TENNESSEE VALLEY AUTHORITY

EMPLOYEE CONCERNS TASK GROUP

PROCEDURE

ECTG M.1

PROGRAM DESCRIPTION

CURRENT REVISION LEVEL: INTERIM ☐ FINAL ☒ 3

PREPARED BY: Technical Assistance Staff

REVISED BY: Technical Assistance Staff

APPROVED BY: W R Brown

DATE APPROVED: 3/14/87

0462T

HISTORY OF REVISION

REV NUMBER	PAGES REVISED	REASON FOR CURRENT REVISION
1	All	General revision.
2	All	General Revisions as noted for clarification and correction. Revision to remove the Concern Categorization Committee from the description of the ECTG organization and organizational chart since this committee is no longer existent. Revision to definition of "Nuclear Safety-Related" to be consistent with TVA Nuclear Quality Assurance Manual.
3	Various	Editorial changes. Not all such changes are sidelined.
	1	Paragraph added to define the ECTG documents which control the program activities.
	4	Added responsibilities of the Corrective Action Program Manager.
	13	Added discussion of requirement for making revisions to reports.
	13	Added the process of esculation of issues for resolution and agreement.
	16	Attachment G, Safety-Related Determination Change.
	16	Attachment H, ECTG Policy Statements will be added at the conclusion of the program.
	Attachment A,	Added Corrective Action Plan Manager
	Attachment B, Page 3	Added requirement for SRP signatures for finalized reports.

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1.0 PROGRAM OBJECTIVE

The primary objective of this Program is to provide for evaluation and the timely disposition, correction, and closeout of safety-related employee concerns within the Program scope in order to provide assurance that plant safety is not adversely affected by identified issues. The secondary objective of the Program is to ensure the evaluation and timely correction, and closeout of the nonsafety-related employee concerns that are within the Program scope.

2.0 PROGRAM DESCRIPTION

The Employee Concern Special Program (ECSP) is described by Program Procedures, Policy Statements, and directive letters. The Employee Concerns Task Group (ECTG) Reports Writer's Guide is a document that provides ECTG personnel with guidance for the preparation of reports describing the evaluation of concerns. It is not a program control document.

3.0 PROGRAM SCOPE

This Program encompasses the concerns and issues identified by: the WBN ECSP as conducted by the Quality Technology Company (QTC); the employee concerns identified to the Nuclear Safety Review Staff (NSRS) and transferred to the Employee Concerns Task Group (ECTG); those concerns identified by the Nuclear Regulatory Commission (NRC) and concerns from the previous Tennessee Valley Authority (TVA) Employee Concern Program. These concerns include known concerns identified prior to February 1, 1986. Concerns identified after February 1, 1986 are processed and controlled under the ongoing Office of Nuclear Power (ONP) Employee Concern Program (ECP).

Note: Allegations forwarded to TVA by the Nuclear Regulatory Commission (NRC) which are within the ECTG scope shall be cross referenced to the employee concerns described above. Where the allegations are the same or sufficiently similar, the results of the ECTG evaluation shall be utilized to close the concern with no further documentation. For allegations which are not the same, a new concern identification form shall be prepared and processed as an additional employee concern.

The Program shall include:

a. Sorting of concerns into logical and manageable categories, subcategories, and elements where necessary.

b. Training of individuals involved in the evaluations performed under this Program.

c. Determination of safety classification.

d. Determination of potential for generic applicability to other TVA nuclear plants and office locations as well as to other items, systems, or processes within any one plant to ensure evaluation for applicability.

e. Determination of the validity of concerns, the need for corrective actions, and notification of responsible management.

f. Identification of root causes and approval of the actions necessary to correct deficient conditions and to preclude their recurrence.

g. Provisions for tracking, verification, and closeout of the corrective actions.

h. Generation and retention of sufficient records to provide auditable evidence of the adequacy of the logic and rationale that provided the basis for judgments made during the evaluation process that support findings and conclusions provided in the Program's reports.

i. Generate and make available and/or submit to employees, the public, and the NRC, a final report summarizing the evaluations and the results of the Program.

Note: Intimidation, harassment, or wrongdoing concerns identified under this Program are assigned to the Office of the Inspector General (OIG) for evaluation and reporting and do not fall under the guidelines of this Program. The OIG will conduct evaluations using OIG procedures and will provide the ECTG with their results.

Note: Welding concerns identified under this program are assigned to the Welding Task Group (WTG) for evaluation and reporting and do not fall under the guidelines of this program. The WTG will conduct evaluations using WTG procedures and will provide the ECTG with their results.

4.0 ORGANIZATION AND RESPONSIBILITIES

NOTE: Any responsibilities identified herein as being assigned to a specific-titled individual may be delegated by that individual to another qualified individual within the same organization. However, delegation of one's responsibility(s) does not relieve one of the ultimate responsibility for the assigned activity.

The TVA Manager of Nuclear Power has established the ECTG and has set the overall priorities for evaluating and reporting on the concerns within the scope of this Program. Additionally, the Manager of Nuclear Power has

established the Senior Review Panel (SRP), consisting of nuclear industry experts, to provide an overview of the Program. Attachment A provides an organization chart depicting the ECTG organization. Attachment B provides the Charter for the Senior Review Panel.

4.1 ECTG Program Manager

The responsibilities of the ECTG Program Manager are as follows:

- Establish the Task Group responsible to carry out the Employee Concerns Special Program (ECSP) encompassing concerns identified prior to February 1, 1986, related to TVA and its nuclear program.

- Carry out the Program through development and implementation of appropriate procedures, written directives, and policy statements as necessary.

