

COMBUSTION ENGINE
Doc: 070-0003



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137-5927

1 SEP 13 1993

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MEMORANDUM TO: James Lieberman, Director
Office of Enforcement

FROM: Charles E. Norelius, Director, Division of
Radiation Safety and Safeguards

SUBJECT: REVIEW OF LICENSEES EMPLOYEE CONCERN PROGRAMS,
ACCORDING TO TI 2500/028 ISSUED 07/29/93

We have completed a review of (ECP) implemented by three licensees with fuel facilities located in Region III. Our findings appear in the completed questionnaires which I have attached for each facility (General Electric Morris Operation, Allied-Signal Metropolis Works, and Combustion Engineering Hematite Facility).

In summary, we found two facilities direct their ECP through their Total Quality Management Program, while the third has developed a formal program titled "An Integrity Program." In each instance, the ECP is still in an evolutionary stage. However, each program is designed in a manner to eliminate any concern about retribution to any employee that raises a safety issue. To date, there is no statistical data available to measure the effectiveness of the ECP at either facility.

The questionnaires were completed by telephone, in lieu of an onsite inspection. This method was discussed and recommended by Scott Pennington, who represented NMSS in this matter.

If you have any questions concerning the attached questionnaires, please contact John Grobe or George McCann of my staff.

Sincerely,

Charles E. Norelius

Charles E. Norelius, Director
Division of Radiation Safety
and Safeguards

Enclosure: As stated

cc w/enclosures:
R. Burnett, NMSS
D. Funk, RIII
R. Rosano, OE

L-83

Attachment

EMPLOYEE CONCERNS PROGRAMS

PLANT NAME: General LICENSEE: General Electric DOCKET #: 072-00001

Electric Morris Operation

NOTE: Please circle yes or no if applicable and add comments in the space provided.

A. PROGRAM:

1. Does the licensee have an employee concerns program? Yes.
(Yes) or No/Comments) The licensee has an Integrity Program.
The program covers compliance concerns and integrity.
2. Has NRC inspected the program? Report # Not inspected
No.

B. SCOPE: (Circle all that apply)

1. Is it for:

- a. Technical? (Yes, No/Comments) Yes. Compliance with
10 CFR 20 and 10 CFR 21.
- b. Administrative? (Yes, No/Comments) Yes.
- c. Personnel issues? (Yes, No/Comments) Yes.

2. Does it cover safety as well as non-safety issues? Yes.
(Yes) or No/Comments)

3. Is it designed for:

- a. Nuclear safety? (Yes, No/Comments) No.
- b. Personal safety? (Yes, No/Comments) Yes.
- c. Personnel issues - including union grievances? Yes.
(Yes) or No/Comments)

4. Does the program apply to all licensee employees? Yes.
(Yes) or No/Comments)5. Contractors? No.
(Yes) or (No/Comments)

Only pertains to safety orientation for contractors.

GE:MO
Docket No. 072-00001

6. Does the licensee require its contractors and their subs to have a similar program? No.
(Yes or No/Comments)
7. Does the licensee conduct an exit interview upon terminating employees asking if they have any safety concerns?
(Yes or No/Comments) No.

C. INDEPENDENCE:

1. What is the title of the person in charge?
General Electric Ombuds-person
2. Who do they report to?
Manager, Irradiation Processes Organization
3. Are they independent of line management? Yes.
4. Does the ECP use third party consultants? Yes.
5. How is a concern about a manager or vice president followed up?
Reviewed by the Ombuds-person

D. RESOURCES:

1. What is the size of the staff devoted to this program?
24 employees were trained to work in the integrity program.
2. What are ECP staff qualifications (technical training, interviewing training, investigator training, other)?
Participants are only required to participate in an Integrity Training Seminar.

E. REFERRALS:

1. Who has followup on concerns (ECP staff, line management, other)?
Integrity concerns are followed up by the Ombuds-person.

F. CONFIDENTIALITY:

1. Are the reports confidential? Yes.
(Yes or No/Comments)

GE:MO
Docket No. 072-00001

2. Who is the identity of the allegor made known to (senior management, ECP staff, line management, other)? (Circle, if other explain) If the problem is brought to line management, the identity of the allegor is known by the Plant Manager. If the 1-800 number is used, then the Ombuds-person would know.

