

TENNESSEE VALLEY AUTHORITY

EMPLOYEE CONCERNS TASK GROUP

PROCEDURE

ECTG C.3

CORRECTIVE ACTIONS

CURRENT REVISION LEVEL: INTERIM FINAL 2

PREPARED BY: WBECTG TECH ASSISTANCE STAFF

REVISED BY: NUCLEAR PROCEDURES STAFF

APPROVED BY: W. K. Burton

DATE APPROVED: 8/28/86

HISTORY OF REVISION

<u>REV NUMBER</u>	<u>PAGES REVISED</u>	<u>REASON FOR CURRENT REVISION</u>
1	All	General revision.
2	All	Complete rewrite

1.0 PURPOSE/SCOPE

The purpose of this procedure is to identify the processing and interfaces related to corrective actions required by the Employee Concerns Special Program (ECSP).

2.0 REFERENCES

- 2.1 Program Procedure ECTG M.1, "Employee Concerns Task Group Procedure."
- 2.2 Procedure ECTG A.3, "Employee Concerns Program Computer System (ECSP) Data Processing."
- 2.3 Procedure ECTG C.2, "Analysis and Reporting of Evaluation Results"
- 2.4 "ECSP Reports Writer's Guide."

3.0 DEFINITIONS

None

4.0 RESPONSIBILITIES

4.1 Manager of Nuclear Power

The Manager of Nuclear Power shall be responsible for resolving any differences of opinion between the ECTG Program Manager and Site Directors or other responsible TVA managers related to ECSP corrective actions.

4.2 ECTG Program Manager

The ECTG Program Manager shall be responsible for:

- a. Approving the initiation section of ECSP Corrective Action Tracking Documents (CATDs).
- b. Transmitting CATDs to affected Site Directors or other responsible TVA managers.
- c. Providing concurrence with proposed corrective action plans for CATDs.
- d. Initiating CATDs resulting from the ECSP Final Report root cause determinations.

4.3 Category Evaluation Group Heads (CEG-Hs)

The CEG-Hs shall be responsible for:

- a. Concurring with CATDs.
- b. Providing initial concurrence with proposed corrective action plans for CATDs.
- c. Following up on CATDs that are not quality-related to verify implementation until the disbanding of the ECTG.

4.4 Site Directors and Other Responsible TVA Managers

Site Directors and other TVA responsible managers identified by the ECTG shall be responsible for planning and implementing corrective actions. Additionally, they shall be responsible for initiating appropriate quality assurance program required deficiency documents for safety-related deficiencies identified by the ECTG and for notifying the ECTG (or the on going ECP Site Representative after the ECTG is disbanded) of the completion of corrective actions.

4.5 ONP ECP Manager

The on going ONP ECP Manager shall be responsible for tracking and updating the ECPS data base with respect to closeout of CATDs. Additionally, the ONP ECP Manager shall be responsible for tracking, following-up, and verifying the closeout of nonsafety-related CATDs after the ECTG is disbanded.

4.6 Program Control and Administration (PC&A) Staff

The PC&A Staff shall be responsible for ECPS data base input and tracking of CATDs until disbanding of the ECTG.

4.7 Senior Review Panel (SRP)

The SRP shall be responsible for review and concurrence with the proposed corrective action plans for CATDs.

5.0 PROCEDURE

5.1 Initiation and Transmittal of CATDs

5.1.1 CATDs shall be initiated by the ECTG according to the requirements of Procedure ECTG C.2.

- 5.1.2 The CATD form is provided in Attachment A with instructions for its completion provided in Attachment B.
- 5.1.3 In accordance with Procedure ECTG C.2, the initiation section of CATDs shall be concurred with by the responsible CEG-H and approved by the ECTG Program Manager.
- 5.1.4 Upon approval of CATDs the ECTG Program Manager shall prepare a transmittal memorandum similar to Attachment C. This memorandum shall transmit a copy of the associated ECTG Report and approved CATDs to the identified responsible Site Director or other responsible TVA manager.
- 5.1.5 The PC&A Staff shall log the transmittal and indicate the Report and associated CATD numbers. The ECPS data base shall be updated as required by Procedure ECTG A.3

5.2 Preparation and Submittal of Proposed Corrective Action Plans

- 5.2.1 Upon receipt, responsible Site Directors or other responsible TVA managers shall review the CATDs and the associated ECTG Report to evaluate actions necessary to prepare the proposed corrective action plan for entry on the CATD.
- 5.2.2 The proposed corrective action plan shall follow the content requirements identified in Attachment B and as reiterated in Attachment C. Proposed corrective action plans shall be approved by the Site Director or other responsible TVA manager and formally submitted to the ECTG Program Manager within 30 calendar days of receipt. Extensions to this response time should be requested in writing.

Note: It is not inappropriate to disagree with all or part of a CATD as long as the formal response process is followed and adequate justification is provided for the position taken.

- 5.2.3 If the CATD is noted as safety-related ("QR") the responsible Site Director or other TVA responsible manager shall cause to be initiated, dispositioned, and approved, appropriate quality assurance program required deficiency document(s). The CATD number shall be noted on each deficiency document and a copy of the CATD attached to it. Likewise a copy of each such deficiency document shall be attached to the CATD and the document's number noted on the CATD.

