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PREPARED <i>[Signature]</i> 5/10/85	SUBMITTED <i>[Signature]</i> 5/10/85	APPROVED <i>[Signature]</i> 5/10/85
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NUCLEAR SAFETY REVIEW STAFF OFFICE PROCEDURE

TITLE: EMPLOYEE RESPONSE TEAM PROGRAM DATE: May 10, 1985

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## EMPLOYEE RESPONSE TEAM PROGRAM

### I. PURPOSE

The purpose of this procedure is to describe methods used by the Employee Response Team (ERT) for the implementation of a program for the identification, investigation and reporting of employee-raised issues of concern, with special emphasis on those issues dealing with nuclear safety at TVA facilities.

### II. SCOPE

This procedure covers responsibilities of the ERT in carrying out the purpose stated in Section I.

The ERT will conduct interviews of TVA employees assigned to the Watts Bar Nuclear Plant (WBNP) and the Watts Bar engineering project. Each employee will be provided an opportunity to confidentially express any concern about safety at WBNP.

ERT will operate telephone "hot lines" and a locally accessible number to permit any persons presently or formerly employed at TVA facilities to express nuclear safety concerns by telephone or to arrange for personal interviews. Subject to confidentiality requirements to protect identities of persons expressing concerns, the ERT will provide TVA with reports of concern expressed to the ERT.

Upon request of the Nuclear Safety Review Staff (NSRS) the ERT will conduct investigations of concerns and provide TVA with reports of such investigations.

The ERT will provide periodic status reports as required by TVA.

### III. POLICY

Refer to TVA Board of Directors memorandum dated April 30, 1985 "TVA Policy on Reporting Nuclear Safety Matters"

### IV. REFERENCES

- A. 10CFR21, Reporting of Defects and Noncompliance
- B. 10CFR50, Section 50.55(e), Significant Deficiency Reporting
- C. 10CFR50, Section 50.7, Employee Protection
- D. Energy Reorganization Act of 1974, Section 210
- E. TVA Code II Expression of Staff Views.
- F. TVA Instruction III CONDUCT.

V. ABBREVIATION/ACRONYMS/DEFINITIONS

- A. EMPLOYEE RESPONSE TEAM (ERT)--QTC Personnel assigned to solicit, investigate as directed, evaluate, initiate resolution, document concerns involving TVA nuclear activities, and communicate with concerned employees on TVA's resolution of issues raised.
- B. CONCERN--An allegation, differing opinion, or unresolved issue, expressed by an individual regarding TVA nuclear activities.
- C. INTIMIDATION AND HARRASSMENT (I&H)--A concern involving discrimination and protected activity as provided in references, sections IV.C and IV.D.
- D. PROTECTED ACTIVITY--Actions which establish a status as provided in References, Section IV.C and IV.D.
- E. FINDING--A determination resulting from an investigation of a concern.
- F. NSRS--Nuclear Safety Review Staff
- G. QTC.--Quality Technology Company- Contractor responsible to NSRS for developing and implementing the ERT program.
- H. OGC-Office of General Counsel

VI. RESPONSIBILITIES

- A. The ERT Program Manager  
  
The ERT Program Manager reports directly to the Director, Nuclear Safety Review Staff, and is responsible for the implementation of this procedure.
- B. The ERT Group Managers  
  
The ERT Group Managers report to the Program Manager and are responsible for planning, organizing, and controlling the activities associated with a specific investigation, (i.e., conduct interviews, plan investigations, perform initial evaluations for reportability).
- C. The ERT Interviewer(s)/Investigator(s)  
  
The ERT Interviewer(s)/Investigator(s) reports to the ERT Group Manager and is responsible for conducting interviews and investigations, as directed.
- D. Director, NSRS- Administers the ERT contract, provides guidance, assistance and direction to ERT on TVA policy as related to the ERT program.

VII. IDENTIFICATION OF CONCERNS

A. Initial Watts Bar Employee Interviews

1. The ERT will conduct an initial interview of each current TVA employee assigned to Watts Bar Nuclear Plant (WBNP) site and Watts Bar Engineering Project; this interview will provide each employee an opportunity to confidentially express any concern about safety at WBNP.
2. This interview is designed to determine employee concerns and the nature of these concerns. Due to the limited amount of time allocated to this interview, (10-20 minutes) follow-up interviews can be scheduled and conducted, and will be conducted at times and places which provide confidentiality.
3. Each employee will be requested to complete the Employee Concern Disclosure Statement (Attachment C). If a concern is expressed, the employee will also be requested to sign a "Confidentiality Agreement" (Attachment F).
4. Each individual expressing concerns will be assigned a unique file number (i.e., IN-YR-XXX) and a file will be established for further investigation and tracking.
5. Records of scheduled interview time will be maintained to ensure all personnel are afforded the opportunity to communicate their concerns to the ERT

B. The ERT Hot Line/Toll Free Line

1. The ERT Hot Line/Toll Free Line will be located in the office area of the ERT.
2. Incoming calls on these lines will be answered from 0700 to 2300 5-6 days per week by the ERT. and the remainder of the time by answering machines.
3. The ERT person receiving the call will initiate a Record of Employee Concern form (Attachment A) to establish the data base for conducting the investigation. The individuals name, address and phone # will be requested, and recorded if provided. If not provided the individual will be told a personal written response will not be possible. A unique file number file (e.g., PH-YR-XXX) will be assigned and a file established for investigation and tracking.

