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PART A

BACKGROUND AND SUMMARY

The safe construction and operation of nuclear plants require that utility management be informed of safety issues and take appropriate corrective action. A significant source of such information is employees. Acquisition of information from employees is enhanced by encouraging employees to provide it directly to supervision and management. The fundamental importance of employee identification of safety concerns is recognized by such laws as the 1978 Amendment to the Energy Reorganization Act of 1974, which provides protection against reprisal for employees who provide information on nuclear safety issues.

In 1980 the TVA Board approved a policy on expression of staff views which encourages and protects the differing views of TVA employees on all matters. The Board policy encourages voluntary expression of differing views on substantive public health and safety issues, including those on any aspect of TVA's nuclear program. These views may be expressed without fear of recrimination or retribution.

In support of this policy, the TVA General Manager issued instructions to Office Managers on August 15, 1980, establishing a program within TVA to identify and resolve employee concerns. The program required each office to establish a system through which employees could voice their views within the line organization. The TVA policy also provided that employees could voice concerns to the NSRS, the General Manager, or the TVA Board of Directors.

As provided by Federal law, employees may also take their concerns to the NRC.

During April 1985, TVA was notified by the NRC that TVA employees had raised a number of significant safety concerns to the NRC and congressional staff, particularly related to the Watts Bar Nuclear Plant. Included in the expressions of concerns to the NRC were the employees' fear of reprisal by TVA management if their views on safety issues were raised within TVA. The NRC expressed its view to TVA that the TVA policy and program for handling employee issues were not resulting in management being informed of them. Further, the NRC believed the potential existed that other nuclear safety issues would remain unexpressed as a result of the fear employees had of reprisal from TVA management. These were fundamental indications that TVA's programs and policies were not being fully implemented and that the legal and policy protections against reprisal action had not gained the full confidence of all TVA employees.

In response to the recognition that existing programs to identify and resolve concerns of employees were not fully effective, TVA has taken and planned the following actions to strengthen TVA's program:

- o Upgraded existing TVA employee concern programs as described in the August 1, 1985 submittal to NRC.

- o Expanded the size of the staff and the functions of NSRS to increase its capability to investigate issues and to establish an onsite presence.
- o Obtained the services of an independent contractor, QTC, providing employees an additional channel through which differing views could be raised while employee identity is protected. This provided time for TVA to improve its own program to receive and resolve employee-identified concerns.
- o Approved a plan for the creation by December 1, 1985, of an Office of IG to operate independently of all TVA line organizations and report to the Board. The IG will have procedures to receive employee concerns and will maintain confidentiality of an employee when requested.
- o Developed a comprehensive plan to restructure the P&E (Nuclear) program for receipt and resolution of employee concerns under a single independent manager that reports directly to the Manager P&E (Nuclear) and that provides a dedicated independent representative at each nuclear plant and in the Chattanooga and Knoxville corporate offices to provide emphasis and assistance to the line in the establishment of an effective employee/supervisor relationship.

This report provides a description and status of the following parts of the TVA program:

- o Special program at Watts Bar for resolving employee concerns.
- o P&E (Nuclear) employee concern program.
- o Transition plan for implementation of TVA's employee concern program.
- o Sequoyah employee concern program description and status.

PART B

SPECIAL PROGRAM AT WATTS BAR FOR RESOLVING EMPLOYEE CONCERNS

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

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

This special program is described below.

I. Responsibility for Obtaining Employee Concerns

QTC was located at the Watts Bar site to receive concerns from TVA employees at the site. In addition, private interviews were scheduled in Knoxville for Watts Bar project employees in the TVA Knoxville offices. QTC was provided with facilities at the site where employees could be privately interviewed. Employees were interviewed for 20-30 minutes and any concerns expressed were documented by QTC. In cases where employees had issues that could not be expressed in the allotted time, follow-up interviews have been and are being conducted by QTC.

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

At the beginning of the effort, 4,864 employees were identified for interviews. By the second week in November, the interview process was nearing completion, and approximately 5,000 employees had been interviewed.

