















Reference Document



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AERICAN ELECTRIC

RELIABILITY | ACCOUNTABILITY











































NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	Failure Mode & Mechanism		
 Failure Mode*: – The manner whereby the failure is observed 			
 Failure Mechanism: 			
 Physical, chemical or other processes that led to the failure 			
Component	Failure Mode	Failure Mechanism	
Relay	Contacts fail closed	Electrical short	
Computer stops processing	Virus downloaded	Virus protection not current	
Transformer	Coil Shorts	Insulation breakdown	
Power Supply	Loss of Output	Diode failure	
* 60% stopped at failure mode during cause analysis			
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NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	Event
 "an unwanted, undesirable change in the solution of plants, systems, or components that lear undesirable consequences to the safe and reliable operation of the plant or system" 	state ads to l
 Often driven by 	
 Deficiencies in barriers and defenses 	
 Latent organizational weaknesses and conditions 	
 Errors in human performance and contend factors 	extual
 Equipment design and/or maintenance 	issues
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NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	Methods of RCA
 The investigation or analysis "Event" characteristics Tools Considerations Equipment-related Human-related Combination 	
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NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION Selection of methods (cont'd)				
	1	1		
METHOD	WHEN TO USE	ADVANTAGES	DISADVANTAGES	REMARKS
Task Analysis	Use whenever the problem appears to be the result of steps taken in a task (just about all the time)	Shows the steps which should have been taken.	Requires personnel and (possibly) equipment time to be performed correctly and completely	both a Cognitive Task Analysis (what was the person thinking while conducting the task) and a Contextual Task Analysis (what was going on while the task was being done).
Events and Causal Factor Analysis	Use for multi-faceted problems with long or complex causal factor chain	Provides visual display of analysis process. Identifies probable contributors to condition.	Time-consuming and requires familiarity with process to be effective.	Requires a broad perspective of the event to identify unrelated problems. Helps to identify where deviations occurred from acceptable methods.
Change Analysis	Use when cause is obscure. Especially useful in evaluating equipment failures	Simple 6-step process	Limited value because of the danger of accepting wrong "obvious" answer.	A singular problem technique that can be used in support of a larger investigation. All root causes may not be identified.
Barrier Analysis	Used to identify barrier and equipment failures, and procedural or administrative problems.	Provides systematic approach.	Requires familiarity with process to be effective.	This process is based on the MORT Hazard/Target concept
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NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION Selection of methods (cont'd)				
METHOD	WHEN TO USE	ADVANTAGES	DISADVANTAGES	REMARKS
MORT/Mini-MORT	Used when there is a shortage of experts to ask the right questions and whenever the problem is a recurring one. Helpful in solving programmatic problems.	Can be used with limited prior training. Provides a list of questions for specific control and management factors.	May only identify area of cause, not specific causes.	If this process fails to identify problem areas, seek additional help or use cause-and-effect analysis.
Human Performance Evaluations (HPE)	Use whenever people have been identified as being involved in the problem cause.	Thorough analysis	None if process is closely followed.	Requires HPE training.
Kepner-Tregoe	Use for major concerns where all aspects need thorough analysis	Highly structured approach focuses on all aspects of the occurrence and problem resolution.	More comprehensive than may be needed	Requires Kepner-Tregoe training.
Fault Tree Analysis	Normally used for equipment-related problems	Provides a visual display of causal relationships,	Does not work well when human actions are inserted as a cause	Uses Boolean algebra symbology to show how the causes may combine for an effect
Cause and Effect Charting (e.g., Reality Charting®)	Useful for any type of problem. Visual display showing cause sequence.	Provides a direct approach to reach causes of primary effect(s). May be used with barrier/change analysis. Focus is on best solution generation.	May not provide entire background to understand a complex problem. Requires experience/knowledge to ask all the right questions.	Requires knowledge of the Apollo Root Cause Analysis techniques. Apollo RealityCharting® software may be used as a tool to aid problem resolution."
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NERC The "Problem"	7
Define the Problem!	
– WHAT is the problem?	
– WHEN did it happen?	
– WHERE did it happen?	
– What is the SIGNIFICANCE of the problem?	
 What the Problem Definition Does Not Contain WHO - There is no need to ask "Who" unless you are asking who knows the answer to a question. This is important to mention because of the strong tendency to place blame, which detracts from the focus on prevention. WHY - Asking "Why" at this stage detracts from defining the problem and is part of the analysis step that will be addressed soon after defining the problem. No SPECULATION, stick to facts as you know them 	
	Y _