- Prepare Partial Implementation Plans that will support plant restart schedules, for each plant site when required to ensure that concerns applicable to a given site are evaluated and required corrective actions are identified.

- Review and approve the Category Evaluation Plans, subcategory reports, and category reports submitted by the Category Evaluation Group (CEGs).

- Ensure the adequacy of records generated or used to substantiate the Program.

- Review and concur with the corrective actions prepared by responsible Site Directors and other responsible TVA managers.

- Verify corrective action implementation for adequacy until ECTG is debanded at which time the ECP will assume verification activities.

- Accomplish Program tasks within established schedules.

- Keep the Site Directors and other responsible TVA management apprised of the Program status.

- Approve the ECTG Final Report.

4.2 Site Directors

Site Directors are responsible for the following:

- Review and concur with this Program Manual (ECTG M.1) and its implementing procedures for those portions in which they have assigned responsibilities.

- Establish in conjunction with the ECTG the priorities for evaluation performance at their sites within overall ONP priorities provided by the Manager of Nuclear Power.

- Review and approve Restart Implementation Plans when required to support plant restart schedules.

- Review ECTG Reports and prepare corrective action plans as requested.

- Initiate QA Program deficiency documents for quality-related deficiencies identified in ECTG Reports.

- Implement corrective actions after concurrence of the ECTG.

- Notify the ECTG (or the on-going ECP Site Representative if the ECTG is disbanded) after completion of corrective actions.

4.3 Corrective Action Program Manager

The Corrective Action Program Manager is responsible for ensuring the scheduled completion, technical sufficiency, and the correction of the problem identified as the result of the Employee Concerns Special Program.

4.4 Other Responsible TVA Managers

Other responsible TVA managers with identified responsibility for corrective actions are responsible for review of the ECTG Reports and for planning and taking appropriate corrective actions.

4.5 Division of Nuclear Quality Assurance

The Director of Nuclear Quality Assurance (DNQA) is responsible for auditing the implementation of this Program. Audits shall be conducted, documented, and followed up in accordance with approved audit procedures which comply with the requirements of the Nuclear Quality Assurance Manual (NQAM).

4.6 Category Evaluation Group-Heads (CEG-Hs)

The CEG-Hs, as members of ECTG, shall be responsible for the evaluation and reporting of those concerns designated by the ECTG Program Manager to be within their respective category. Evaluation and reporting activities shall be accomplished according to the requirements of this Program. Each CEG-H shall develop and submit a Category Evaluation Plan for his respective category for review and approval by the ECTG Program Manager and subsequent concurrence by the Senior Review Panel (SRP). The CEG-Hs are also responsible for the following:

- Sorting of concerns into logical subcategories and further categorizing into elements (individual issues) where necessary. Attachment F provides guidelines for subcategorizing concerns.

- Training and verification of the qualifications and, to the extent required, independence of assigned personnel.

- Verification of the preliminary determinations of safety status and generic applicability on a concern basis as done by the Technical Assistance Staff (TAS) and determination of generic applicability at the element and subcategory report levels (see Attachment E for guidelines and format).

- Determination of the correct assignment of concerns to their category.

- Evaluation of the validity of issues relating to assigned concerns.

- Determination of the cause(s) of valid concerns.

- Identification of the need for corrective actions that will eliminate and preclude recurrence of deficiencies.

- Verification of the initiation of appropriate plant deficiency documents by responsible line management as a part of their planned corrective action responses to safety-related concerns.

- Generation or compilation of records to provide auditable evidence of the adequacy, logic, and rationale that provided the basis for judgments (findings) made during the evaluation process.

- Review of and concurrence with corrective action responses prepared by responsible line management.

- Verification, followup, tracking, and closeout of corrective actions up to the time that the ECTG is disbanded. Those corrective actions still remaining open at that time shall be appropriately transferred to the ongoing Employee Concerns Program Manager or Quality Assurance (QA) for verification, followup, tracking, and closeout as required by ECTG C.3.

- Data base maintenance (through input to the Program Control and Administration [PC&A] Staff) for identified employee concerns.

- Performance of their category program tasks within established schedules.

- Informing the ECTG Program Manager of the status of the category evaluations and reports.

- Concurrence with subcategory and category reports.

- Approval of element reports.

4.7 Other Sites Category Evaluation Group Head

The Other Sites Category Evaluation Group Head is responsible for:

- Reviewing the Stone and Webster Engineering Corporation (SWEC) systematic analysis, and NSRS classical open items to identify priorities and actions needed to support restart and closure of these items at all sites.

- Providing information to the ECTG Program Manager and all Site Directors on SWEC and NSRS issues and the priority of resolution

- Monitoring and assessing the adequacy of review and resolution of SWEC/NSRS issues performed by the ECTG team at Browns Ferry.

- Establishing verification methodologies for the review and resolution of SWEC/NSRS issues at all sites.

- Monitoring performance and taking actions where applicable to support restart, and completion of work on NSRS/SWEC issues at all sites other than Browns Ferry.

- Approving reports resulting from the review and program monitoring activities.

4.8 Program Control & Administration (PC&A) Staff

The PC&A Staff reports to the ECTG Program Manager and consists of two sections, the Technical Assistance Staff and the Administrative Staff. Their respective responsibilities are as follows:

4.8.1 Technical Assistance Staff (TAS)

The TAS is responsible for:

- Development and maintenance of the Employee Concerns Special Program Manual.

- Technical review of Category Plans and element, subcategory, and category reports.

- Evaluator training.

- Initial processing and classification of concerns by:

  - assignment to category(s)

  - determination of safety classification

  - determination of generic applicability to other TVA nuclear plants, other TVA locations, or other items, systems, or processes within the same plant.

