TENNESSEE VALLEY AUTHORITY

EMPLOYEE CONCERNS TASK GROUP

PROCEDURE

ECTG C.1

RECEIPT, PROCESSING, AND EVALUATION OF CONCERNS

CURRENT REVISION LEVEL: INTERIM ☐ FINAL ☒ 2

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HISTORY OF REVISION

REV NUMBER	DATE	PAGES REVISED	REASON FOR CURRENT REVISION
1		All	General Revision.
2		All	Complete Rewrite.

1.0 PURPOSE/SCOPE

The purpose of this procedure is to define the methods and steps required to receive employee concerns into the Program, process them, and to perform evaluations of the concerns.

2.0 REFERENCES

2.1 Program Procedure ECTG M.1, "Employee Concerns Task Group Procedure"

2.2 Procedure A.1 "Processing of Generically Applicable Employee Concerns"

2.3 Procedure A.2, "Protection of Sensitive Information"

2.4 Procedure A.3, "Employee Concerns Program Computer System (ECPS) Data Processing"

2.5 Procedure A.4, "Evaluator Training and Indoctrination"

2.6 Procedure C.2, "Analysis and Reporting of Evaluation Results"

2.7 Procedure C.3, "Corrective Actions"

3.0 DEFINITIONS

None

4.0 RESPONSIBILITIES

4.1 Technical Assistance Staff (TAS)

4.1.1 The TAS shall be responsible for receipt of employee concern documents that require entry into the Employee Concerns Special Program (ECSP).

4.1.2 The TAS shall be responsible for initial determinations of the appropriate concern category and responsible CEG-H(s).

4.1.3 The TAS shall be responsible for initial determination of those concerns that are safety-related and those that are potentially generically applicable to other sites.

4.1.4 The TAS shall be responsible for the initial Employee Concern Program Computer System (ECPS) data base inputs.

4.2 Program Control & Administration (PC&A) Staff

The PC&A Staff shall be responsible for inputting and updating the ECPS data base.

4.3 ECTG Program Manager

The ECTG Program Manager shall be responsible for designating a lead CEG-H for shared concerns and for ensuring that the designated lead CEG-H is noted in the ECPS data base.

4.4 Category Evaluation Group Heads (CEG-Hs)

4.4.1 CEG-Hs shall be responsible for verification of the correct assignment of concerns to their categories and determining appropriate subcategories and elements, when applicable, to ensure that all concerns relating to a similar issue are evaluated. They are responsible for ensuring that subcategory and element assignments are input into the ECPS data base.

4.4.2 CEG-Hs shall be responsible for assigning independent, trained, and indoctrinated evaluators to perform the evaluations of each issue of employee concerns at all involved sites.

4.4.3 CEG-Hs shall be responsible for scheduling of evaluations according to schedule requirements provided by the ECTG Program Manager to ensure supporting plant restart schedules to the overall Program schedule.

4.4.4 CEG-Hs shall be responsible for coordinating all evaluation activities at sites other than Watts Bar Nuclear Plant (WBN) with the Other Sites CEG-H.

4.4.5 The Other Sites CEG-H shall be responsible for coordinating all evaluation activities and ECTG schedules with Site Directors other than WBN.

4.4.6 Designated lead CEG-Hs for shared concerns shall be responsible for ensuring that all aspects of the original concern are evaluated.

4.4.7 CEG-Hs shall be responsible for the preparation and revision when necessary, of Category Evaluation Plans.

4.4.8 CEG-Hs shall be responsible for approving and issuing notifications of immediate (remedial) corrective actions when deemed necessary.

4.5 Evaluators

4.5.1 Evaluators shall be responsible for evaluating the issues associated with the assigned element or subcategory according to guidance provided in approved Category Evaluation Plans.

4.5.2 Evaluators shall be responsible for withdrawing in writing from any assigned evaluation for which they do not meet the independence criteria.

4.5.3 Evaluators shall be responsible for gathering information and preparing a case file that supports the evaluation.

4.5.4 Evaluators shall be responsible for notifying their CEG-H and documenting any cases of intimidation, harassment, or lack of cooperation encountered during the evaluation process.

5.0 PROCEDURE

5.1 Receipt and Initial Processing of New Concerns

5.1.1 New concerns shall be forwarded to the TAS immediately upon receipt by the ECTG.

5.1.2 The TAS shall verify the received concern(s) against any transmittal document that may have been used to ensure that all documents transmitted were received.

5.1.3 The TAS shall review the concern document(s) to ensure that all sensitive information relating to the identification of the concerned individual has been expurgated. If not expurgated, or properly expurgated of such information, the document(s) shall be expurgated per ECTG Program Managers instructions.

