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NUCLEAR SAFETY REVIEW STAFF OFFICE PROCEDURE

TITLE: "HANDLING OF EMPLOYEE CONCERNS" DATE: 6/25/85

I. PURPOSE

The purpose of this procedure is to provide instructions to all NSRS personnel regarding the processing of employee concerns. The process described herein provides and emphasizes as high a degree of security and confidentially of concerned employees' identities, as is practical.

II. SCOPE

This procedure covers only NSRS internal processing of employee concerns and allegations brought to the attention of any NSRS member by any of the following methods:

Telephone calls
Memoranda or letters
Referral by another TVA organization
Personal Contact Referral by a source external to TVA (such as NRC)

This procedure does not cover the processing of concerns identified by referral from QTC or concerns and differing opinions held by NSRS staff members. Other NSRS procedures address these areas.

III. POLICY

It is the policy of NSRS to receive, process, investigate and report on nuclear safety-related allegations and issues of concern regarding the TVA nuclear program. Insofar as practical, this work will be conducted to maintain the anonymity of employees who have expressed concerns. A minimum number of Investigations Group personnel will be permitted access to or knowledge of, a concerned employee's identity. Only the Director has the authority to allow the disclosure of an individual's identity to other TVA organizations, such as OGC, should it be necessary. Under no circumstances will investigators (or other NSRS members) confirm the identity of a concerned employee, even if the identity is known to line management, or if the concerned employee states he is not interested in preserving his/her anonymity.

IV. REFERENCES

A. TVA Code IV "Expression of Staff Views"
B. NSRS Procedure 0303 "Conduct of Investigations"
C. TVA Instruction III Conduct, Complaints.
D. TVA Board of Directors' Memorandum to All Employees dated April 30, 1985

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V. ABBREVIATIONS/ACRONYMS/DEFINITIONS

A. Abbreviations/Acronyms

1. QTC — Quality Technology Company
2. ERT — Employee Response Team
3. ERTP — Employee Response Team Program
4. IG — NSRS Investigations Group
5. OGC — Office of the General Counsel
6. OC — Office of Construction
7. OE — Office of Engineering
8. PMO — Project Manager's Office
9. OCS — Office of Corporate Services
10. OHS — Occupational Health and Safety
11. OER — Office of Employee Relations
12. NUC PR — Office of Nuclear Power
13. DNS — NUC PR Division of Nuclear Services
14. NEB-NLS — OE Nuclear Engineering Branch, Nuclear Licensing Section

B. Definitions

1. Investigation - A planned, indepth, sequence of actions thoroughly performed so as to produce a documented, replicable conclusion(s) regarding the validity or invalidity (substantiation nonsubstantiation) of an issue of concern. Such actions would normally include: interviews with personnel cognizant of the issue, review of pertinent requirements and documentation, and critical observation of activities and/or hardware.

2. Evaluation - A systematic series of actions performed to produce a documented, replicable conclusion regarding the validity of an issue of concern, but which may be less formal and indepth than an investigation. Evaluations would normally require only communications of readily obtained accurate information or justification regarding an issue to an employee who may have been misinformed about the facts or requirements of his/her issue.

   Example:

   Issue: There is no ASME code plate on any of the valves in the component cooling water system.

   Evaluation: The statement is true. However, the CCW system was designed and constructed to ANSI B-31.1 requirements and as such, it is not required or permissible to install ASME code stamped plates on the valves.

VI. RESPONSIBILITIES

A. Director, NSRS is responsible for establishing a program to receive and process employee concerns confidentially. At his discretion, he may refer concerns personally received to the Head, IG or alternate, or may personally process them.

B. Investigations Group

1. The Head of IG is responsible for:

a) Executing the program described in this procedure for handling employee concerns confidentially.

b) Receiving and processing concerns referred to NSRS or called in directly by employees. In his absence, a designated alternate will perform this function.

c) Determining which concerns received will be handled by NSRS and which will be referred to other organizations as designated by the Director.

d) Assigning IG engineers to investigate or evaluate those concerns which appear to be nuclear safety-related.

e) Assuring that security measures are established and functioning within NSRS to minimize unnecessary disclosure of a concerned employee's identity.

f) Coordinating with clerical staff to have an identification number assigned to each employee concern.

g) Assuring security of a confidential cross reference listing of individuals' identities versus employee concern identification numbers. This cross reference is maintained in a limited access location (locked file).

h) Making additional contacts, if required with the concerned employee to obtain further information. If not practical, the investigation team leader should make the contact.

C. The IG Staff is responsible for:

1. Investigating or evaluating assigned concerns expeditiously and thoroughly in accordance with reference IV.B, at all times protecting the identity of the concerned employee, if known, from disclosure.