- Performance and documentation of internal assessments and reviews of the program to assess the adequacy of program implementation for the ECTG Program Manager.

4.8.2 Administrative Staff

The Administrative Staff shall be responsible for:

- Planning, scheduling, and budget support

- Input and maintenance of the Employee Concern Program Computer System (ECPS data base)

- File maintenance

- Control of sensitive ECTG files and other sensitive information

4.9 Contractors to TVA

Contractors assigned responsibilities within this program shall perform their work in accordance with this program and its implementing procedures or in accordance with procedures approved by the ECTG Program Manager.

5.0 CATEGORIZATION OF CONCERNS

5.1 Definition of Categories

The following nine categories of concerns, as defined below, shall be utilized:

1. Quality Assurance/Quality Control (QA/QC) - Concerns related to the adequacy of QA/QC Programs and procedures (e.g., document control, records, deficiency reporting and corrective action, inspection except NDE and weld inspection, auditing, etc.) and the training, qualification and certification of QA/QC personnel.

2. Material Control - Concerns related to the adequacy of materials including their procurement, receiving, handling, and storage and to the controlling procedures.

3. Management and Personnel - Concerns related to the adequacy of policies, management attitude and effectiveness, organization structures, personnel management, and personnel training and qualification, except those covered by the QA/QC category .

4. Intimidation, Harassment and Wrongdoing - Concerns related to personnel conduct that interferes with employees' ability to fulfill their assigned responsibility, unauthorized actions taken against employees for fulfilling their assigned responsibility, and illegal activities or violations of TVA policies and regulations. Concerns belonging to this category are transmitted by the PC&A Staff to the OIG for evaluation.

5. Operations - Concerns related to operational activities including operator qualifications, maintenance or equipment maintenance needs, security, health physics, and ALARA (as low as reasonably achieveable) implementation, and to preoperational and surveillance testing.

6. Welding - Concerns related to any aspect of welding including welder or weld procedure qualification, weld inspection/nondestructive examination (NDE), heat treatment, weld quality, filler material quality, and weld documentation. Welding QA/QC programmatic concerns shall be addressed in the QA/QC category.

7. Construction - Concerns related to the adequacy of construction practices, the quality of as-constructed facilities (excluding welding and as-designed features), in-storage and installed maintenance prior to turnover to operations, measuring test and handling equipment used during construction, and construction testing activities.

8. Industrial Safety - Concerns related to the working environment and controls which protect the health and safety of employees in the workplace (excluding health physics and ALARA).

9. Engineering - Concerns related to the adequacy of the design process and the as-designed plant features. The design process is the technical and management processes that commence with the identification of design inputs and lead to and include the issuance of all design output documents.

5.2 Assigning Concerns to Categories

The PC&A Staff shall be responsible for the initial categorization of concerns. Final determinations of categorization shall be the responsibility of cognizant CEG-Hs.

Assignment of a concern to a single category may not be possible. When multi-category assignments are made, the assigned CEG-Hs shall coordinate their efforts to ensure adequate evaluation and reporting of all of the aspects of the affected concern. Any changes to category assignments (including multi-category assignments) shall be approved by the CEG-Hs involved and forwarded to the PC&A Supervisor for data base update.

The PC&A Staff shall clearly identify the original concern document with the category(s) to which it is assigned. Additionally, the PC&A Staff shall maintain this identification in the ECPS data base.

Subcategorization of concerns shall be accomplished in accordance with the criteria provided in Attachment F.

6.0 PROTECTION OF SENSITIVE INFORMATION

Procedures shall be developed and implemented by the ECTG Program Manager that ensure the protection of sensitive information. These procedures shall identify responsibilities and establish the methods for the receipt, maintenance, and access control to sensitive information while in the control of the ECTG.

All QTC identified concern information in employee concern documentation that might potentially identify the concerned employee has been expurgated by either QTC or by the NRC prior to TVA taking possession of such documentation. Although these files have been expurgated, they shall be treated as sensitive information. The NRC has control of the QTC unexpurgated files. Unexpurgated files of concerns/issues conducted under TVA programs also shall be protected as sensitive information whenever anonymity of concerned individuals is to be maintained.

7.0 EVALUATION OF EMPLOYEE CONCERNS

7.1 Subcategorization of Employee Concerns

CEG-Hs shall establish subcategories when the evaluation of assigned concerns would be better managed by subcategorization. Subcategories may be further divided into "elements" where similar issues or concern aspects can best be evaluated together rather than on an individual-concern basis. Concerns assigned to subcategories (and elements as appropriate) shall be entered into the ECPS data base. Evaluations are performed at the element level versus the individual concern when more than one concern is involved in an element.

7.2 Determination of Safety Classifications

Determination of the safety classification (i.e., safety-related, safety significant, and nonsafety-related) of most of the concerns in the Employee Concerns Special Program was already accomplished by the responsible contractor or the Nuclear Safety Review Staff (NSRS) prior to their entry into this program. Those concerns classified by the NSRS that were not classified according to the criteria provided in Attachment C were later rereviewed and classified accordingly. Those not previously classified shall be reviewed and classified in accordance with the criteria and guidelines provided in Attachments C and D, as applicable, by the TAS. Initial safety classifications made by TAS in accordance with Attachment C and D shall be documented using Attachment A of ECTG A.3 and noted in the ECPS data base. As evaluation or verification activities proceed, changes to the safety-related status may become necessary. These changes will be made by the CEG-H using Attachment G of ECTG M.1.

