

TENNESSEE VALLEY AUTHORITY

EMPLOYEE CONCERNS TASK GROUP

PROCEDURE

ECTG C.3

CORRECTIVE ACTIONS

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

0686T

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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
3	All	General Revision. Also added the CATD numbering system from Policy Statement 4, incorporated the requirement for retrofit of CATDs to all ECTG reports issued before August 29, 1986, from Policy Statement 9, provided description of requirement for Sequoyah Corrective Action Plans (CAPs), and provided instructions for voiding a CATD. Added the responsibilities of the Corrective Action Program Manager. Added clarification to the instructions for the verification of a closure by ECTG and ECP. Added attachment E, Verification Closeout Checklist. Deleted the requirement for the SRP to sign and date CATDs.

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 Task Group (ECTG). This procedure also provides for the retrofit of CATDs to all ECTG reports issued before August 29, 1986.

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 (ECPS) Data Processing."
- 2.3 Procedure ECTG C.2, "Analysis and Reporting of Evaluation Results"
- 2.4 "ECTG 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 Tennessee Valley Authority (TVA) managers related to ECTG corrective actions.

4.2 ECTG Program Manager

The ECTG Program Manager shall be responsible for:

- a. Approving the initiation section of ECTG 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 ECTG 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 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 Employee Concern Program (ECP) Site Representative after the ECTG is disbanded) of the completion of corrective actions.

4.5 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.

4.6 Office of Nuclear Power (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 after disbandment of the ECTG. 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.

4.7 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.

4.8 Senior Review Panel (SRP)

The SRP shall be responsible for review and concurrence with the proposed corrective action plans for CATDs. This review and concurrence will be documented on the cover sheets of the final report.

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 CATD(s) to the identified responsible site director or other responsible TVA managers.
- 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 CATD(s) 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 quality related ("QR") and the line agrees that corrective action is required, the responsible site director or other TVA responsible manager shall cause to be initiated, dispositioned, and approved, the 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 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 ECTG Program Manager.
- 5.3.4 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.
- 5.3.5 Upon concurrence of the corrective actions by the ECTG, the PC&A Staff shall formally transmit this information to the responsible site director or other responsible TVA manager.
- 5.3.6 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 Until the ECTG is disbanded the PC&A Staff shall track all CATDs.
- 5.4.2 The CEG-H shall verify the satisfactory implementation of the corrective action(s) as approved on the CATD.
- 5.4.3 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.

- 5.4.4 Nonquality-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 quality-related CATDs the tracking and closeout is accomplished via the quality assurance program deficiency document that was initiated.
- 5.4.6 The ECTG PC&A Staff or the ONP ECP Site Representative, as applicable, shall file the completed CATD with the associated ECTG Report and ultimate transmittal to RIMS for retention.
- 5.4.7 If line management demonstrates to the satisfaction of the ECTG CEG-H that a CATD does not, in fact, identify a problem requiring corrective action then the affected ECTG report shall be revised; however, the Findings (4.0) section shall not be revised. Instead, the reason for voiding the request for corrective action shall be explained in the report's corrective action section. Attachment D, "Supporting Documentation for Voiding Corrective Action Tracking Documents," should be completed and attached to all voided CATDs as a permanent record.

Concerning the information that should be provided on Attachment A, the "Reason for Voiding CATD" section should be explicit and should contain an auditable explanation of the voiding action. If the CATD was appropriately written to document an evaluation finding (that it is not an administrative error) or if a C/A response has been received, then the section on "Disposition of CATD Issue or C/A Proposal" must be completed. This section must explain why the finding or proposed C/A does not need to be pursued. If the issue is transferred to another category, this section must explain how the voided CATD issue will be addressed by the new evaluation group.

The information contained on Attachment A shall be concurred with by the CEG-H and approved by the ECTG Program Manager.

5.5 Sequoyah Nuclear Plant (SQN) Corrective Action Plans (CAPs)

- 5.5.1 Although SQN Corrective Action Plans (CAPs) are not a formal part of the ECTG program, the program requires documentation of proposed corrective action and formal concurrence by the CEG-H and Program Manager as documented on the CATD form and the Senior Review Panel as documented on the report cover sheet.

- 5.5.2 CAPs received from SQN will be reviewed by the applicable CEG-H, signed where applicable, and returned to SQN via the PC&A staff for SQN tracking purposes only.
- 5.5.3 Each CEG-H is responsible to insure the corrective action plans adequately addresses the problem identified on the CATD form. The PC&A Staff is responsible for the routing and tracking of both the CATD and CAP forms.

6.0 ATTACHMENTS

- Attachment A, ECPS Corrective Action Tracking Document (CATD) form.
- Attachment B, Instructions for Completing the CATD form.
- Attachment C, Standard CATD Transmittal Memorandum.
- Attachment D, Supporting Documentation for Voiding Corrective Action Tracking Documents.
- Attachment E, Verification Closeout Checklist.