5.3 Review and Concurrence With Proposed Corrective Action Plans

- 5.3.1 Upon receipt of proposed corrective action plans presented in the corrective action section of the CATDs, the PC&A Staff shall note the receipt in the ECPS data base and forward the CATD and any attachments to the appropriate CEG-H.
- 5.3.2 The CEG-H shall review the corrective action plan for acceptability in correcting and precluding recurrence of the identified problem as well as for responsiveness in meeting the content requirements for the corrective action sections of CATDs identified in Attachment B.
- 5.3.3 Upon satisfactory review, the CEG-H shall sign and date the CATD in the appropriate space noting concurrence and forward it to the SRP.
- 5.3.4 The SRP shall review the proposed corrective action and upon satisfactory review, sign and date the CATD in the appropriate space noting concurrence and forward it to the ECTG Program Manager
- 5.3.5 The ECTG Program Manager shall review the proposed corrective action and upon satisfactory review, shall sign and date the CATD in the appropriate space noting concurrence.
- 5.3.6 Upon concurrence of the corrective actions by the ECTG, the PC&A Staff shall update the ECPS data base accordingly and formally transmit the CATD back to the responsible Site Director or other responsible TVA manager for implementation.
- 5.3.7 If concurrence is not achieved and a satisfactory resolution can not be reached at the ECTG and responsible organization level, the ECTG Program Manager shall formally document and escalate the matter for the Manager of Nuclear Power's resolution.

5.4 Corrective Action Tracking, Follow-up, Verification, and Closeout

- 5.4.1 The PC&A Staff shall track the approved corrective action commitment dates for nonsafety-related CATDs and shall notify the CEG-H when those dates are reached. The CEG-H shall then ensure the satisfactory implementation of the corrective action(s) as approved on the CATD.
- 5.4.2 Upon satisfactory verification of all committed corrective actions, the verifier (as defined on Attachment B) shall sign and date the CATD in the appropriate space. The CATD shall then be forwarded to the PC&A Staff.

- 5.4.3 Upon receipt of closed out CATDs, the PC&A Staff shall update the ECPS data base according to Procedure ECTG A.3 and file the completed CATD in the appropriate ECTG Report file and ultimate transmittal to RIMS for retention.
- 5.4.4 Nonsafety-related CATDs that are not completed by the time the ECTG is disbanded, shall be tracked, followed-up, verified and closed out in a manner similar to paragraphs 5.4.1, 5.4.2, and 5.4.3 by the ONP ECP Manager.
- 5.4.5 For safety-related CATDs the tracking and closeout is accomplished via the quality assurance program deficiency document that was initiated.
- 5.4.6 The CATD copy that was attached to the deficiency document shall be completed and signed by the verifying individual, removed from the QA deficiency document, and forwarded to ECTG or to the ONP ECP Site Representative, if the ECTG has been disbanded
- 5.4.7 The ECTG PC&A Staff or the ONP ECP Site Representative, as applicable, shall update the ECPS data base accordingly and file the completed CATD with the associated ECTG Report and ultimate transmittal to RIMS for retention.

6.0 ATTACHMENTS

- 6.1 Attachment A, ECPS Corrective Action Tracking Document (CATD) form.
- 6.2 Attachment B, Instructions for Completing the CATD form.
- 6.3 Attachment C, Standard CATD Transmittal Memorandum.

ECSP Corrective
Action Tracking Document
(CATD)

INITIATION

Applicable ECSP Report NO:

1. Immediate Corrective Action Required: Yes No
2. Stop Work Recommended: Yes No
3. CATD No. _____ 4. INITIATION DATE _____
5. RESPONSIBLE ORGANIZATION: _____
6. PROBLEM DESCRIPTION: QR NQR _____

7. PREPARED BY: NAME _____ DATE: _____ ATTACHMENTS
8. CONCURRENCE: CEG-H _____ DATE: _____
9. APPROVAL: ECTG PROGRAM MGR. _____ DATE: _____

CORRECTIVE ACTION

10. PROPOSED CORRECTIVE ACTION PLAN: _____

11. PROPOSED BY: DIRECTOR/MGR: _____ DATE: _____ ATTACHMENTS
12. CONCURRENCE: CEG-H: _____ DATE: _____
SRP: _____ DATE: _____
_____ DATE: _____
_____ DATE: _____
ECTG PROGRAM MGR: _____ DATE: _____

VERIFICATION AND CLOSEOUT

13. Approved corrective actions have been verified as satisfactorily implemented.

SIGNATURE

TITLE

DATE

Instructions for Completing
the CATD Form

INITIATION

1. Identify if immediate (remedial) corrective actions is needed.
2. Identify if immediate stop work is recommended.
3. Enter the CATD number - this number is made up of the associated Subcategory Report Number plus a dash and a sequential number for each CATD issued against that Report.

Note: CATDs may also be issued by the ECTG Program Manager against the ECSP Final Report for root causes identified in the Report.

4. Enter the CATD initiation date.
5. Identify the organization responsible for identifying and taking corrective action.
6. Describe the problem - provide sufficient detail to allow the responsible organization to prepare the proposed corrective action plan. Attach additional pages if necessary. Try to limit each CATD to single problems. Also check one box to identify if the problem is safety-related ("QR") or nonsafety-related ("NQR").
7. Preparer of the CATD signs and dates.
8. The CEG-H signs and dates - noting concurrence.
9. The ECTG Program Manager signs and dates - noting approval.

CORRECTIVE ACTION

10. The identified responsible organization describes the proposed corrective actions. The actions shall include the following:
 - a. Actions to identify all similar items or instances if the problem stated in 6 indicates there may be other items or instances involved and the date(s) for completing these actions.
 - b. Actions taken or planned to correct the identified and similar items or instances and the date(s) for completing these actions.
 - c. Actions taken or planned that will preclude the recurrence of the identified problem and the date(s) for completing those actions.
 - d. Actions completed to date and the results achieved.

