



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION II  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, SW, SUITE 23T85  
ATLANTA, GEORGIA 30303-3415

November 20, 1997

[REDACTED]

7C

SUBJECT: RII-97-A-0153 - [REDACTED]

7C

Dear [REDACTED]

This is in reference to our August 1, 1997, letter which indicated that we would initiate action to review concern (2) [REDACTED]

[REDACTED] The NRC has completed its follow up in response to the concerns you brought to our attention on [REDACTED]. The enclosure to this letter lists your concerns and describes how the NRC resolved the concerns you raised.

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Thank you for informing us of your concerns. We feel that our actions in this matter have been responsive to those concerns. We take our safety responsibilities to the public very seriously and will continue to do so within the bounds of our lawful authority.

Should you have any additional questions, or if I can be of further assistance in this matter, please call me on the NRC Safety Hotline at 1-(800)-577-8510 or (404)-562-4540.

Sincerely,

*Milton B. Shymlock*  
Milton B. Shymlock, Chief  
Reactor Projects Branch 4  
Division of Reactor Projects

Certified Mail No. P 485 920 215  
RETURN RECEIPT REQUESTED

- Enclosures: 1. Allegation Evaluation Report  
2. Excerpt from Inspection Report 50-400/97-09

Information in this record was deleted  
in accordance with the provisions of Information  
Act, exemptions 7C  
FOIA-2001-0130

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ENCLOSURE 1

ALLEGATION EVALUATION REPORT

ALLEGATION NUMBER RII-1997-A-0153

HARRIS NUCLEAR PLANT

DOCKET NO. 50-400

ALLEGATION:

[REDACTED]

CONCERN 2:

[REDACTED]

DISCUSSION:

The inspectors reviewed a 1996 employee opinion survey and interviewed operators in order to determine whether [REDACTED] existed and whether there was any discernable impact on [REDACTED] performance.

The 1996 employee opinion survey indicated that responses obtained from the [REDACTED] were generally less favorable than those obtained from other organizational units. Areas evaluated by the opinion survey included the licensee's ability to deal fairly with employees and treat employees with respect.

The inspector informally interviewed several [REDACTED] including some who performed [REDACTED]. Everyone interviewed agreed that declining morale had been an issue over the last two years. The disparity was whether employee morale was still an issue at the time of this inspection and whether there was a link to employee performance and safety issues. Some felt employee morale had improved in the last few months, and was better than that of a year ago (when it was generally perceived to be at its worst), while others thought morale was still pretty low. The inspector perceived that the opinions expressed were based partially on recent treatment in relation to personnel actions or employee appraisals.

In general, those interviewed were happy with some of the recent management changes in [REDACTED]. The consensus was that the new [REDACTED] had made progress in his attempts to remove some of the barriers to good performance (administrative burdens, excessive overtime, external distractions). They generally felt that the new manager had made progress in achieving some of the objectives in the site's recently implemented Near Term Improvement Plan, allowing operators to focus more on safely operating the plant. Recent efforts to realign the operations organization, including personnel changes in first-line and middle management, were viewed positively. 7C

Some negatives still existed, including a perceived "pass/fail" approach to performance appraisals, and licensee management's alleged casual approach to communicating a recent organization change.

The results of the above-mentioned interviews and employee survey review were not surprising to the inspectors, who were aware of recent [REDACTED] and an attempt by licensee management to focus on performance issues. In essence, operators have been under a "microscope" for the year or two because of performance problems. The combination of the "microscope" effect and recent operational challenges and an unexpectedly lengthy refueling outage have likely contributed to low employee morale. Licensee management was aware of the morale issue and had identified it as an improvement item in its newly implemented Near Term Improvement Plan. 7C

During the above survey review and employee interviews, the inspector did not identify any immediate safety concerns. However, it was clear that low [REDACTED] morale had been an issue in 1996 and 1997. There was no conclusive evidence that linked the low morale to the increased human error rate in either year. However, it was considered likely that the increased management scrutiny of employee performance has highlighted a morale problem that may have been developing for a period of time. 7C

