

# ShawPittman LLP

*A Limited Liability Partnership Including Professional Corporations*

J. PATRICK HICKEY  
(202) 663-8103  
patrick.hickey@shawpittman.com

November 11, 2003

Mr. Theodore R. Quay, 06F2  
NRC Branch Chief  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Quay:

In accordance with the Confirmatory Order issued on November 24, 1999 to Morrison-Knudsen Corporation (now Washington Group International, Inc.), and the November 7, 2002 letter (QM-02-030) to you from Louis E. Pardi, President, Washington Power and William A. Fox, President, SGT, LTD, enclosed are the completed survey forms for the final surveys required under the Order, performed this year at the Washington Group offices in Princeton and Downers Grove, and at the Oconee site.

Sincerely,



J. Patrick Hickey  
Counsel for WGI, Inc.

Enclosures



# Washington

## INTER-OFFICE CORRESPONDENCE

DATE: October 7, 2003

TO: Selected Nuclear Services Employees

FROM: L. Pardi

LOCATION: Various

LOCATION: Princeton

SUBJECT: **Safety Conscious Work Environment Survey**

Washington is committed to maintaining a work environment whereby any person should feel free to express any nuclear safety concern without fear of retaliation. In order to evaluate the effectiveness of our Employee Concerns Program, we are conducting a random survey to determine how people feel about this program. All responses to this survey are strictly confidential. We ask that you do not put your name on this form. There is space at the end of the survey for any comments you may wish to add. I ask that you take a minute to complete this questionnaire and send it to Barry Scott at 06P8 in Princeton. I would like to thank you in advance for taking the time to respond to this form.

	YES	NO
1. Are you aware that Washington maintains an Employee Concern Program that allows you to document any nuclear safety concern that you may have?	X	
2. Do you know that you can report a Nuclear Safety Concern by hotline phone? (877) 626-7585	X	
3. Would you promptly report any nuclear safety concerns you had to someone in authority?	X	
4. Do you feel that Washington promotes a safety conscious work environment?	X	
5. Are you aware that federal law prohibits an employer from taking adverse employment action against an employee because they have raised nuclear safety concerns?	X	
6. Have you seen the Nuclear Regulatory Commission (NRC) "Notice to Employees" (Form 3) posted on bulletin boards at various locations at your office/site?	X	
7. Do you currently have any nuclear safety concerns that have not been adequately addressed by Washington? If so, please document your concern on an Employee Concern Report or contact the hotline.		X

**Additional Comments (use reverse side if necessary)**




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NOTE:
I AM WORKING IN NY OFFICE WHICH WORK ONLY NON-NUCLEAR PROJECTS.



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**Additional Comments (use reverse side if necessary)**


10-7-03



**The Steam Generating Team Ltd.**  
INTER-OFFICE CORRESPONDENCE

To: Oconee Steam Generator Replacement Project Personnel      Circle One: (Staff/Craft)  
 From: William A Fox, President SGT  
 Date: October 9, 2003  
 Subject: **SAFETY CONSCIOUS WORK ENVIRONMENT SURVEY**

SGT is committed to maintaining a work environment whereby any person should feel free to express any nuclear safety concern without fear of retaliation. In order to evaluate the effectiveness of our Employee Concerns Program, we are conducting a random survey to determine how people feel about this program. All responses to this survey are strictly confidential. We ask that you do not put your name on this form. There is space at the end of the survey for any comments you may wish to add. I ask that you take a minute to complete this questionnaire and return it to George Krauss in the Management Trailer. I would like to thank you in advance for taking the time to respond to this form.

