

TENNESSEE VALLEY AUTHORITY
EMPLOYEE CONCERN ACTIVITIES
(Revised May 2, 1986)

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PART A

TVA OFFICE OF NUCLEAR POWER EMPLOYEE CONCERN PROGRAM

I. Summary

This document describes how employee concerns are handled within TVA's Office of Nuclear Power (ONP). For the purpose of clarity and understanding, line organization activities and responsibilities are not to be construed as part of the formal Employee Concern Program (ECP). A discussion of these line organization activities and responsibilities is included within this program description for completeness. All related activities, as described, are based upon the fundamental premise that the great majority of employee concerns are best handled and resolved to the satisfaction of all parties by line management organization and that the formal ECP organization, including Site Representatives, (1) complements and reinforces the ability of line management to deal with employee concerns; and (2) ensures employees that their concerns will receive prompt and effective action.

The program embodies several key fundamentals designed to support high standards of quality and safety in TVA nuclear activities. These include:

- o Providing for early identification of problems of employee/management relations within the line organization.
- o Elimination of intimidation, harassment, or reprisal actions against employees raising concerns.
- o Focusing the responsibility for effective operation of the program in a single organization.
- o Providing for confidentiality upon employee request.
- o Developing improved communication between employees and supervisors.
- o Encouraging employee participation in accomplishing program improvements.
- o Encouraging the line organization to solve problems which exist within the line organization.
- o Providing an independent communication channel within the line organization for employees to use for reporting concerns outside their work organization (Site Representative (SR)).
- o Using the TVA Inspector General (IG) as an outlet independent of the ONP organization.
- o Utilizing standardized documentation, recordkeeping, trending, and common data base for all locations.

The ECP Manager, who reports directly to the Manager of Nuclear Power, is responsible for management and direction to accomplish the objectives of the overall program. The ECP Manager will promote the ECP within the line organization and maintain relations with all levels of line management and with appropriate organizations outside ONP. The ECP Manager and his organization also provide for receiving and resolving employee concerns raised with the ECP Manager's organization. A key element of this program is an ECP SR at each major nuclear-related location.

The ECP SR is responsible for identifying and working with senior management to correct situations brought to the ECP SR's attention where employee/supervisor/management communications or relationships fail to establish an environment for free expression of concern. The ECP SR also serves as a recipient of concerns or differing employee views separate from the line organization in which the employee works. It is the ECP SR's responsibility to evaluate the nature of the individual's concern and to channel efforts towards its proper resolution. This may include encouraging resolution of the concern with line supervision, evaluation of the concern by site line organization staff, evaluation of the concern by the ONP corporate staff, or evaluation of the concern by a third party organization.

Nothing in this description alters or affects any employee's right to report any matter to the TVA IG, which provides a reporting channel totally independent of the line organization or ECP Manager. The employee also has access to NRC, Office of Safety and Health Administration, or the Department of Labor.

II. Employee Concern Program Description

A. Organization

The Manager of Nuclear Power has primary responsibility for the safe design, construction, and operation of TVA's nuclear plants. Essential to the successful execution of this responsibility is the ability to obtain information from employees about concerns, issues, or conditions that they believe are not correct; and thus, the ability to take effective, timely corrective action. Functions and responsibilities of the key members of this organization are as follows:

1. Manager of Nuclear Power

The Manager of Nuclear Power is responsible for all activities in ONP and establishes policy and general program direction for an effective ECP. Through the manager's direction and actions, an environment for employees to freely express their concerns regarding work activities within the office is established. Immediate and decisive action is taken against any employee or manager that has been shown to take actions involving recrimination or retribution against an employee for raising a concern.

2. Line Organization Directors and Managers

The line organization directors and managers have primary responsibility for all work activities at the nuclear plants or for the work activities in organizational units supporting the nuclear plants. These directors and managers are responsible for establishing a work environment within their area of responsibility that encourages open communication and mutual respect between employees and supervisors. Employee concerns and ideas are encouraged and given due consideration. Disposition of information received from employees will normally be handled through routine processes, programs, or procedures such as design change requests, nonconformance reports, suggestions, etc., and would not be documented as an "employee concern." Responses to employees on actions taken or planned are essential. These directors and managers are responsible for implementing administrative procedures that define responsibilities of employees and supervisors for handling such matters within their respective organizations and for providing training to ensure all employees understand the program.