ECTG Corrective
Action Tracking Document
(CATD)

INITIATION Applicable ECTG 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 _____ ATTACHMENTS DATE: _____
- 8. CONCURRENCE: CEG-H _____ DATE: _____
- 9. APPROVAL: ECTG PROGRAM MGR. _____ DATE: _____

CORRECTIVE ACTION

- 10. PROPOSED CORRECTIVE ACTION PLAN: _____

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

VERIFICATION AND CLOSEOUT

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

SIGNATURE TITLE DATE

Instructions for Completing
the CATD Form

ECTG C.3
Attachment B
Page 1 of 2
Revision 3

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, the applicable plan acronym (i.e. BFN, BLN, SQN, WBN or NPS if not plant specific) plus a dash, and a sequential number for each CATD issued against that plant in the report.

NOTE: CATDs may also be issued by the ECTG Program Manager against the ECTG 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 six 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.

Instructions for Completing
the CATD Form

ECTG C.3
Attachment B
Page 2 of 2
Revision 3

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 date of the ECTG CEG-H and the ECTG Program Manager when they concur with the proposed corrective action plan.

VERIFICATION AND CLOSEOUT

13. Upon verification of the satisfactory implementation and completion of the proposed corrective action, the signature and title of the verifying individual along with the date of verification will be included on the CATD. Verification will be performed by the appropriate individual as follows:
 - a. Prior to disbandment of the ECTG:
 1. Any cognizant individual from the ECTG will close out both quality related and non-quality related CATDs.

Note: For quality related CATDs, the verifying individual shall ensure that QA and/or QC has closed out the proposed corrective action through normal line documentation.
 - b. After disbandment of the ECTG:
 1. A cognizant ONP ECP site representative will close out all non-quality related CATDs.
 2. A cognizant QA representative will close out quality related CATDs

To:

From: Watts Bar Employee Concerns Task Group, Program Manager

Date:

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

ECTG Report No. _____
ECTG 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 or 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 initiated 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

Supporting Documentation For Voiding
Corrective Action Tracking Documents

CATD No. _____

Initiation Date _____

Corrective Action Provided Already _____ Yes _____ No

Date C/A Provided if applicable _____

Reason for Voiding CATD: _____

Disposition of CATD issue or C/A Proposal: _____

Prepared by: _____
Name Date

Concurrence: _____
CEG-H Date

Approval: _____
ECTG Program Manager Date

cc: Construction Activity Program Manager, A108 IOB, Watts Bar
Concern File

VERIFICATION CLOSEOUT CHECKLIST

CATD NO. _____

VERIFICATION ACTIVITY NO. 1

Verify that adequate actions have been performed to identify all similar items or instances if the problem stated in section 6 and/or the corrective action plan in section 10 of the CATD indicates there may be other items or instances involved and that actions taken are adequate.

SUMMARY: Line/Corporate organization performed this action by -

- Walkdown
- Documentation and/or drawing reviews
- Examinations or tests
- Engineering analysis
- Other - specify _____

DISCUSSION:

Describe evidence found to substantiate that items checked above were performed adequately and adequately implemented the corrective action plan in section 10 of CATD. Reference associated documentation. If N/A box below is checked, provide justification, e.g., problem was an isolated human error.

Discussion continued on continuation page.

Actions taken were found to be adequate (Check appropriate box)	Y <input type="checkbox"/>	N <input type="checkbox"/>	N/A <input type="checkbox"/>
--	-------------------------------	-------------------------------	---------------------------------

_____ Signature	_____ Title	_____ Date	_____ Line/Corp Organization
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VERIFICATION CLOSEOUT CHECKLIST

CATD NO. _____

VERIFICATION ACTIVITY NO. 2

Verify that actions have been taken to correct the identified items and similar items or instances (when applicable), and that corrective action is adequate.

SUMMARY: Line/Corporate organization accomplished this corrective action by -

- Repair or replacement
- Procedure and/or drawing revision
- Training
- Engineering analysis and/or review
- Examination or testing
- Modification (ECN)
- Establish program
- Other - specify _____

DISCUSSION:

Describe evidence found to substantiate that corrective action items checked above adequately corrected the problem(s), e.g., review documentation associated with the repair, replacement, modification, training, engineering analysis, examination and/or testing, perform field observations, and review CAQ dispositions and corrective actions when applicable and verify that all CAQ corrective actions have been signed off, by appropriate QA/QE representative, as having been completed (list CAQs).

Discussion continued on continuation page.

Actions taken were found to be adequate Y N
(Check appropriate box)

Signature

Title

Date

Line/Corp Organization

VERIFICATION CLOSEOUT CHECKLIST

CATD NO. _____

VERIFICATION ACTIVITY NO. 3

Verify that actions have been taken to preclude the recurrence of the identified problem(s) and have been adequately implemented.

SUMMARY: Line/Corporate organization accomplished this corrective action by -

- Repair or replacement
- Procedure and/or drawing revision
- Training
- Engineering review and/or analysis
- Examination or testing
- Modification (ECN)
- Establish program
- Other - specify _____

DISCUSSION:

Describe evidence found to substantiate that corrective action items checked above will adequately prevent recurrence of problem(s). Reference specific items discussed like site procedures, documents reviewed, certain type components replaced, etc. If N/A box below is checked, provide justification, e.g., problem was an isolated human error.