All concerns raised by employees are identified on "K-forms," with a separate K-form written for each concern. K-forms are provided to NSRS for assignment for investigation. In the process, QTC retains all information that associates the name of the employee to a concern. The forms are also provided to NRC for information and to the line organization for actions considered prudent prior to completion of the investigation.

II. Responsibility for Classification of Concerns

All concerns that are identified on K-forms are provided to the NSRS unless the concerns relate directly to NSRS. The NSRS examines each concern for classification as potentially related to:

- o Nuclear safety
- o Intimidation and harassment
- o Employee misconduct
- o Other

In this effort the NSRS has the benefit of a preliminary classification determination by QTC on the "K-forms."

After the concern is placed into one of the above categories, the K-forms are provided to the responsible organization for investigation.

As of the second week in November, about 4,000 concerns had been identified to QTC. Of those concerns which had been provided to NSRS, 1,338 were defined as presenting nuclear safety-related issues, 74 related to intimidation and harassment, 228 involved concerns of employee misconduct, and about 1,784 involved "other" concerns.

III. Responsibility for Investigation of Various Categories of Employee Concerns

The responsibility for the investigation of employee concerns is currently assigned to the NSRS, the OGC, or to the OER in accordance with the following:

A. Nuclear Safety-Related Concerns

NSRS is responsible for the investigation of nuclear safety-related concerns. NSRS assigns some concerns to QTC, retains them for its own investigation, or may hire additional contractors to investigate special concerns or groups of concerns. Further, the NSRS utilizes a milestone committee comprised of line and NSRS representatives to assist in establishing which nuclear safety-related concerns should receive priority investigation.

All concerns investigated by NSRS, QTC, or contractors utilized by NSRS document the findings of the investigation in a draft report. Draft reports prepared by QTC or any other contractor are reviewed by NSRS and approved prior to submittal to the line organization for response.

All investigation reports, where concerns are substantiated and NSRS requires response or corrective action from the line organization, are provided to the responsible line organization for action.

An investigation report is not deemed final until it has either been established that (1) the concern is not substantiated, (2) the concern is substantiated but no corrective action is required, or (3) corrective action defined by the line in response to NSRS findings or recommendations is acceptable to NSRS. As of the second week in November about 208 investigations in this category had been completed and 147 had been closed out.

B. Intimidation and Harassment and Employee Misconduct Concerns

Because the employees' expressed fear of reprisal was fundamental to the points NRC made to TVA in April 1985, concerns of intimidation and harassment have been identified by line management as the priority misconduct issues to investigate and resolve.

Currently OGC is responsible for the investigation of intimidation and harassment concerns and concerns of other kinds of employee misconduct. In most of those cases involving intimidation and harassment, OGC utilizes QTC to obtain the information about the concerns and, after receiving a report from QTC, provides the information to management on the existence of intimidation and harassment. The information QTC provides is consistent with the concerned employees' interest in confidentiality. Using QTC to assist in the gathering of information, OGC handles intimidation and harassment cases in accordance with the established procedures for misconduct cases.

Concerns of employee misconduct, other than intimidation and harassment cases, are investigated by OGC, or at OGC's direction, by QTC or TVA managers not involved in the concerns. In each case the facts found by OGC are reported to management.

TVA management is responsible for determining and taking any action deemed necessary based on OGC's findings resulting from intimidation and harassment investigations or employee misconduct investigations. OGC is responsible for reporting information about possible violations of law to appropriate law enforcement agencies.

As of the second week in November, investigations involving six intimidation and harassment concerns raised to QTC had been completed and reported to management. 1/ When management determines what action to take on OGC's report in which intimidation and harassment was substantiated, a response will be given by QTC to the employees who raised the concerns.

C. All Other Concerns

All other concerns are transmitted from NSRS to OER. OER assigns concerns, or groups of concerns, to various organizations for investigation. Such assignments are made with care being taken that the investigators are sufficiently independent from the activities or issues involved that an unbiased investigation can be accomplished.

The manager of OER is responsible for the review of final investigation reports, including the review of corrective action. As of the second week in November, 362 investigations had been completed and the reports provided to QTC for closure with the concerned employee.