3. Employee Concern Program Manager

The ECP Manager is responsible for taking actions to ensure the program is understood by employees and management, is functioning to accomplish the goals of the program, and is achieving desired results. The ECP Manager is responsible for establishing a program within the ECP organization for receiving and evaluating employee concerns for which the employee/supervisor has been ineffective, is not trusted, or where the employee desires confidentiality. The ECP manager is also responsible for working with line management and QA to identify any areas of weakness within the line program or to assist line management in the promotion of the ECP within their organizational units. The ECP Manager arranges with organizations outside of the ONP to obtain assistance in evaluating employee concerns or in providing information to these organizations in the resolution of employee concerns. The ECP Manager is responsible for the staffing and supervision of ECP SRs at all major ONP installations and offices and for seeing that the program at each site is a consistent part of the overall unified TVA ECP. The ECP Manager implements a program to evaluate the effectiveness of the ECP, providing feedback to line management at each of the major installations and offices and to the Manager of Nuclear Power.

4. Employee Concern Program Site Representatives

ECP SRs provide visible evidence of ONP management's commitment and desire to obtain employee input, including concerns relative to the safe and efficient design, construction, and operation of TVA's nuclear plants. The ECP SR will provide emphasis and assistance to the line supervisors in the establishment of an effective employee/supervisor relationship. Additionally, the ECP SR will be available to receive employee concerns when there is a breakdown in the desired employee/supervisor communications or working relationship. Employees that are being terminated or transferred from one location to another will also be given an exit interview by the ECP SR to ensure there are no unidentified deficiencies of which the employee is knowledgeable. The ECP SR is responsible for the evaluation or investigation of employee concerns that are received by the ECP SR. The ECP SR may investigate the concern or may utilize other resources to have an investigation made where it can be done by persons not involved in the concern. The ECP SR will be responsible for the completion of an acceptable investigation and for closing the issue with the employee.

The ECP SR is responsible for performing evaluations of the ECP within the line organization or for taking actions necessary to determine if the goals of the program are being met in the workplace.

5. Supervisors

It is the inherent responsibility of a supervisor to take action when a perceived deficiency is identified. Such action should include evaluation and corrective action if needed. The employees working for a supervisor have available firsthand knowledge of the adequacy of the basic ingredients necessary for accomplishing work in accordance with quality requirements. The supervisor is responsible for evaluating or arranging for the appropriate line, quality assurance, or other organization to evaluate any matter raised by an employee and for promoting within the work group an atmosphere that encourages employees to bring to the supervisor's attention conditions that are either unacceptable or that the employee perceives as unacceptable.

6. Employees

Employees are responsible for performing work activities in accordance with instructions provided by management and utilizing proper equipment and procedural controls. Employees have an obligation to report to their supervisor conditions which exist that are not within the limits established by procedural controls or the failure of equipment that would result in a work activity being performed in an unacceptable manner. Employees have an obligation to identify unsafe conditions to their management.

B. Management of Employee Concerns

There are four distinct steps in the management of employee concerns.

- o Receipt of the employee concern
- o Investigation of the employee concern
- o Corrective action by the line organization
- o Providing feedback to the employee

Each of these steps is discussed in subsections B.1 and B.2 with an indication of the intended method for handling the concerns and the alternate methods available to the employee.

Within the ONP organization, an employee may bring an employee concern to the responsible supervisor or to the ECP SR at the location where the employee is working. The receipt and handling of concerns by these organizational units are as indicated in subsections B.1 and B.2.

The choice made by an employee where to express a concern will in many cases reflect the employee's confidence in the supervisor's or manager's ability to resolve the concern.

1. Resolution of Employee Concerns by Supervisor

The preferred method for handling employee concerns is with the employee expressing a concern to the responsible supervisor. This is the normal and desired method for handling problems or concerns an employee has in the workplace. The supervisor has the continuing responsibility to supervise the assigned employees, including providing clarification of work activities, procedures, policy, or other matters. Any concern brought to the attention of the supervisor and resolved at that level to the satisfaction of the employee, including those situations where corrective action is required, is the exercise of good management.

In the resolution of the employee concern or question, the supervisor may utilize the normal line organizational units, including discussion with other levels of supervision or management. In all cases where either the supervisor or manager considers he does not have sufficient information or expertise to handle the concern or question, the supervisor or manager should either obtain assistance to adequately handle the concern or advise the concerned employee that the concern may be taken to the ECP SR.

2. Resolution of Employee Concerns By Employee Concern Program Site Representative

a. Receipt of Employee Concern

An employee concern can be received by the ECP SR from a number of means, including any of the following.