Discussion continued on continuation page.

Actions taken were found to be adequate (Check appropriate box)	Y <input type="checkbox"/>	N <input type="checkbox"/>	N/A <input type="checkbox"/>
--	-------------------------------	-------------------------------	---------------------------------

Signature

Title

Date

Line/Corp Organization

VERIFICATION CLOSEOUT CHECKLIST

CATD NO. _____

VERIFICATION ACTIVITY NO. 4

Describe corrective actions to be verified that are not addressed in section 6 for verification activities 1, 2, or 3 but are addressed in the corrective action plan in section 10 of the CATD.

SUMMARY:

DISCUSSION:

Discussion continued on continuation page.

Actions taken were found to be adequate Y N
(Check appropriate box)

Signature

Title

Date

Line/Corp Organization

VERIFICATION CLOSEOUT CHECKLIST

CATD NO. _____

VERIFICATION ACTIVITY NO. _____

DISCUSSION: (Continued)

Discussion continued on continuation page.

ECTG REPORTS
WRITER'S GUIDE

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

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ECSP Reports

Writer's Guide

1.0 OBJECTIVES

An objective of the Writer's Guide is to provide Employee Concerns Task Group (ECTG) members with sufficient guidance to ensure that the Employee Concern Special Program (ECSP) reports are developed according to a planned hierarchy and format and in enough detail to support the preparation of a single final report. Additional objectives are to produce subcategory and category reports with content to satisfy scrutiny by NRC and others and to provide sufficient information on which to base corrective action plans.

2.0 SCOPE

The Writer's Guide applies to the four tiers of reports developed under the Employee Concern Special Program: element reports, subcategory reports, category reports, and the ECTG Final Report.

3.0 REPORT HIERARCHY AND DEFINITIONS

Each report should be supported and substantiated by the next lower level of reports in the report hierarchy. The lowest level of reports should be supported and substantiated by the associated case files as required by the Program Procedures.

Such a report progression increasingly frees ascending report levels from overburdening detail so that effective generalizations can be drawn. Thus, each higher level of report summarizes the reports on which it is built and then uses its broader perspective to arrive at collective significance and root causes.

ECTG reports may start either at the element or the subcategory level.

3.1 Element Reports

Elements summarize one or more employee concerns dealing with one or more closely related issues. In those cases where an element is issued as a formal report, the element report should contain sufficient detail to make it unnecessary for a reader to examine case files for the concerns summarized. See Section 5.0 for content guidance.

3.2 Subcategory Reports

Subcategory reports summarize the evaluations of a number of elements. The subcategory report does more than collect element level evaluations, however. The subcategory level overview of element findings leads to an integration of information that cannot take place at the element level. This integration of information reveals the extent to which problems overlap more than one element and will therefore require corrective action for underlying causes not fully apparent at the individual element. Subcategory reports should contain sufficient detail to make it unnecessary for the reader to examine element reports or case files for the issues summarized. Subcategory reports should include both the generic and site-specific results of the entire evaluation process for a subcategory. See Section 6.0 for content guidance.

3.3 Category Reports

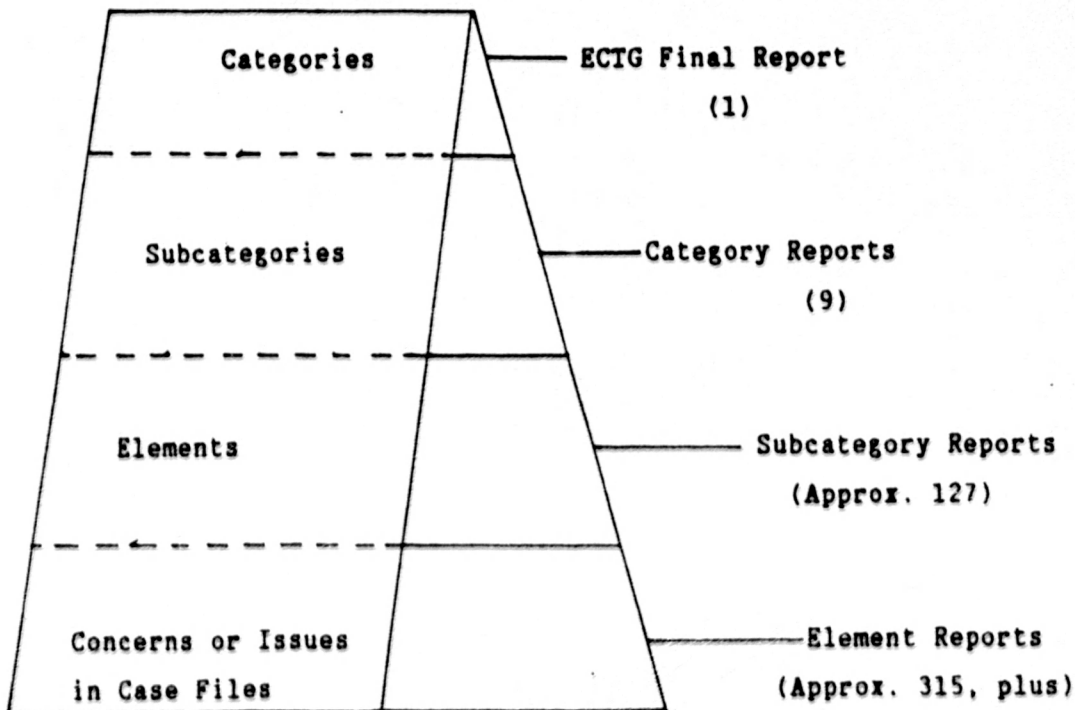
Category reports summarize the subcategory reports. Each category report reviews the major findings and collective significance of the subcategory reports under it. The category report integrates the information assembled in its subcategories, addressing particularly the underlying causes of those problems that run across more than one subcategory. Category reports form the basis for preparation of the ECTG Final Report. See Section 7.0 for content guidance.