Instructions for Completing
the CATD Form

Note: Attach additional pages if necessary. Also identify by number and attach a copy of any quality assurance program deficiency documents initiated and whose disposition has been approved as a part of your response to quality-related CATDs.

11. Signature and date of the responsible Site Director or other responsible TVA manager.
12. Concurrence signatures and dates of the ECTG CEG-H. The SRP and the ECTG Program Manager when these individual concur with the propose corrective action plan.

VERIFICATION AND CLOSEOUT

13. Signature, title, and date of the individual that verified the satisfactory implementation and completion of the proposed corrective actions. This individual may be:
 - a. From the ECSP ECTG if the CATD is nonquality-related and is verified before to disbanding of the ECTG.
 - b. A ONP ECP Site Representative if the CATD is nonquality-related and is after the ECTG has been disbanded.
 - c. A QA or QC person if the CATD is safety-related.

To:

From: Watts Bar Employee Concerns Task Group, Program Manager

Date:

Subject: Transmittal of ECSP Report and Corrective Action Tracking Documents (CATDs)

ECSP Report No. _____
ECSP CATD Nos. _____

The above Report and CATDs are attached and require your review and preparation of proposed corrective action plans for each of the CATDs.

Your proposed corrective action plans should include the following:

- a. Actions to identify similar items are instances if the problem stated indicates there may be other items or instances involved and the date(s) for completing these actions.
- b. Actions taken or planned to correct the identified and similar items or instances and the date(s) for completing these actions.
- c. Actions taken or planned that will preclude the recurrence of the identified problem and the date(s) for completing these actions.
- d. Actions completed to date and the results achieved.

Also identify by number and attach a copy of any quality deficiency documents initialed whose disposition has been approved. This applies to all CATDs identified as quality-related ("QR").

Please return your signed proposed corrective action plans by completing items 10 and 11 on the CATD within 30 calendar days of receipt of this transmittal.

ECTG Program Manager

cc: CEG-H

ENCLOSURE 2

ECSP REPORTS
WRITER'S GUIDE

Concurrence:

Assistant Program Manager

J. Khan
Signature

8/28/86
Date

Assistant Program Manager

M. V. Ruloff
Signature

8/28/86
Date

Approved:

Program Manager

W. R. Brown
Signature

8/28/86
Date

Table of Contents

<u>Section</u>	<u>Page</u>
1.0 <u>OBJECTIVE</u>	1
2.0 <u>SCOPE</u>	1
3.0 <u>REPORT HIERARCHY AND DEFINITIONS</u>	1
4.0 <u>REPORT FORMATS</u>	7
4.1 <u>Element Reports</u>	7
4.2 <u>Subcategory Reports</u>	8
4.3 <u>Category Reports</u>	9
4.4 <u>ECSP Final Report</u>	10
5.0 <u>CONTENTS OF ELEMENTS REPORTS</u>	10
6.0 <u>CONTENTS OF SUBCATEGORY REPORTS</u>	18
7.0 <u>CONTENTS OF CATEGORY REPORTS</u>	27
8.0 <u>CONTENTS OF THE ECSP FINAL REPORTS</u>	32
9.0 <u>REPORT TITLES</u>	40
10.0 <u>REPORT NUMBERING</u>	41
11.0 <u>REPORT FORMS AND PAGE NUMBERING</u>	41
12.0 <u>STYLE</u>	43
13.0 <u>ATTACHMENTS</u>	44

3.1 Element Reports

The ECSP reports may start at the element level. Element Reports summarize one or more employee concerns dealing with a similar specific issue. An element's evaluation may be reported in one report or in site-specific reports at the discretion of the Category Evaluation Group Head (CEG-H). Element Reports should contain sufficient detail to make it unnecessary for a reader to examine case files for the concerns summarized. See 5.0 for content guidance.

3.2 Subcategory Reports

Subcategory Reports summarize employee concerns on the same general issue. They add information and conclusions that may only be seen at a broader perspective than is possible from an element or concern level. When the subcategory's general issue is broad-scoped, the Subcategory Report will summarize Element Reports on each specific issue within the general issue. Subcategory Reports should contain sufficient detail to make it unnecessary for the reader to examine Element Reports or case files for the concerns summarized. Subcategory Reports should include both the generic and site-specific results of the entire evaluation process for a subcategory. See 6.0 for content guidance.

3.3 Category Reports

Category Reports summarize the Subcategory Reports, and they add information and conclusions that may only be seen at a broader perspective than is possible from a subcategory level. Category Reports form the basis for preparation of the Final Report. See 7.0 for content guidance.

5.5.7 For any finding of noncompliance, state any corrective actions already initiated and the results achieved to date. Also, indicate if the finding is "safety-related" or "safety-significant" when applicable. List any nonconformance or corrective action documentation that may already exist or that was initiated as a result of the evaluation and identify the disposition or resolution when available. In particular, note any immediate corrective actions and stop work orders initiated as a result of the evaluation(s).

5.5.8 All negative findings should be based on facts identified in the Element Report. The findings section should only include discussions that are based on documented facts.

5.6 Attachments (Section 7.0)

5.6.1 This section should list each attachment to the Element Report. When deemed pertinent by the CEG-H, attachments may include documents or information that does not lend itself to inclusion in the text, but is needed for the completeness or understanding of the report. Attachments should be used sparingly.