- o Walk-in
- o Scheduled interviews
- o Phone call
- o Referral from line organization
- o Exit interview
- o Mail-in (form)

Walk-in

Any employee may choose to express a concern with the ECP SR. The employee may desire to have confidentiality and thus not choose to have the concern resolved by the supervisor. The ECP SR will obtain sufficient information to fully identify the concern of the employee and to allow for its investigation and resolution. During the interview, the employee will be asked if confidentiality is desired. Confidentiality will be preserved if requested. There will be a documented record of all concerns expressed to the ECP SR.

In all cases where an employee comes to the ECP SR, the ECP SR will determine the nature of the concern. The ECP SR will encourage the employee to attempt to resolve the issue with the supervisor. Where the employee does not choose to do so, the ECP SR will attempt to determine the reasons for this condition and will evaluate the condition for further action.

Scheduled Interviews

The ECP SR may interview employees and/or managers to obtain feedback regarding the ECP or as part of an investigation. Scheduled interviews may include a few employees from different organizational units or may include all employees from selected organizational units depending on the objectives of the interview process.

Phone Calls

All ECP SRs will have the capability to receive phone calls from those persons at or in the vicinity of the site. Any concerns received by the ECP SRs will be handled in the same manner as concerns provided by walk-ins.

Referral from Line Organization

An employee concern may be brought to the attention of the site representative from the line supervisor of the employee or other line managers receiving a concern from an employee. Such a referral may be made because the supervisor was unable to resolve the issue or because the supervisor (and his/her manager) determined that the issue or concern could more appropriately be resolved by the ECP SR.

Exit Interview

All employees leaving the site that are either terminated or transferred to another job in TVA will be interviewed as a part of the employee checkout procedure. During the interview process, the employee will be requested to indicate if there are concerns regarding safety of construction or operations.

Mail-In (Forms)

At all major nuclear program locations, employees will have available forms that can be utilized to identify a concern. Any employee concern received in this way will be treated the same as a concern originating from other means.

B. Investigation of Employee Concern

The ECP SR is responsible for the evaluation and/or investigation of all concerns brought to the attention of the ECP SR organization. This includes concerns originating from any of the sources identified in subsection B.2.a.

The ECP SR is responsible for the following actions involving the resolution of an employee concern.

- o Preliminary evaluation of the concern.
- o Evaluation/investigation of the concern or assignment of the concern to an organizational unit for evaluation or investigation.
- o Review of the findings and/or results of investigations assigned to other organizations and accepting or rejecting the report or referring the report to the ECP Manager for evaluation.

Preliminary Evaluation of Concern

The ECP SR will make a preliminary evaluation of the concern, determine its general category, and the basic issues involved with it. Prior to performing an investigation or assigning the concern for investigation, the ECP SR may determine if the concern has previously been identified or investigated.

The ECP SR may utilize such information to either immediately respond to the employee or determine what additional information is needed and the extent of investigative activity.

Assignment of Concern for Investigation

Based upon the preliminary evaluation of the concern as indicated above, the ECP SR will either resolve the concern by completing any needed investigation or determine an appropriate organizational unit for investigation. Assignment for investigation will be made to a knowledgeable organizational unit within TVA, consistent with ensuring an adequate degree of independence, a lack of involvement with the concern, and requirements associated with confidentiality. Some of the available sources for investigation are described in subsection C.4.

The ECP SR notifies the ECP Manager of the results of the preliminary evaluation of intimidation and harassment concerns prior to beginning any investigation. The ECP Manager will discuss the preliminary evaluation results with the Manager of Nuclear Power. Depending upon the nature of the concern, the complexity of the issue, the requirement for trained investigators, and/or the degree of involvement of ONP management in the case, the Manager of Nuclear Power decides whether the concern is to be assigned for investigation as described above or referred to the IG for investigation. The ECP SR is notified by the ECP Manager of the investigation assignment.