NERC	Phase I:	Data	Collection (cont'd)	
 Methods of g Interviews fact-find Preferable People m Consider Steps: Pi Reviewing R Operating Inspection Maintena Meeting F Procedur specifica 	jathering infor ing, NOT fault-fin ly in person, one-o host familiar with th "walk-through" reparation, Openin ecords g logs, alarm sequ n/surveillance reco nce records, Equi minutes, computer res and instructions	mation ding in nat on-one he problem og, Question ences, corr ords, pment histo data s, Vendor n	ture <i>ning, Closing</i> respondence, ory records, Work orders, nanuals, Drawings &	
Conside Not inten	r "artifacts" ded to be all-inclus	sive list		
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NERC	Change An	alysis – V	Vorksheet exa
Change Factor	Difference / Change	Effect	Questions to Answer
What ? (Conditions, occurrence, activity, equipment)			
When ? (Occurred, identified, plant status, schedule)			
Where ? (Physical location, environmental conditions)			
How ? (Work practice, omission, extraneous action, out of sequence procedure)			
Who? (Personnel involved, training, qualification, supervision)			
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ERC	Events and Causal Factor Analy			Events and Caus	
WHEN TO USE	ADVANTAGES	DISADVANTAGES	REMARKS		
Use for multi-	Provides visual	Time-consuming	Requires a broad		
faceted problems	display of	and requires	perspective of the		
with long or	analysis	familiarity with	event to identify		
complex causal	process.	process to be	unrelated problems.		
factor chain.	Identifies	effective.	Helps to identify		
	probable		where deviations		
	contributors to		occurred from		
	the condition.		acceptable methods.		

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NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	MORT Reference	ce
	NRI-1 (2009)	
	NRT MORT User's Manual	
	For use with the	
	Management Oversight & Risk Tree	
	Second Edition	
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	<u>K-T (</u>	<u>Kepner-Tregoe) Proble</u>	<u>m Analysis</u>	•
STATE DEVIATION:				
Specify the Problem	IS	IS NOT	Distinctions of IS compared with IS NOT	Changes in distinctions (list Dates)
What identity				
Where location				
When timing				
Extent magnitude				
Develop Possible Causes from experience, changes, distinctions		Test for Probable Cause Against specifications (list assumptions from destructive test)		
1 2			Does not explain:	Explains only if:
Determine Most Probable Cause:		Verify True Cause (steps):		
			2	
			3	