	YES	NO
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2. Do you know that you can report a Nuclear Safety Concern by hotline phone? Call Duke at (800) 525-3783 or SGT at (877) 626-7585	X	
3. Would you promptly report any nuclear safety concerns you had to someone in authority?	X	
4. Do you feel that SGT promotes a safety conscious work environment?	X	
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*Charlie Williams*

*Paul W. ... 10-9-03*



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I feel that SGT Management has always addressed Safety Concerns in an expedient manner and has always gone the "extra step" to ensure all employees are aware of "Safety First"

**SGT**  
**The Steam Generating Team Ltd.**  
INTER-OFFICE CORRESPONDENCE

To: Oconee Steam Generator Replacement Project Personnel      Circle One: (Staff) (Craft)

From: William A Fox, President SGT

Date: October 9, 2003

Subject: **SAFETY CONSCIOUS WORK ENVIRONMENT SURVEY**

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**Additional Comments (use reverse side if necessary)**




**The Steam Generating Team Ltd.**  
INTER-OFFICE CORRESPONDENCE

To: Oconee Steam Generator Replacement Project Personnel      Circle One: (Staff/Craft)  
 From: William A Fox, President SGT  
 Date: October 9, 2003  
 Subject: **SAFETY CONSCIOUS WORK ENVIRONMENT SURVEY**

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<i>None</i>



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**Additional Comments (use reverse side if necessary)**

Yes I believe that SGT has concerns about the safety of their employees, but I also believe they place a lot of value on the numbers. So they don't look bad.



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Additional Comments (use reverse side if necessary)

THERE ARE TIMES WHEN I DO NOT KNOW IF WHAT I AM SEEING IS A REAL SAFETY CONCERN. IF I KNOW IT TO BE A NUCLEAR SAFETY PROBLEM I WOULD MENTION IT. IF I DON'T KNOW BUT I'M STILL CONCERNED I WOULD ASK SOME QUESTIONS & ACT ACCORDINGLY.



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- |  |
|--|
| 1. Have not seen any of the NRC Form 3 in the CAB facility and craft area at the CAB. It would be nice to have the form posted in these areas.                                   |
| 2. Question #4 and the Subject title are misleading. Shouldn't the subject title and question 4 state "Nuclear Safety"? One could read the question to mean "industrial safety". |





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5. Are you aware that federal law prohibits an employer from taking adverse employment action against an employee because they have raised nuclear safety concerns?	YES	
6. Have you seen the Nuclear Regulatory Commission (NRC) "Notice to Employees" (Form 3) posted on bulletin boards at various locations around the Site?	YES	
7. Do you currently have any nuclear safety concerns that have not been adequately addressed by SGT? If so, please document your concern on an Employee Concern Report or contact one of the hotlines.		NO

**Additional Comments (use reverse side if necessary)**




**The Steam Generating Team Ltd.**  
INTER-OFFICE CORRESPONDENCE

To: Oconee Steam Generator Replacement Project Personnel      Circle One: (Staff/Craft)  
 From: William A Fox, President SGT  
 Date: October 9, 2003  
 Subject: **SAFETY CONSCIOUS WORK ENVIRONMENT SURVEY**

SGT is committed to maintaining a work environment whereby any person should feel free to express any nuclear safety concern without fear of retaliation. In order to evaluate the effectiveness of our Employee Concerns Program, we are conducting a random survey to determine how people feel about this program. All responses to this survey are strictly confidential. We ask that you do not put your name on this form. There is space at the end of the survey for any comments you may wish to add. I ask that you take a minute to complete this questionnaire and return it to George Krauss in the Management Trailer. I would like to thank you in advance for taking the time to respond to this form.

	YES	NO
1. Are you aware that SGT maintains an Employee Concern Program that allows you to document any nuclear safety concern that you may have?	X	
2. Do you know that you can report a Nuclear Safety Concern by hotline phone? Call Duke at (800) 525-3783 or SGT at (877) 626-7585	X	
3. Would you promptly report any nuclear safety concerns you had to someone in authority?	X	
4. Do you feel that SGT promotes a safety conscious work environment?	X	
5. Are you aware that federal law prohibits an employer from taking adverse employment action against an employee because they have raised nuclear safety concerns?	X	
6. Have you seen the Nuclear Regulatory Commission (NRC) "Notice to Employees" (Form 3) posted on bulletin boards at various locations around the Site?	X	
7. Do you currently have any nuclear safety concerns that have not been adequately addressed by SGT? If so, please document your concern on an Employee Concern Report or contact one of the hotlines.		X