2. Refraining from discussion of concerns under investigation with other members of NSRS insofar as practical.

3. Referring concerned employees to the Head IG, where directly approached (e.g. in the field) or if not practical, obtaining sufficient detail regarding the concern to permit meaningful investigation or evaluation, and discussing such contact with the Head, IG or alternate, only.

4. Providing reports or other documentation of the results of investigations and evaluations to Director, NSRS/designee(s), for review, approval, and distribution.

5. Determining whether reports require a coded list of personnel contacted, developing such lists, and coding the reports for typing (i.e. indiviudal A, B, etc.).

6. Making recommendations for corrective action when appropriate.

7. Performing follow-up of corrective action recommendations to assure resolution of safety-related issues.

   Note: Reference lists (key codes) identifying an employee to the code shall only be typed by the IG secreatry/alternate.

D. The Administrative Staff IG Secretary/Alternate is responsible for:

1. Maintaining the administratively confidential files secure and current.

2. Controlling keys to the confidential file cabinets

3. Obtaining investigation reports from confidential files for NSRS personnel when requested. However, employee-identifying information may only be obtained for the Director or Head, IG/Alternate.

4. Typing all employee-identifying information as requested.

5. Mailing responses and reports to individuals when directed by the Head, IG.

   Note: When assigned by the administrative supervisor, other administrative staff personnel may type investigation reports, which do not identify personnel contacted except as permitted by this procedure.

VII. IMPLEMENTING INSTRUCTIONS

A. Receiving Concerns

1. With the exception of the Director's authority described in VI.A, all concerns, regardless of the mechanism of receipt, should be referred to the Head, IG or alternate so that he may obtain detailed information about the concern, and minimize exposure of the employee's identity.

2. The Head, IG/Alternate (or other staff member receiving concern, if referrel is not practical) obtains, and documents on attachment 1, as much information as possible regarding the concern. Regardless of the nature of the concern, no commitment to investigate should be made - rather, state that the issue will be evaluated to determine if and when the issue will be investigated, and that the employee will be contacted with that decision (if further contact is possible).

   The following points are emphasized as important to address when receiving a concern verbally:

   a) Solicit the employee's identity. Assure the individual that a minimum number of NSRS personnel will be aware of his/her identity and that it will not be disclosed outside of NSRS, within legal limitations.

   b) Determine if the employee has voiced the issue with his/her supervisor. <u>If so</u>;

      - when was this done?
      - what action was taken?
      - inform the employee that, if NSRS investigates, his/her supervisor may suspect that a concern was voiced, but NSRS will not confirm a person's identity.

      <u>If not</u>:

      - Why not? Did the individual fear reprisals?

   c) Request that all pertinent details be written and sent to the Head, IG, along with copies of pertinent documents and the names of other individuals who may be able to provide additional or supporting information relating to the subject concern.

   d. Request a phone number and/or address for additional contact.

   e. If the employee will not identify him/herself, state that a personal response will not be possible.

B. <u>Investigations/Evaluations</u>

1. The Head, IG/Alternate will assign an IG staff engineer to perform the investigation/evaluation of the subject employee concern and log this information on Attachment 2. The IG

staff engineer will take precautions to ensure the continued anonymity of the concerned employee. The investigations/evaluations performed by NSRS-IG will be performed and documented in accordance with reference IV.B with exceptions as follows:

(1) Formal two-week notification to the investigated organization may not be made. Formal notification of intention and presence at the affected location will be made to the cognizant manager by the investigation team leader (entrance meeting) as well as notification of completion/departure (exit meeting).

(2) Investigation reports shall not contain the names of personnel contacted for information. Lists of personnel contacted for an investigation shall be retained in NSRS confidential files.

2. At the discretion of the Head, IG, potentially sensitive reports and those which may affect a plant's operating license or are determined to require evaluation for reportability will be referred to the Director, NSRS, for approval, otherwise they maybe approved by the Head, IG/designee.

3. Upon approval, NSRS investigation reports will be transmitted to the TVA organization(s) responsible for corrective action if the issue is substantiated and recommendations are made by NSRS. This transmittal will be made using Attachment 3, "NSRS Investigation Report I-_____, (subject)," and will contain the recommendation(s) made by NSRS, and a response due date.

4. If no corrective action is recommended, i.e., no recommendations are made, the report will be distributed as follows:

- Concerned employee (Administratively Confidential Transmittal typed and mailed by the IG secretary/alternate only)
- NSRS file copy
- Affected organization manager
- TVA information office
- Other TVA management as necessary

5. If investigation reports contain recommendations for corrective action, the report will not be considered final until the response is received and evaluated, at which time distribution as indicated in B.4 above will be made.