5.6.2 Attachments should be identified with a capitalized alpha character and an appropriate title.

Example:

Attachment A, Element Summary Table

5.6.3 Attachment A, Element Summary Table, should contain the following information in tabular form:

- a. List by number all concerns characterized in this Element Report.
- b. Provide a brief description of each concern.
- c. Identify any other ECTG element and subcategory report number that also discusses any of the concerns characterized in this report.
- d. Identify each concern characterized in this report that has been determined to be safety-related.
- e. Identify each valid safety-related concern characterized in this report that is also designated as an unreveiwed safety-significant question.
- f. Identify those valid safety-related concerns characterized in this report which were generically applicable.

This may be accomplished by providing an updated printout from the Employee Concern Computer Program System (ECPS) data base.

6.0 CONTENTS OF SUBCATEGORY REPORTS

When the Subcategory Report is the lowest-level report, its objective is to provide a summary of the evaluation and results contained in the case files.

When the Subcategory Report is not the lowest-level report, its objective is to provide a summary of the evaluation process and results that have been discussed in the Element Reports. Subcategory Reports are intended to contain adequate information to stand alone and provide sufficient information on which responsible line management can prepare a corrective action plan.

These reports also allow the ECTG to perform a broader evaluation of the collective significance identified in Element Reports, thus providing the first attempt at determining causes for the identified findings and their collective significance.

Subcategory Reports are intended for readership by the SRP, ECSP management, US NRC, ONP responsible line management, TVA employees, and the general public.

The contents for each of the Subcategory Report sections are discussed in 6.1 through 6.8.

6.1 Characterization of Issues (Section 1.0)

6.1.1 This section is to include individually, or collectively, a characterization of the problems as originally perceived and identified in K-forms or other reports of concerns, that are within the applicable subcategory scope. The writer should try to provide the flavor of the original concerns while still including adequate information to indicate the scope and technical aspects of the concerns.

6.1.2 The accurate characterization of a concern allows the Subcategory Report writer to test the appropriateness of the concern or specific issue evaluation process: was what worried the employee actually addressed? Identifying the scope and technical aspects of the concern or specific issue that brings employees' worries into measurable focus.

6.1.3 Writers are cautioned not to inject their own biases into concerns or to rewrite to the extent that the original concern is not fully addressed.

6.1.4 The characterization of issues should be presented as a summarization of the issues as characterized in the Element Reports.

6.2 Summary (Section 2.0)

6.2.1 This section is intended to provide the nontechnical reader with the essence of the report. The writer should concisely:

- a. Restate in simple terms the issues raised by the associated concerns.
- b. Provide a summary of the evaluation process.
- c. Identify the findings as cited against requirements.
- d. Discuss collective significance of the findings as it affects Management Effectiveness, Employee Effectiveness, and Technical Adequacy.
- e. Discuss the perceived causes for the findings.

f. Describe any corrective actions taken and the results achieved to date.

6.2.2 This section should be revised in Revision 1 of a Subcategory Report to reflect the approved corrective action plans described in detail in section 7.0 - Corrective Actions, after the ECTG has concurred with such plans. Section 7.0 will be left incompletd in Revision 0 of Subcategory Reports.

6.3 Evaluation Process (Section 3.0)

6.3.1 This section is to include a thorough (1) discussion of the methods and requirements used to evaluate the issue(s) involved in the subcategory, and (2) justification of the methods and requirements used. This discussion should summarize interviews conducted, documentation researched, activities observed, items inspected or tested, or mathematical and computer analyses that may have been performed. It is not necessary to list individuals interviewed or equipment number for items inspected. The type (e.g., responsible area, discipline, etc.) and number of individuals interviewed and the type, number, or percentage of items inspected or tested are sufficient. However, documents cited may be individually enumerated along with their dates or revision numbers when it appears appropriate to do so. Otherwise, a summary method should be used.

6.3.2 Sample plans should be discussed, including confidence intervals, when the sampling was intended to be statistically valid.

6.3.3 If the evaluation method at one site was different from that at other sites for generically applicable concerns, this discussion is to note the various approaches used.

6.4 Findings (Section 4.0)

This section contains both a development of the historical background and the conclusions on the subcategory evaluation process determined by judgment against cited requirements. Each of these subjects should be presented in separate subheadings within this section. (i.e., Discussion and Findings/Conclusions).

Findings are discussions of the facts and judgments identified during the evaluation process. Such discussions should include references to the timeframe of the events and actions involved. Findings are to be summarized in the same format as stated for Element Reports in 5.5.

6.5 Collective Significance (Section 5.0)

6.5.1 When determining the collective significance of the findings within a subcategory, an analysis of the Element Reports may reveal a pattern of findings or a pattern of the causes and may identify further problems within one or more of the following ONP functional categories:

- a. Management Effectiveness is TVA ONP management's ability to achieve its nuclear program goals. Management effectiveness may involve such activities as:
 - ° allocation and use of human, material, and financial resources
 - ° establishment and implementation of policies, procedures, and instructions
 - ° planning and scheduling

- ° training
 - ° employment of management and communication techniques
 - ° establishment of organizational structures
- b. Employee Effectiveness is the measure of the ability of employees to fulfill their responsibilities in the TVA ONP nuclear program. Employee effectiveness may be impacted by such issues as fair and consistent treatment, illegal or unauthorized activities of fellow employees, industrial safety, and employee perceptions of management effectiveness and technical adequacy.
- c. Technical Adequacy is the measure of the ability of the design, procurement, construction, operation, security, or maintenance of TVA ONP nuclear facilities to comply with established requirements.

6.5.2 Collective significance analyses are not limited to discussions of requirements spelled out in sections 3.0 and 4.0. However, they must provide a logical rationale, based on provided evidence, for any generalizations offered.