Review of Investigation Reports Performed by Other Organizations

The ECP SR is responsible for review of all investigation reports, including those performed by other organizations. The ECP SR will specifically examine the report to determine if it addresses the concern and to ensure that findings are supported by factual information. In cases where the ECP SR considers the report deficient or unclear, the ECP SR will meet and resolve the concerns with the investigating organization. The ECP SR will determine if findings address the concerns identified in the report. When the ECP SR is satisfied that the investigation report is adequate, the report is submitted to the ECP Manager for approval. Once approved, the ECP Manager provides the report to appropriate line management.

c. Corrective Action by the Line Organization

Upon receipt of the investigation report, the line organization is responsible for implementation of corrective actions to investigation report findings. The implementing organization will provide written response to the ECP Manager regarding the specific corrective actions taken to findings identified. Any disagreements regarding findings or corrective actions between the line organization and ECP Manager will be escalated to the Manager of Nuclear Power for final resolution. Additionally, the line will review the report and its findings for generic applicability, reportability to NRC, and to determine the need for stop work orders.

d. Notifying Employee of Concern Resolution

The ECP SR is responsible for providing the employee who raised a concern with the results of the investigation. This will generally be done by arranging a meeting with the employee. At the meeting, the findings of the investigation and the designated corrective action will be presented. Employees who have raised concerns that were not resolved prior to the employee leaving TVA will be notified of the resolution. The employee will be provided with the results of the investigation report. If the employee however is not satisfied with the resolution of the concern, the ECP SR will discuss with the employee other means of having the concern evaluated. The employee may desire to have the concern examined by the IG. If so, the ECP SR will provide the IG with the file on the employee's concern.

e. Records

The ECP SR will be responsible for maintaining records of the entire activity involving resolution of a concern. This will include the identification of the concern, the investigation report, the designation of corrective action by the line organization, any correspondence relative to the specific concern, the closure process with the employee, any transfer of information to the ECP data base, and records of employee exit interviews.

C. Program Support Activities

1. Employee Concern Program Data Base

Information related to evaluation and/or investigation of employee concerns will be retained by each ECP SR and will be input into a computer data base.

In order to ensure maximum benefit from the information data base, the ECP Manager will establish and enforce specific guidance and requirements for data base input for all nuclear sites where ECP SRs are located.

The ECP SR will use the data base to determine if the concern has already been raised and, if so, to obtain reference to the appropriate investigation report findings and the corrective action. If the concern was similar to a concern previously investigated, the ECP SR will utilize previous investigations to supplement any new investigative activity. At a specific site, if a concern is identical to one raised previously, the ECP SR may utilize earlier investigative efforts and designated corrective action to determine root causes.

The data base will be supplemented by information that will eventually include summary information on all concerns and related investigation results from the Watts Bar ECSP.

2. Training and Orientation of Employees

All employees in ONP are provided training or orientation in the ECP. This includes program emphasis in various General Employee Training courses, orientation handouts for new employees, and periodic paycheck inserts as a minimum.

Special training regarding this program will be provided to employees and management where the ECP Manager and/or the ECP SRs identify situations where there is indication that employee/supervisor interfaces are not satisfactory.

3. Promotion of the Employee Concern Program

The ECP Manager will implement a continuing program to promote the program and employee means of access to it. This will include the use of posters, signs, periodic meetings, and articles in periodicals prepared by organizational units.

The ECP Manager and ECP SR's staff will actively promote the program within the line organization at the senior manager level.

4. Investigative Sources

The line organization at the supervisory or managerial level, the ECP Manager, and the ECP SRs may require capability to evaluate and/or investigate some employee concerns that they receive from employees. When a concern is brought to the attention of the line supervisor, if the concern relates to activities for which the supervisor is responsible, the supervisor would address the concern or issue by comparing the employee's concern with the condition required by the program or procedural control associated with the work activity. If there are any doubts about the resolution of the concern, the supervisor would seek advice or assistance from upper management or staff support. In a like manner, a concern relating to activities not within the supervisor's responsibilities would be addressed by seeking advice and assistance from the organizational unit having responsibility for the work activity. In cases of issues that are either complex or outside the competence of the organizational unit, assistance may be requested from any of the organizational units within the ONP organization. The supervisor should not hesitate to seek assistance from higher levels within the organization and, if warranted, have an evaluation or investigation of the issue initiated.

Within the ONP organization, there are a large number of technical personnel that are experienced in technical evaluation and investigation. When issues develop that supervisors are not familiar with, the supervisor or higher levels of management may utilize these technical personnel to assist in investigations.

The ECP Manager and the ECP SRs may utilize the same pool of resources within the line organization as the line supervisors and managers. However, when concerns are provided to the ECP Manager or the ECP SRs, this may indicate a need for special expertise or technical expertise with sufficient isolation from the line to maintain independence or confidentiality. In these cases, the ECP may utilize technical expertise from other sites or contract for the investigation.

