which the inattentive events occurred.
- 10-The creation of a training DVD to ensure a consistent message is delivered. Every employee will be required to view the DVD. This DVD discusses the importance of attentiveness and the need to report these issues when observed by any and all avenues provided within Wackenhut Nuclear Security, the client and the NRC.
- 11-Revised post assignments in order to reduce the opportunity of inattentive events occurring.
- 12-Increased manpower at the corporate level to help make sure these enhancements are fully and aggressively implemented.

But as I mentioned previously, we didn't want to stop there. We tasked our third-party expert, Conner & Winters LLP, with conducting an evaluation of the Peach Bottom Security Force regarding the effectiveness of our Safety Conscious Work Environment efforts. SCWE is the NRC requirement that calls for the establishment and maintenance

of an environment in which employees are encouraged to raise safety concerns both to their own management and to the NRC without fear of retaliation.

Our third party expert's analysis concluded that WNS effectively implemented policies and programs designed to encourage employees at Peach Bottom to raise concerns. Unfortunately, members of one team at Peach Bottom subverted the normal operation of the internal channels specifically set up to facilitate the raising of concerns and then resolving them.

While overall the report provides assurance that a SCWE existed and that the issues seemed to be isolated to one shift, the bottom line is that leadership failed to adequately address an employee's concerns. This I believe gets to the root of this issue in this case, which was ineffective leadership. I am not here today to make any excuses for the actions that took place at Peach Bottom. To the contrary, I am here to take responsibility and explain how we are not only addressing the issue of inattentiveness, but how we will deliver a caliber of supervisor and manager that leads by example and represents a high degree of integrity and professionalism as he/she supports their people.

In addition to the rules established by the NRC, Wackenhut has numerous avenues available to our employees to raise their concerns without fear of retaliation. These include the Open Door Policy, the Safe-2-Say Program, Direct Access to the President of the division, and the client's Employee Concerns Program. All of the programs provide for anonymous reporting. These programs have been evaluated by a third-party expert and confirmed to be effective in clearly imparting the company's expectations concerning reporting procedures without fear of retaliation.

While I believe strongly that this incident is not reflective of the approximately 4,000 security officers that exceed expectations on a daily basis, I take full responsibility for the actions of my people. And, in my mind, part of taking responsibility is to make absolutely sure incidents of this sort do not happen again.

This gets me back to the principal finding of our assessment – if security vendors wish to provide security in heavily regulated markets, a new paradigm must exist that consistently provides sustainable and high quality performance. I believe we do just that with RSS.

In our assessment of the previous security services model, it became clear that providers of security services focused on price as a competitive advantage and, with that, security officers were trained to comply with a standard set of regulatory needs.

As you well know, regulatory requirements continue to evolve in the nuclear sector and security staffing continues to increase as the potential for terrorism changes at home and abroad. But in many ways the contract security model did not keep pace with these changes. One example is that too much separation existed between security and other station operations.

As the CEO of RSS, I will no longer provide that model when doing business with nuclear and other regulated facilities. We are committed to evolving WNS clients into

RSS in accordance with our new model. This new model focuses on providing solutions and will require us to deliver specific results and objectives to our clients. It is based on three critical pillars: Leadership Development, Strategic Alliances and Technology.

First, we need to provide a significant level of ongoing **Leadership Development** and a continuous learning environment. At the end of the day, effective leadership is the answer to most organizational needs. Our new model provides for greater leadership development than is currently possible by increasing staff so that an effective, ongoing leadership program can proceed in parallel with the full staffing of the facility's security needs. In my mind, enhanced leadership development is indispensable and cannot and will not be separated from the security we provide our clients.

Second, we need to enter into **Strategic Alliances** with our clients. Under the former model, we provided qualified and trained personnel, but in many cases contract security services still stood outside the operations of the facility. Our new approach is built on providing a suite of services that are fully integrated with facility management. We will create mutually beneficial partnerships that will measure us against our ability to deliver specific results and objectives for our clients. Put simply, if we don't meet a set key performance criteria that is predetermined with the client, we don't get paid.

Finally, we will integrate **Technology** more effectively to ensure our personnel have the tools they need to fulfill their responsibilities and optimize their performance. We have already worked with high-tech designers to develop a prototype we call the ASA-100. Among its many capabilities, this device contains a motion detector that alerts management when a lack of motion is detected. Additionally, the use of Keystone, our automated total quality improvement system, will measure our performance across all facilities and identify best practices to ensure increased performance.

I believe there is general agreement in this room that we are all seeking the level of security that nuclear power facilities require and deserve. In short, I am confident in our model. We will not only be accountable for results, but see this as the very basis of our alliances with our clients.

Let me finish by emphasizing a very important point. ***America's nuclear power facilities today are among the safest and most secure facilities in the nation.*** What I have addressed this morning is not only a preventative solution to inattentiveness, but a better way to ensure the quality and sustainability of security at nuclear and other regulated facilities in the U.S.

Again, I appreciate the opportunity to address this committee today and am prepared to answer any questions you may have.