6.6 Causes (Section 6.0)

6.6.1 As defined in 3.11, causes at the Subcategory Report level are the proximate situations, events, or agents that produced a negative finding. On the subcategory level, the writer searches for the proximate (i.e., nearest or immediate) causes of problems identified in the collective significance analysis.

- 6.6.2 To accommodate corrective actions for proximate causes, the writer must identify a responsible organization(s) for each cause.
- 6.6.3 The discussion should be written in a subheading format similar to the Findings section. That is, it should discuss under a subheading of GENERIC, causes for which a single TVA ONP corrective action should be taken to preclude recurrence. Those for which site unique corrective actions are appropriate should be addressed uniquely under a SITE SPECIFIC subheading.
- 6.6.4 For each cause discussed, provide information adequate to ensure communicating the logic and rationale for the judgment.
- 6.6.5 Writers are cautioned not to exceed the scope of the Subcategory Report in attempting to determine root causes as defined in 3.12. Determination and discussion of root causes are better left to Category Reports or the Final Report because of the broader perspective available to each.

6.7 Corrective Actions (Section 7.0)

- 6.7.1 This section heading in Revision 0 Subcategory Reports should discuss any immediate corrective actions or stop-work orders initiated as a direct result of the evaluations.
- 6.7.2 Additionally, this heading should identify, by number, any nonconformance or corrective action documentation that may already exist or that was initiated as a result of the evaluation and identify the disposition when available. The current status and results achieved to date should also be included when known.

- 6.7.3 When the subcategory report is revised to include the approved corrective action plans, this section should be revised to include a summary of those plans.
- 6.7.4 All nonconformance and corrective action documents generated under the QA program as a direct result of the subcategory evaluations should be listed and the disposition described in summary form. When correction action is being taken outside of the QA program, reference should be made to the RIMS number of the memorandum that provided the approved corrective action plan.
- 6.7.5 Corrective actions should be provided for two categories of identified problems. Corrective actions should:
- a. Fix the problems identified in the finding and any similar problems.
 - b. Fix the proximate causes discovered by collective significance analysis of the findings.
- 6.7.6 Corrective action discussions at the subcategory level should, as applicable, include the following:
- a. Actions taken or planned to identify all similar items requiring correction and the scheduled date(s) for completing those actions. Findings from the report that required corrective actions may have only included examples of the deficiency and may not have identified all similar instances.
 - b. Actions taken or planned to correct all listed and similar deficiencies and the scheduled date(s) for completing those actions.

- c. Actions taken or planned to correct the causes identified in the report inclusive of those resulting from collective significance analysis and the scheduled date(s) for completing those actions. These actions should be clearly sufficient to correct the root causes and to aid in precluding recurrence.
- d. Results achieved to date and the results expected when all corrective actions are completed.

6.7.7 In discussing the corrective actions, the writer should place them in Generic or Site Specific categories for the reasons given in 6.4.5.

The SITE SPECIFIC heading should be chosen instead of the GENERIC heading whenever corrective action would be expected to be different due to the uniqueness of a site. Keep in mind, however, that it is now TVA ONP's policy to provide centralized direction and to perform the same activity at each site in exactly the same manner. This policy is reflected in the Nuclear Procedures System Policy signed by S. A. White on June 6, 1986. Since a good part of the corrective actions required will involve revision or development of policies, programs, or procedures, the report writer needs to be familiar with the new ONP procedure system being developed under direction of the Nuclear Procedures Staff at the Chattanooga Office Complex.

6.8 Attachments (Section 8.0)

6.8.1 This section should list each attachment to the Subcategory Report. When deemed pertinent by the CEG-H, attachments may include documents or information that does not lend itself to inclusion in the text, but yet is needed for the completeness or understanding of the report. Attachments should be used sparingly.

6.8.2 Attachments should be identified with a capitalized alpha character and an appropriate title.

Example:

Attachment A, Subcategory Summary Table

6.8.3 Attachment A, Subcategory Summary Table, should contain the following information in tabular form:

- a. List by number all concerns characterized in this Subcategory Report sorted by element number when applicable.
- b. Provide a brief description for each concern.
- c. Identify any other ECTG Subcategory Report number that also discusses any of the concerns characterized in this report.
- d. Identify each concern characterized in this report that has been determined to be safety-related.
- e. Identify each valid safety-related concern characterized in this report that is also designated as an unreviewed safety-significant question.

- f. Identify those valid safety-related concerns characterized in this report which were generically applicable.

This may be accomplished by providing an updated printout from the ECPS data base.

7.0 CONTENTS OF CATEGORY REPORTS

The objectives of the Category Report are (1) to provide a summary of the evaluation process and results that have been discussed in the associated Subcategory Reports and (2) to provide a broadening of the perspective applied to evaluating the collective significance at the category level. The goal is to provide a preliminary determination of root causes for the identified findings through analysis of the collective significance of the associated Subcategory Reports.

Category Reports are intended for readership by the SRP, ECSP management, US NRC, responsible line management, TVA employees, and the general public.

The contents for each of the Category Report sections are discussed in 7.1 through 7.8.

7.1 Characterization of Issues (Section 1.0)

7.1.1 This section is to include, individually or collectively, a generalized characterization of issues as originally perceived and identified in K-forms or other reports of concerns that are within the applicable category scope. The writer should try to provide the flavor of the issues while still including adequate information to indicate the scope and technical aspects of the concerns.

7.1.2 The accurate characterization of an issue allows the Category Report writer to test the appropriateness of the issue evaluation process: was what worried employees on this issue actually addressed? Identifying the scope and technical aspects of the issue brings employees' worries into measurable focus.

7.1.3 Writers are cautioned not to inject their own biases or to rewrite to the extent that the original issue is not fully addressed.