5. Differing Professional Opinions

When an ECP SR receives an employee concern which involves an issue of differing professional opinion, the ECP SR informs the ECP Manager immediately of the nature of the issue. The ECP Manager will ensure that an appropriate resolution mechanism has been established within the TVA ONP organization and that the existence of the issue is brought to the attention of the Manager of Nuclear Power and any other individual designated by him.

D. Employee Concern Program Evaluation

The ECP Manager is responsible for providing a system for evaluating the adequacy of the ECP. Several aspects of the program will be evaluated as indicated in the following sections.

1. Employee Understanding of the Program

The ECP Manager will periodically determine the employee's understanding of the program for voicing a concern. This may include sending questionnaires to employees, conducting interviews, or any method that will be statistically representative.

2. Employee Satisfaction With Employee Concern Program

The ECP SR at all locations will periodically determine the employee's satisfaction with the program based upon his experience with voicing concerns, the resolution of the concern, the timeliness of the process, and the resultant corrective action.

This determination will include feedback from employees known to have taken concerns to the line organization as well as to the ECP SR.

3. Employee Need for Confidentiality and Employee Concern Regarding Recrimination

The ECP SR will periodically discuss with employees who have chosen this method to voice a concern the basis for their selection and their concern regarding confidentiality and recrimination. Such discussions will be held on a periodic basis to determine if line and ECP staff activities are being successful in improving the employee/management relationship. Such discussions and findings from these discussions will be handled so that protection to these employees is provided.

4. Trending of the Number of Employees Using the Line Employee Concern Program Compared to the Inspector General System

The ECP Manager will periodically meet with the IG to discuss the trends involving employees using the IG system instead of the ECP system. Information relating to root causes as determined by the IG will be evaluated by the ECP Manager to design corrective action in the ECP system.

In addition to evaluations performed by the ECP Manager, additional evaluation or audit of the program will be made by the Quality Assurance organization.

PART B

WATTS BAR EMPLOYEE CONCERN SPECIAL PROGRAM

A major action taken by TVA as a result of NRC's views in April 1985 was the establishment of a special program for identifying and resolving employee concerns, particularly those from employees associated with the Watts Bar Nuclear Plant. To provide a means for immediately securing information from employees, to give TVA time to improve its own systems, and to gain additional experience in some areas, TVA established a contract with an independent contractor, Quality Technology Company (QTC).

TVA specified in the contract that all employees would be ensured confidentiality unless they consented to QTC releasing their identity. Under this arrangement, QTC would not give TVA the names of employees expressing concerns. To provide the highest degree of protection to the TVA employees, TVA contracted to have all employees associated with the Watts Bar project interviewed, thus eliminating the potential for an employee to be uncomfortable or reluctant by having to volunteer to be interviewed.

This special program is described below.

I. Obtaining Employee Concerns

QTC was located at the Watts Bar site to receive concerns from TVA employees. In addition, private interviews were scheduled in Knoxville for Watts Bar project employees in the TVA Knoxville offices. QTC was provided with facilities at the site where employees could be privately interviewed. Initially, some employees were interviewed for 20 minutes. The remainder were interviewed for 30 minutes, and any concerns expressed were documented by QTC. In cases where employees had issues that could not be expressed in the allotted time, followup interviews were conducted by QTC.

Employees associated with the Watts Bar project were provided complete access to QTC through scheduled interviews, by "walk-in" interviews, and by utilizing toll free telephone numbers. In addition, new employees (or employees transferred to Watts Bar from other TVA sites) were interviewed, and exit interviews were conducted by QTC when employees left the site. Employees at all sites had access to QTC by utilizing toll free telephone numbers and by mail.

At the beginning of the effort, 4,864 employees were identified for interviews. When the interview process by QTC was closed out on February 1, 1986, 5,876 employees had been interviewed. Approximately 5,000 concerns had been raised by approximately 1,850 employees.

Concerns raised by employees are identified on "K forms." In the process, QTC retained all information that associated the name of the employee to a concern. The "K forms" are provided to NRC for information and to the line organization for actions considered prudent prior to completion of investigation of the concern.

II. Methodology for Closing Concerns

A. Program at the Watts Bar Nuclear Plant Site

The first phase of the Watts Bar Employee Concern Special Program (ECSP), primarily involving identification of employee concerns, has been completed. Watts Bar employee concerns have been identified and many were investigated individually. The next phase of the program, which has as its objective the resolution of the concerns identified as applicable to Watts Bar and those applicable to other TVA nuclear plants, has begun.