3. Can employees be:

a. Anonymous? Yes No/Comments) Yes.

b. Report by phone? Yes No/Comments) Yes. A 1-800 number is available for any employee to report a compliance or integrity issue.

G. FEEDBACK:

1. Is feedback given to the allegor upon completion of the followup? Yes or No - If so, how? Yes. It may be a formal written reply by the Ombuds-person.

2. Does program reward good ideas? Yes. It is incorporated into the Manager's Incentive Awards Program.

3. Who, or at what level, makes the final decision of resolution? Depends on the issue; from Ombuds-person an issue could go to the CEO for resolution.

4. Are the resolutions of anonymous concerns disseminated? Yes. Normally through the Plant Safety Committee.

5. Are resolutions of valid concerns publicized (newsletter, bulletin board, all hands meeting, other)? Yes. Normally through an "all hands meeting" at the plant level.

H. EFFECTIVENESS:

1. How does the licensee measure the effectiveness of the program? Although measured by the Ombuds-person, this has not been tested because of the small sampling statistics.

2. Are concerns:

a. Trended? Yes or No/Comments) No samples have been reported. The program (Integrity Program) is less than 1 year into implementation.

b. Used? Yes or No/Comments) Yes.

3. In the last three years how many concerns were raised? 0
Of the concerns raised, how many were closed? N/A What percentage were substantiated? N/A

GE:MO

Docket No. 072-00001

4. How are followup techniques used to measure effectiveness (random survey, interviews, other)?

Interviews.

5. How frequently are internal audits of the ECP conducted and by whom?
No sample tested; responsible auditor is the Ombuds-person.

I. ADMINISTRATION/TRAINING:

1. Is ECP prescribed by a procedure? (Yes) or No/Comments) Yes.

2. How are employees, as well as contractors, made aware of this program (training, newsletter, bulletin board, other)?

All methods are available for use.

ADDITIONAL COMMENTS: (Including characteristics which make the program especially effective, if any.)

The program is evolving.

The August 1993 issue of The General Electric Nuclear Energy Journal provided the 1-800 number for all employees to call the Ombuds-person about any concerns related to compliance matters or integrity.

The inspector concluded that the licensee has an Employee Concerns Program in place. However, the program is still evolving and no real samples have been analyzed.

There is no way to measure the effectiveness of the program at this time. But the program has been formalized, and a staff has been selected to act on employee concerns.

NAME: / TITLE: / PHONE #: / DATE COMPLETED: 8/19/93
George M. France, III, Fuel Facilities Inspector, (708) 790-5786

Attachment

EMPLOYEE CONCERNS PROGRAMS

PLANT NAME: Hematite Combustion
LICENSEE: Engineering, Inc. DOCKET #: 070-00036

NOTE: Please circle yes or no if applicable and add comments in the space provided.

A. PROGRAM:

1. Does the licensee have an employee concerns program? (Yes) or no/Comments) Handled through the Total Quality Management Program.
2. Has NRC inspected the program? Report # NO

B. SCOPE: (Circle all that apply)

1. Is it for:
 - a. Technical? (Yes) No/Comments)
 - b. Administrative? (Yes) No/Comments)
 - c. Personnel issues? (Yes) No/Comments)
2. ~~Does it cover safety as well as non-safety issues?~~ (Yes) or No/Comments)
3. Is it designed for:
 - a. Nuclear Safety? (Yes) No/Comments)
 - b. Personal safety? (Yes) No/Comments)
 - c. Personnel issues - including union grievances? (Yes) or No/Comments)
4. Does the program apply to all licensee employees? (Yes) or No/Comments)

5. Contractors? (Yes) or No/Comments)

6. Does the licensee require its contractors and their subs to have a similar program?
(Yes or No Comments)

7. Does the licensee conduct an exit interview upon terminating employees asking if they have any safety concerns?
(Yes) or No/Comments)

General interview is conducted/not limited to safety

C. INDEPENDENCE:

1. What is the title of the person in charge?
Plant Manager

2. Who do they report to?
Vice President, Manufacturing Operations

3. Are they independent of line management?
NO

4. Does the ECP use third party consultants?
Support is available by corporate office. Specific issues (safety) may be handled by consultant.