IV. Responsibility for Corrective Action

The line organization is responsible for taking appropriate corrective action on issues raised within their respective organizations following the receipt of a K-form or investigation report.

A. Actions Upon Receipt of K-Form

K-forms are periodically provided to the line organization to inform them of potential problem areas so that the line will take timely corrective action if a significant safety issue or deficiency is known or can be identified prior to investigative effort. The line will evaluate the need for: (1) implementing a stop work order, (2) requesting priority investigation, (3) reporting the condition to NRC, or (4) taking action to notify other site directors of a known problem.

1/ TVA has provided a copy of one of these reports to NRC's Office of Investigations. In addition, OGC reports completed in the same time and involving four other employees who made allegations of reprisal were provided to NRC's Office of Investigation. These concerns were expressed directly to OGC and were not received through the QTC concern-gathering process.

B. Actions Upon Receipt of Investigation Report

The line evaluates the findings from those investigation reports dealing with nuclear safety concerns and takes action to respond to the reports, indicating corrective action to programs or hardware. Additionally, the line evaluates the need for stop work orders, reportability, and generic implications at other TVA plants. In those cases involving "other" concerns, the line is informed of actions that are required during the investigation process and the report indicates corrective action when required.

Following the designation of corrective action, the line tracks the implementation and ensures timely completion of work, consistent with operating plans and commitments to NSRS and/or NRC.

C. Program Relating to Evaluation of Overall Findings

The line, with advice and assistance from NSRS, OGC, and OER, has responsibility for evaluating the collective effect of findings for all employee concerns on nuclear safety and other interests. To accomplish this, the line organization evaluates each investigation report to identify the category of the substantiated concern, the significance of the finding, and the impact of the finding.

Information obtained from the evaluation process will be computerized so that, when the total investigation process is completed and all reports evaluated, information can be retrieved from the data base to draw conclusions regarding the collective findings. As a part of the evaluation, findings relating to substantiated issues in the "other" category, intimidation and harassment, misconduct and nuclear safety will be examined to determine if further corrective action is needed by management.

V. Records

The NSRS maintains the official record of all concerns and the investigation report for each concern, along with the responses from line organizations except for those directly involving NSRS. The NSRS also maintains a record of the information that is sent back to the employee (other than the identity of the employee). In the case of misconduct and intimidation and harassment allegations the records are maintained by OGC.

The Watts Bar site director is responsible for the records of the actions involving the closeout of each employee concern raised through QTC that relates to Watts Bar. Such records include the corrective action taken, in progress or planned; evaluation efforts; an employee concern data base for the evaluation efforts; and an employee concern data base for the site. Other site directors have similar responsibilities for employee concerns raised through QTC that relate to their sites.

VI. Response to Individual Employees

The final step in the process of completing an inquiry on an employee concern is the notification to the employee of the results of TVA's effort. All employees who raised a concern with QTC are notified of the actions taken to respond to it. As of the second week in November, employees had been notified of about 53 nuclear safety-related and 241 "other concerns."

VII. Report Upon Completion of Special Program

At the completion of the special program at Watts Bar, TVA will prepare a report on the program. The report will include the following information:

- o Statistical evaluation of findings.
- o Significance of findings on hardware, programs, management, and employees at Watts Bar.
- o Nuclear safety significance of findings.
- o Impact of findings on other TVA nuclear plants.
- o Evaluation of root causes.
- o Specific corrective actions of significance to hardware, programs, and management.
- o Long-term employee communication and response efforts considered necessary as a result of the Watts Bar program to be initiated and implemented at Watts Bar or other TVA nuclear plants.

The report will be prepared by the line organization with input from OER, OGC, and NSRS.

Any additional actions deemed necessary by the TVA Board will be added to the report prior to providing it to NRC.

VIII. Summary of Employee Concern Program Status

A summary status of concerns that have been identified to QTC through the special program at Watts Bar for each TVA nuclear plant is shown in Table 1. This table shows the number of concerns that have been identified by category, the number that have been investigated, and the number that have been closed out as of the second week in November.