4. Hot line and toll free calls will be recorded on weekends, holidays, and after working hours by an answering machine.
5. Each working day the "Hot Line Daily Log" (Attachment B) will be completed by ERT personnel checking the answering machine.
6. Any recorded calls will be transcribed onto the Record of Employee Concern form (Attachment A) and a file initiated with a unique number (i.e., PH-YR-XXX) for further investigation and tracking.
  - a. differentiation between employees and non-employees will be attempted for trending purposes
7. Except when the answering machine is in operation, ERT will not tape record telephone calls, or interviews without permission.

C. Exit Interviews

1. All project personnel terminating or transferring from WBNP will exit through the ERT office and be requested to complete an Employee Concern Disclosure Statement (Attachment C).
2. All employees checking out through ERT will receive an ERT clearance statement if required (Attachment D).
3. Those individuals stating a concern(s) (Item 2 checked on Attachment C and a written statement) will be requested to participate in an interview with an ERT Representative to establish the details of each concern, and the Record of Employee Concern (Attachment A) will be completed.
4. Those individuals who prefer not to complete an Employee Concern Disclosure Statement will be provided with an alternate method of contacting the ERT with any concerns (Employee Concern Solicitation Letter, attachment E).
5. Each individual directing concerns to the ERT will be afforded confidentiality (Confidentiality Agreement, Attachment F).
6. Each individual expressing concerns will be assigned a unique file number (i.e., EX-YR-XXX) and a file will be established for further investigation and tracking.

D. Alternatives for Exit Interviews

1. For those individuals who resign offsite, are terminated during off-shift hours, or for other reasons do not interview with ERT when exiting, the Program Manager will send a Registered Employee Concern Solicitation Letter (Attachment G) requesting completion of the Employee Concern Disclosure Statement (Attachment C).
2. These letters and all responses received will be logged. Responses will be processed in accordance with this procedure.

E. Unscheduled Concerned Individuals

1. Personnel who contact the ERT office without being scheduled to discuss WBNP concerns with the ERT personnel will be expeditiously processed.
2. For each individual expressing a concern(s) the ERT will complete a Record of Employee Concern form (Attachment A) and assign a unique file number (i.e., WI-YR-XXX). A file will be established for further investigation and tracking.

F. WBNP Concerns Identified by External Sources

1. Concerns received by ERT from sources external to TVA will be documented, and reported in accordance with this procedure.
2. For these concerns, A unique file number (OW-YR-XXXX for WATTS BAR and OO-YR-XXX for other TVA projects) and file will be established in accordance with this procedure.

G. Non-WBNP Concerns Identified

1. Concerns received by ERT regarding nuclear projects other than Watts Bar (i.e., Browns Ferry, Bellefonte, Sequoyah, etc.) will be documented, investigated and reported in accordance with this procedure.
2. For these concerns, a unique file number (i.e., XX-YR-XXX) and file will be established for further investigation and reporting.

## H. Confidentiality

1. Employees expressing concerns will be afforded every opportunity to ensure confidentiality from individuals or organizations external to the ERT.
2. The names and identities of persons expressing concerns will be kept confidential. Such names and any information which could be used to identify the person will be the property of ERT and will not be released to NSRS, TVA or any third party, except as required by law.
3. An individual expressing a concern will not be required to give his or her name.

## I. Priorities and Categories

1. ERT will prioritize and categorize each concern as to subject matter, consistent with guidelines established by NSRS.
2. Refer to Attachment I for general criteria to be used to determine the priority of concerns.
3. Refer to Attachment J for a list of typical categories to be used.

## J. Potential Reportability Screening and Safety System Assessment (10CFR50.55e and 10CFR21)

1. As each separate concern is identified for each assigned file, the Program Manager/Group Manager will perform a reportability screening and initiate a Request for Reportability Evaluation (Attachment M). The form will be stamped PRELIMINARY and placed in the appropriate file.
  - a. While a concern may not be initially reportable, the investigation at a later time may indicate reportability per 10CFR50.55(e)/10CFR21, or Tech. Specs. (after licensing) In this situation, the Request for Reportability Evaluation will be labeled "FINAL" and will be forwarded, along with the concern and any additional information to the NSRS. Requests for reportability determination will be forwarded to the appropriate organizations for disposition.