7.2 2.0 - Summary

This section is intended to provide the nontechnical reader with the essence of the report. The writer should concisely:

- a. Restate in simple terms the issues raised by the associated concerns.
- b. Provide a summary of the evaluation process.
- c. Identify the findings as cited against requirements.
- d. Discuss collective significance of the findings as it affects Management Effectiveness, Employee Effectiveness, and Technical Adequacy.
- e. Discuss the perceived causes for the findings.
- f. Describe any corrective actions taken and the results achieved to date.

7.3 Evaluation Process (Section 3.0)

7.3.1 This section is to include a general discussion of the methods and requirements used to evaluate the issue(s) involved in the category. The section should also include a justification of the methods used and the requirements selected. This discussion should provide a general summary of interviews conducted, documentation researched, activities observed, items inspected or tested, or mathematical and computer analyses that may have been performed.

7.3.2 If the evaluation methods at one site were significantly different from those at other sites for generically applicable concerns, this discussion is to note the various approaches used.

7.4 Findings (Section 4.0)

7.4.1 This section contains a development of the historical background and the conclusions on the category evaluation process determined by judgment against cited requirements. Each of these subjects should be presented in separate subheadings within this section (i.e., Discussion and Findings/Conclusions). Findings can be summarized from the Subcategory Reports at major issue levels in the same format as stated in 5.5.

7.5 Collective Significance (Section 5.0)

7.5.1 When determining the collective significance of the findings within a category, an analysis of the Subcategory Reports may reveal a pattern of findings or a pattern of the causes identified in and may identify further problems within one or more of the ONP functional categories identified in 6.5.1.

7.5.2 Collective significance analyses are not limited to discussions of requirements spelled out in sections 4.0 and 5.0. However, they must provide a logical rationale, based on provided evidence, for any generalizations offered.

7.6 Root Causes, Preliminary Analysis (Section 6.0)

7.6.1 On the category level, the writer summarizes causes already discussed in the Subcategory Reports (see 6.6.1).

7.6.2 The discussions should be written in the same subheading format described in 6.6.3

7.6.3 In addition to the summary in 7.6.1, the writer makes a preliminary root cause analysis by determining the cause of the problems identified in the category collective.

7.6.4 To accommodate corrective action, the writer should determine a responsible organization(s) for each cause identified by performing 7.6.3

7.6.5 Writers are cautioned not to exceed the scope of the Category Report in attempting to determine root causes as defined in 3.12. Determination and discussion of the ultimate perceived root causes are better left to the Final Report because of the broader perspective available at that level.

7.7 Corrective Actions (Section 7.0)

7.7.1 This section of the Category Report should not be written until all corrective action plans for the associated Subcategory Reports have been concurred with and the Subcategory Reports revised to reflect approved corrective action plans.

7.7.2 This section should summarize the revised corrective action sections of the associated Subcategory Reports.

7.7.3 Corrective actions for the preliminary root causes identified in the Category Report will not be obtained nor discussed until after initial issuance of the Final Report.

7.8 Attachments (Section 8.0)

7.8.1 This section should list each attachment to the Category Report. When deemed pertinent by the CEG-H, attachments may include pertinent documents or information that does not lend itself to inclusion in the text, but yet is needed for the completeness or understanding of the report. Attachments should be used sparingly.

7.8.2 Attachments should be identified with a capitalized alpha character and an appropriate title.

Example:

Attachment A, Category Summary Table

7.8.3 Attachment A, Category Summary Table, should contain the following information in tabular form:

- a. List by number all concerns characterized in this Category Report sorted by element and subcategory numbers.
- b. Provide a brief description for each concern.
- c. Identify any other ECTG Category Report number that also discusses any of the concerns characterized in this report.

- d. Identify each concern characterized in this report that has also been determined to be safety-related.
- e. Identify each safety-related concern characterized in this report that is also designated as an unreviewed safety-significant question.
- f. Identify those concerns characterized in this report which were generically applicable.

This may be accomplished by providing an updated printout from the ECPS data base.

8.0 CONTENTS OF THE ECSP FINAL REPORT

The objective of the Final Report is to provide a complete synopsis of the ECSP. The Final Report is a compendium of the Category Reports, an analysis of all issues within categories that relate to a subject, and an explanation of the purpose, scope, and management approach taken to accomplish the program. The Final Report should not contain technical details except where significant safety issues are discussed, due to the intended readership of the report. Even when technical issues are discussed they should be written at a level that can be understood by nontechnical readers.

The Final Report is intended for readership by the SRP, ECSP management, TVA management, US NRC, US Congress, responsible line management, TVA employees, and the general public.

The contents for each of the Final Report sections are discussed in 8.1 through 8.7.

8.1 Introduction and Background (Section 1.0)

This section of the Final Report is to contain the conditions that caused the ECSP to be formed and an explanation of the chronological events leading to its formation. Some portion of the discussion under this section should state that TVA was fortunate to have these concerns expressed and to have the opportunity to fix problems that might not otherwise have surfaced. This section should also preview what the reader can expect to find discussed in the rest of the report.

8.2 ECSP Program Description (Section 2.0)

This section of the report is to contain a thorough description of the scope, objectives, and management approach taken to carry out the program.

This description should contain:

- a. program objectives
- b. program scope
- c. program organization
- d. program methods used to assure concerned individuals of their anonymity
- e. program methods to categorize and subcategorize concerns
- f. program methods for evaluation of concerns
- g. program reports hierarchy explanation
- h. collective significance approach used to determine root causes

- i. methods used to obtain and implement corrective actions required to fix identified problems and preclude their recurrence
- j. methods used to track, follow up, verify, and close out corrective actions

This discussion should include the roles played by QTC and NSRS as well as the begin and end dates of the program.