3.4 ECTG Final Report

The ECTG Final Report integrates and assesses the entire ECSP effort, including the separate Inspector General's report on intimidation and harassment and the Welding Task Group's report on welding concerns. Additionally, this report describes the entire ECTG process and the process to be used for corrective action tracking, followup, and closeout. See Section 8.0 for content guidance.

3.5 Report Hierarchy

The ECTG reports hierarchy can be depicted graphically as:



3.6 Senior Review Panel (SRP)

The SRP is a special review group of recognized experts within the nuclear power industry. It was established to provide independent and objective oversight of efforts to resolve employee concerns by the Watts Bar Special Employee Concerns Program.

3.7 Employee Concerns Task Group (ECTG)

The ECTG was established by the Manager of Nuclear Power to evaluate and report on those employee concern documents generated before February 1, 1986. Concerns identified after that date are processed and controlled under the Office of Nuclear Power (ONP) Employee Concerns Program (ECP).

3.8 Category Evaluation Group Head (CEG-H)

The CEG-H is a person responsible for evaluating and reporting on one of the nine categories of concerns designated by the Concerns Categorization Committee (CCC).

3.9 Safety-Related Concerns

Safety-related concerns are evaluated concerns that address activities, structures, systems, or components to ensure the following:

- integrity of the reactor coolant pressure boundary
- capability to shut down reactor and maintain it in a safe shutdown condition
- capability to prevent or mitigate consequences of accidents which could result in potential offsite exposures in excess of those specified in 10 CFR 100

- capability to monitor and control critical post accident parameters

3.10 Unreviewed Safety-Significant Questions

Unreviewed safety-significant questions are evaluated concerns that have the potential for:

- causing offsite exposures to exceed limits specified in technical specification or 10 CFR 100
- increasing 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
- creating the probability of an accident or malfunction of a type different from any previously evaluated in the safety analysis report
- reducing the margin of safety as defined in the technical specification

3.11 Cause

A cause is the proximate situation, event, or agent that produces a negative finding, i.e., the reason for a negative finding.

3.12 Root Cause

A root cause is the source, origin, or underlying cause of a negative finding or a pattern of negative findings.

3.13 Corrective Action

Corrective action is action taken to correct conditions surrounding negative findings and their causes. Corrective actions for the causes of negative findings are taken with emphasis on precluding recurrence.

3.14 Requirements

As used in ECTG Reports, the term "requirements" includes (1) those obligations imposed by Federal, State, and local governments; (2) active commitments to regulatory agencies; (3) management policy or other documented criteria. Such criteria are measures of consistent practice accepted as reliable standards and may be documented in the Section 4.0 of the appropriate report. In some cases, a criterion may have to be developed by the evaluator when no other source of requirements exists.

3.15 Negative Findings

Negative findings are those revealed by the evaluation process to require corrective action that has not been taken by normal ONP channels. If the problem had already been identified and resolved before the ECTG evaluation it is not a negative finding.

3.16 Issue

As used in ECTG Reports, an issue is a potential problem, as interpreted by the ECTG during the evaluation process, that has been raised by one or more concerns.

4.0 REPORT FORMATS

4.1 Element Reports

Element reports should be written in the following general format: |

<u>Section Number</u>	<u>Section Title</u>
1.0	<u>Characterization of Issues</u>
2.0	<u>Summary</u>
3.0	<u>List of Evaluators</u>
4.0	<u>Evaluation Process</u>
5.0	<u>Findings</u>
6.0	<u>Attachments</u>
Attachment A	<u>Element Summary Table</u>

A discussion of contents of each of these sections is provided |
in Section 5.0. The CEG-H may allow formats other than the one |
presented here, but the same levels of detail and basic contents
should be retained.

