

RAS 5905 50-390-CIVP, et al. - Licensee Exhibit 66 - Rec'd 9/13/02

DOCKETED
USNRC



COMMUNICATIONS
PRACTICE 5

2003 MAR -4 PM 2: 27

Expressing Concerns and Differing Views

OFFICE OF THE SECRETARY
RULES, COMPLAINTS AND
ADJUDICATIONS STAFF

WHAT

TVA encourages the voluntary expression of concerns and differing views involving all aspects of its activities in all of its operating groups. It places special emphasis on differing views on substantive public health, environmental and safety matters.

Employees are strongly encouraged to seek resolution of concerns and differing views with their immediate supervisor and to proceed up their management chain if necessary to achieve resolution. However, differing views may be voiced to any management level at any time. Any person found guilty of acts of reprisal, such as acts of intimidation, harassment or discrimination, against an employee because the employee expressed a differing view is subject to disciplinary action, up to and including termination.

TVA encourages and protects the concerns and differing views of employees regarding all aspects of TVA operations. Every employee is entitled to have differing views heard by management when the employee considers the issue significant and the view differs from a management decision which has been made or is pending. It is TVA policy that every responsible view is valuable and should be heard and appropriately considered in decision-making processes.

WHO

- All employees and contractors

WHY

TVA encourages the voluntary expression of concerns and differing views. This policy is communicated to employees to encourage their cooperation and participation at all working levels, thus furthering the employees' fulfillment of duties, productive efforts, and observance of standards.

HOW

TVA Exh. 66

ALTERNATIVES

Employees who believe they have been subjected to reprisal (which includes any form of intimidation, harassment or discrimination) for expressing concerns or differing views should report their concern to appropriate TVA managers or to the Inspector General.

CA000253

NUCLEAR REGULATORY COMMISSION

License No. 58-390 Official Exh. No. TVA 66

In the matter of TVA

Staff IDENTIFIED

App. RECEIVED

Inte. REJECTED

Of WITHDRAWN

DATE 9-13-02 Witness

Clerk R. DAVIS

Employees who disagree with the final disposition of an occupational health or safety issue may file a complaint in writing to the:

Office of Federal Agency Safety Programs
Occupational Safety and Health Administration
U.S. Department of Labor
200 Constitution Avenue, N.W. Washington, D.C. 20210

Employees who believe violations of Nuclear Regulatory Commission (NRC) rules or terms of the license have occurred associated with the design, construction or operation of a TVA nuclear plant should report suspected violations immediately to their supervisor. Employees are free to contact the NRC directly with issues associated with the design, construction or operation of a TVA nuclear plant. Employees may contact the NRC through an NRC inspector or contact the Nuclear Regulatory Commission, Region II, 101 Marietta Street N.W., Suite 2900, Atlanta, Georgia 30323; telephone 404/331-4503.

ROLES

All Employees

- Are encouraged to resolve issues directly with their line management so corrective action may be handled promptly and at the working level.
- Are encouraged to express their views about significant issues through their chain of command if not resolved.
- May at any time express their views related to occupational health or safety issues to Occupational Health and Safety and views related to design, construction or operation of TVA nuclear plants to TVA Nuclear's Concerns Resolution Staff.

Supervisors

- Have principal responsibility for ensuring the implementation of the policy.
- Communicate the policy to employees.
- Ensure that differing views are heard and appropriately considered in decision-making processes.
- Provide protective measures to encourage participation without fear of reprisal.
- Refer unresolved issues through the chain of command as far as necessary.

The Chief Operating Officer, Chief Administrative Officer, Chief Nuclear Officer, Inspector General, General Counsel, Executive Vice Presidents and Senior Vice Presidents/Vice Presidents

- Administer this policy for their organizations. Inform the Board through the chain of command of differing views that have not been resolved to the satisfaction of the employee.

Line Management, TVA Nuclear

- Receives, investigates and provides for the resolution of concerns and differing views associated with the design, construction and operation of TVA nuclear plants. Concerns and differing views may be received either through line management or its Concerns Resolution Staff.

President, TVA Nuclear

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- Designated as the Chief Nuclear Operator responsible for TVA in matters relating to receiving, assessing and, as appropriate, reporting to the NRC defects and noncompliances related to nuclear safety.

Concerns Resolution Staff, TVA Nuclear

- Receives differing views from employees either:
 - On referral, after line management and the employee have been unable to resolve the issues, or
 - Directly, if the employee believes that pursuit of the issues with line management would be ineffective.
- May receive and act upon concerns or differing views that are made in confidence or anonymously.
- Executes a confidentiality understanding at the request of the employee.
- Provides its findings to the responsible organization.
- Notifies employees of investigation findings and corrective actions.
- Refers to the Inspector General:
 - Alleged violations of law and employee conduct regulations, including allegations of reprisal.
 - Allegations of waste, fraud and abuse.
 - Other matters within the OIG's investigative jurisdiction.
- Provides information to and, as appropriate, consults with Occupational Health and Safety on all differing views which raise issues of occupational health and safety.

Occupational Health and Safety

- Represents the Designated Agency Safety and Health Official in matters involving differing views on occupational health and safety issues.
- Receives, investigates and provides for resolution of differing views on issues of occupational health and safety associated with TVA activities.
- May receive differing views:
 - On referral, after line management and the employee have been unable to resolve the issue, or
 - Directly, if the employee believes that pursuit of the issue with line management would be ineffective.
- May receive and act upon differing views made in confidence or anonymously.
- Maintains confidentiality at the request of the employee.
- Provides follow-up reports with findings and recommendations both to the employee and the responsible organization.
- Monitors implementation of recommendations.
- Makes recommendations to the appropriate corporate officer where further action by the responsible organization is deemed necessary.
- Refers reports of reprisal to the Inspector General for investigation and, as requested, assists in the health and safety aspects of such investigations.
- Refers reports of nuclear safety issues to TVA Nuclear for investigation and, as requested, assists with the occupational health and safety aspects of such investigations.

Office of the Inspector General

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- Receives and investigates:
 - Allegations of known or suspected violations of laws, regulations or TVA policies and

procedures.

- o Concerns about the efficiency and economy of TVA programs and operations, including allegations of mismanagement, waste, fraud and abuse.
- o Allegations of reprisal by superiors or coworkers for expression of differing views.
- Investigates allegations that are raised either confidentially or anonymously.
- Provides information to and, as appropriate, consults with Occupational Health and Safety on occupational health and safety issues.
- Provides information to and, as appropriate, consults with TVA Nuclear on nuclear safety issues.

Board of Directors

- Reviews and acts upon views expressed by employees to management that have not been resolved to the satisfaction of the employee.
- Reviews and acts upon unresolved views expressed by employees of the Office of the Inspector General.

RESOURCES

- Human Resource Managers/Officers
- Managers/Supervisors
- Concerns Resolution Staff, TVA Nuclear
- Occupational Health and Safety Staff
- Office of the Inspector General

This practice is based on Board action of November 28, 1990.

COMMUNICATIONS PRACTICE 5

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Last Revised 4/94

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