TABLE 1
SUMMARY OF EMPLOYEE CONCERN PROGRAM STATUS

WATTS BAR NUCLEAR PLANT

<u>Concern Category</u>	<u>Number of Concerns</u>	<u>Number Investigated</u>	<u>Number Closed</u>
Nuclear Safety-Related	1,204	204	145
Intimidation and Harassment	69	6	3
Misconduct	213	0	0
Other	1,737	347	347

SEQUOYAH NUCLEAR PLANT

<u>Concern Category</u>	<u>Number of Concerns</u>	<u>Number Investigated</u>	<u>Number Closed</u>
Nuclear Safety-Related	73	2	1
Intimidation and Harassment	4	0	0
Misconduct	11	0	0
Other	31	10	10

BROWNS FERRY NUCLEAR PLANT

<u>Concern Category</u>	<u>Number of Concerns</u>	<u>Number Investigated</u>	<u>Number Closed</u>
Nuclear Safety-Related	24	1	0
Intimidation and Harassment	1	0	0
Misconduct	0	0	0
Other	7	3	3

BELLEFONTE NUCLEAR PLANT

<u>Concern Category</u>	<u>Number of Concerns</u>	<u>Number Investigated</u>	<u>Number Closed</u>
Nuclear Safety-Related	37	1	1
Intimidation and Harassment	0	0	0
Misconduct	4	0	0
Other	9	2	2

PART C

POWER AND ENGINEERING (NUCLEAR) EMPLOYEE CONCERN PROGRAM

I. Summary

Following is a description of the ECP for the P&E (Nuclear) organization. Plans are to have this program in place by February 1, 1986. The transition plan for getting this program in place is detailed in Part D.

The P&E (Nuclear) ECP has been restructured to accomplish several key objectives that are deemed essential to improving overall effectiveness within the P&E (Nuclear) organization including:

- o Providing for early identification of problems of employee/management relations within the line organization.
- o Providing total responsibility for the ECP in a single organization.
- o Developing improved communication between employees and supervisors.
- o Encouraging employee participation to accomplish program and implementation improvement.
- o Utilizing the line organization to solve problems which exist within the line organization.
- o Providing an independent communication channel within the line organization for employees to use for reporting concerns outside their work organization.
- o Using the IG as an outlet independent of the P&E (Nuclear) organization.
- o Trending employee concerns received using line arrangements compared to other concern receipt mechanisms.

In order to accomplish these objectives and to provide assurance that the program objectives will be maintained, the Manager, P&E (Nuclear), has established an ECP Manager that reports directly to the Manager, P&E (Nuclear). The ECP Manager is held accountable for providing resources for establishing independent site representatives and for assisting line management with program implementation and program direction to accomplish the objectives of the overall program.

The ECP Manager will promote the ECP within the line organization and establish and maintain relations with all levels of line management and with appropriate organizations outside P&E (Nuclear). The ECP Manager and his organization also provide for receiving and resolving employee concerns raised with the ECP Manager's organization. A key element of this program includes the establishment of an ECF-SR at each major P&E location.

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

Should the employee decide not to express a concern through the P&E (Nuclear) ECP, the employee can report to the TVA-IG which provides a reporting channel totally independent of the line organization. The employee also has access to NRC, OSHA, or the DOL.