- b. Those concerns determined not to meet reportability requirements will be recorded as such in the appropriate blocks of the Request for Reportability Evaluation form. (Attachment M) The form will be attached to each final report and will be referenced as the basis of the reportability evaluation statement.
- c. Those concerns expressed to any ERT personnel that may have an impact upon plant or safety system operability will be immediately directed to the NSRS for referral to the appropriate organization for action.
- d. The ERT will identify on the employee Concern Assignment Request if the concerned individual feels the item is reportable.

K. NSRS Notification and ERT Request for Investigation Assignment

- 1. Subject to the confidentiality provision of this procedure, ERT will notify NSRS of each concern received by ERT.
- 2. The Employee Concern Assignment Request (Attachment K) will be used for this notification. This form also provides for NSRS to respond to ERT regarding assignment of responsibility for investigation of the concern.
- 3. A Transmittal (Attachment L) form will be used to submit Employee Concern Assignment Request(s) to NSRS.
- 4. Concerns and findings related to NSRS activities will be reported by letter to the General Manager or the Office of the General Counsel

VIII. INVESTIGATION OF CONCERNS - This section applies only when the ERT is directed to investigate by NSRS.

A. Investigative Plan Development

- 1. The Group Manager(s) will complete an Investigative Plan (Attachment N) for each concern. Each concern identified by an individual will be assigned a separate sequential number (CONCERN NO. block) with the concern described in detail (CONCERN block).
- 2. A comprehensive series of investigative steps, which are intended to resolve each concern identified, will be defined (ACTION block). The action items are to be structured, if possible, to identify "root cause."

3. The Group Manager will assign an ERT member (INVESTIGATION block) and a scheduled date for completion of each action identified (SCHEDULE DATE block).
4. As each ACTION is completed by the ERT member, the Group Manager will indicate the actual date of completion (COMPLETION DATE block).
5. Once all planned investigative actions are completed and the concern is resolved, the Group Manager will indicate whether the concern was substantiated or not (SUBSTANTIATED--YES/NO block) and whether it was reportable or not (Reportable--yes/no).
6. The plan will be revised as new developments arise and will represent investigative history when the concern is resolved.

B. TYPES OF CONCERNS FOR INVESTIGATION

1. Hardware and Documentation Concerns

- a. Hardware and documentation concerns will be reviewed by the Program Manager for categorization with similar concerns for investigation and resolution. Computer data entries regarding concerns are such that related concerns may be grouped for a single investigation.
- b. As directed, the Group Manager, Interviewer, Investigator will plan and investigate these employee concerns and compliance with applicable:
  - (1) drawings
  - (2) specifications
  - (3) codes and standards
  - (4) site procedures.
- c. The investigation may encompass physical hardware inspections with assistance by qualified inspectors from site personnel (N45.2.6/ASNT-TC-1A) or documentation/records reviews or a combination of both.

d. The investigative process may reveal findings which are not directly related to concerns. These findings will be handled in accordance with this procedure and will be uniquely identified.

2. Cost, Schedule and Other Management Related Concerns

a. The Program Manager/Group Manager will document all nonquality-related concerns (i.e., drugs, firearms, cost and schedule, etc.). Each concern of this nature will be formally transferred to NSRS for resolution.

b. Upon receipt of the response from NSRS the Program Manager will close the concern.

c. The concerned individual will be contacted by the Program Manager (Attachment S). The concerned individual will be provided with a statement of the concern(s), finding(s), corrective action(s) taken, and a closure statement (Attachment Q).

3. Intimidation and Harassment (I&H)

a. I&H concerns will be referred through NSRS to OGC for investigation by or at the direction of OGC pursuant to TVA Instruction III, CONDUCT, Complaints.

b. Concerns involving I&H will be processed in accordance with this procedure and the following additional criteria:

I&H concerns require the identification of a protected activity and participation in a protected activity by the individual. For the purposes of this procedure, an individual will be considered to have engaged in a protected activity if a concern has been transferred to the NRC, identified to the immediate supervisor or other responsible management, or identified to the ERT.

IX. RESOLUTION AND REPORTING OF CONCERNS

A. As each investigation is completed, the ERT member will complete and forward an ERT Investigation Internal Report (Attachment O) to the Program Manager.