**Additional Comments (use reverse side if necessary)**

None at this time



**The Steam Generating Team Ltd.**  
INTER-OFFICE CORRESPONDENCE

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6. Have you seen the Nuclear Regulatory Commission (NRC) "Notice to Employees" (Form 3) posted on bulletin boards at various locations around the Site?	X	
7. Do you currently have any nuclear safety concerns that have not been adequately addressed by SGT? If so, please document your concern on an Employee Concern Report or contact one of the hotlines.		X

**Additional Comments (use reverse side if necessary)**




**The Steam Generating Team Ltd.**  
INTER-OFFICE CORRESPONDENCE

To: Oconee Steam Generator Replacement Project Personnel      Circle One (Staff/Craft)

From: William A Fox, President SGT

Date: October 9, 2003

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	YES	NO
1. Are you aware that SGT maintains an Employee Concern Program that allows you to document any nuclear safety concern that you may have?	✓	
2. Do you know that you can report a Nuclear Safety Concern by hotline phone? Call Duke at (800) 525-3783 or SGT at (877) 626-7585	✓	
3. Would you promptly report any nuclear safety concerns you had to someone in authority?	✓	
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5. Are you aware that federal law prohibits an employer from taking adverse employment action against an employee because they have raised nuclear safety concerns?	✓	
6. Have you seen the Nuclear Regulatory Commission (NRC) "Notice to Employees" (Form 3) posted on bulletin boards at various locations around the Site?	✓	
7. Do you currently have any nuclear safety concerns that have not been adequately addressed by SGT? If so, please document your concern on an Employee Concern Report or contact one of the hotlines.		✓

**Additional Comments (use reverse side if necessary)**




**The Steam Generating Team Ltd.**  
INTER-OFFICE CORRESPONDENCE

To: Oconee Steam Generator Replacement Project Personnel      Circle One: (Staff) (Craft)

From: William A Fox, President SGT

Date: October 9, 2003

Subject: **SAFETY CONSCIOUS WORK ENVIRONMENT SURVEY**

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	YES	NO
1. Are you aware that SGT maintains an Employee Concern Program that allows you to document any nuclear safety concern that you may have?	X	
2. Do you know that you can report a Nuclear Safety Concern by hotline phone? Call Duke at (800) 525-3783 or SGT at (877) 626-7585	X	
3. Would you promptly report any nuclear safety concerns you had to someone in authority?	X	
4. Do you feel that SGT promotes a safety conscious work environment?	X	
5. Are you aware that federal law prohibits an employer from taking adverse employment action against an employee because they have raised nuclear safety concerns?	X	
6. Have you seen the Nuclear Regulatory Commission (NRC) "Notice to Employees" (Form 3) posted on bulletin boards at various locations around the Site?	X	
7. Do you currently have any nuclear safety concerns that have not been adequately addressed by SGT? If so, please document your concern on an Employee Concern Report or contact one of the hotlines.		X

**Additional Comments (use reverse side if necessary)**






The Steam Generating Team Ltd.  
INTER-OFFICE CORRESPONDENCE

To: Ocone Steam Generator Replacement Project Personnel      Circle One: (Staff) Craft)

From: William A Fox, President SGT

Date: October 9, 2003

Subject: **SAFETY CONSCIOUS WORK ENVIRONMENT SURVEY**

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	YES	NO
1. Are you aware that SGT maintains an Employee Concern Program that allows you to document any nuclear safety concern that you may have?	✓	
2. Do you know that you can report a Nuclear Safety Concern by hotline phone? Call Duke at (800) 525-3783 or SGT at (877) 626-7585	✓	
3. Would you promptly report any nuclear safety concerns you had to someone in authority?	✓	
4. Do you feel that SGT promotes a safety conscious work environment?	✓	
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**Additional Comments (use reverse side if necessary)**

All safety concerns that have been identified have been promptly resolved either by the SGT Safety Dept or appropriate Craft. I believe SGT to be safety conscience and follow safety guide lines for all SGT Teams.