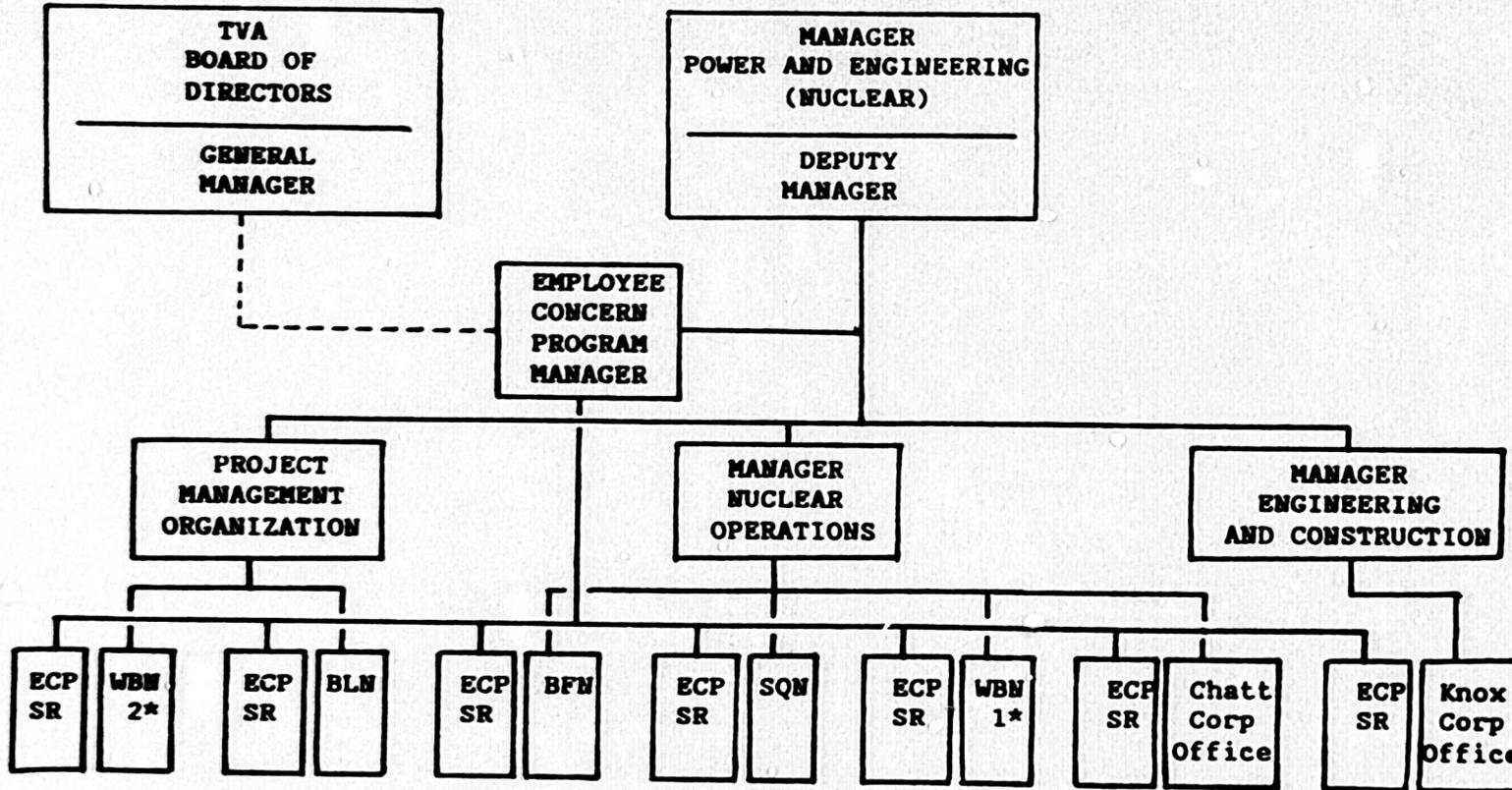
The organization and assignment of responsibility for the ECP is described in Section II.A and the detailed description of how the program is to be managed is described in Section II.B. Some of the more significant program support activities are indicated in Section II.C. Finally, in Section II.D is an indication of the plans for program evaluation.

II. Employee Concern Program Description

A. Organization

The Manager, P&E (Nuclear) has primary responsibility for the safe design, construction, and operation of TVA's nuclear plants. Essential to the successful execution of this responsibility is the ability to obtain information from employees about concerns, issues, or conditions that they believe are not correct; and thus the ability to take effective timely corrective action. Figure 1 shows the P&E (Nuclear) organization for obtaining and resolving employee concerns. Functions and responsibilities of the key members of this organization are as follows:

Figure 1
 POWER AND ENGINEERING (NUCLEAR)
 EMPLOYEE CONCERN PROGRAM ORGANIZATION CHART



-3-

*May be filled by one person

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1. Manager, P&E (Nuclear)