5. How is a concern about a manager or vice president followed up?

The Office of Vice President, Regulatory Affairs may participate in resolving concerns.

D. RESOURCES:

1. What is the size of the staff devoted to this program? No specific size, Inclusive of line management.

2. What are ECP staff qualifications (technical training, interviewing training, investigator training, other)? Concerns are referred to most knowledgeable staff person.

E. REFERRALS:

1. Who has followup on concerns (ECP staff, line management, other)?
Assigned to one individual; specific knowledge of the concern.

F. CONFIDENTIALITY:

1. Are the reports confidential?
(Yes) or No/Comments)
Depending upon the subject matter, however, the TQM program encourages an open forum for all hands.
2. Who is the identity of the allegor made known to (senior management, ECP staff, line management, other)? (Circle, if other explain)
Concerns can be held confidentially, but on a case-by-case bases. The allegor is known by line management.
3. Can employees be:
 - a. Anonymous? (Yes) No/Comments)
TQM program is designed to reduce anonymous concerns.
 - b. Report by phone? (Yes) No/Comments)

G. FEEDBACK:

1. Is feedback given to the allegor upon completion of the followup?
(Yes) or No - If so, how?)
Managers are urged to do a follow-up promptly.
2. Does program reward good ideas?
Awards are normally provided through other programs. (The Flame of Excellence)
3. Who, or at what level, makes the final decision of resolution?
Depends on the concern. Vice President, Manufacturing Operations
4. Are the resolutions of anonymous concerns disseminated? Yes (general memorandum)
5. Are resolutions of valid concerns publicized (newsletter, bulletin board, all hands meeting, other)? All of the above

H. EFFECTIVENESS:

1. How does the licensee measure the effectiveness of the program?
No specific means;
2. Are concerns:
 - a. Trended? (Yes or (No) Comments)

b. Used? (Yes) or No/Comments)

3. In the last three years how many concerns were raised? ^{NOT} ~~Established~~ of the concerns raised, how many were closed? ~~Most~~ ^{Most} What percentage were substantiated? Half resulted in some form of action.

4. How are followup techniques used to measure effectiveness (random survey, interviews, other)?

5. How frequently are internal audits of the ECP conducted and by whom? A corporate audit is conducted annually; All Hands questionnaire is completed, collected and reviewed.

I. ADMINISTRATION/TRAINING:

1. Is ECP prescribed by a procedure? (Yes or No) Comments)
All Hands sessions inclusive of TQM program

2. How are employees, as well as contractors, made aware of this program training newsletter, bulletin board, other)?

Newsletter and Training

ADDITIONAL COMMENTS: (Including characteristics which make the program especially effective, if any.)

The Total Quality Management program is implemented to improve communication and the quality of management in the work place. A formal ECP program is not identified. Employee concerns are normally handled by a department manager or through the All Hands sessions without fear of retribution.

Management urges employees to participate in bringing specific concerns to managements attention. Resolution is normally handled by the most knowledgeable managers.

NAME: George M. France III / TITLE: Fuel Facilities Inspector / PHONE #: (708)790-5786 / Date Completed: 8/20/93
2500/028 Attachment A-4 Issue Date: 07/29/93

Attachment

EMPLOYEE CONCERNS PROGRAMS

Metropolis Allied-
PLANT NAME: Works LICENSEE: Signal, Inc. DOCKET #: 040-03392

NOTE: Please circle yes or no if applicable and add comments in the space provided.