- B. The Investigation Internal Report will include the following:
1. Personnel contacted (during the investigation)
  2. Concern (investigated in accordance with the investigative plan)
  3. Findings (results of investigation--concern substantiated or not substantiated)
  4. Observations (general comments)
  5. Recommend Corrective Action (As Appropriate)
- C. The ERT Investigation Report (Attachment O) is the report that will be transmitted to NSRS. This report will contain the same information indicated in Section IX.B, above, except as indicated in Section VII.H (confidentiality) and section VII.K.4 (conflict of interest) of this procedure
- D. Questions regarding the adequacy of corrective action will be resolved between NSRS and line management.
- E. The Program Manager/Group Manager will review each file to assure that no concerns were overlooked and that the file is complete (Checklist, Attachment P).
- F. An Employee Concern Disposition Form (Attachment Q) will be prepared to document each completed concern.
- G. The final report package will contain the following:
1. Statement of employee concern (Attachment Q).
  2. Investigation findings (Attachment O).
  3. Corrective action(s) taken (Attachment Q).
  4. Statement of reportability (Attachment M).
  5. Closure statement (e.g., "This concern was determined to be with merit. \*\*Closed\*\*"), (Attachment Q).
  6. Investigative Plan (Attachment N)
- H. The final report package will be transmitted (Attachment L) to the Director, NSRS for approval as to completeness. The NSRS will notify ERT upon approval of the final report package.

I. Upon approval of the final report package by NSRS, the concerned individual will be contacted by the Program Manager. The Program Manager will provide a letter (Attachment S) to the concerned individual with the specific resolution of the stated concerns (Attachment Q). and will notify NSRS that the individual has been contacted.

X. ANALYSIS OF INVESTIGATIVE RESULTS AND RESOLUTIONS

A. To support "root cause" determination, the Program Manager will implement and maintain a trending program which will provide management with a basic "feedback" mechanism required to meet project requirements. This mechanism is the ERT Trends report (Attachment T). The basic elements of the trending program center on data retrievability and sorting to suit TVA/WBNP requirements. The key attributes are:

- 1. Concern categorization coding
- 2. Statistical data gathering
- 3. Evaluation and analysis

B. The ERT Trends report and the Investigative Plan provide for detailed tracking of status and actions scheduled for resolution.

XI. MANAGEMENT REPORTS

A. The Program Manager will compile ERT data and issue the following to NSRS:

- 1. Daily Status Report (Attachment U).
- 2. Weekly Status Report of the ERT Program Activities (Attachment V).
- 3. ERT Monthly Status Report (Attachment W)
- 4. ERT FINAL REPORT PACKAGE (see Section IX.G) (Attachment Q)
- 5. ERT Trends report (Attachment T)

XII. ERT RECORDS

A. The ERT files are not considered quality records. However, due to the nature and importance of the files, the records will be organized, controlled and protected.

The contents of each completed file will be indexed, segregated, total pages numbered, and maintained in a bound folder. The in-process files will be maintained by the Program Manager. No information that would identify a concerned employee will be released outside QTC except as required by law.

- C. Access to the in-process and closed files will be authorized by the Program Manager.
- D. ERT files will be retained by QTC for a period of 2 years from completion of contract or issuance of operating license whichever is later.

III. INTERPRETATIONS- In the event of any inconsistency between this procedure and TVA's contract with QTC, the contract provisions shall govern.

## II. ATTACHMENTS

The following attachments are examples of forms as referenced in this procedure; the actual content and format may vary, however, the essential elements will be incorporated in the forms used:

- A. RECORD OF EMPLOYEE CONCERN
- B. HOT LINE DAILY LOG
- C. EMPLOYEE CONCERN DISCLOSURE STATEMENT
- D. ERT CLEARANCE STATEMENT
- E. EMPLOYEE CONCERN SOLICITATION LETTER
- F. CONFIDENTIALITY AGREEMENT
- G. INVESTIGATION INTERNAL REPORT
- H. EMPLOYEE CONCERN LOG
- I. CRITERIA USED TO DETERMINE PRIORITY OF CONCERNS
- J. CATEGORIES
- K. EMPLOYEE CONCERN ASSIGNMENT REQUEST
- L. TRANSMITTAL
- M. REQUEST FOR REPORTABILITY EVALUATION
- N. INVESTIGATIVE PLAN
- O. ERT INVESTIGATION REPORT
- P. ERT COMPLETED CHECKLIST (A&B)
- Q. EMPLOYEE CONCERN DISPOSITION FORM
- R. ERT INTERVIEW/INVESTIGATION TIME RECORD
- S. CONCERN PROCESSED LETTER
- T. ERT TRENDS (COMPUTER GENERATED-NOT INCLUDED IN ATTACHMENTS)
- U. DAILY STATUS REPORT
- V. WEEKLY STATUS REPORT
- W. MONTHLY STATUS REPORT

RECORD OF EMPLOYEE CONCERN

File No: \_\_\_\_\_

PERSONAL/CONFIDENTIAL

DATE/TIME OF CALL RECEIVED  
OR INTERVIEW CONDUCTED:

\_\_\_\_\_ AM/PM

RECEIVED BY: \_\_\_\_\_

Ans. Device? Yes/No

CONCERNED INDIVIDUAL: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

TELEPHONE NO: \_\_\_\_\_

ALTERNATE PHONE: \_\_\_\_\_

EMPLOYER: \_\_\_\_\_

DATES OF EMPLOYMENT: \_\_\_\_\_

POSITION: \_\_\_\_\_

STATEMENT OF CONCERN(S): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Additional Information

SUPERVISOR/FOREMAN NAME: \_\_\_\_\_

SUPERVISOR/FORMAN NOTIFIED: Yes \_\_\_\_\_ No \_\_\_\_\_ (Date/Time) \_\_\_\_\_

IF YES, RESULTS: \_\_\_\_\_

IF NO, WHY NOT? \_\_\_\_\_

NAMES OF OTHER INDIVIDUALS WHO MAY BE ABLE TO PROVIDE ADDITIONAL OR SUPPORTING  
INFORMATION RELATING TO SUBJECT CONCERN: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

METHOD/TIME FRAME ESTABLISHED FOR CONTACTING INDIVIDUAL: \_\_\_\_\_  
\_\_\_\_\_

REMARKS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

TELEPHONE (HOT LINE) DAILY LOG

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Date	Name	Comments
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EMPLOYEE CONCERN DISCLOSURE STATEMENT

I, \_\_\_\_\_ SS# \_\_\_\_\_  
(print full name)

Badge# \_\_\_\_\_

acknowledge that:

I have this opportunity to CONFIDENTIALITY express any personal concern I may have regarding the TVA Watts Bar or other nuclear project;

If I know of a NUCLEAR SAFETY PROBLEM (a problem which could affect the safe operation, and/or affect the health/safety of site personnel or the general public) or other (non-safety) problems, I understand that I can express my knowledge and concern to the EMPLOYEE RESPONSE TEAM (ERT) with CONFIDENTIALITY:

(check correct box)

1 NO....I do not have personal concern or knowledge regarding NUCLEAR SAFETY PROBLEM at Watts Bar or other TVA nuclear projects;

2. YES... I do have personal concern or knowledge regarding a Nuclear Safety Problem, or other (non-safety) problem, at a TVA nuclear project;

scribe: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Interviewed/received by:

I certify the above information to be true and correct to the best of my knowledge:

\_\_\_\_\_  
Signature of Individual

\_\_\_\_\_  
Company and Department or Craft

ERT File No. \_\_\_\_\_

ERT CLEARANCE

DATE \_\_\_\_\_

EMPLOYEE NAME \_\_\_\_\_

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ERT CLEARANCE

DATE \_\_\_\_\_

EMPLOYEE NAME \_\_\_\_\_

---

ERT CLEARANCE

DATE \_\_\_\_\_

EMPLOYEE NAME \_\_\_\_\_

Date

(name & address--confidential information)

Dear (name--confidential information):

As a present or former employee with the Watts Bar or other TVA nuclear projects, you have the opportunity to CONFIDENTIALLY express any personal concern you may have regarding any NUCLEAR SAFETY PROBLEM (a problem which could affect the safe operation, and/or other (non-safety) problems involving the Watts Bar or other TVA nuclear projects.

The Employee Response Team (ERT), consisting of non-TVA personnel, has implemented a program to identify, investigate and report employee concerns, particularly those concerns which may reflect a NUCLEAR SAFETY PROBLEM at the Watts Bar or other TVA nuclear projects. This program includes a private interview with all personnel assigned to the Watts Bar Nuclear Plant and the Watts Bar engineering project.

Our records indicate that you may not have had the opportunity to participate in this program. Therefore, we have enclosed an Employee Concern Disclosure Statement form. Please complete the form and return it in the enclosed envelope. Although we would like you to enter your name and other identification (so that we can report to you on our findings), it is not required. We do want to know about any NUCLEAR SAFETY PROBLEM that needs attention.

You may wish to call us on one of our telephone HOT LINES (see below) to talk and/or arrange for a CONFIDENTIAL interview. Please do not hesitate to contact us if you have any questions or concerns regarding TVA nuclear projects.

Thank you for your cooperation.

Sincerely,

Program Manager  
Employee Response Team

ERT Telephone HOT LINES  
Local to Watts Bar site:  
(615) 365-4388

Inside Tennessee (toll free):  
1-800-423-3071

Outside Tennessee (toll free):  
1-800-323-3835

ERT Form E

CONFIDENTIALITY AGREEMENT

I have information that I wish to provide in confidence to Quality Technology Company (QTC). I request an express pledge of confidentiality as a condition of providing this information to QTC. I will not provide this information voluntarily to QTC without such confidentiality being extended to me.