4.2 Subcategory Reports

Subcategory reports should be written in the following general format:

<u>Section Number</u>	<u>Section Title</u>
1.0	<u>Characterization of Issues</u>
2.0	<u>Summary</u>
3.0	<u>Evaluation Process</u>
4.0	<u>Findings</u>
5.0	<u>Collective Significance</u>
6.0	<u>Causes</u>
7.0	<u>Corrective Actions</u>
8.0	<u>Attachments</u>
Attachment A	<u>Subcategory Summary Table</u>
Attachment B	<u>List of Concerns by Issue</u>

A discussion of the contents of each of these sections is provided in Section 6.0.

4.3 Category Reports

Category reports should be written in the following general format:

<u>Section Number</u>	<u>Section Title</u>
1.0	<u>Characterization of Issues</u>
2.0	<u>Summary</u>
3.0	<u>Evaluation Process</u>
4.0	<u>Findings</u>
5.0	<u>Collective Significance</u>
6.0	<u>Root Causes, Preliminary Analysis</u>
7.0	<u>Corrective Actions</u>
8.0	<u>Attachments</u>
Attachment A	<u>Category Summary Table</u>

A discussion of the contents of each of these sections is provided in Section 7.0.

4.4 ECTG Final Report

The ECTG Final Report should be written in the following general format:

<u>Section Number</u>	<u>Section Title</u>
1.0	<u>Introduction and Background</u>
2.0	<u>ECSP Program Description</u>
3.0	<u>Overall Characterization Of Issues</u>
4.0	<u>Summary of Findings</u>
5.0	<u>Collective Significance</u>
6.0	<u>Root Causes, Final Analysis</u>
7.0	<u>Corrective Actions Taken Or Planned</u>

A discussion of the contents of each of these sections is provided in Section 8.0.

5.0 CONTENTS OF ELEMENT REPORTS

The objective of an element report is to provide a thorough discussion of the evaluation and findings on one or more issues raised by employee concerns. These reports should be very detailed and often highly technical. Except for those required for Sequoyah restart, they are not intended for readership outside of the ECTG.

The contents for each of the element report sections are discussed in 5.1 through 5.7.

5.1 Characterization of Issues (Section 1.0)

5.1.1 This section is to include, individually or collectively, a characterization of the specific issue(s) as originally perceived and identified in K-forms or other reports of concerns. The element report writer should try to retain the flavor of the employee's original concern(s), but also include the scope and technical aspects needed to bring the concern(s) into focus as an issue.

5.1.2 The accurate characterization of the issue or issues allows the element report writer to test the appropriateness of the element evaluation process: i.e., was what worried the employee actually addressed? Identifying the scope and technical aspects of the issue or issues brings employees' worries into measurable focus.

5.1.3 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.

5.1.4 The writer should also provide a brief discussion that tells why the concerns were grouped into the element. If only one concern is involved, no discussion on this subject is necessary.

5.2 Summary (Section 2.0)

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

- a. Restate in simple terms the issue(s) raised.
- b. Provide a summary of the evaluation process:

- c. Identify the findings as cited against requirements or criteria.

5.3 List of Evaluator(s)(Section 3.0)

This section lists the individual ECTG members who collected the information in the case files for the concerns evaluated in the element. The first and middle initials and last name of each of the individuals should be provided. The list should be alphabetized by last names.

5.4 Evaluation Process (Section 4.0)

5.4.1 This section is to include a thorough discussion of the methods and requirements used to evaluate the issue or issues raised by the concerns dealt with in this report. The section should also include justification of the methods and requirements used. This discussion should include, as applicable, interviews conducted, documentation researched, activities observed, items inspected or tested, or mathematical and computer analyses that may have been performed.

5.4.2 The discussion should summarize the evaluation activity. For instance, it is not necessary to list individuals interviewed or equipment numbers of items inspected because such specific, detailed, and documented information should be contained in the case files. 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. The type (e.g., responsible area, discipline, etc.) and number of individuals interviewed and the type, number, or percentage of items inspected or tested

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

5.4.3 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. However, if the CEG-H chooses to do the element evaluation in a site-specific report, the discussion of generic applicability can be restricted to the specific site addressed in the element. Generic applicability for all sites may then be reserved for the subcategory report.

5.5 Findings (Section 5.0)

This Section contains both a discussion of the facts identified during the evaluation process and the conclusions reached by judging those facts against cited requirements. The subheadings Discussion and Conclusion should be used to separate the two sections. The discussion should include references to the timeframe of the events, actions, and documentation involved.

5.5.1 The writer should state whether or not each of the characterized issues was found to identify a problem requiring corrective action.

5.5.2 For problems requiring corrective action, the writer should cite the requirement and the source of the requirement by title and page or section number when applicable. The requirements discussed in 4.0 should also be paraphrased or quoted.

5.5.3 Definition of Requirements - See 3.14

5.5.4 The findings section should be strictly limited to a discussion of those items for which requirements have been identified. Requirements may be found in design documents, procedures, policies, codes, standards, licenses, Safety Analysis Reports (SARs), technical specifications, permits, jurisdictional regulations, laws, other sources, or as delineated by the evaluator in section 4.0. Findings can be positive as well as negative. However, for negative findings the writer needs to identify an organization responsible for accomplishing corrective action.