7.3 Determination and Handling of Generic Applicability

Determination of the potential for generic applicability of a concern at one plant to other TVA nuclear plants and locations and/or to other items, systems, or processes within the same plant shall be accomplished for concerns that are designated as "safety-related". A review for generic applicability was accomplished to the criteria of Attachment E. Those not already determined shall be determined in accordance with the "Instructions for Review of Employee Concerns for Generic Applicability," provided in Attachment E, by the TAS. Those concerns identified as having generic applicability shall be noted in the ECPS data base. Revisions to the ECPS data base designation of generic applicability shall be documented on Attachment A of ECTG A.3.

7.4 Evaluation Methods

The methods used to evaluate concerns shall be specified and/or guided by the approved procedures of this program. Such procedures shall ensure the adequacy and, where possible, the consistency of the evaluations.

Each CEG-H shall prepare a Category Plan that establishes the actual evaluation methods to be used in evaluating their assigned category of concerns. The Category Plans shall be reviewed and approved by the ECTG Program Manager and concurred with by the SRP. The content and format requirements of Category Plans shall be specified by approved Program procedures.

The evaluation process shall be documented in a Case File that provides sufficient objective evidence to provide the basis for all judgments made to ensure that the logic and rationale is clearly identifiable.

8.0 EVALUATION REPORTS

8.1 Element Reports

The ECTG reports may start at the element level. Element reports summarize one or more employee concerns dealing with a similar specific issue. An element's entire evaluation may be reported in one report or in separate site-specific reports at the discretion of the CEG-H. Element reports should contain sufficient detail to make

it unnecessary for a reader to examine case files for the concerns summarized. See the ECTG Report Writer's Guide for content and format guidance. Element reports shall be reviewed by an independent peer and the TAS, and approved by the responsible CEG-H. Site specific element reports prepared in accordance with paragraph 9.0 also require concurrence by the SRP.

8.2 Subcategory Reports

Subcategory reports summarize employee concerns on the same general issues across TVA ONP. They add information and conclusions that may be seen only at a broader perspective than is possible from an element or concern level. When the subcategory's general issues are broad-scoped, the subcategory report will summarize element reports on each specific issue within the general issues. 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 the ECTG Report Writer's Guide for content and format guidance.

Subcategory reports shall be reviewed by an independent peer and the TAS, concurred with by the SRP and the responsible CEG-H, and approved by the ECTG Program Manager. After concurrence with corrective actions proposed by line management and the corrective actions are reflected in the revised subcategory report, the subcategory report shall be reviewed, concurred, and approved in the same manner as the initial report.

8.3 Category Reports

Category reports summarize the subcategory reports, and they add information and conclusions that may be seen only at a broader perspective than is possible from a subcategory level. Category reports form the basis for preparation of the final report. See the ECTG Report Writer's Guide for content and format guidance. Category reports are reviewed, concurred with, and approved as in 8.2. Category reports shall summarize the subcategory reports and shall include the findings, the approved corrective actions, and provide the basis for closeout of all applicable individual concerns.

8.4 ECTG Final Report

The ECTG Final Report summarizes the entire ECTG effort and adds information and conclusions not readily apparent at the category level. Additionally, this report describes the entire ECTG process and the process to be used for corrective actions tracking,

followup, and closeout. See the ECTG Report Writer's Guide for content and format guidance. The Final Report shall be approved by the ECTG Program Manager and concurred with by the SRP and the Manager of Nuclear Power.

8.5 Revisions to Reports

During the course of the program, it may be necessary to revise reports to incorporate the resolution of comments resulting from internal or external reviews, to incorporate additional or updated information, or to make editorial changes.

Where such changes involve changes to the technical content of a report, the report should receive a complete review.

If comments do not require anything more than typos, grammar, or rewording for clarity, make the necessary changes. The report is submitted to word processing for the change. The current revision level will be maintained.

However, if the comments require additional investigations or substantial rewriting of a report, make the necessary changes. Submit to word processing to raise the revision level on all pages and the cover sheet. Resign the cover sheet and resubmit through the concurrence/approval cycle. Additionally, any rejection by the SRP requires raising the revision level.

Reports should be revised to incorporate corrective action responses.

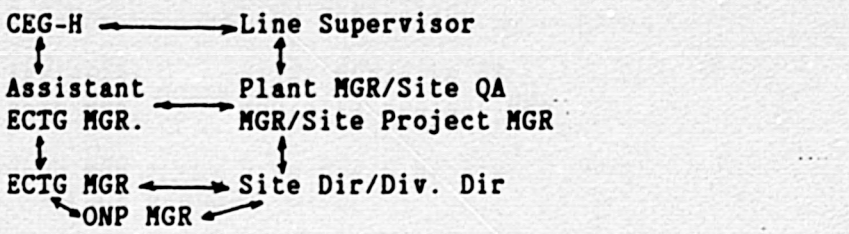
In all cases, revision of reports shall be controlled by the responsible CEG-H or the Program Manager.

9.0 CORRECTIVE ACTIONS

Corrective action responses are the responsibility of the site directors or other TVA managers identified in the Evaluation Reports. Responses to identified items requiring corrective action shall be made via formalized memorandums and shall utilize the ECTG Corrective Action Tracking Document contained in ECTG Procedure C.3.

The responses to safety-related items shall include a copy of the nonconformance or corrective action document that was initiated and shall include approvals required for the proposed disposition. Proposed corrective action responses shall be provided to the ECTG Program Manager as soon as possible, but no later than thirty days after receipt of the associated category or subcategory report.

If a resolution cannot be reached between the evaluator and the line engineer within seven days, on any issue, the following process shall be utilized to resolve the issue within the timeline indicated.