It is my understanding, consistent with its legal obligations, that QTC by agreeing to this confidentiality, will adhere to the following conditions:

(1) QTC will not identify me by name or personal identifier in any QTC initiated document, conversation, or communication released to the public which relates to the information provided by me. I understand the term "public release" to encompass any distribution outside of QTC with the exception of other public agencies which may require this information in furtherance of their responsibilities under law or public trust.

(2) QTC will disclose my identity only to the extent required for the conduct of QTC related activities.

(3) During the course of the investigation, QTC will also make every effort consistent with investigative needs of QTC to avoid actions which would clearly be expected to result in the disclosure of my identity to persons subsequently contacted by QTC. At a later stage I understand that even though QTC will make every reasonable effort to protect my identity, my identification could be compelled by orders or subpoena issued by courts of law, hearing boards, or similar legal entities. In such cases, the basis for granting this promise of confidentiality and any other relevant facts will be communicated to the authority ordering the disclosure in an effort to maintain my confidentiality. If this effort proves unsuccessful, a representative of QTC will attempt to inform me of any such action before disclosing my identity.

I also understand that QTC will consider me to have waived my right of confidentiality if I should take any action that may be reasonably expected to disclose my identity. I further understand that QTC will consider me to have waived my rights to confidentiality if I provide (or have previously provided) information or if circumstances indicate that I am intentionally providing false information to QTC, this confidentiality will be deemed waived.

I have read and fully understand the contents of this agreement. I agree with its provisions.

Name(print) \_\_\_\_\_ Address \_\_\_\_\_  
Date \_\_\_\_\_ Signature \_\_\_\_\_

Agreed to on behalf of QTC \_\_\_\_\_

ERT INVESTIGATION INTERNAL REPORT

CONCERN NO:

CONCERN:

INVESTIGATION  
PERFORMED BY:

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DETAILS:

Prepared By \_\_\_\_\_  
Date

Reviewed By \_\_\_\_\_  
Date

EMPLOYEE CONCERN LOG

- ( ) ECRT Hot Line Log
- ( ) Problem Investigation Log

EMPLOYEE CONCERN FILE NO.	DATE/TIME RECEIVED	REC'D BY	ASSIGNED TO	REF'D TO	DATE RESOLVED	DATE OF FEEDBACK TO CALLER	CLOSE DATE	NATURE OF CONCERN

EMPLOYEE RESPONSE TEAM

PRIORITIES

The following are the general criteria to be used to determine the PRIORITY of concerns received. This prioritization will be done prior to transfer to TVA and will be reviewed and approved by the appropriate group manager before submittal.

1. (a)...Personnel Safety  
(b)...Nuclear Safety Related  
(c)...Affects Licensing
  
2. (a)...Intimidation and Harassment  
(b)...Falsification of records  
(c)...Drugs. etc.
  
3. (a)...Programmatic Problems  
(b)...May affect plant "Reliability"  
(c)...Procedural Violations
  
- (a)...Non-Safety Concerns  
(b)...Schedule Pressure  
(c)...Employee Personal Feelings

"A" CATEGORIES AND CODES

<u>"A" Code</u>	<u>Category</u>
01	Organization
02	QA Program
03	Design/Engineering
04	Procurement
05	Instructions/Procedures/Specs/Drawings
06	Document Control
07	Purchased Material/Equipment/Services
08	Material Identification/Control
09	Special Processes (Welding and Other)
10	Inspection/Examination (NDE)
11	Testing/Test Control
12	M&TE/Calibration
13	Maintenance/Storage/Handling
14	Status (Tagging/Identification)
15	Nonconformances/Deficiencies
16	Corrective Action/Stop Work
17	Records/Documentation
18	Audits/Surveillance
19	10 CFR 50.55(e) and Part 21
20	Construction/Installation/Fabrication
21	Safety (Industrial/OS&H)
22	Security (Plant/Construction)
23	Legal - Criminal
24	Intimidation and Harassment

"A" CATEGORIES AND CODES (Continued)

<u>"A" Code</u>	<u>Category</u>
25	Cost/Schedule/Productivity
26	Industrial/Labor Relations .
27	Public Relations
28	(Spare)
29	(Spare)
30	(Spare)
31	Plant Startup
32	Plant Operations

Employee Concern Assignment Request

To: Director - NSRS

ERT has received the Employee Concern identified below, and has assigned the indicated category and priority:

Priority \_\_\_\_\_ Concern# \_\_\_\_\_

Category \_\_\_\_\_

Concern: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Manager, ERT                      Date

NSRS has assigned responsibility for investigation of the above concern to:

- ERT
- NSRS/ERT (Jointly)
- NSRS
- Others (Specify) \_\_\_\_\_

\_\_\_\_\_  
NSRS                                      Date



REQUEST FOR REPORTABILITY EVALUATION

1. Request No. \_\_\_\_\_ (ERT Concern No.) \_\_\_\_\_ (ID No., if reported)
2. Identification of Item Involved: \_\_\_\_\_ (Nomenclature, system, manuf., SN, Model, etc.)
3. Description of Problem (Attach related documents, photos, sketches, etc.)