5.1.4 Upon completion of the receipt and initial input process the PC&A Staff shall file the new concern(s) according to ECTG Procedure A.2.

5.1.5 TAS shall make an initial generic applicability determination using Attachment E of Program Procedure, ECTG M.1. The completed form shall be forwarded to the PC&A Staff for input into the ECPS data base. The other sites CEG-H shall be notified when a concern is determined to be potentially generically applicable to sites other than the specifically named site(s).

5.1.6 TAS shall then determine the appropriate category to which a new concern shall be assigned based on the Category definitions provided in Program Procedure, ECTG M.1. If assigned to more than one category (CEG), the ECTG Program Manager shall designate a lead CEG-H for the shared concern. This designation shall be noted in the ECPS data base.

If assigned to the Intimidation, Harassment, and Wrongdoing, (IH&W) Category, TAS shall formally transmit those concerns to the Office of the Inspector General (OIG) for their handling. If a concern in the IH&W Category also includes technical aspects, the concern shall be assigned to the appropriate ECTG CEG-H(s) for evaluation of the technical aspects of the concern. If the OIG returns a concern to ECTG based on their determination to not evaluate the concern within OIG, TAS shall assign the concern to the most appropriate ECTG CEG-H(s) for evaluation.

5.1.7 TAS shall prepare input sheets for initial concerns data according to Procedure ECTG A.3.

5.1.8 The PC&A Staff shall input the data into the ECPS data base.

5.1.9 TAS shall provide the concern document, along with any other available information, to the appropriate CEG. In the case of multiple concerns on one concern document that are being handled by multiple CEG-Hs, copies of the concern shall be provided to each affected CEG-H.

5.2 <u>Further Subcategorizing of Concerns</u>

5.2.1 The responsible CEG-H shall further subcategorize concerns into subcategories and (when appropriate) into elements within subcategories.

5.2.2 Further subcategorizing concerns into subcategories and elements allows the evaluation of one or more concerns to be accomplished at one time when those concerns deal with a single or similar issue.

5.3 Category Evaluation Plans (CEPs)

5.3.1 Each CEG shall prepare a formal program description that describes the plan for evaluating each category. The CEP and revisions thereto shall be submitted to the ECTG Program Manager for approval after concurrence by the SRP. The content and format should be as noted below:

1.0 Group Organization - Specify delegation of authority.

2.0 Resource Requirements - Specify resources and manpower required.

3.0 Subcategories - Specify the breakdown of concerns by subcategory and rationale for subcategories selection.

4.0 Action Plan for Evaluation - Specify exact approach and methodology to be used. Methodologies shall include, where applicable:

- Comparison to baseline requirements
- Establishment of requirements or evaluation criteria when none exist
- Interviews
- Observation of work activities
- Review of records
- Inspection of structures, systems, and components

5.0 Schedule and Milestone Dates - Specify schedules for completion of evaluations and required reports

5.3.2 CEPs should ensure the ability to determine the extent of a problem. An individual employee concern may only be one example of a problem. The CEP may include the use of sampling as a technique that may be used to determine the extent of a problem.

5.3.3 When sampling is intended to be statistically valid, the sample plan shall be included, including confidence intervals (or AQL).

5.3.4 CEPs may require revision as deemed necessary by the CEG-H. Whether the CEP is revised or not, the CEP is only intended as a guide to the evaluation process. In any case, the evaluations that are performed must be able to determine the validity or nonvalidity of the category's issues and all conclusions must be supported by the case files.

5.4 Assignment of Evaluators

5.4.1 Evaluators shall be assigned by the responsible CEG-H. Assigned evaluators shall have completed the training and indoctrination requirements specified in Procedure, ECTG B.1 unless, in the case of contracted evaluators, they have completed training and indoctrination requirements of the contractor's procedures that were approved by the ECTG Program Manager as required by Program Procedure ECTG M.1.

5.4.2 Evaluators shall also meet the following criteria for independence:

a. The evaluator shall not have been directly or indirectly involved in the item(s), work, or incident(s) being evaluated.

b. The evaluator shall not have been involved in previously making any investigations or determinations as to the adequacy of the item(s), work, or incident(s) being evaluated other than those associated with the resolution of employee concerns.

5.4.3 If an evaluator determines in the course of the evaluation that he/she has previously been involved directly or indirectly in the concern, he/she shall be responsible and accountable for withdrawing from the evaluation. Such withdrawals shall be in writing to the CEG-H. A copy of the written withdrawal shall be retained in the associated case file.

5.4.4 A new independent evaluator shall then be assigned by the CEG-H. The new evaluator shall review the work done to date, redo any work not done adequately, and continue with the evaluation process.