Escalation of such issues to the ECTG or ONP Manager shall be documented by formal memorandums and a copy included in ECTG files. Corrective action responses require concurrence by the responsible CEG-H, the ECTG Program Manager, and the SRP.

Corrective actions of safety-related items shall be tracked, followed up and closed out in accordance with controlling procedures for the nonconformance or corrective action document. Tracking, followup, and closeout of nonsafety-related items shall be accomplished by the ECTG until it is disbanded, after which the ongoing Employee Concern Program Staff shall be responsible.

Corrective actions shall be incorporated into each report in such a way that they can be understood without the benefit of the CATD. The reader should not be forced to go to the CATD to understand the corrective action.

The line organizations' words shall be used in reports in order to avoid making commitments for such organizations.

10.0 RESTART IMPLEMENTATION PLANS

When it is determined that all evaluations and reports required by this Program cannot be completed prior to the scheduled restart of a given plant, the ECTG Program Manager shall prepare a Restart Implementation Plan for approval by the affected Site Director. Restart Implementation Plans shall include identification of those concerns that require evaluation, the site or sites at which they must be evaluated, the reports or partial reports that must be completed, and the criteria to be used by the Site Director to determine the corrective actions that must be implemented and verified as a prerequisite to plant restart.

As a minimum, Restart Implementation Plans must require sufficient evaluation of all applicable potentially safety-related employee concerns to permit decisions to be made regarding which concerns must be resolved and what corrective action must be completed as a prerequisite for plant startup.

11.0 EVALUATOR TRAINING AND QUALIFICATION

The CEG-Hs shall have overall responsibility for the indoctrination and training of assigned evaluators. Training shall be planned, accomplished, and documented in accordance with the approved procedures of this Program. For TVA personnel and contractor personnel utilizing ECTG Procedure B.1, training shall be conducted by or under the cognizance of the TAS.

12.0 EVALUATOR INDEPENDENCE

The use of TVA personnel in the evaluation of concerns shall be accomplished in a manner to preclude the evaluator having been personally involved, either directly or indirectly, in the concern involved. In such cases, the evaluator is responsible and accountable to identify those cases in writing and to withdraw from any involvement in the evaluations related to that concern. Written withdrawals shall be included in the appropriate case files.

13.0 FEEDBACK TO INITIATING EMPLOYEES

The category and subcategory reports shall be made available to all employees, applicable former employees, and other interested parties as a means of communicating how concerns were resolved. The ECTG Program Manager shall be responsible for initiation of proper communications to inform employees of this policy.

14.0 RECORDS

The following constitutes the minimum required records, as applicable, resulting from this Program:

- All approved versions of this Program and its implementing procedures, including documented concurrences and approvals.
- Individual training and indoctrination records.
- DNQA audit report(s) and associated corrective action documentation.
- Formal memorandums and their attachments required by the Program.
- Approved category plans.

- Completed Generic Applicability Determination forms.
- Lowest level evaluation reports - final approved revision.
- Subcategory reports - final approved revision.
- Individual Case Files.
- Category reports - final approved revision.
- ECSP Final Report - final approved revision.
- Site Restart Implementation Plans
- Any other documentation deemed pertinent by the ECTG Program Manager.

These records shall be assigned a retention period of life of plant (LOP) |

15.0 ATTACHMENTS

Attachment A, Employee Concerns Task Group Organizational Chart

Attachment B, Senior Review Panel (SRP) Charter

Attachment C, Criteria for Evaluating Concerns to Determine Those That are Nuclear Safety Related for Use as Applies to Employee Concerns

Attachment D, Criteria for Evaluating Safety-Related Employee Concerns to Determine if a Safety-Significant Question or Safety Hazard Exists