Low employee morale has existed in the [REDACTED] during 1996 and 1997. Licensee management was aware of recent morale and performance issues and has undertaken efforts to improve both areas. 7

#### CONCLUSION:

Based on the information provided this allegation was substantiated in that [REDACTED] morale problems existed during a time of increased [REDACTED] errors; however, it could not be substantiated that morale problems were the sole cause of the errors. 7C

## CONCERN NUMBER 3:

The CI stated that, in the past (prior to downsizing efforts), one had to observe activities for weeks at a time, and perform such activities under the supervision of a qualified individual before getting sign-offs on a qual card. For the recent Radwaste qualifications, [redacted] were rushed through, often only reading procedures and system descriptions, then performing a task once, before getting signatures. When a newly certified individual was asked to perform a task later, he or she would not have sufficient training or knowledge to perform the task without assistance. 7C

The CI stated that, there was no intentional falsification of qualification cards related to the Radwaste systems. [redacted] were pushed by management to meet a certain deadline for being qualified. They were to perform the qualification requirements in addition to their normal duties and often were not given sufficient time to qualify correctly. 7C

## DISCUSSION:

The inspector reviewed the Quality Check Program described in Procedure REG-NGGC-0001, Revision 3, with the Quality Check representative and the Manager-Performance Evaluation and Regulatory Affairs (PERAS). The inspector was told that a change to the Quality Check Program was being prepared. A sample file was used to demonstrate implementation of the procedure. The inspector had the following general observations, which were being considered by the licensee for inclusion in the new program revision:

- Quality Check files are considered closed after investigation completion, even if corrective actions are not completed.
- The term "resolved" was not used equivalently with "corrected". Resolved concerns may be those where investigation is complete and corrective actions agreed upon, as opposed to corrective actions completed and the concern resolved.
- Concerned individuals were not necessarily informed of corrective action completion, only of investigation completion.
- Corrective actions were being tracked through a data base used by Quality Check personnel. Actions to line organizations may not be in a site-wide tracking system.
- Procedure AP-615, Condition Reporting, Revision 24, exempts Quality Check items from the condition reporting program. However, Procedure REG-NGGC-0001 discusses writing condition reports for Quality Check items. Licensee personnel were preparing a change to AP-615 in response to this observation.

The inspector observed the following related to the Quality Check file:

- The investigation appeared to be thorough and well documented.
- File organization needed improvement.
- Corrective actions were given a due date which had long since passed, but there was no evidence in the file that the corrective actions were complete. The inspector concluded from discussions with licensee staff that this was a documentation and administration issue only.
- The file indicated that a condition report (CR) had not been written for the investigation findings even though they represented potential procedure implementation problems. The inspector found that the line organization had written a CR, but the Quality Check staff was not aware.

The inspector reviewed a line organization self-assessment conducted May 7-10, 1996, titled "Assessment of OJT/TPE for cross-qualification of Non-Licensed Operator (NLO) Systems". The self-assessment was conducted by the training department to determine if cross-qualification implementation on NLO systems was effective. The assessment identified two weaknesses. The first was that the distinction between on-the-job training (OJT) and task performance evaluation (TPE) were not consistently observed. The second was that operators were allowed to assume rad-waste watch-standing duties without properly completing the identified qualification requirements. Ten corrective actions were identified by this self-assessment with organizations and due dates assigned. The inspector reviewed Condition Report 96-01284 which implemented the corrective actions. The corrective actions were completed on July 17, 1997. The inspector discussed the corrective actions with the former operations manager who stated that cross-qualification was stopped as a performance appraisal objective in the fall of 1996. The former operations manager had discussed this action with the inspector at that time. That action was not included in the condition report corrective actions. The inspector found the self-assessment thorough.

#### CONCLUSION:

7C [REDACTED] did not have the required proficiency on the radwaste watch stations prior to being qualified.