NERC	Fault Tree Analysis (FTA)
 Top-down approvement Graphical represent might lead to fail Steps followed: Define the top event Establish bound Examine the set Construct the Analyze the fail Prepare corree Implement the 	pach sentation of the events which ilure event (problem, or primary effect or primary ndaries system fault tree tree ctive action plan e plans
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NORTH AMERICAN ELECT RELIABILITY CORPORATION	Fault T	ree Analysis (symbols)
Gate Symbol		Causal Relations
\square	AND gate	Output event occurs if all of the inputs occur simultaneously
\bigtriangleup	OR gate	Output event occurs if any one of the input event occurs
\bigcirc	Inhibit gate	Input produces output when conditional event occurs
	Priority AND gate	Output event occurs if all input events occur in the order from left to right
\bigtriangleup	Exclusive OR gate	Output event occurs if one, but not both, of the input events occur
mt0.0	<i>m</i> -out-of- <i>n</i> gate (voting or sample gate)	Output event occurs if <i>m</i> -out-of- <i>n</i> input events occur
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NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	Fault Tree Analysis (symbols)		
Event Symbol	Meaning		
	Event represented by a gate		
\bigcirc	Basic event with sufficient data		
\diamond	Undeveloped event		
\bigcirc	Either occurring or not occurring		
\bigcirc	Conditional event used with inhibit gate		
\bigtriangleup	Transfer symbol		
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NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	Caus	e and Effect - principles	
– Cause and Effect are the same thing			
Effect		Cause	
Generator Trips	Caused by	Protection System Misoperation	
Protection System Misoperation	Caused by	Incorrect Signal	
Incorrect Signal	Caused by	Bad Installation	
Bad Installation	Caused by	Work Package Issue	
Work Package Issue	Caused by	Procedure Problem	
Procedure Problem	Caused by	Expectation Misunderstanding	
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NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	ganizational Weaknesses LOW's			
Pre-Job Briefing	Values & Norms			
Communications – Oral & Written	Maintenance Processes			
Work Planning & Scheduling	Procedure Development			
Controls, Measures and Monitoring	Goals & Priorities			
Design & Modifications	Organizational Structure			
Task Structure	Roles & Responsibilities			
Written Guidance:	Training & Qualification			
Rules, Policies and Practices				
 A review of the INPO industry events occur more often due to prone work environments than 	ent data base reveals that o error-prone tasks and error- from error-prone individuals			
 Error-prone tasks and work envir by latent organizational weaknes 	onments are typically created ses. Source: Reason – 1991 (modified)			
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		enses		
C d c	onsider using applicable efenses when the hazard annot be eliminated			
		Physical	Administrative	
	Create Awareness			
	Detect and Warn			
	Protect			
	Recover			
	Contain			
	Enable Escape			
Soi	rce: Maurino (1995) acts	ved defenses or their cons	s allow inappropriate sequences to occur.	
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NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	- Error Precursors			
Task Demands	Work Environment			
Time pressure (in a hurry)	Distractions / Interruptions			
High workload (memory requirements)	Changes / Departure from routine			
Simultaneous, Multiple tasks	Confusing displays / control			
Repetitive actions (monotony)	Work - arounds			
Unclear goals, roles, or responsibilities	Unexpected equipment conditions			
Lack of or unclear standards	Back shift or recent shift change			
Complex / High information flow				
Individual Capabilities	Human Nature			
Unfamiliarity with task (first time)	Stress			
Lack of knowledge (faulty mental model)	Habit patterns			
Imprecise communication habits	Assumptions			
Lack of proficiency; inexperience	Complacency / over confidence			
Overzealousness for safety critical task	Inaccurate risk perception			
Illness or fatigue – Fitness for duty	Communication shortcuts			
Lack of big picture				
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NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	Cognitive Biases? Heuristics??
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NORTH		Cognitive Bi	ases
	Common	Decision-making and Behavioral Biases	
	Automation bias	The tendency to trust information provided via electronic information systems over intuition or humans; accepting information derived from the use of automation as a "best guess" instead of vigilant information seeking and processing	
	Bandwagon effect	The tendency to do (or believe) things because other people do, with the goal of gaining in popularity or being on the winning side	
	Confirmation bias	The tendency to search for or interpret information in a way that confirms one's preconceptions or course of action.	
	Professional deformation	The tendency to look at things according to the conventions of one's profession, ignoring broader points of view	
	Denial	The tendency to disbelieve or discount an unpleasant fact or situation	
	Expectation bias	The tendency to believe, certify results or analysis that agree with one's expectations of an outcome and to disbelieve, discard, or downgrade corresponding weightings for information that appears to conflict with those expectations	
	Extreme aversion	The tendency to avoid extremes, being more likely to choose an option if it is the intermediate choice	
	Framing effect	The drawing of different conclusions based on how data are presented	
	Illusion of control	The tendency to believe that one can control or at least influence outcomes that one clearly cannot	
	Information bias	The tendency to seek information even when it cannot affect action	
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	AN ELECTRIC DRPORATION	Cognitive Biases (co	ont'd)
	Loss aversion	The disutility of giving up an object is greater than the utility associated with acquiring it	
	Normalcy bias	The tendency to discount novelty and to respond to such events with only routine procedures	
	Neglect of probability	The tendency to completely disregard probability when making a decision under uncertainty	
	Not invented here	The tendency to ignore that a product or solution already exists because its source is seen as an adversary	
	Reactance	The urge to do the opposite of what someone wants one to do out of a need to resist a perceived attempt to constrain one's freedom of choice	
	Selective perception	The tendency for expectations to affect perception	
	Unit bias	The tendency to want to finish a given unit of a task or an item often resulting in sequential behavior limiting simultaneous tasks	
	Wishful thinking	The formation of beliefs and making decisions according to what might be pleasing to imagine instead of by appealing to evidence or rationality	
	Zero-risk bias	Preference for reducing a small risk to zero instead of seeking a greater reduction in a larger risk	
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NEF	Heuristics and Biases
	Anchoring - the common human tendency to rely too heavily, or "anchor," on one trait or piece of information when making decision. Attentional Bins - implicit cognitive bias defined as the tendency of enotionally dominant atimuli in one's environment to preferentially draw and hold attention. Bin bins door - the tendency to a correlative as biased than other people do (or believe) the same. Related to grouptink and herd behavior. Bins this door - the tendency to a correlative of the same tendence of the tendency to a correlative of the same tendence of the interpret of the same for or interpret information in any bar confirm and specocopations. Contrast effect - the tendency to a pend frome more y when it is denominated in same annots (e.g. correly atter than the same tendence of the interpret of the interpret of the same disability of the making tendence with the evolutional tip men same state (e.g. correly atter than they acould be evolution to part the annotation (e.g. correly atter than they acould be evolution to the interpret of the i
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Heuristics and Biases