C. Additional Investigation Report Criteria

Investigation reports documenting the results of employee concern investigations should only contain the names of cognizant

management personnel M-6 and above. Only numbers of craftsmen, operators, etc., should be given. A listing of all persons contacted (except the concerned employee) should be maintained in a separate, locked working file. This list would be prepared by the team leader or designee. If the team leader feels it is necessary to enhance readability of the report, a code listing of individuals such as individual A, B, C, etc., should be used in the report. A key code listing would be maintained in a separate working file.

D. Closure of Investigations

NSRS will close the investigation file for each employee concern when the corrective action recommended to resolve the employee concern has been implemented and completion verified and if possible the concerned employee has been sent a final response per section B.5.

E. Records and Logs

NSRS IG will maintain the following records and logs:

- record of employee concern form
- confidential key listing of concerned employees
- list of persons contacted during each investigation
- copies of all investigation reports/evaluation results
- investigation plans
- requests for reportability evaluation (final only)
- employee concern disposition form
- NSRS item follow-up and closure memoranda
- logs of concerns (coded)/assignments
- special reports (as generated)

VIII. ATTACHMENTS AND APPENDICES

A. Attachments

1. Record of employee concern

2. NSRS investigation assignment log (computer generated example)

3. NSRS investigation report transmittal form

Attachment 1

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: _____

POSITION: _____

TIME IN POSITION: _____

STATEMENT OF CONCERN(S): _____

_____

_____

_____

_____

_____

Additional Information
SUPERVISOR/FOREMAN NAME: _____
SUPERVISOR/FOREMAN 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: _____

_____

_____

_____

ATTACHMENT 2

06/25/85

NUCLEAR SAFETY REVIEW STAFF
INVESTIGATIONS GROUP
ASSIGNMENT LOG

REPORT NUMBER	QTC NUMBER (IF APPLICABLE)	SUBJECT	MILESTONE	DUE DATE
** INVESTIGATOR				
I-85-131		SCHEDULE CHANGE	7 N/A	/ /
I-85-132		SCHEDULE CHANGE	7 N/A	/ /
I-85-133	IN-85-389-001	INSTAL BEFOR DSGN CG		/ /
I-85-134	IN-85-428-002	SAW DRW FPR SNUBBER		/ /
** INVESTIGATOR BFS				
I-85-157	IN-85-010-002	VIOLATION OF 050 NTS		/ /
** INVESTIGATOR BFS/MAH				
I-85-110-WBN	IN-85-024-001	DRWN & 050 NOTES	1 FUEL-LD	06/18/85
I-85-106-SQN		IMPROPER PIPE INSULA	7 N/A	12/20/85
I-85-124-WBN	IN-85-052-001	DWNGS & 050 NOTES	1 FUEL-LD	/ /
** INVESTIGATOR BFS/PRW				
I-85-122-WBN	IN-85-406-002	WELD INSPEC CRITERIA	5 100% PWR	/ /
** INVESTIGATOR BFS/RCC				
I-85-126-WBN	IN-85-002-001	MATERIAL IDENTIFICAT	6 OTHER	/ /
** INVESTIGATOR FJS				
I-85-158	IN-85-415-002	CONCRETE ERCW LINES	2 CRITICAL	/ /
** INVESTIGATOR FJS/PRW				
I-85-105-BLN		BOLT MATERIAL PROCUR	7 N/A	12/20/85
** INVESTIGATOR GBB				
I-85-137	IN-85-400-002	GASKET FAILURE		/ /
** INVESTIGATOR GGB/RDS				
I-85-156	IN-85-360-001	NEURTON FLUX EXPOSUR		/ /
** INVESTIGATOR GGB/WDS				
I-85-153	IN-85-114-001	#2 LOCAL RAD SOURCES		/ /
** INVESTIGATOR JDS				
I-85-130-WBN		STRNG AIR IN AIR LOC	7 N/A	/ /
** INVESTIGATOR JDS/BFS				
I-85-102-BLN		INST QC ACCPT CRITRA	7 N/A	12/20/85
** INVESTIGATOR JDS/FJS				
I-85-151	IN-85-348-002	INSUFFNT AIR SYSTEM		/ /
** INVESTIGATOR JDS/WDS				
I-85-118-WBN	IN-85-211-001	ERCW LINE LEAK	3 5% POWER	06/25/85
I-85-123-WBN	IN-85-373-001	DAMAGED CABLE		/ /

TVA 64 (03-9-65)

Attachment 3

UNITED STATES GOVERNMENT

Memorandum

TENNESSEE VALLEY AUTHORITY

TO :

FROM : K. W. Whitt, Director, Nuclear Safety Review Staff, E7B31 C-K

DATE :

SUBJECT: NUCLEAR SAFETY REVIEW STAFF INVESTIGATION REPORT TRANSMITTAL

Transmitted herein is NSRS Report No. _____

Subject _____

Concern No. _____

and associated recommendations for your action/disposition.