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

2. Line Managers

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

3. Employee Concern Program Manager

The ECP Manager is responsible for establishing an ECP within the P&E (Nuclear) organization and for taking actions to ensure the program is understood by employees and management, is functioning to accomplish the goals of the program, and is achieving desired results. The ECP Manager is responsible for establishing a program within the ECP organization for receiving and evaluating employee concerns for which the employee/supervisor has been ineffective, is not trusted, or where the employee desires confidentiality. The ECP manager is also responsible for working with line management and QA to identify any areas of weakness within the line program or to assist line management in the promotion of the ECP within their organizational units. The ECP Manager arranges

with organizations outside of P&E (Nuclear) to obtain assistance in evaluating employee concerns or in providing information to these organizations in the resolution of employee concerns. The ECP Manager is responsible for the staffing and supervision of ECP-SRs at all major P&E (Nuclear) installations and offices and for seeing that the program at each site is a consistent part of the overall unified TVA ECP. The ECP Manager implements a program to evaluate the effectiveness of the P&E (Nuclear) ECP, providing feedback to line management at each of the major installations and offices and to the Manager, P&E (Nuclear).

4. Employee Concern Program Site Representatives

ECP-SRs provide visible evidence of P&E (Nuclear) management's commitment and desire to obtain employee input including concerns relative to the safe and efficient design, construction, and operation of TVA's nuclear plants. The ECP-SR will provide emphasis and assistance to the line supervisors in the establishment of an effective employee/supervisor relationship. Additionally, the ECP-SR will be available to receive employee concerns when there is a breakdown in the desired employee/supervisor communications or working relationship. Employees that are being terminated or transferred from one location to another will also be given an exit interview by the ECP-SR to ensure there are no unidentified deficiencies of which the employee is knowledgeable.

The ECP-SR is responsible for the evaluation or investigation of employee concerns that are received by the ECP-SR. The ECP-SR may investigate the concern or may utilize other resources to have an investigation made where that can be done by persons not involved in the concern. The ECP-SR will be responsible for the completion of an acceptable investigation and for closing the issue with the employee.