5.5 Evaluation of Concerns/Issues

5.5.1 Using the guidance provided in the approved CEP, the assigned evaluator shall evaluate the concerns/issues relating to the assigned subcategory or element. This includes evaluation of those concerns determined to be potentially generically applicable to more than one site.

5.5.2 The evaluator shall discuss and clarify the scope and evaluation process with he/she CEG-H. This can include gathering all available information from the concern document(s); other associated case files; inputs from other evaluators for shared concerns; and previous evaluation reports and deficiency documents related to the subject issue or concerns.

5.5.3 The evaluators shall be responsible for the accurate and objective collection, documentation, coordination, and analysis of data needed to thoroughly evaluate the assigned subcategory or element. The scope of the individual's evaluation effort shall be guided by the CEG-H and the Category Evaluation Plan (CEP). The evaluator, as applicable, shall:

a. Perform comparisons of "baseline" requirements, documents, and records to ensure consistency and implementation of requirements.

b. Conduct interviews, both formal and informal, with cognizant personnel to either verify document based findings or provide nondocument-based evaluation input.

c. Perform observation of work activities and review of records and other documents to ensure compliance with requirements and instructions.

d. Perform inspections and sampling to verify the adequacy of previously accomplished work.

5.5.4 During the course of the evaluation, sufficient documentation shall be established to support the evaluation results and the judgments made. During the evaluator's review, any existing deficiency documents (i.e., copies of NCRs, DRs, etc.), that are associated with the issue in question shall be included or referenced in the file as supporting evidence.

5.5.5 The employee concerns case files (maintained for the lowest level of evaluation) shall be maintained during the active life of the program in an environment consistent with provisions stressing security, retrievability, and record maintenance to ensure availability for future use and regulatory oversight. The documentation shall be presented in an understandable manner in the case file, and should include or make reference to the following:

- Title, number identification, and revision of documents reviewed

- Dates, subjects, and file numbers of correspondence reviewed.

- Names, dates, and results of personnel interviewed (anonymity shall be afforded when specifically requested.)

- Equipment numbers and locations of equipment observed or inspected when necessary.

- Identification of any processes or activities observed and the results of such observations.

- Identification of inspection report number and the inspection results when equipment is reinspected during the evaluation.

- Copies of the original concern documentation.

5.5.6 If, during the course of the evaluation, evaluators feel that they were harassed or intimidated or that they were not afforded adequate cooperation, they shall notify their respective CEG-H immediately and then document the incident by completing and forwarding Attachment A to their CEG-H.

5.5.7 If, during the course of the evaluation, evaluators identify a condition that warrants immediate (remedial) corrective action, they shall complete Attachment A, "ECSP Corrective Action Tracking Document" of Procedure ECTG C.3 and forward it to their CEG-H for processing. This may include the determination for the need to recommend stopping work or the further processing of an item(s) or activity(s). Examples of situations which may require immediate corrective action include the following. Guidance on determining the need to stop work is provided in Attachment B.

- Continuation of a work process or practice without correction would be a violation of SAR commitments which would impact plant licensibility.

- Immediate correction of a program or procedure is necessary to prevent nonconforming material or components from being fabricated or installed.

- Immediate corrective action is required to prevent loss or destruction of plant records attesting to the quality of work or necessary for licensing or operation.

5.5.8 The reporting and analysis of evaluations shall be done according to Procedure ECTG C.2.

6.0 ATTACHMENTS

6.1 Attachment A, Notice of Intimidation, Harassment, or Lack of Cooperation During an ECSP Evaluation

6.2 Attachment B, Guidance for Evaluating the Need to Stop Work

Notice of Intimidation, Harassment, or Lack of Cooperation During an ECSP Evaluation

SUBMITTED BY: EVALUATOR: _____ _____
Signature Date

DATE, TIME, AND PLACE OF INCIDENT: _____

INDIVIDUALS INVOLVED IN INCIDENT: _____

DESCRIPTION OF INCIDENT: _____

☐ ADDITIONAL SHEETS ATTACHED

REVIEWED BY: CEG-H: _____ _____
Signature Date

ACTION TAKEN: _____

☐ ADDITIONAL SHEETS ATTACHED

REVIEWED BY: ECTG PROGRAM MGR: _____ _____
Signature Date

GUIDANCE FOR EVALUATING THE NEED TO STOP WORK

The decision to stop work is at the discretion of TVA--and more specifically the Site Director or other responsible TVA manager--and is wholly the responsibility of TVA. The evaluation to recommend stop work should be based primarily on the following considerations.

1. Is there an immediate threat to the health and safety of the public or to TVA employees?

2. Can corrections be expected such that further work can continue without adversely affecting the quality of the plant?

3. Do the investigation results indicate a willful failure to comply with the Atomic Energy Act of 1954, as amended (e.g., a conscious attempt to circumvent known rules, regulations, or laws)?