It is requested that you respond to this report and the attached recommendations by _____. Should you have any questions, please contact _____ at telephone _____.

_____
Director, NSRS/Designee

cc:

--Copy and Return--

To: K. W. Whitt, Director of Nuclear Safety Review Staff, E7B31 C-K

From: _____

Date: _____

I hereby acknowledge receipt of NSRS Report No. _____

Subject _____

for action/disposition.

_____ _____
Signature Date

(Please copy entire page for return)

Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan

ASSIGNMENT LOG
ERT CONCERN PROGRAM
MILESTONE INDEXED

QTC NUMBER	PRI	ORGANIZATION ASSIGNED	SUBJECT	DATE DUE	RESPONSE RECIEVED
** **MILESTONE 1 FUEL LOAD					
EX-85-003-003	01	ERT	UNAUTH CHNG TO WDREC	07/08/85	/ /
IN-85-001-003	01	ERT	WELDS UNDER WATER	06/04/85	/ /
IN-85-031-001	01	ERT	ENBD PLTS NOT CORREC	07/08/85	/ /
IN-85-037-001	01	ERT	CONCRETE ANCHORS	06/04/85	/ /
IN-85-038-001	01	ERT	ANALYS OF LARGE PIPE	07/08/85	/ /
IN-85-039-001	01	ERT	THML STRS ON PIPING	07/08/85	/ /
IN-85-088-001	01	ERT	VACUM TEST ON DOORS	06/04/85	06/18/85
→IN-85-130-002	01	ERT	FIRE SEALS BREACHED	06/04/85	/ /
IN-85-169-001	01	ERT	SYS 62 VALVE CLASS	07/08/85	/ /
IN-85-202-001	01	ERT	CRACK IN WELD	06/04/85	/ /
IN-85-406-001	01	ERT	UNAUTH CHNG TO WDREC	07/08/85	/ /
PH-85-012-001	03	ERT	INSPECT OF WELDS	07/08/85	/ /
PH-85-018-001	01	ERT	AUDIT FINDS WITHHELD	07/08/85	/ /
XX-85-019-001	01	ERT	AUDIT FINDGS AT BLN	07/08/85	/ /
→IN-85-024-001	01	NSRS	DRWNS & 050 NOTES	07/08/85	/ /
→IN-85-052-001	01	NSRS	DRWNGS & 050 NOTES	07/08/85	/ /
IN-85-393-003	01	NSRS	FSAR REQ FOR SUPERV	07/08/85	/ /
** **MILESTONE 2 CRITICALITY					
IN-85-069-001	01	ERT	INADEQUATE INSPECTS	07/08/85	/ /
IN-85-106-001	01	ERT	MN STM LOADS SUPPORT	/ /	06/18/85
IN-85-186-002	01	ERT	INSL ON CONDT & CABL	07/08/85	/ /
IN-85-216-001	01	ERT	WELDING SEQUENCE	07/08/85	/ /
IN-85-217-001	01	ERT	CONDENS POTS, #1	07/08/85	/ /
IN-85-281-001	01	ERT	DIFFUSER FLOW	07/08/85	/ /
IN-85-025-001	01	NSRS	INCORE THERMO TEST	07/08/85	/ /
→IN-85-064-002	01	NSRS	SHUTDN BDS TOP OPEN	07/08/85	/ /
IN-85-415-002	01	NSRS	CONCRETE ERCW LINES	07/08/85	/ /
** **MILESTONE 3 5% POWER					
IN-85-001-002	01	ERT	WELD ROD CONTROL	06/04/85	/ /
IN-85-027-002	01	ERT	COMPUTER ANALYSIS	07/08/85	/ /
IN-85-052-008	01	ERT	PROCED FOR WELD RODS	07/08/85	/ /
IN-85-086-001	01	ERT	STM GEN MATERIALS	06/04/85	/ /
IN-85-108-001	01	ERT	SYS 68 PIPING	07/08/85	/ /
IN-85-113-003	01	ERT	WELDER CERTIFICATION	07/08/85	/ /
IN-85-186-004	01	ERT	BOARDS IN ELEC PANEL	07/08/85	/ /
IN-85-221-001	01	ERT	IMPROPER VALVE OPER	07/08/85	/ /
PH-85-001-002	01	ERT	INST LNS SLOPE PROB	06/04/85	/ /
IN-85-064-001	01	NSRS	SPRAY ON SHUTDN BDS	07/08/85	/ /
IN-85-211-001	01	NSRS	ERCW LINE LEAK	07/08/85	/ /
→IN-85-388-006	01	NSRS	INSUFFNT HT#/HT CODE	07/08/85	/ /