

2/12/04  
69 FR 7025

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**From:** "Heffner, Ken" <ken.heffner@pgnmail.com>  
**To:** "nrcprep@nrc.gov" <nrcprep@nrc.gov>  
**Date:** Fri, Mar 19, 2004 2:53 PM  
**Subject:** Comments on SCWE Best Practices Document

> The attachment is Progress Energy comments on the SCWE Best Practices document. Comments were requested on 2/12/04 69 FR 7025.

- >
- > Kenneth M. Heffner
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- >> <<04-039 Letter Groblewski-NRC Comments SCWE Document.pdf>>

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Serial: PE&RAS 04-039  
March 19, 2004

Chief, Rules and Directives Branch  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject: Comments on Best Practices to Establish and Maintain a Safety-Conscious Work Environment (SCWE)  
(69 FR 7025; February 12, 2004)**

Ladies and Gentlemen:

Progress Energy is submitting the following comments related to the subject Federal Register notice.

Progress Energy would like to endorse the comments submitted by the Nuclear Energy Institute (NEI) on March 19, 2004. In particular, we would like to emphasize the following:

1. We agree with NEI that this document is unnecessary. There is sufficient guidance in NEI 97-05 "Nuclear Power Plant Personnel-Employee Concerns Program-Process Tools In A Safety Conscious Work Environment."
2. We feel that the issuance of this document would have the unintended consequence of being perceived by inspectors and the public that the document represents a checklist to be used when reviewing a licensee's SCWE. It could leave them with the impression that if any of the elements were missing that the licensee's SCWE program was deficient even though other good practices may be equally effective.
3. In the workshop held on February 19, 2004 there was a concern expressed about non-power reactor materials licensees not having access to the NEI guidance. We agree that this is a valid concern but feel that this document is not the correct way to address it. NEI has said that they will make 97-05 available on their public website. In addition the NRC could issue an Information Notice to the classes of licensees about which it is concerned.

Please contact me at (919) 546-4579 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony Groblewski', with a long horizontal flourish extending to the right.

KMH

Tony Groblewski  
Supervisor – Corporate  
Regulatory Affairs