- Status quo bias the tendency to like things to stay relatively the same (see also loss aversion, endowment effect, and system justification).

- Status gou bias the tendency to like things to tary relatively the same (see also loss aversion, endowment effect, and system justification). Unit bias the tendency to want to finish a given unit of atask or an item. Strong effects on the consumption of dool in particular. Wishful thinking the formation of beliefs and the making of decisions according to what is pleasing to imagine instead of by appeal to evidence or rationality. Zarorisk bias preference (or reducing a small risk to zero over a greater reduction in a larger risk. Anbiguity effect the tendency to aver bid options for which insisting information makes the probability seem "unknown." Anchoring effect the tendency to aver bid options for which making indegradient of a correlation or association. Availability teuristic estimating what is more likely by what is more available in memory, which is biased toward wird, unusual, or emotionally charged examples. Availability teuristic estimating what is more iskely by what is more available in memory, which is biased toward wird, unusual, or emotionally charged examples. Availability accessed a self-relifering of age winder available in memory, which is biased toward wird, unusual, or emotionally charged examples. Availability accessed a self-relifering of age rocess in which a collective belief gains more and more plausibility through its increasing repetition in public discourse (or "repeat something long enough and it will become true").

- Note: The second secon

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NERC **Heuristics and Biases** NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION Actor-observer bias – the tendency for explanations of other individuals' behaviors to overemphasize the influence of their situation (see also Fundamental attribution error), and for explanations of one's own behaviors to do the opposite (that is, to overemphasize the influence of our situation and underemphasize the influence of our own personality).
Dunning-Kruger filect - a twoldol bias. On one hand the lack of metacognitive ability defudes people, who overrate their capabilities. On the other hand, skilled people underrate their abilities, as they assume the others have a similar understanding.
Egocentic bias – occurs when people claim more responsibility for themselves for the results of a joint action than an outside observer would.
Fore effect (aka Bamum effect) – the tendency to give high accuracy ratings to descriptions of their personality that supposedly are tailored specifically for them, but are in fact vague and general enough to apply to a wide range of people. For example, horoscopes.
Flade consensus effect – the tendency for people to overe-emphasize personality-based explanations for behaviors observed in others while underemphasizing the role and power of situational influences on the same behavior (see also actor-observer bias, group attribution error, positivity effect, and negativity effect).
Ilusion of transparency – people precive their knowledge of their peers to surpass their peers' knowledge of them.
Ilusion of asymmetric insight – people precive their knowledge of their peers to surpass their peers' their own groups.
Ilusion of asymmetric insight – people precive their knowledge of their peers to surpass their peers' knowledge of them.
Ilusion of asymmetric insight – people precive their knowledge of their peers to surpass their peers' knowledge of them.
Ilusion of transparency – people overestimate there ability to know others.
Ilusion of people to people to give preferential treatmen • Actor-observer bias - the tendency for explanations of other individuals' behaviors to overemphasize the influence of their personality and underemphasize nuch more predictable. • Ultimate attribution error – similar to the fundamental attribution error, in this error a person is likely to make an internal attribution to an entire group instead of the individuals within the group