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4. Reason for Reportability: (Use supplemental sheets if necessary)
- A. This design or construction deficiency, were it to have remained uncorrected, could have affected adversely the safety of operations of the nuclear power plant at any time throughout the expected lifetime of the plant.

No \_\_\_\_\_ Yes \_\_\_\_\_ If Yes, Explain: \_\_\_\_\_

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AND

- B. This deficiency represents a significant breakdown in any portion of the quality assurance program conducted in accordance with the requirements of Appendix B.

No \_\_\_\_\_ Yes \_\_\_\_\_ If Yes, Explain: \_\_\_\_\_

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OR

- C. This deficiency represents a significant deficiency in final design as approved and released for construction such that the design does not conform to the criteria bases stated in the safety analysis report or construction permit.

No \_\_\_\_\_ Yes \_\_\_\_\_ If Yes, Explain: \_\_\_\_\_

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OR

D. This deficiency represents a significant deficiency in construction of or significant damage to a structure, system or component which will require extensive evaluation, extensive redesign, or extensive repair to meet the criteria and bases stated in the safety analysis report or construction permit or to otherwise establish the adequacy of the structure, system, or component to perform its intended safety function.

No \_\_\_\_ Yes \_\_\_\_ If Yes, Explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

OR

E. This deficiency represents a significant deviation from performance specifications which will require extensive evaluation, extensive redesign, or extensive repair to establish the adequacy of the structure, system, or component to perform its intended safety function.

No \_\_\_\_ Yes \_\_\_\_ If Yes, Explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

IF ITEM 4A, AND 4B OR 4C OR 4D OR 4E ARE MARKED "YES", IMMEDIATELY HAND-CARRY THIS REQUEST AND SUPPORTING DOCUMENTATION TO NSRS.

This Condition was Identified by:

\_\_\_\_\_  
ERT Group Manager Phone Ext. \_\_\_\_\_

\_\_\_\_\_  
ERT Project Manager Phone Ext. \_\_\_\_\_

Acknowledgment of receipt by NSRS

Signed \_\_\_\_\_

Date \_\_\_\_\_ Time \_\_\_\_\_

INVESTIGATIVE PLAN

File No: \_\_\_\_\_

ERT Representative \_\_\_\_\_

Concern Closed \_\_\_\_\_  
Reportable \_\_\_\_\_

Concern No.	CONCERN	Action Item(s)	Investigator	Schedule Date	Completion Date	Substantiated	
						Yes	No

ERT INVESTIGATION REPORT

CONCERN NO:

CONCERN:

INVESTIGATION  
PERFORMED BY:

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DETAILS:

Prepared By \_\_\_\_\_  
Date

Reviewed By \_\_\_\_\_  
Date

ERT INVESTIGATION REPORT

ERT INVESTIGATION REPORT CONCERN NO: \_\_\_\_\_

CONTINUATION SHEET Page \_\_\_\_\_ of \_\_\_\_\_

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DETAILS

ERT COMPLETED CONCERN CHECKLIST

Concern No. \_\_\_\_\_

COMPLETED CONCERN CHECKLIST

NO.	DOCUMENT TITLE	ATTACH	NO OF PAGES	INIT	DATE
1.	EMPLOYEE CONCERN ASSIGNMENT REQUEST				
2.	REQUEST FOR REPORTABILITY EVALUATION (PREL)				
3.	ECRT INVESTIGATIVE PLAN (LATEST COMPLETED REVISION)				
4.	ECRT INVESTIGATION REPORT(S)				
5.	REQUEST FOR REPORTABILITY EVALUATION (FINAL)				
6.	EMPLOYEE CONCERN DISPOSITION FORM *				
7.	QUALITY CONCERN FINAL REPORT COVER LETTER				
8.	TIME RECORD(S)				
9.	MISCELLANEOUS DOCUMENTS				
		TOTAL NUMBER OF FILE PAGES			

\* THIS ITEM TO BE CHECKED BY GROUP MANAGER

ERT COMPLETED FILE CHECKLIST

FILE NO. \_\_\_\_\_

COMPLETED FILE CHECKLIST

NO	DOCUMENT TITLE	ATTACH	NO OF PAGES	INIT	DATE
1.	RECORD OF EMPLOYEE CONCERN				
2.	EMPLOYEE CONCERN DISCLOSURE STATEMENT				
3.	CONFIDENTIALITY AGREEMENT				
4.	REQUEST FOR REPORTABILITY EVALUATION (PREL)				
5.	ECRT INVESTIGATIVE PLAN (LATEST COMPLETED REVISION)				
6.	ECRT INVESTIGATION REPORT(S)				
7.	REQUEST FOR REPORTABILITY EVALUATION (FINAL)				
8.	EMPLOYEE CONCERN DISPOSITION FORM				
9.	CLOSURE LETTER (TO INDIVIDUAL) (AS APPLICABLE)				
10.	QUALITY CONCERN FINAL REPORT COVER LETTER				
11.	TIME RECORD(S)				
12.	EMPLOYEE CONCERN ASSIGNMENT REQUEST				
TOTAL NUMBER OF FILE PAGES					

EMPLOYEE CONCERN DISPOSITION REPORT

CONCERN NO.