James Parsons, SGT Field Eng.



The Steam Generating Team Ltd.  
INTER-OFFICE CORRESPONDENCE

To: Oconee Steam Generator Replacement Project Personnel      Circle One: (Staff/Craft)

From: William A Fox, President SGT

Date: October 9, 2003

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**Additional Comments (use reverse side if necessary)**




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**Additional Comments (use reverse side if necessary)**




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	YES	NO
1. Are you aware that SGT maintains an Employee Concern Program that allows you to document any nuclear safety concern that you may have?	Y	
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The Steam Generating Team Ltd.  
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Date: October 9, 2003

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4. Do you feel that SGT promotes a safety conscious work environment?	X	
5. Are you aware that federal law prohibits an employer from taking adverse employment action against an employee because they have raised nuclear safety concerns?	X	
6. Have you seen the Nuclear Regulatory Commission (NRC) "Notice to Employees" (Form 3) posted on bulletin boards at various locations around the Site?	X	
7. Do you currently have any nuclear safety concerns that have not been adequately addressed by SGT? If so, please document your concern on an Employee Concern Report or contact one of the hotlines.		X

**Additional Comments (use reverse side if necessary)**




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	YES	NO
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7. Do you currently have any nuclear safety concerns that have not been adequately addressed by SGT? If so, please document your concern on an Employee Concern Report or contact one of the hotlines.		X

**Additional Comments (use reverse side if necessary)**




Washington

*Barry,*  
*Looks like we got one*  
*from HIM @ OCONEE.*  
*Geoff.*

INTER-OFFICE CORRESPONDENCE

DATE: October 7, 2003

TO: Selected Nuclear Services Employees

FROM: L. Pardi

LOCATION: Various

LOCATION: Princeton

SUBJECT: Safety Conscious Work Environment Survey

Washington is committed to maintaining a work environment whereby any person should feel free to express any nuclear safety concern without fear of retaliation. In order to evaluate the effectiveness of our Employee Concerns Program, we are conducting a random survey to determine how people feel about this program. All responses to this survey are strictly confidential. We ask that you do not put your name on this form. There is space at the end of the survey for any comments you may wish to add. I ask that you take a minute to complete this questionnaire and send it to Barry Scott at 06P8 in Princeton. I would like to thank you in advance for taking the time to respond to this form.

	YES	NO
1. Are you aware that Washington maintains an Employee Concern Program that allows you to document any nuclear safety concern that you may have?	X	
2. Do you know that you can report a Nuclear Safety Concern by hotline phone? (877) 626-7585	X	
3. Would you promptly report any nuclear safety concerns you had to someone in authority?	X	
4. Do you feel that Washington promotes a safety conscious work environment?	X	
5. Are you aware that federal law prohibits an employer from taking adverse employment action against an employee because they have raised nuclear safety concerns?	X	
6. Have you seen the Nuclear Regulatory Commission (NRC) "Notice to Employees" (Form 3) posted on bulletin boards at various locations at your office/site?	X	
7. Do you currently have any nuclear safety concerns that have not been adequately addressed by Washington? If so, please document your concern on an Employee Concern Report or contact the hotline.		X

Additional Comments (use reverse side if necessary)

<i>Sheet turned in at Oconee (PDS 10/29/03)</i>
<i>will be counted with Oconee population because individual is assigned to site</i>

*I have send you by e-mail this form before.*

*I. Akyar.*



The Steam Generating Team Ltd.  
INTER-OFFICE CORRESPONDENCE

To: Oconee Steam Generator Replacement Project Personnel      Circle One: (Staff/Craft)