8.3 Overall Characterization of Concerns (Section 3.0)

8.3.1 This section is to include a broad characterization of the concerns within the program's scope. Particularly significant individual concerns can be addressed separately and the remainder addressed collectively. The writer should try to provide the flavor of the original perceived concerns while still including adequate information to indicate the scope and technical aspects contained in particularly significant concerns.

8.3.2 This discussion should use meaningful statistics about the associated concerns whenever possible. Meaningful statistics can save words and are, if presented properly, easily understood. Meaningful statistics could include:

- a. Number of concerns versus the number of personnel interviewed.
- b. Number of management-related concerns.
- c. Number of concerns related to employee confidence.

- d. Number of technically-related concerns.
 - ° Number involving hardware
 - ° Number involving documentation
- e. Number of concerns in each of the categories.
- f. Number of validated concerns in each of the categories.
- g. Number of safety-related concerns (after completion of evaluations).
- h. Number of unreviewed safety-significant question concerns (after completion of evaluations).
- i. Number of generically-applicable concerns (after completion of evaluations).
- j. Number of concerns applicable to each site.
- k. Number of concerns that related to a subject, especially if related concerns were evaluated under different categories.
- l. Number of concerns that the existing systems had already identified and the number of those that were already fixed.

8.4 Summary of Findings (Section 4.0)

8.4.1 This section is to include a development of the historical background and a summary discussion of the findings and their associated requirements as presented in the Category Reports. These items should be correlated to the characterized concerns. This section's discussion should be limited to the very significant individual findings. The findings may be positive as well as negative. Such discussions should include reference to the timeframe of the events, actions, and documentation involved.

8.4.2 For presentation purposes, the writer may again find it helpful to use statistics to assist in summarizing and adding a sense of proportion to the findings resulting from the program.

8.5 Collective Significance (Section 5.0)

8.5.1 This section should include a summary discussion of the collective significance analyses presented in the Category Reports.

8.5.2 Additionally, this section should perform a collective significance analysis of the Category Reports. Patterns identified at this level of analysis may lead to the identification of even broader scoped problems than those identified in Category Reports.

8.5.3 Also, this section should include a collective significance analysis along major subject lines that may have been evaluated under separate categories (e.g. analyze all results related to welding when weld inspector qualifications were evaluated under QA/QC, welding management under Management and Personnel, and technical aspects under Welding).

8.5.4 When determining the collective significance of the entire program, all of the following ONP functional categories should be discussed (see 7.5.1).

- a. Management Effectiveness (If appropriate, discuss the consistency and degree of enforcement of requirements and policies applied by TVA's management.)
- b. Employee Effectiveness
- c. Technical Adequacy

8.6 Root Causes, Final Analysis (Section 6.0)

8.6.1 This section should summarize the root cause discussions presented in Category Reports.

8.6.2 Additionally, the causes for any problems identified in the collective significance analysis performed at the Final Report level should be presented.

8.6.3 To accommodate corrective action, the writer should determine a responsible organization(s) for each cause identified by performing 8.6.2.

8.7 Corrective Actions Taken or Planned (Section 7.0)

8.7.1 This section is to include a number of discussions on correcting the problems identified by the program. Only especially significant findings should be discussed individually. Most of the corrective actions should be discussed in a collective summary

- 8.7.2 The writer should discuss all corrective actions in a positive and straightforward manner. Ensure that (1) there is an organization and decision process in place, (2) the problem is in an approved fix program, or (3) the problem is already fixed.
- 8.7.3 All root causes added by the Final Report and discussed in section 6.0 should also be discussed as a part of this section. Do not leave anything out. It may be necessary to develop this section in Revision 0 without a discussion of the corrective action plans for the final root causes identified in 6.0. After these correction action plans have been prepared by line management and concurred with by the ECTG, the Final Report may be revised to reflect those approved corrective action plans.
- 8.7.4 Note in this section that TVA has several of task groups in place that are working on resolution of a number of significant problems, some of which overlap with those identified under this program. Identify these areas and show their relevance to the correction of the problems identified under the ECSP.
- 8.7.5 Include under this section's discussions, a sense of proportion that shows the degree of what TVA did right versus the problems that were only found through the conduct of this program. This discussion could be augmented by reference to the statistical presentations described in 8.3.2 and 8.4.2.

- 8.7.6 Describe other major actions taken or planned by TVA to enhance its performance in the management of its nuclear program. Specifically, reference the Nuclear Performance Plans (NPPs) and show how many of the areas found as problems under this program already have work underway as a result of the NPPs that when completed will assist in precluding their recurrence.
- 8.7.7 Describe the management actions already taken and the efforts underway to ensure a continuing supply of adequately trained and experienced top level managers for TVA's nuclear program. Describe the new policy, program, and procedure philosophy and its role in precluding recurrence of TVA's problems. Discuss the newly instituted policy on centralized direction of TVA's nuclear program.
- 8.7.8 Describe ECS Program's overall value in restoring employee confidence at TVA. Also, include a brief discussion of the new ongoing employee concern and differing professional opinion program that is now in place.
- 8.7.9 Provide a specific discussion on a site-by-site basis as to corrective actions that are to be completed before restart or licensing of each facility.
- 8.7.10 Describe the mechanisms that will be used to track, follow up, verify, and close out each required corrective action resulting from the ECS Program.
- 8.7.11 Describe the mechanisms that will be used to let current and former TVA employees know how their concerns were evaluated and resolved. Also, describe the mechanism for such employees to respond when they feel that their concerns were not adequately resolved.