A. PROGRAM:

1. Does the licensee have an employee concerns program? (Yes) or no/Comments) The program is called Total Quality Management-Employee Communication/Feed-Back
2. Has NRC inspected the program? Report # NO

B. SCOPE: (Circle all that apply)

1. Is it for: All concerns except emergencies and collective bargaining
 - a. Technical? (Yes) No/Comments)
 - b. Administrative? (Yes) No/Comments)
 - c. Personnel issues? (Yes) No/Comments)
2. Does it cover safety as well as non-safety issues? (Yes) or No/Comments)
3. Is it designed for:
 - a. Nuclear Safety? (Yes, (No) Comments) N/A This facility is not licensed to handle fissile quantities of SNM material.
 - b. Personal safety? (Yes) No/Comments)
 - c. Personnel issues - including union grievances? (Yes, or (No) Comments) Does not include union grievances
4. Does the program apply to all licensee employees? (Yes) or No/comments)

5. Contractors? (Yes or No/Comments)
6. Does the licensee require its contractors and their subs to have a similar program?
(Yes or No/Comments)
7. Does the licensee conduct an exit interview upon terminating employees asking if they have any safety concerns?
(Yes or No/Comments)

C. INDEPENDENCE:

1. What is the title of the person in charge? No one person is in charge. Concerns involve a formal written presentation through line management
2. Who do they report to? Plant manager
3. Are they independent of line management? No
4. Does the ECP use third party consultants? No
5. How is a concern about a manager or vice president followed up? Those concerns are not applicable to this program. A 1-800 number is provided to handle problems under the ethics program.

D. RESOURCES:

1. What is the size of the staff devoted to this program? All hands program through line management
2. What are ECP staff qualifications (technical training, interviewing training, investigator training, other)? Other department managers are trained in employee relations.

E. REFERRALS:

1. Who has followup on concerns (ECP staff, line management, other)? Assigned to department manager who arranges for prompt and proper action.

F. CONFIDENTIALITY:

1. Are the reports confidential?
(Yes or No/Comments) However, when resolutions are disseminated to the originator of the concern, the distribution involves line management and the Human Resources Department
2. Who is the identity of the alleged made known to Department (senior management, ECP staff, line management, other)? (Circle, if other explain) Line management and representatives of the Human Resources Department
3. Can employees be:
 - a. Anonymous? (Yes, No Comments) Anonymous concerns are normally processed through a 1-800 number under the licensees ethics program
 - b. Report by phone? (Yes, No Comments)
The program requires completion of a formal document.

G. FEEDBACK:

1. Is feedback given to the alleged upon completion of the followup?
(Yes or No - If so, how?) A formal document is completed by line management. The top copy is returned to the alleged.
2. Does program reward good ideas? No. Provisions/criterion for rewards is handled through other channels of Human Resources
3. Who, or at what level, makes the final decision of resolution? Department manager level.
4. Are the resolutions of anonymous concerns disseminated? Anonymous concerns are not handled in this program.
5. Are resolutions of valid concerns publicized (newsletter, bulletin board, all hands meeting, other)? Bulletin Board

H. EFFECTIVENESS:

1. How does the licensee measure the effectiveness of the program? To be resolved. The program has not been tested. Implementation began July 1993
2. Are concerns:
 - a. Trended? (Yes or No/Comments) No samples available. The program has not been tested.

b. Used? (Yes or No/Comments) Not tested. No samples available

3. In the last three years how many concerns were raised? 0 Of the concerns raised, how many were closed? 0 What percentage were substantiated? 0

4. How are followup techniques used to measure effectiveness (random survey, interviews, other)?
To be resolved

5. How frequently are internal audits of the ECP conducted and by whom? To be established. Based on volume of samples, or sample population.

I. ADMINISTRATION/TRAINING:

1. Is ECP prescribed by a procedure?
(Yes or No/Comments)

2. How are employees, as well as contractors, made aware of this program (training, newsletter, bulletin board, other)? Bulletin Board

ADDITIONAL COMMENTS: (Including characteristics which make the program especially effective, if any.)

The program is in the evolution stage. Initiated in July 1993, the program is designed for "all hands" to participate. Anonymous concerns are handled by the employers ethics program, 1-800 number. Safety concerns should be shared for the benefit of all workers, hence, retribution is not an issue. In contrast, the total quality management concept encourages all workers to get involved in making a "better", "safer" work place.

A program is in place for employees to communicate safety concerns by a pathway that is inclusive of line management, but free of retribution.

NAME: France, III, TITLE: Fuel PHONE #:
George M. Facilities (708)
_____/ _____ Inspector / 790-5786 Date Completed: 08/19/93