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

5. Supervisors

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

6. Employees

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

B. Management of Employee Concern Program

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

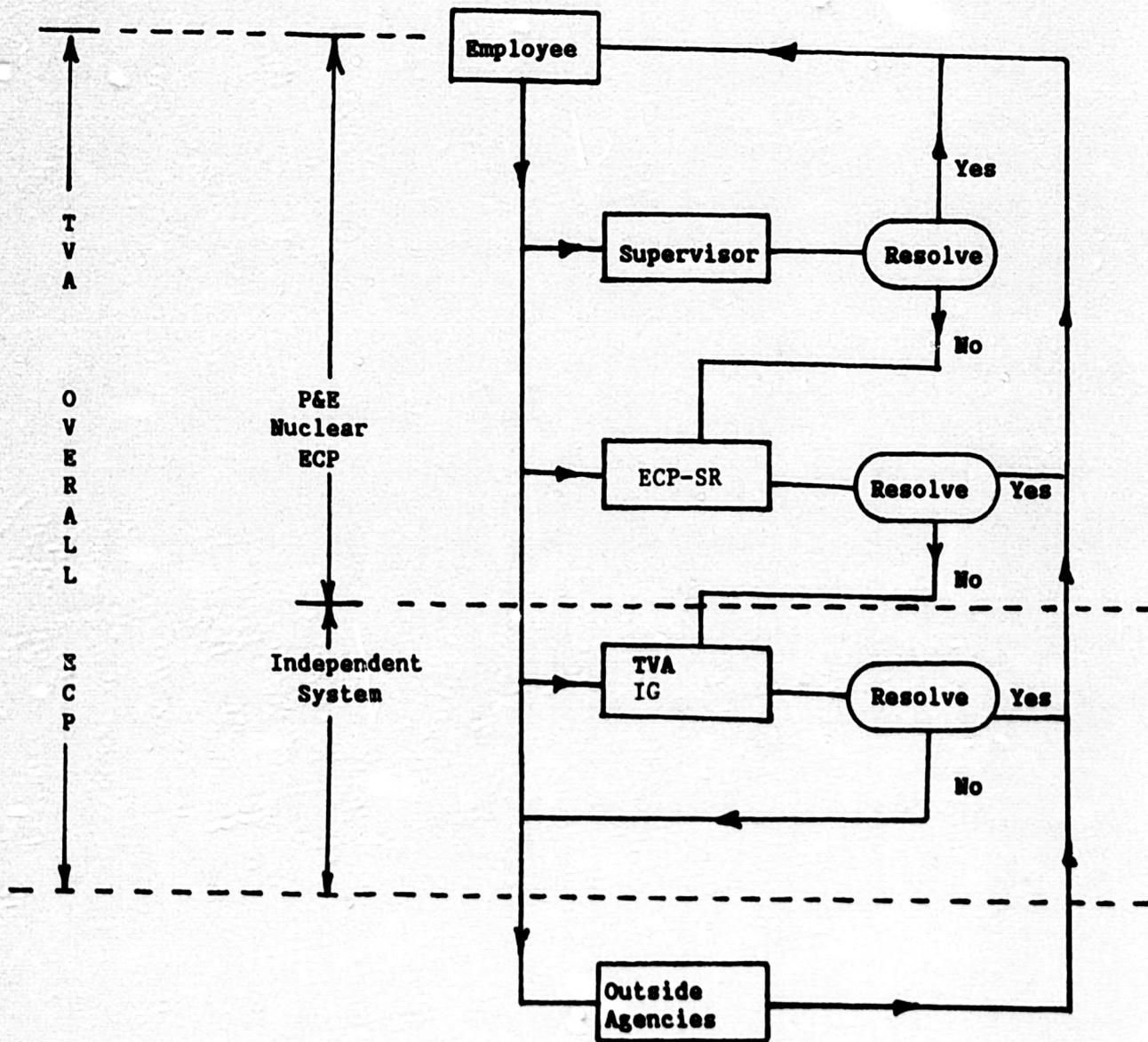
- o receipt of the employee concern
- o investigation of employee concern
- o corrective action by the line organization
- o providing feedback to the employee

Each of these steps is discussed in the following subsections with an indication of the intended method for handling the concerns and the alternate methods available to the employee. The flow chart associated with the process is indicated in Figure 2.

Within the P&E (Nuclear) organization an employee may bring an employee concern to the responsible supervisor or to the ECP-SR at the location where the employee is working. The receipt and handling of concerns by these organizational units are as indicated in Sections B.1 and B.2.

Figure 2

TVA
EMPLOYEE CONCERN PROGRAM (ECP)
FLOW CHART FOR HANDLING CONCERNS



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

1. Resolution of Employee Concerns by Supervisor

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

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

2. Resolution of Employee Concerns by ECP-SRs

a. Receipt of Employee Concern

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

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

Walk-in

Any employee may choose to express a concern with the ECP-SR. The employee may desire to have confidentiality, and thus not choose to have the concern resolved by the supervisor. The ECP-SR

will obtain sufficient information to fully identify the concern of the employee and to allow for its investigation and resolution. During the interview, the employee will be asked if confidentiality is desired. Confidentiality will be preserved if requested. There will be a documented record of all concerns expressed to the ECP-SR.

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

Scheduled Interviews

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

Phone Calls

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

Referral from Line Organization

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

Exit Interview

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

Mail-In (Forms)

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

b. Investigation of Employee Concerns

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

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

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

Preliminary Evaluation of Concern

The ECP-SR will make a preliminary evaluation of the concern, determining its general category of the concern, and the basic issues involved with it. Prior to performing an investigation or assigning the concern for investigation, the ECP-SR will search the P&E (Nuclear) ECP data base to determine if the concern has previously been identified or investigated. The ECP-SR will utilize such information to either immediately respond to the employee or determine what additional information is needed and the extent of investigative activity.