8.7.12 Conclude the report with a summary statement about the results achieved to date and the ultimate results expected.

9.0 REPORT TITLES

Report titles should identify the element, subcategory, or category. Titles should be worded as illustrated below:

1. Element Reports

Damage To Valves During Construction

2. Subcategory Reports

Damage To Equipment During Construction

3. Category Reports

Construction

4. Final Report

ECSP Final Report

Titles should clearly reflect the entire subject to which they apply. The title of Element Reports should make clear the element, subcategory, and category of which the element is a subpart.

10.0 REPORT NUMBERING

10.1 Reports are to be numbered to provide traceability between Category, Subcategory, and Element Reports. Each report should be numbered with the applicable category, subcategory, or element numbers that are already assigned by the ECSP procedures.

10.2 ECSP Final Report Numbering

Numbering is not applicable to the ECSP Final Report.

11.0 REPORT FORMS AND PAGE NUMBERING

11.1 Cover Sheet Information

The Cover Sheet form for all reports is provided in Attachment A. This form provides for the following information:

- a. Report number - (to be noted as "N/A" on the Final Report)
- b. Revision number
- c. Page number
- d. Report type - (i.e., Element Report, Subcategory Report, Category Report, or Final Report)
- e. Title
- f. Reason for revision - (to be noted as "N/A" for Revision 0 of each report)
- g. Category, subcategory, or element number - (to be noted as "N/A" on the Final Report)
- h. Prepared by - (signature and date of the individual that prepared the report or report revision)

- i. Peer Review - (signature of reviewer and date of review--applies to Element and Subcategory Reports)
- j. Review by other - (provides an added space for documenting the review of another individual that may have been requested by the CEG-H or the ECSP Manager. To be noted as "N/A" when not used)
- k. Concurrences - (signature and date of those individuals required by procedure to concur with the report or as directed by the ECSP manager)
- l. Approvals - (signature and date of the ECSP Manager on all but Element Reports and the Manager, Nuclear Power only signs on the ECSP Final Report. The Manager, Nuclear Power space is to be noted as "N/A" on all reports except the ECSP Final Report)

11.2 Continuation Sheet Form

The Continuation Sheet Form for all reports is provided in Attachment B. This form is to contain the information shown in paragraph 11.1, items "a" through "e." Text of the report shall be entered in the space provided. Any attachments required to complete the report should be provided on these Continuation Sheets whenever possible. When not possible, the information requested in paragraph 11.1, items "a" through "e", are to be provided at the top of each such attachment.

11.3 Page Numbering

Page numbering is to be continuous throughout the report and inclusive of all attachments.

12.0 STYLE

12.1 Headings

Headings used in the reports should be used for each section and any major subparts of the sections. Engineering notation (numbering) and presentation should appear as:

Example:

5.0 FINDINGS

5.1 Damaged Conduit

5.2 Damaged Valves

Individual paragraphs below headings should not be numbered as was done in this writers guide.

12.2 Treatment of Acronyms and Capitalization

Use the ONP Condensed Style Guide for guidance on the treatment of acronyms and capitalization.

12.3 Readability

The writer is reminded and cautioned that the reports are meant for multiple audiences:

- a. avoid "shop language" or define it
- b. avoid paragraphs of more than ten lines
- c. rethink any sentences over 14 words in length

- d. rethink words over three syllables
- e. spell out numbers ten and below use; the arabic numerals for all others
- f. use a comma before "and" in a series
- g. introduce listings with a colon
- h. enumerate each item in a listing with lower case letters

13.0 ATTACHMENTS

Attachment A, ECSP Reports Cover Sheet

Attachment B, ECSP Reports Continuation Sheet

ATTACHMENT A

ECSP REPORTS COVER SHEET

 TENNESSEE VALLEY AUTHORITY	TVA EMPLOYEE CONCERNS SPECIAL PROGRAM	REPORT NUMBER: _____		
	REPORT TYPE: _____	REVISION NUMBER: _____		
	TITLE: _____	PAGE: 1 OF _____		
REASON FOR REVISION:				
PREPARATION				
PREPARED BY: _____ <div style="display: flex; justify-content: space-between; width: 80%; margin: 0 auto;"> SIGNATURE DATE </div>				
REVIEWS				
PEER: _____ <div style="display: flex; justify-content: space-between; width: 80%; margin: 0 auto;"> SIGNATURE DATE </div>				
OTHER: _____ <div style="display: flex; justify-content: space-between; width: 80%; margin: 0 auto;"> SIGNATURE DATE </div>				
CONCURRENCES				
<table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%; height: 40px; vertical-align: bottom;"> _____ SIGNATURE DATE </td> <td style="width:50%; height: 40px; vertical-align: bottom;"> SRP: _____ SIGNATURE DATE </td> </tr> </table>			_____ SIGNATURE DATE	SRP: _____ SIGNATURE DATE
_____ SIGNATURE DATE	SRP: _____ SIGNATURE DATE			
APPROVED BY: _____ <div style="display: flex; justify-content: space-between; width: 80%; margin: 0 auto;"> ECSP MANAGER DATE (FINAL REPORT ONLY) MANAGER OF NUCLEAR POWER DATE </div>				

ATTACHMENT B

ECSP REPORTS CONTINUATION SHEET

 TENNESSEE VALLEY AUTHORITY	TVA EMPLOYEE CONCERNS SPECIAL PROGRAM	REPORT NUMBER:
	REPORT TYPE:	REVISION NUMBER:
	TITLE:	PAGE: OF