5.5.5 The findings in element reports that are potentially applicable to multiple Office of Nuclear Power (ONP) sites, should be categorized for discussion as follows:

- a. **GENERIC** - Discuss those findings that are generically applicable to all sites. However, for negative findings limit the discussion of generically applicable findings to those for which a single Office of Nuclear Power (ONP) corrective action would be appropriate.
- b. **SITE SPECIFIC** - Discuss those findings that are specific to a particular site in the following order:

Watts Bar
Sequoyah
Browns Ferry
Bellefonte
Chattanooga
Knoxville

Element reports that are specific to only one ONP site should discuss findings applicable only to that site.

Example:

If the finding applies to the Division of Nuclear Engineering (DNE) design control process, the finding should be discussed under the generic heading because the design control process can affect the design of any of the plants. On the other hand, if the finding focuses on the top management of DNE, the finding should be discussed under a specific heading for the DNE-Knoxville.

- 5.5.6 All findings should clearly state the governing requirement(s) and state that compliance is or is not achieved. Where compliance is not achieved, state the precise case(s) where noncompliance is evidenced and the basis for determining the noncompliance.
- 5.5.7 For any finding of noncompliance, state any corrective action 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 action and stop work orders initiated as a result of the evaluation(s).
- 5.5.8 All negative findings should be based on documented facts presented in the Discussion section.

5.6 Attachments (Section 6.0)

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. However, 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. A listing by number of all concerns evaluated in the issue or issues in this element report.
- b. A brief description of each concern.
- c. Identification of any other ECTG element and subcategory report number that also discusses any of the concerns discussed in this report.
- d. Identification of each concern in this report that has been evaluated to be safety-related.

e. Identification of each safety-related concern in this report that has also been evaluated to be a potential unreviewed safety-significant question.

f. Identification of those safety-related concerns in this report which were evaluated to be generically applicable.

This information can be provided by the use of updated printout from the Employee Concerns Computer Program System (ECPS) data base, containing information to be established by an ECTG Policy Statement.

6.0 CONTENTS OF SUBCATEGORY REPORTS

When a 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 that make up the subcategory. Subcategory reports are intended to stand alone and provide sufficient information to allow responsible line management to prepare a corrective action plan, when one is necessary.

Subcategory reports are intended for readership by the SRP, ECTG management, US Nuclear Regulatory Commission (NRC), ONP responsible line management, TVA employees, and the general public.

Guidelines for each section in the subcategory report 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 issues raised by the concerns assigned to the subcategory. The writer should retain the flavor of the original concerns while including, when possible, adequate information to indicate the scope and technical focus of each issue.

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

6.1.3 When element reports have been written, the characterization of issues should be presented as a summary of the characterization sections of 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 the issue or issues in simple terms.
- b. Provide a summary of the evaluation process.
- c. Identify the major findings as cited against requirements.
- d. State the collective significance of the findings.
- e. State the causes for the major findings.
- f. Summarize any corrective action taken and 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.

6.3 Evaluation Process (Section 3.0)

6.3.1 This section should include a general discussion of the methods used to evaluate the issue(s) involved in the subcategory, and a discussion of specific methodology. This latter discussion should specify 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 issues, this discussion is to note the various approaches used.

6.4 Findings (Section 4.0)

This section should contain both a discussion section and a conclusion section for each issue evaluated. An introductory background section is optional. The judgments offered in the conclusion section should follow logically from evidence offered in the discussion.

Discussions should include references to the timeframe of the events and actions involved. Conclusions should state the judgments arrived at after comparing the evidence presented in the discussion against the governing requirements or criteria against requirements cited in the discussion.

6.5 Collective Significance (Section 5.0)

6.5.1 The collective significance determines the importance and consequences of findings within a subcategory. It may use one or more of the following ONP functional categories to put the evaluations undertaken in a meaningful prospective:

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 speaking to the functional categories suggested above or to strict 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 as to what the findings in the subcategory mean for the long-term success of TVA's nuclear program.

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, i.e., a problem requiring corrective action. On the subcategory level, the writer searches for the proximate (i.e., nearest or immediate) causes of problems identified in the findings or the collective significance analysis.

6.6.2 To ensure that corrective actions are taken efficiently, the writer must identify the responsible organization(s) for each cause.

6.6.3 The Causes Section should be written in a format similar to the Findings Section. That is, it should be easy for the reader to follow which causes are aimed at identifying generic problems and which are intended to identify site-specific problems. The section should also make clear which site or sites are involved in the case of each cause.

6.6.4 For each cause discussed, provide information adequate to ensure communication of 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. Discussion and determination of root causes are better left to category reports or the ECTG Final Report because of the broader perspective available to each.

6.7 Corrective Actions (Section 7.0)

6.7.1 This section of Revision 0 subcategory reports should discuss in subsection 7.1 any immediate corrective actions or stop-work orders initiated as a direct result of the evaluations.

6.7.2 Additionally, this section 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 in subsection 7.2 a summary of corrective action initiated as a result of this report.