NERC	Heuristics and Biases
 Cryptomnesia – a form of misattribution where a m Egocentric bias – recalling the past in a self-servin remembering a caught fish as being bigger than it w False memory – confusion of imagination with mer Hindsight bias – filtering memory of past events the were; also known as the "I-knewi-t-al-along effect." Positivity effect – older adults remember relatively Reminiscence bump – the effect that people tend t periods. Rosy retrospection – the tendency to rate past even Self-serving bias – perceiving oneself responsible Suggestibility – a form of misattribution where idea Telescoping effect – the effect that recent events a recently. Von Restorff effect – the tendency for an item that Bounded rationality – limits on optimization and rat Attribute substitution – making a complex, difficult j Attributo theory, especially: Salience Cognitive dissonance, and related: Impression management Self-perception theory Heuristics, including: Availability heuristic – estimating what is more likel charged examples Representativeness heuristic – judging probabilitie Affect heuristic – basing a decision on an emotiona Introspection lilusion Adaptive bias Misinterpretations or misuse of statistics. 	emory is mistaken for imagination. g manner, e.g. remembering one's exam grades as being better than they were, or as. nory, or the confusion of true memories with false memories. ough present knowledge, so that those events look more predictable than they actually more positive than negative things, compared with younger adults[46] o recall more personal events from adolescence and early adulthood than from other lifetime nts more positively than they had actually rated them when the event occurred. for desirable outcomes but not responsible for undesirable ones. s suggested by a questioner are mistaken for memory. ppear to have occurred more remotely and remote events appear to have occurred more "stands out like a sore thumb" to be more likely to be remembered than other items. ionality judgment by unconsciously substituting an easier judgment by by what is more available in memory, which is biased toward vivid, unusual, or emotionally as on the basis of resemblance al reaction rather than a calculation of risks and benefits
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NERC	Organizational Limitations
 Organization Little conta and people 	al "blind spots" ct between people performing one task performing another task ("fiefdoms")
 Organization 	al bias
 Congregati people, not their group 	ng of like-minded (or like-background) t passing information to others "outside "
 "homophily migrate to 	" – the tendency of similar individuals to each other
 Diffusion of r 	esponsibility
 "Someone 	else will do it"
• AKA - "bys	stander effect"
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NERC NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	Cause Codes (cont'd)
A1 Design/Engineering	
 B1 = DESIGN INPL 	JT LTA
 B2 = DESIGN OUT 	PUT LTA
 B3 = DESIGN/DOC 	CUMENTATION LTA
 B4 = DESIGN/INST 	ALLATION VERIFICATION LTA
 B5 = OPERABILITY 	Y OF DESIGN/ENVIRONMENT LTA
• <u>A2 Equipment/Material</u>	
B5 = PROCUREME	
• B6 = DEFECTIVE,	FAILED, OR CONTAMINATED
• B7 = EQUIPMENT	INTERACTIONS LTA
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NERC	Cause Codes (cont'd)
A5 Communications	
 B1 = WRITTEN COMMU PRESENTATION LTA 	NICATIONS METHOD OF
 B2 = WRITTEN COMMU 	NICATION CONTENT LTA
 B3 = WRITTEN COMMU 	NICATION NOT USED
 B4 = VERBAL COMMUN 	IICATION LTA
• <u>A6 Training</u>	
 B1 = NO TRAINING PRO 	OVIDED
 B2 = TRAINING METHO 	DS LTA
 B3 = TRAINING MATER 	IAL LTA
• <u>A7 Other</u>	
 B1 = EXTERNAL PHENO 	DMENA
 B2 = RADIOLOGICAL / H 	HAZARDOUS MATERIAL PROBLEM
 B3 = VENDOR OR SUPF 	PLIER PROBLEM
	DOE-G 231.1-2 (2003)
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Cause Coding of events The event happened on (date) and was a result of real fault on one of the feeder circuit.