We have evaluated the program results thus far and have considered the NRC comments expressed as a result of its ECP inspections. Our review confirmed the need for a new approach in order to place emphasis on providing an in-depth review of the areas where concerns were identified, achieving a more rapid resolution of issues, developing a generic treatment of issues addressing the applicability to all plants, identifying patterns and root causes, increasing efficiency, improving management control, and providing a more effective means of closeout, while at the same time ensuring employee confidentiality. All concerns, both safety-related and nonsafety-related, will be resolved by this methodology.

In order to accomplish resolution of the employee concerns, as described above, TVA established the Watts Bar Employee Concern Task Group (ECTG) in February 1986. The ECTG is composed of TVA employees, including senior managers, and is assisted by contractors having special expertise in certain areas.

To resolve and close out the concerns in an effective and efficient manner, the concerns have been grouped into nine categories. This provides for consistent evaluation of related concerns and evaluation of their collective impact. This also aids in identifying and developing immediate and permanent corrective actions to address the issues specifically and programmatically. The responsibility for each category has been assigned to a designated evaluation group within the task group. This responsibility includes identification of the issues involved, thorough investigation of the issues, identification of root causes, identification of potentially reportable 10 CFR 50.55(e), 50.72, 50.73, and Part 21 items, concurrence with identified corrective actions, and preparation of a closeout report.

Based on a review of the concerns identified by employees, patterns and similarities were discerned, and the concerns were grouped as follows:

QA/QC
Material Control
Management & Personnel
Intimidation, Harassment, and Misconduct
Operations
Welding
Construction
Industrial Safety
Engineering

The concerns in each category were assigned to a review group. The review groups utilize senior TVA and/or contractor personnel to:

1. Subgroup categories as needed
2. Define specific review approaches and establish a schedule for review
3. Perform the review and test the validity of preliminary conclusions, determine extent of conditions, and evaluate their significance
4. Notify the line organization of any conditions adverse to quality discovered during investigations and evaluations
5. Perform root cause determination
6. Review and concur in final corrective actions
7. Prepare a closeout report which forms the basis for closing the concerns in each category.

During the review process, any items which are identified as being potentially reportable under 10 CFR 50.55(e), 50.72, 50.73, and/or Part 21 will be referred to the responsible TVA organization for action. These referrals will be appropriately documented and tracked as part of the program.

A Senior Review Panel consisting of nuclear industry experts from outside TVA, reporting to the Manager of Nuclear Power, has been established. The purpose of this panel is to review: concern categorization, root cause analysis, proposed corrective actions, and group closeout reports.

A review of documentation covering approximately 16 months prior to January 1, 1986, has been performed outside of the ECSP. This documentation included NRC reports, SALP reports, internal Quality Assurance audits, Nuclear Safety Review Staff (NSRS) review, and various other items that are quality indicators. The items found in this review were compiled. This compilation was reviewed and assigned to the appropriate evaluation group to be included as appropriate in the evaluation of employee concerns. Those items that parallel employee concern issues will be included in the subcategory investigations.

The closeout of the existing concerns will be accomplished through the preparation and distribution of formal reports for each issue category. The reports will include a section outlining TVA's planned actions to resolve the task group findings. These reports will be made available to all employees and other interested parties to indicate how these concerns were resolved.

The IG will investigate and report on intimidation and harassment issues. In addition, he will monitor the other elements of the program to ensure that confidentiality is maintained. The IG will assume responsibilities for these activities currently being completed by the Office of the General Counsel.

Commitments to NRC relating to the Watts Bar ECSP (in the November 20, 1985 submittal) will be identified; and, if they are not to be included in this revised program, they will be reevaluated. As a result of this reevaluation, the program will either be modified or the commitment revised.

This program is subject to Quality Assurance overview.

- B. Some of the concerns derived from the QTC interview process involve the Browns Ferry, Sequoyah, and Bellefonte Nuclear Plants. Some of these concerns, mostly involving Sequoyah, were investigated by NSRS or QTC. In addition, concerns at each of the TVA plants were reviewed for their potential generic applicability to the other plants. The Watts Bar ECTG will investigate and report its findings on the remaining concerns that are specific to or generically applicable to these plants. These concerns may be investigated individually or grouped as practicable to efficiently complete the investigations. Reports will be published identifying the findings, and the line organization will identify the corrective actions to the Watts Bar ECTG for its concurrence.