

From: Harold Eichenholz *EX*  
 To: Theodore Wingfield  
 Date: Sat, Apr 3, 2004 1:08 PM  
 Subject: Re: Brief For Transcript Reviews

Ted,

Attached please find the completed transcript review given to me last week.

Harold

>>> Theodore Wingfield 04/01/04 09:38AM >>>

Attached is the applicable form (any specific info included are merely examples of items to enter).  
When finished just email it back to me.

We prefer a "efficient & quality" review of the transcripts (instead of a "rapid" review).  
The reason were asking for help is that the volume of transcripts to review has increased beyond the level where I will be able to review them all by mid-late April.

Brief prior to reviewing a transcript:

- 1) Review the attached "review considerations" document. This was written by Scott Barber to aid in generating a focussed look at a transcript. It provides a good overview of what we are looking for.
- 2) Read the attached example "binning" document. This will help communicate some of the issues that have been identified, a flavor of what we are extracting from the transcripts, as well as give you an understanding of why we issued our January 28th letter to PSEG.

Thanks,  
Ted

Information in this record was deleted  
 in accordance with the Freedom of Information  
 Act, exemptions 7C  
 FOIA- 2005-0194

*R-27*

**Reviewer Harold Eichenholz notes/comments on the [redacted] interview (10-29-03)** 7C

The following are my observations/questions of the [redacted] interview 10-29-03.

ASSESSMENT QUESTION	YES/NO	AMPLIFICATION (WHY, WHY NOT, ETC.)
Subject will raise concerns and has done so?	Yes	Doesn't bother him what people think of him
Subject would raise concerns if necessary?	Yes	His management tells them - if you have an issue bring it up
Subject raises concerns for others, why?	Yes	[redacted] and acts for those that either do not want to deal with concern or bring it up, or don't want to be identified with concern
Subject won't raise concerns- Why?	Yes	Most try to fix concerns in-house first so that the NRC would not need to be involved
Do others raise concerns?	Yes	But concern is that people that raise concerns do not feel that they are being heard.
Others don't or hesitate to raise questions?	Yes	Some are uncomfortable, but it is not a pervasive problem
Someone has experienced retaliation for raising concerns?	No	

**Bins for Issues:**

- #1 - PERCEIVED LACK OF FREEDOM TO RAISE SAFETY CONCERNS TO PSEG MANAGEMENT
- #2 - PRODUCTION OVER SAFETY ISSUES
- #3 - SCHEDULE PRESSURE ISSUES
- #4 - LABOR - MANAGEMENT ISSUES
- #5 - INDUSTRIAL SAFETY ISSUES
- OTHER UNSPECIFIED ISSUES/COMMENTS

**#1 - PERCEIVED LACK OF FREEDOM TO RAISE SAFETY CONCERNS TO PSEG MANAGEMENT**

- (p. 54 - 59) The safety culture at Salem reflects managers, and to a lesser degree peers, looking down on people that raise issues. Interviewee believes that OSs take direction from above that they are not comfortable with because they have to, and thinks that his particular OS has had his job threatened for backing up the NEOs and therefore was taken off shift for several weeks to get "reprogrammed.". This OS has stated on several occasions that his crew gets him in trouble all the time. Thinks the problem resides with a couple of AOMs (the current General Manager new position), and a director that is no longer on-site. An operations person is harassed by his supervisors (i.e., they hound him hard) because he raises issues.

**#2 - PRODUCTION OVER SAFETY ISSUES**

- (P. 12 - 17) Discusses the Salem 1 Valve BF19 (feed reg. Valve) equipment problem that occurred in mid Oct. 03 that required a plant shutdown. The valve appeared to be stuck and the interviewee indicated that no actions were taken for many hours, including entering TS 3.0.3 and sending someone to attempt to free up the valve and figure out that the valve was mechanically stuck (said the situation was hokey - it took way longer than it should have in his opinion). The sticking of the valve appears to be a recurrent plant equipment problem involving the valve getting hung up, with a normal response by plant operators consisting of sending a maintenance person to free up the valve (spraying on lubricant and striking valve components with a mallet). The failure of the valve results in entry into TS 3.0.3 which would require a plant shutdown.
- (p. 28 - 34) MS 42 valve bonnet steam leak on a manual valve which should have required a plant shutdown to close valve - operators would not go near valve because leak was so bad (p. 20) and couldn't determine where the leak was coming from. But [redacted] and [redacted] went to valve without operators and [redacted] and without consideration for the need of a steam rescue should conditions worsen. The thought process that went into

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the decision making to close the valve in the manner in which it was done was a "megawatt mentality." (Interviewee only has second hand knowledge of issue)

- (p 43 - ) Grassing in intake structure event in March 03 - Unit 2 was taken off and Unit 1 50% power. The interviewee thought that the OS was getting pressure from above him to keep the units on-line because he looked uncomfortable.