The event happened because the kV Bus Differential Relay circuit was not connected correctly and the relay saw the fault on the feeder circuit as a ____kV bus and not just a normal feeder fault. The relay opened all of the kV breakers and the _____ transformer main breakers. This caused the city wide outage of MW.

What was the real cause of the problem?

What was the reason for the "not connected correctly" condition?

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NE NORTH A RELIABI	MERICAN ELECTRIC			Ca	use C	ode S	Sele	ecti	on
	Select the appropriate grouping After selecting a Level A descrip Once Level A and Level B select	of the Level A otion, you then ions are made, Level A Code	Descriptions pick the appropriate Lev select the appropriate Le Pick the Level B Code Description	el B descriptio evel C descript Level B Code Selected is	on. IF NOT selected, th ion. IF NOT selected,	ne block will show any the block will show ar	previous select ny previous select Level C Code Selected is	tions, whic ctions, wh	
	Management Problem	A4	RESOURCE MANAGEMENT LTA	A4B2	 Insufficient manpor identified goal / obje 	wer to support ective	▼A4B2C03		
						Data Selection Select from the list the most correct description of the source of the			
	Defined as:		Defined as:		Defined as:	problem			
	An event or condition that could		Evaluation of the		Personnel were not a	available as required			
	be directly traced to managerial		processes whereby		by task analysis of go	al/objective.			
	actions, or methodology (or lack		manpower and						
	thereof). A "management"		material were						
	problem attributed to		allocated to						
	management methods		successfully perform						
	(directions, monitoring,		assigned tasks. Note:						
	assessment, accountability, and		A4B2 serves as an						
	corrective action), inadequate		expansion to A4B1,						
	resource allocation, work		Management						
	organization and planning,		Methods, since both						
	supervisory methods and/or		A4B1 and A4B2 are						
	change management practices.		important inter-						
	Note: Apparent Cause Corrective		related factors. A4B2						
	Actions for this branch in		provides more in-						
	particular easily slip into		depth causal nodes for						
	correcting the program as		evaluating manpower						
	opposed to the implementation.		and material issues						
	Fixing the program is the realm		impacting						
	of Root Cause[s]. The analyst is		performance of work-						
	cautioned to gauge Corrective		related activities.						
	Actions appropriately.								
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- EMS Alert Advisory Analysis- During the Event Analysis (EA) field trial, 28 Category 2b events have occurred where a complete loss of SCADA/EMS lasted for more than 30 minutes. Analysis is currently being conducted to provide emerging trends for the industry
- Current analysis of these events has shown:
 - **Software failure** is a major contributing factor in 50 percent of the events
 - Testing of the equipment has been shown to be a factor in over 40 percent of the failures:
 - $\,\circ\,$ Test environment did not match the production environment
 - Product design (less than adequate)
 - Change Management has had an impact in over 50 percent of the failures:
 - Risk and consequences associated with change not properly managed
 - Identified changes not implemented in a timely manner
 - Individual operator skill-based error was involved in 15 percent of the events...

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	EFFECTIVENESS RANKING		ACTION TYPE	CHARACTERISTIC	EXAMPLES	
	Most Effective	1	Preventive Design Changes	Automatically prevents the undesirable situation with no human action required	- auto-start circuitry on low system pressure - permanent handrails around fall hazard	
		2	Mitigating Devices	Automatically limits the adverse effects of the undesirable situation with no human action required	 Fire sprinkler systems automatic shutoffs/trip circuitry 	
		3	Warning Devices	No human action is required to activate, but success is dependent upon human action to recognize and understand the warning and respond properly	 radiological boundaries and postings low level alarms 	
		4	Administrative Controls	Long-term in nature; provides a consistent and reproducible result if utilized, but human action is required to implement, and respond properly	rew/revised procedures rew/revised preventive maintenance tasks formal training and qualification requirements	
		5	Active Stop-Gap Measures	Limited, short-term actions involving direct face-to-face communication; human action is required to remember, implement, and respond appropriately	- counseling - lessons learned training session	
	Least Effective	6	Passive Stop-Gap Measures	Limited, short-term actions involving written communication; human action is required to locate the source document, remember, implement, and respond appropriately	- required reading - training bulletins	
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