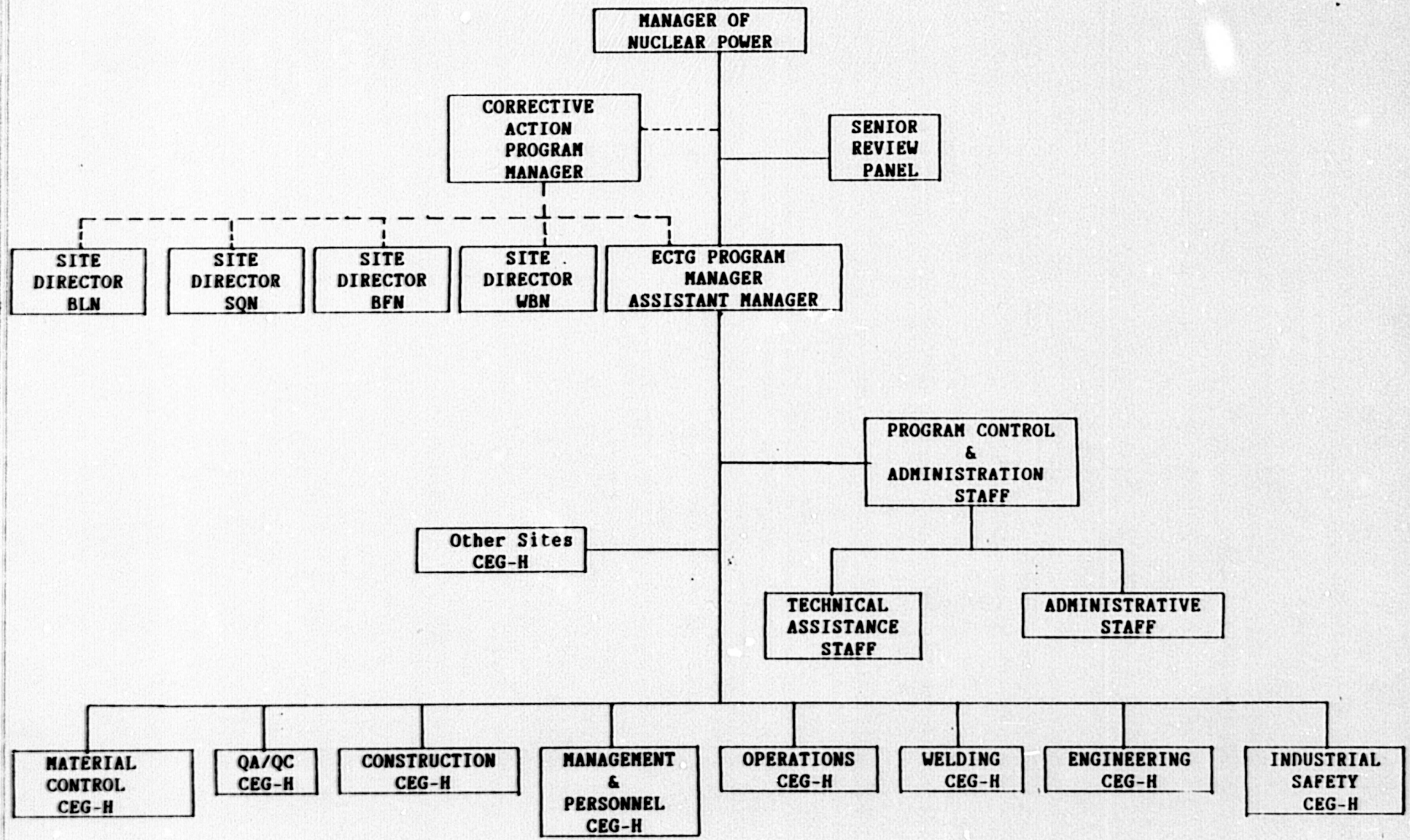
Attachment E, Instructions for Review of Employee Concerns for Generic Applicability

Attachment F, Criteria for Subcategorizing Concerns

Attachment G, Safety-Related Determination Change

Attachment H, Employee Concerns Task Group Policy Statements (Note: To be added at the conclusion of the Program) |

EMPLOYEE CONCERNS TASK GROUP ORGANIZATIONAL CHART



SENIOR REVIEW PANEL (SRP) CHARTER

Objective

The SRP has been established by the Manager of Nuclear Power to provide an independent and objective oversight of efforts to resolve employee concerns identified by the Watts Bar Special Employee Concerns Program. This oversight will help to ensure that (1) the scope and depth of the evaluation effort are adequate, (2) findings are correct, (3) the proposed corrective actions adequately address identified problems, and (4) the final report adequately describes the evaluation effort, evaluation findings, and measures taken to resolve the identified concerns.

The SRP members shall report directly to the Manager of Nuclear Power.

Membership

The SRP membership shall consist of members selected by the Manager of Nuclear Power. Membership shall be selected to provide highly qualified personnel with a background in matters related to nuclear power plant design, construction, and operation. Each selected member shall be a recognized expert within the nuclear power industry.

Responsibilities of the SRP Members

- Review and concur with the category and subcategory reports including the findings resulting from this Program.
- Review and concur with recommendations for remedial actions and corrective actions to preclude recurrence.
- Review and concur with final evaluation reports.
- When a significant disagreement exists among members of the Senior Review Panel or between members of the SRP and other participants in the Program, the Manager of Nuclear Power shall be advised of the disagreement and the various positions on the matter in question for resolution.
- In those instances where SRP members do not concur with actions or recommendations or where additional evaluations are necessary, the SRP members will individually evaluate and, where appropriate, recommend further evaluations and/or alternative recommendations.

- SRP members may suggest reassignment of concerns to categories or subcategories, etc.

- Items not associated with Employee Concerns but which the SRP members consider relevant should be brought to TVA management's attention by forwarding to the Manager of Nuclear Power.

Panel Activities

- Views can be obtained by telephone if the appropriate written material is available to any member not present. SRP matters will be considered by at least three members, each of whom will provide their individual views to TVA either in writing or orally.

- An agenda normally will be prepared for each meeting. The information to be reviewed will be provided to SRP members one week prior to the meeting if possible; members should review this information prior to the meeting.

- A designated SRP secretary shall be responsible for preparing meeting minutes, preparing agenda, and coordinating SRP activities. Minutes will be reviewed and approved by the individual members of the SRP.

Current Members of the SRP

The members selected for the SRP are listed below. This membership has been selected to provide highly qualified personnel with a background in matters relating to nuclear power plant design, construction, and operation.

- M. Bender - Former Director of Engineering at Oak Ridge National Laboratory

- J. M. Dunford - Former Startup Readiness Consultant for Three Mile Island

- D. L. Garland - Former Quality Assurance Manager for Westinghouse; and QA Consultant

- R. E. Kosiba - Former V. P. of Quality and Technology for Babcock and Wilcox

- J. C. LaVallee, Jr. - Former Nuclear Project Manager for Sargent & Lundy

- James R. McGuffey - Former Head of Dept. of QA and Inspection at Oak Ridge

SRP Signatures for Finalized Reports

For all applicable element and subcategory reports, the SRP secretary will sign for the members of the SRP. This will indicate that SRP files contain documentation of individual panel member concurrence.

Category reports will be signed by all SRP members. These signatures will be followed by a memorandum from the SRP listing all supporting reports on which the members have individually concurred. This memorandum will be signed by all panel members.