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 corrective 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:

- a. Fix the problems identified in the finding and any similar problems.
- b. Fix the causes discovered by collective significance analysis of the findings.

6.7.6 Corrective action summaries at the subcategory level should, as applicable, include the following:

- a. Actions taken or planned to identify all similar items requiring correction. Problems that required corrective action may have included, in the Findings Section, only examples of the deficiency and may not have identified all similar instances.
- b. Actions taken or planned to correct all listed and similar deficiencies.
- c. Actions taken or planned to preclude recurrence of problems.
- d. Results achieved to date and the results expected when all corrective actions are completed.

6.7.7 In discussing the corrective action, the writer should make clear which corrective actions are generic and which are site-specific and in the case of the latter, which site or sites are involved.

The SITE SPECIFIC heading should be chosen instead of the GENERIC heading whenever corrective action is 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.

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, will be a printout from the Employee Concerns Computer Program data base.

7.0 CONTENTS OF CATEGORY REPORTS

The objectives of a category report are (1) to provide a summary of the evaluation process and results that have been discussed in the subcategory reports in that category and (2) to provide a broader perspective by assessing the collective significance of all the subcategory reports in the category. Category reports integrate the information provided in the subcategories; they are intended particularly to determine causes and corrective action for those problems which overlap subcategories and, therefore, cannot be conclusively dealt with at the subcategory level.

Category reports are intended for readership by the SRP, ECTG 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 below.

7.1 Characterization of Issues (Section 1.0)

7.1.1 This section is to include an explanation of the nature of the issues dealt with in each subcategory report in the category.

7.1.2 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 Summary (Section 2.0)

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

- a. Restate briefly and simply the major issues in the subcategories.

- b. Provide a summary of the category evaluation process. |
- c. Identify the major subcategory findings. |
- d. Discuss collective significance of the subcategory report evaluations. |
- e. Summarize major causes for problems discovered in the subcategories and additional causes that were identified by the category level collective significance analysis. |
- f. Recap corrective action taken at subcategory level and summarize additional corrective action taken as a result of the category evaluation. |

7.3 Evaluation Process (Section 3.0)

This section is to include a general discussion of the methods, requirements, and criteria used to assess the subcategory evaluations. |

7.4 Findings (Section 4.0)

This section may begin with an historical background. Major findings from each subcategory report should be summarized. Additional findings as a result of the category evaluation should be detailed. |

7.5 Collective Significance (Section 5.0)

7.5.1 The category collective significance analysis integrates the information presented in the subcategories with the additional findings, if any, determined at the category level. What do the evaluations in this category mean for the long-term performance of TVA's nuclear program? |

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 At the category level, the writer summarizes the major causes discussed in the subcategory reports (see 6.6.1).

7.6.2 In addition to the summary call for in subsection 7.6.1, the writer performs a preliminary root cause analysis by determining the causes of the problems identified by the category evaluation and collective significance analysis as overlapping subcategory boundaries, and thus unlikely to be corrected by action at the subcategory level alone.

7.6.3 To ensure efficient corrective action, the writer should determine a responsible organization(s) for each cause identified by performing the analysis called for in 7.6.2.

7.6.4 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 some root causes are better left to the ECTG Final Report if it is suspected that they are causes for problems that overlap more than one category.

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 subcategory reports in that category 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 category's subcategory reports. |

7.7.3 Corrective action for problems identified at the category report level should be detailed although they may be modified by the initial issuance of the ECTG 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, will be a printout from the Employee Concerns Computer Program data base, containing information to be determined by an ECTG policy statement. |

8.0 CONTENTS OF THE ECTG FINAL REPORT

The objective of the ECTG Final Report is to provide a comprehensive assessment of the ECSP. The final report is a compendium of the category reports; an analysis of all major issues within categories; and an explanation of the purpose, scope, and management approach taken to accomplish the program. Because it is intended for a wide general audience, the final report should not contain technical details except where significant safety issues are discussed. 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, ECTG 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 ECTG 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 issues
- g. explanation of the program's report hierarchy
- h. collective significance approach used to determine root causes
- i. methods used to obtain and implement corrective actions required to solve 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 start and completion dates of the program.

8.3 Overall Characterization of Issues (Section 3.0)

8.3.1 This section is to include a broad characterization of the issues raised by the employee concerns within the program's scope. Particularly significant issues can be addressed separately and the remainder addressed collectively.

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

- a. Number of concerns and issues versus the number of personnel interviewed.
- b. Number of management-related concerns and issues.
- c. Number of concerns and issues related to employee confidence.
- d. Number of technically-related concerns and issues.
 - Number involving hardware
 - Number involving documentation
- e. Number of concerns and issues in each of the categories.
- f. Number of issues identifying problems requiring corrective action in each of the categories.
- g. Number of safety-related issues (after completion of evaluations).
- h. Number of unreviewed safety-significant question issues (after completion of evaluations).
- i. Number of generically applicable issues (after completion of evaluations).
- j. Number of issues applicable to each site.
- k. Number of concerns that related to a subject, especially if related concerns were evaluated under different categories.