From: William A Fox, President SGT

Date: October 9, 2003

Subject: SAFETY CONSCIOUS WORK ENVIRONMENT SURVEY

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	YES	NO
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2. Do you know that you can report a Nuclear Safety Concern by hotline phone? Call Duke at (800) 525-3783 or SGT at (877) 626-7585	X	
3. Would you promptly report any nuclear safety concerns you had to someone in authority?	X	
4. Do you feel that SGT promotes a safety conscious work environment?		X
5. Are you aware that federal law prohibits an employer from taking adverse employment action against an employee because they have raised nuclear safety concerns?	X	
6. Have you seen the Nuclear Regulatory Commission (NRC) "Notice to Employees" (Form 3) posted on bulletin boards at various locations around the Site?	X	
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Additional Comments (use reverse side if necessary)

So far "SAFETY" does not seem to be an issue out here. It is how fast the work can be done. Safety is out the window! ALARA, is also a joke. Supervision seems to think whether you have something (a job) to do or NOT you are to remain in Containment (out of sight basically) from the time you arrive to work until you leave, with the exception of 30 minutes for lunch. They ASSUME that

if you are in the break room, then you are trying to keep from working, so instead of asking the people what they are doing, they just make the rule that you have to remain in containment with the exception of lunch. (which you don't get paid for anyway) It's ridiculous to have



**The Steam Generating Team Ltd.**  
**INTER-OFFICE CORRESPONDENCE**

To: Oconee Steam Generator Replacement Project Personnel      Circle One: (Staff/Craft)

From: William A Fox, President SGT

Date: October 9, 2003

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**Additional Comments (use reverse side if necessary)**

At The beginning of work around unit #1 equipment hatch some workers disregarded the Red-Black Danger Ribbon supervision Got A HANDLED hat fixed ~~it~~ the problem





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However, all OF THIS goes out of the window when you are trying to reach a deadline to finish a job, sometimes.



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Safety is last schedule is first in the book





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<i>to safety need to be better.</i>



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SAFETY IS #2
SCHEDULE IS FIRST



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**Additional Comments (use reverse side if necessary)**

Housekeeping + Safety Need be more aggressive.
Too many UNSAFE conditions areas + look like nobody care about. Lack of communication between G.F. + Superintendents - Don't care much as long as you do the job.



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AS long AS Job gets done They dont care
unless Duke person is stand there over see Job
SAFety don't make me laugh



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**Additional Comments (use reverse side if necessary)**

ALARA Does not exist in any form here. It is a joke employees are expected to stay in the can all night with no breaks. I got no supper break and was questioned why I was out. We were told to do one task w/o briefing, at a match we ~~and~~ were told another task and then after we spent 2 hrs in can w/o ability to complete first 2 tasks, or any drawings, instruction, alara, anything we were told to do a third project that was not possible either. We spent 4 hrs in can accomplishing nothing and picked up excessive, unnecessary dose. We are chastised (on back)



The Steam Generating Team Ltd.  
INTER-OFFICE CORRESPONDENCE

To: Oconee Steam Generator Replacement Project Personnel      Circle One: (Staff/Craft)  
From: William A Fox, President SGT  
Date: October 9, 2003  
Subject: **SAFETY CONSCIOUS WORK ENVIRONMENT SURVEY**

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**Additional Comments (use reverse side if necessary)**

~~Want craft to stay in the CAN~~ ~~supervisor!~~  
 want craft to stay in the CAN All night and not  
 take a break even if there no work for you to do at that  
 time They are just trying to make showing for Duke  
 so they say fuck the worker



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**SGT**  
**The Steam Generating Team Ltd.**  
INTER-OFFICE CORRESPONDENCE

To: Oconee Steam Generator Replacement Project Personnel      Circle One: ~~(Staff)~~ **(Craft)**

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Date: October 9, 2003

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**Additional Comments (use reverse side if necessary)**


**SGT**  
 The Steam Generating Team Ltd.  
INTER-OFFICE CORRESPONDENCE

To: Oconee Steam Generator Replacement Project Personnel      Circle One: (Staff) Craft