CRITERIA FOR EVALUATING CONCERNS TO DETERMINE THOSE THAT ARE NUCLEAR SAFETY-RELATED FOR USE AS APPLIES TO EMPLOYEE CONCERNS

A. GENERAL GUIDANCE

The evaluation to determine whether a concern is safety-related must always be resolved in a conservative direction to ensure that nuclear safety is the priority consideration. Consideration of plant capacity factor, economics, and the effects of plant unavailability are not to be taken into account when performing this evaluation.

For use by Employee Concerns Task Group (ECTG), the term "nuclear safety-related" as defined below applies to systems, structures, and components that perform a primary safety function and to related activities. Such systems, structures, and components are listed in the Q-list for WBN and in the Critical Structures Systems and Components (CSSC) list for other plants.

Items performing a primary safety function are those that are necessary to ensure:

1. The integrity of the reactor coolant pressure boundary.

2. The capability to shut down the reactor and maintain it in a safe condition; and/or

3. The capability to prevent or mitigate the consequences of an incident which could result in potential offsite exposures comparable to those specified in 10 CFR Part 100.

The CSSC items could be affected by any concern related to:

- The CSSC item itself (i.e., its design, operation, maintenance, material or any other hardware deficiency).

- Activities related to any portion of the process necessary to achieve a final operational configuration of safety-related items.

- Activities related to any portion of the process which could result in failure of a CSSC.

- Commitments TVA made to regulatory agencies.

A concern in any of the above areas could affect adversely the ability of a CSSC item to perform its intended function or to meet requirements established by regulatory agencies necessary to assure the safe operation of the plant and to protect the health and safety of the nuclear plant employees and the public. Therefore, it should be categorized as nuclear safety-related. These areas are discussed in more detail below.

Additionally, those items which are necessary for the following are also to be treated as nuclear safety-related for purposes of generic applicability determinations and corrective action and to emphasize their importance to nuclear plant safety and licensing:

- The physical security of CSSC.
- Conformance with the ALARA concept.
- An adequate fire protection program.

B. SPECIFIC GUIDANCE

Concerns about safety-related items (i.e., CSSC items) are to be designated as nuclear safety-related as specified above. Any item (including instruments and controls) should be considered CSSC if it performs (or if its failure would degrade) any of the following specific safety-related functions:

1. Maintains core reactivity control under emergency conditions including those covered by anticipated transients without scram (e.g., reactivity control systems).

2. Provides a barrier for containing reactor coolant within the reactor coolant pressure boundary (e.g., reactor coolant piping, valves, and fittings).

3. Cools the reactor core under emergency conditions (e.g., residual core heat removal systems).

4. Maintains fuel clad integrity (e.g., fuel clad, core power monitoring systems).

5. Provides power, control, logic, indication, and protection to systems or components to enable them to accomplish their safety function (e.g., diesel generators, vital ac and dc power).

6. Supports or houses equipment that performs a safety function or protects that safety-related equipment from potential natural phenomena, equipment failure, and man-made hazards (e.g., Seismic Class I containment and structures, fire protection systems).

7. Maintains specified environment (e.g., temperature, pressure, humidity, radiation) as required in vital areas to maintain equipment operability and personnel access (e.g., control room habitability systems).

8. Supplies cooling water for the purpose of heat removal from the systems and components that provide a safety function (e.g., essential component cooling and service water systems).

9. Contains radioactive waste such that its failure could result in the uncontrolled release of radioactive waste to the offsite environments (e.g., low-level radioactive waste discharge isolation valves).

10. Controls fuel storage to prevent inadvertent criticality (e.g., fuel storage racks).

11. Ensures adequate cooling for irradiated fuel in spent fuel storage (e.g., spent fuel cooling system).

12. Minimizes the probability of dropping objects on stored fuel (e.g., overhead crane).

13. Maintains primary containment as required by the FSAR to meet General Design Criteria (GDC) 54, 55, 56, and 57 (e.g., containment penetrations and associated isolation and boundary valves).

14. Doors and hatches that serve one or more of the following functions for safety-related equipment and areas: (1) pressure confinement, (2) leakage confinement, (3) missile protection, (4) pipe whip and jet impingement barrier, (5) equipment rupture flood protection, (6) natural flood protection, or (7) fire protection.

15. Any other function required by 10 CFR 50, Appendix A (the GDC).

16. Any activities that may directly or indirectly affect the ability of CSSC to perform their safety-related functions. These include, but are not limited, to the following:

    16.1 Designing

    16.2 Purchasing

    16.3 Fabricating

16.4 Handling

16.5 Shipping

16.6 Storing

16.7 Erecting or Constructing

16.8 Cleaning

16.9 Inspecting

16.10 Testing

16.11 Operating

16.12 Maintaining

16.13 Repairing

16.14 Modifying

16.15 Auditing

16.16 Fire protection

17. Any concern expressed by an employee, an interested individual, or a group that relates in a negative manner to the ability of CSSCs to perform their intended function, to safety-related activities, or to a violation or deviation from TVA commitments should be classified as nuclear safety-related.

18. Any concern expressed by an employee involving those activities regulated by 10 CFR 20, "Standard for Protection Against Radiation."

19. Any concern expressed by an employee about the physical security aspects of safety-related systems.

20. Any concern expressed by an employee that impacts a technical specification operability requirement.

CRITERIA FOR EVALUATING SAFETY-RELATED EMPLOYEE CONCERNS TO DETERMINE IF AN UNREVIEWED SAFETY-SIGNIFICANT QUESTION OR SAFETY HAZARD EXISTS

A. GENERAL GUIDANCE

1. The safety evaluation may be based on engineering judgments to the extent deemed necessary to the individuals involved in the review, but questions that result in significant doubt must always be resolved in favor of a nuclear safety finding.