**#3 - SCHEDULE PRESSURE ISSUES**

- (p. 34 -40) Deferral of 5 or 10 yr. inspection interval for bolts for at least one outage, possibly two ( Summer 2002 or 2002, but possibly Fall 2003). Halfway through 18-month cycle found lots of boron and degraded bolts. Operability determination required to see if bolts holding the head on the RHR heat exchanger were good enough to hold while bolts were replaced one at a time. Deferral of inspection was due to wanting to hold outage schedule to 19 days. Bolting condition should have found deferral of inspection if inspection was conducted. Interviewee unaware if inspection was a specific NRC ISI or IST requirement or if deferral was NRC approved or not. But, he was aware that the responsible engineer was angry when inspection was deferred and when the bolt wastage was identified, and that the item was removed from the outage schedule.

**#4 - LABOR - MANAGEMENT ISSUES**

- (p. 62 - 69) In last 1.5 years had escalating battle between workers and management - thinks it started when INPO gave them a three ratings. Management will not take accountability for deficient processes like work controls - an absolutely horrendous process that results in 17% wrench time. The issues with work controls has been an ongoing problem for years and they can't seem to get a handle on it. Also, there is a concern by workers that there is mismanagement in not fixing broken stuff out in the primary system that needs to be fixed, but because of outage schedule the work on the primary system is frozen even with 14 more days required for work on the secondary side. Management does not give credible answers to the plant workers raising questions on this matter and the answers given just do not make any sense.
- (p. 73 - 77 ) NEOs concern about being heard. It's the screaming and yelling, the tit-for-tat stuff that is all adding up into "white noise". NEOs are concerned about how do you make sure that what really needs to be heard gets heard and continue to believe that their attempts to continue to be heard is still being treated by management as white noise. Most NEOs feel they are white noise - except for a few that are good at jumping up and down. About a year ago the management and union held fairly regular scheduled meetings and were doing ok for awhile, but in the last 6-months things have gotten really bad. No sense in doing them because they are not productive - not getting anything done. The current situation is that NEOs believe there are issues with the plant and some issues with the workforce, but basically the workforce doesn't trust the management at all, in anything - either running the plant or in personnel issues between the company and union. While this environment may be making some people uncomfortable about raising nuclear safety or personal safety issues, it is his opinion that those that tend to raise issues will continue to do so.

**#5 - INDUSTRIAL SAFETY ISSUES**

- (p. 28 - 34) MS 42 valve bonnet leak on a manual valve - efforts to close valve were done without proper consideration for steam rescue should conditions deteriorate as part of valve manipulation. (Interviewee only has second hand knowledge of issue)

**OTHER UNSPECIFIED ISSUES/COMMENTS**

- (p. 19 - 28) Relates to potential issue about event notifications disappearing. Interviewee has had difficulty in locating them in system (example 201-63-897, MS-42 valve bonnet leak in Sept. 02, found only one notification when he knew that three had been written). Believes that a sensitive CR written against a supervisor for not paying attention to safety processes (heat stress and ALARA) was changed to prevent access unless you had the right level of authority. Not sure if notifications are disappearing, and believes that if information on notifications in the system is being changed it is not being done through malice.
- (p. 46 - 48) Continuously have problems with charging pumps and room coolers due to bio-fouling. Situation causes routine entry into charging system TS to allow cleaning of lube oil coolers and routine challenge to safety-related equipment and room coolers. Lot of people working on issue and trying to fix problem and it is a top priority - doesn't think there is any malice regarding this issue and believes that the service water system is one of their hardest challenged systems. ( p. 70 - ) Also, feed pumps and air compressors have fouling of their coolers more frequently than used to.
- (p. 51 - 53) Record retention concern raised by interviewee in June or July of 2003 that is currently being reviewed by his organization. Concern involves not keeping Q-based records, and therefore not being able to prove that required activities are being accomplished.