From: William A Fox, President SGT

Date: October 9, 2003

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**The Steam Generating Team Ltd.**  
**INTER-OFFICE CORRESPONDENCE**

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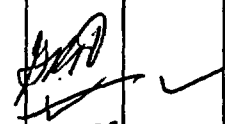
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10-25-03

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**Additional Comments (use reverse side if necessary)**




**The Steam Generating Team Ltd.**  
INTER-OFFICE CORRESPONDENCE

To: Oconee Steam Generator Replacement Project Personnel      Circle One: (Staff/Craft)

From: William A Fox, President SGT

Date: October 9, 2003

Subject: **SAFETY CONSCIOUS WORK ENVIRONMENT SURVEY**

SGT is committed to maintaining a work environment whereby any person should feel free to express any nuclear safety concern without fear of retaliation. In order to evaluate the effectiveness of our Employee Concerns Program, we are conducting a random survey to determine how people feel about this program. All responses to this survey are strictly confidential. We ask that you do not put your name on this form. There is space at the end of the survey for any comments you may wish to add. I ask that you take a minute to complete this questionnaire and return it to George Krauss in the Management Trailer. I would like to thank you in advance for taking the time to respond to this form.

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1. Are you aware that SGT maintains an Employee Concern Program that allows you to document any nuclear safety concern that you may have?	✓	
2. Do you know that you can report a Nuclear Safety Concern by hotline phone? Call Duke at (800) 525-3783 or SGT at (877) 626-7585	✓	
3. Would you promptly report any nuclear safety concerns you had to someone in authority?	✓	
4. Do you feel that SGT promotes a safety conscious work environment?	✓	
5. Are you aware that federal law prohibits an employer from taking adverse employment action against an employee because they have raised nuclear safety concerns?	✓	
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If they continue to fail to pay properly, someone
could possibly flip out!



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*They need to pay people for the time & job they do. Betlock they stop doing the job that is suppose to be done! In the way they want it done!*



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<i>Other crafts don't work together.</i>



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<i>Why can't we wear clothes modestly under our coveralls when we are grinding?</i>





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*Have be included to ensure one, but have been told by they are not very good at protecting you from contamination*



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4. Do you feel that SGT promotes a safety conscious work environment?	✓	
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Additional Comments (use reverse side if necessary)

NEED TO PRACTIST MORE ALARA!
NEED TO PRACTIST MORE STAR!
NEED TO PRACTIST MORE SAFETY!



**The Steam Generating Team Ltd.**  
INTER-OFFICE CORRESPONDENCE

To: Oconee Steam Generator Replacement Project Personnel      Circle One: (Staff/Craft)  
 From: William A Fox, President SGT  
 Date: October 9, 2003  
 Subject: **SAFETY CONSCIOUS WORK ENVIRONMENT SURVEY**

SGT is committed to maintaining a work environment whereby any person should feel free to express any nuclear safety concern without fear of retaliation. In order to evaluate the effectiveness of our Employee Concerns Program, we are conducting a random survey to determine how people feel about this program. All responses to this survey are strictly confidential. We ask that you do not put your name on this form. There is space at the end of the survey for any comments you may wish to add. I ask that you take a minute to complete this questionnaire and return it to George Krauss in the Management Trailer. I would like to thank you in advance for taking the time to respond to this form.

	YES	NO
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**Additional Comments (use reverse side if necessary)**

I thought after the training courses that were given on Safety that everything here on site would be in order with safety procedures, but all we every here see about safety are QEP's to read. No mention of "be careful, or be aware" on the job. It's all about getting the job done on schedule or before. There are many, many safety hazards inside + outside of containment, and on site in general. So many to list.





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Additional Comments (use reverse side if necessary)

WHAT GIVE'S WHITE HATS THE RIGHT TO GO THROUGH RED BARACADE WITHOUT ASKING. THEY SHOULD SET AN EXAMPLE FOR THE REST. THANK YOU



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