DATE OF PREPARATION:

CONCERN:

FINDING(S):

CORRECTIVE ACTION(S)

CLOSURE STATEMENT:



Date

(name & address-CONFIDENTIAL INFORMATION)

Dear (name-CONFIDENTIAL INFORMATION):

The Employee Response Team (ERT) for Watts Bar and other TVA nuclear projects has completed the implementation of its program for investigation and resolution of the concern(s) you have expressed to us. The results of our mutual efforts are indicated in the enclosed ERT Employee Concern Disposition report(s). If you have any questions regarding this letter or the enclosed information, or if at any time in the future you have any additional questions or concerns regarding Watts Bar or other TVA nuclear projects, please contact ERT

Although we feel that we have resolved the concern you expressed, we want you to have the same feeling. Therefore, if you are not satisfied with this resolution of your concern, please contact ERT or the TVA Board of Directors, or the Nuclear Regulatory Commission (NRC).

In accordance with our Confidentiality Agreement, your identity is known only to Quality Technology Company (QTC) in connection with the concern(s) you expressed. Even though we have completed our efforts regarding your concern(s), we will continue to honor our agreement. If you feel that this confidentiality has been compromised in any way, or if you feel that you have been subjected to any form of intimidation, harassment, discrimination, or similar actions due to your expression of concern(s), please contact ERT, the TVA Office of General Counsel, or the Nuclear Regulatory Commission (NRC).

On the reverse side of this letter are the telephone numbers and mailing addresses for the organizations/offices indicated above.

Sincerely,

Program Manager  
Employee Response Team

ERT DAILY REPORT

TO: M. A. Harrison  
FROM: ERT Program Manager  
DATE:  
SUBJECT: DAILY REPORT

\_\_\_\_\_ interviews were conducted yesterday \_\_\_\_\_  
(Date)

\_\_\_\_\_ individuals expressed concerns.

\_\_\_\_\_ concerns appear to be safety related.

\_\_\_\_\_ had no concerns but would inform if they had.

\_\_\_\_\_ stated they would not tell if they had a concern.

Attached are transmittal letters for \_\_\_\_\_ concerns to be  
dispositioned.

W. S. Schum  
Program Manager

WEEKLY STATUS REPORT OF THE  
EMPLOYEE RESPONSE TEAM

TO: Director - Nuclear Safety Review Staff  
FROM: Project Manager - Employee Response Team  
SUBJECT: Weekly Status Report of the Employee Response Team  
Program Activities

During the week ending \_\_\_\_/\_\_\_\_/\_\_\_\_, \_\_\_\_ persons were processed through the \_\_\_\_ Program. \_\_\_\_ indicated no known concerns, \_\_\_\_ indicated a knowledge of existing or past concerns, \_\_\_\_ cases are under investigation, \_\_\_\_ investigation were completed, \_\_\_\_ could not be substantiated, \_\_\_\_ were substantiated.

Following is a categorical summary of activities by organization.

THIS WEEKS SUMMARY:

ORGANIZATION
NO. OF PERSONNEL PROCESSED
NO CONCERNS
CONCERNS
CUMULATIVE SUMMARY TO DATE:
ORGANIZATION
NO. OF PERSONNEL PROCESSED
NO CONCERNS
CONCERNS
TOTAL NO. SUBSTANTIATED
TOTAL NO UNDER INVESTIGATION
TOTAL NO. CLOSED

See Attached for a brief description of new concerns under investigation, and listing of those closed or transferred.

WEEKLY STATUS REPORT OF THE  
EMPLOYEE RESPONSE TEAM

Page \_\_\_\_ of \_\_\_\_

EMPLOYEE CONCERN  
FILE NO.

CONCERNS WEEK ENDING

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TEAM MONTHLY STATUS REPORT

TO: Director, Nuclear Safety Review Staff

FROM: Project Manager, ERT

SUBJECT: ERT Monthly Status Report

During the month of \_\_\_\_\_, ERT files have been opened  
involving \_\_\_\_\_ concerns.

cc:

Attachment

TEAM MONTHLY STATUS REPORT

Page \_\_\_\_ of \_\_\_\_

CONCERN	DATE/TIME RECEIVED	CONCERN	STATUS
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