2. Consideration of plant capacity factor, economics, and the effects of plant unavailability are not to be taken into account when performing this evaluation.

B. SPECIFIC GUIDANCE

Safety Significant Criteria are those criteria used to analyze a potential safety-related concern that if validated could:

1. Result in potential offsite exposure exceeding those limits specified in the Technical Specifications or 10 CFR 100.

2. Increase the probability of an occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report.

3. Create the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report.

4. Reduce the margin of safety as defined in the basis of any technical specification.

If any of the above criteria are met, a safety-significant question or safety hazard may be involved. A prioritized corrective action must be completed before an identified plant operational mode is achieved. The significance of the safety question or hazard will determine the priority of the completion of corrective action. Such determination and the corrective actions planned or taken shall be included in the appropriate Program required report(s).

INSTRUCTIONS FOR REVIEW OF EMPLOYEE CONCERNS FOR GENERIC APPLICABILITY

Expressed concerns may have implications or applicability beyond the identified circumstances. The generic implications/applicability may involve additional structures, components, systems, features, or processes at the plant where the concern has been identified, or may involve other TVA plants. In order to determine whether a concern has potential or actual generic applicability, the information available is to be reviewed for this specific purpose using the elements and considerations set forth in this attachment. The objectives of the review are to: (1) identify those concerns with generic implications, (2) identify which plants are implicated, (3) provide advance notification to organizations responsible for the areas implicated, and (4) ensure that all implications of the concern are evaluated.

Determinations of generic applicability should be approached on a conservative, yet reasonable basis. The determination is to have a reasonable factual basis (not merely speculation). It is acceptable to base the generic determination on the evaluator's knowledge or experience. The explanation on Form A of this attachment shall provide enough detail to clearly communicate the basis, or reasoning, for drawing the conclusion. For instance, the reason "if it happened at Watts Bar, it could happen at Sequoyah," is insufficient reason to determine an item generic. There must be some reasonable factual basis presented which explains why that is the case, e.g., ". . . this concern appears to have resulted from a deficiency in G-39 (upper-tier document that applies to all plants), therefore, it is generic . . . " is an adequate and reasonable, factual basis for concluding that the concern is generic. In other words, you must be able to define in writing some reasonable common link between the concern and other plants or plant features which indicates that those other plants or features (which are beyond the scope of the concern) could be similarly affected. When there is not enough definitive information to identify (or eliminate) a generic issue, it is acceptable to say so.

As each concern or group of concerns is identified to be generic to other plants, a list or lists will be maintained identifying each concern and to which plant each concern is applicable. Each generic applicability review shall be reviewed and concurred with by a second party.

FORM A

GENERIC APPLICABILITY DETERMINATION

_____
Concern Number

A. Meaningful Evaluation Possible /_/ Yes /_/ No

B. Generic Implications /_/ Yes /_/ No; if Yes, /_/ Same Plant? /_/ Other Locations?

C. Other Locations and Plants Affected /_/ Knox /_/ Chatt /_/ WBN /_/ SQN /_/ BLN /_/ BFN

D. Explanation/Justification _____

_____

_____

Evaluated by _____/____ Reviewed by _____/_____

The following provides clarifying instructions and guidance for completing this form.

I. Evaluation - Assume the concern, as stated, is true.

A. To conclude that a concern is generic, you must be able to define (in writing) some reasonable common link between the concern and other plants and TVA locations or between the concern and other plant features or processes of the same plant which indicates that those other plants or features could be similarly affected. If there is not enough information to identify and define (or else eliminate) such a common link, then there is not enough information to perform a meaningful preliminary evaluation so Part I.A should be answered "No." In this case, Parts I.B and I.C need not be completed. Part I.D should provide the justification for the "No" answer.

B. A concern has generic implications if an approved code, standard, procedure, specification, process, etc., is deficient, is implied to be deficient, or is being improperly implemented in other than an isolated case. Generic applicability is not restricted to the items listed above. Any other programmatic deficiencies, common problems, etc., should also be considered in the review.

C. Self-explanatory

D. Provide enough detail to clearly communicate the basis, or reasoning, for the conclusion.

Miscellaneous Instructions

- Be sure to record concern number in top, right-hand corner.
- Answer all questions and fill in all blanks except as noted.
- Date your signature.
- Signature in "reviewed by" signifies concurrence with all information in the section signed.
- Explanation/justification may be continued on an attached blank sheet, as long as the applicable section is clearly identified.

CRITERIA FOR SUBCATEGORIZING CONCERNS

Concerns are to be subcategorized by the CEG for evaluation. Factors to be considered include the following:

1. Is the concern the same, or similar to, the other concerns?

2. Would the evaluation activities be the same or similar?

3. Does the concern fit within the defined boundary of the subcategory?

4. When the subcategory evaluation is completed in accordance with the evaluation plan, will the concern, as stated, be specifically and clearly addressed both in the evaluation and in the subcategory evaluation report?

SAFETY-RELATED DETERMINATION CHANGE

TO: W. R. Brown, ECTG, Program Manager

FROM: _____, ECTG
(Applicable Category Head)

DATE: _ _/_ _/_ _

SUBJECT: Concern No. _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _

The subject concern has been determined to be

☐ Safety-Related

☐ Not Safety-Related

(check one)

in category: _ _ subcategory: _ _ _ _ _

Justification/Explanation: _____

_____

_____

_____

_____

_____
(Applicable Category Head)

cc: RIMS, MR 4N 72A-C
Concerns File