1. Number of concerns previously identified by existing ONP procedures and the number of those that were already corrected before ECTG evaluation.

8.4 Summary of Findings (Section 4.0)

8.4.1 This section should include an historical background and a summary discussion of the major findings as presented in the category reports.

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 of 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 problems that overlap categories and are thus unlikely to be corrected by action at the category level only.

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 for definitions). |

a. Management effectiveness (If appropriate, discuss the consistency and degree of enforcement of requirements and policies applied by TVA 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 ensure efficient corrective action, the writer should determine a responsible organization(s) for each cause identified. |

8.7 Corrective Actions Taken or Planned (Section 7.0)

The following are suggestions for those assigned responsibility for the final report. |

8.7.1 This section should summarize corrective action already taken by normal ONP procedures and as a result of ECTG evaluations. |

- 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 correction program, or (3) the problem has already been corrected. |
- 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. 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 task groups in place that are working on resolution of a number of significant problems, some of which overlap those identified under this program. Identify these areas and show their relevance to the correction of the problems identified under the ECTG. |
- 8.7.5 This section should also convey a sense of proportion: comparing what TVA did right to the problems that were only found through this program's evaluations. 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 ECTG's overall value in restoring employee confidence at TVA. Also, include a brief discussion of the new ongoing Employee Concerns Program (with its provisions for differing professional opinions).
- 8.7.9 Provide a specific discussion on a site-by-site basis of 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 ECTG.
- 8.7.11 Describe the mechanisms that will be used to let current and former TVA employees know how the issues raised by 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.b 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

ECTG 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 part.

10.0 REPORT NUMBERING

10.1 Reports are to be numbered to show the relationship 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 ECTG procedures.

10.2 ECTG Final Report Numbering

Numbering is not applicable to the ECTG 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 requires 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 ECTG 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 additional review(s) that may have been requested by the CEG-H or the ECTG Manager. To be noted as "N/A" when not used)

k. Concurrences - (signature and date of those individuals required by procedure or directed by the ECTG Manager to concur with the report)

l. Approvals - (The signature and date of the ECTG Manager is needed on all but element reports; the Manager of Nuclear Power signs the ECTG Final Report. The Manager of Nuclear Power's signature space will be placed only on the ECTG Final Report cover sheet.

11.2 Continuation Sheet Form

The Reports Continuation Sheet Form for all reports is provided in Attachment C. 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.

11.3 Page Numbering

Page numbering is to be continuous throughout the report. Attachments, however, will be numbered separately. Any prefatory material will be numbered separately also using small capital Roman numerals.

12.0 STYLE

12.1 Headings

Headings should be used for the first three outline levels.

Example:

5.0 FINDINGS

5.1 Damaged Conduit

5.2 Damaged Valves

5.2.1 Large Valves |

5.2.2 Small Valves |

Individual paragraphs below headings should not be numbered. |

12.2 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 20 words in length |
- d. rethink words over three syllables
- e. spell out numbers ten and below; use arabic numerals for all others |
- f. use a comma before "and" in a series
- g. introduce listings with a colon
- h. use acronyms conservatively |

13.0 ATTACHMENTS

Attachment A, ECTG Reports Cover Sheet |

Attachment B, ECTG Final Report Cover Sheet |

Attachment C, ECTG Reports Continuation Sheet |

ATTACHMENT A

ECTG REPORTS COVER SHEET

TVA EMPLOYEE CONCERNS
SPECIAL PROGRAM

REPORT NUMBER: _____

REPORT TYPE: _____

REVISION NUMBER: _____

TITLE: _____

PAGE 1 OF _____

REASON FOR REVISION: _____

PREPARATION

PREPARED BY: _____

SIGNATURE

DATE

REVIEWS

PEER: _____

SIGNATURE

DATE

TAS: _____

SIGNATURE

DATE

CONCURRENCES

CEG-H: _____

SIGNATURE

DATE

SRP: _____

SIGNATURE

DATE

APPROVED BY: _____

ECTG MANAGER

DATE

ATTACHMENT B

ECTG FINAL REPORT COVER SHEET

TVA EMPLOYEE CONCERNS
SPECIAL PROGRAM

REPORT NUMBER:

REPORT TYPE:

REVISION NUMBER:

TITLE:

PAGE 1 OF ____

REASON FOR REVISION:

PREPARATION

PREPARED BY:

SIGNATURE

DATE

REVIEWS

PEER:

SIGNATURE

DATE

TAS:

SIGNATURE

DATE

CONCURRENCES

CEG-H:

SRP:

SIGNATURE

DATE

SIGNATURE

DATE

APPROVED BY:

ECTG MANAGER

DATE

MANAGER OF NUCLEAR POWER
CONCURRENCE (FINAL REPORT ONLY)

DATE

1246T

ATTACHMENT C

ECTG REPORTS CONTINUATION SHEET

TVA EMPLOYEE CONCERNS
SPECIAL PROGRAM

REPORT NUMBER:

REVISION NUMBER:

PAGE # OF