Assignment of Concern for Investigation

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

Review of Investigation Reports Performed by Other Organizations

The ECP-SR is responsible for review of all investigation reports including those performed by other organizations. The ECP-SR will specifically examine the report to determine if it addresses the concern and to assure that findings are supported by factual information. In cases where the ECP-SR considers the report deficient or unclear, the ECP-SR will meet and resolve the concerns with the investigating organization. The ECP-SR will determine if specified actions address the concerns identified in the report. When the ECP-SR is satisfied that the investigation report is adequate, the report will be provided to line management for corrective action.

c. Corrective Action by the Line Organization

Upon receipt of the investigation report, the line organization designates corrective action identifying specific actions in response to investigation report findings. If these actions are acceptable to the ECP-SR, action will be taken in accordance with the specified timetable. Additionally, the line will review the report and its findings for generic applicability, reportability to NRC, and to determine the need for stop work orders.

d. Notifying Employee of Concern Resolution

The ECP-SR is responsible for providing the employee who raised a concern with the results of the investigation. This will generally be done by arranging a meeting with the employee. At the meeting the findings of the investigation and the designated corrective action will be presented. Employees who have raised concerns that were not resolved prior to the employee leaving TVA will be notified of the resolution. The employee will be provided with the documented report and designated corrective action which has been identified by the line management. The ECP-SR will determine if the designated resolution is understood by the employee and if the actions are considered acceptable by the employee. If the employee is not satisfied, the ECP-SR will determine the nature of the concerns remaining with the employee. If the concerns can be resolved, the resolution process will proceed as already described. If the employee however is not satisfied with the resolution of the concern, the ECP-SR will discuss with the employee other means of having the concern evaluated. If the employee desires to have the concern examined by the IG, the ECP-SR will provide the IG with the concern file on the employee's concern.

e. Records

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

C. Program Support Activities

1. Employee Concern Program Data Base

The information that is obtained from the evaluation and/or investigation of employee concerns will be retained by each ECP-SR. Records requirements are discussed in Section II.B.2.e. In addition to maintaining these records, specific information regarding individual concerns will be input into a computer data base. The data base will initially be established and used to determine the collective significance of the employee concerns identified during

the special program at the Watts Bar Nuclear Plant. That data base will later be used, along with input from the P&E (Nuclear) ECP at all sites, to assist the ECP-SRs in their preliminary investigation of employee concerns.

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

The ECP Manager will interface with all site managers and ECP-SRs to ensure that the data base is being utilized in their evaluation efforts.

The ECP data may also be utilized by other organizations including the QA organization in the performance of their responsibilities.

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

2. Training and Orientation of Employees

All employees with P&E (Nuclear) will be provided training/orientation in the ECP, in particular training will be provided regarding changes brought about by the creation of the ECP Manager and ECP-SR organization. Employees will be advised of transition plans, including changes involving QTC, NSRS, line organization, and the IG.

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

3. Promotion of the ECP

The ECP will be initiated with a policy statement from the Board. Carrying out that policy the line organization will establish a continuing program to promote the program and employee means of access to it. This will include but not be limited to the use of posters, signs, periodic meetings, and articles in

periodicals prepared by organizational units. The managers of organizational units from the office level down to the section level will periodically discuss the progress of the program with their respective staffs and employees.

The ECP Manager and ECP-SRs staff will actively promote the program within the line organization at the senior manager level.

4. Investigative Sources

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

Within the P&E (Nuclear) organization there are a large number of technical personnel that are experienced in technical evaluation and investigation. When issues develop that supervisors are not familiar with, the supervisor or higher levels of management may utilize these technical personnel to assist in investigations. Additional resources exist in both the Nuclear Safety Staff (NSS) and the Quality Assurance organizational units. Both of these organizations may be utilized to assist in the investigation of the more complex issues raised by employees.

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

D. Employee Concern Program Evaluation

The ECP Manager and staff are responsible for providing a system for evaluating the adequacy of the P&E (Nuclear) ECP. Several aspects of the program will be evaluated as indicated in the following sections.

1. Employee Understanding of the Program

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

2. Employee Satisfaction With ECP

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

This determination will include feedback from employees known to have taken concerns to the line organization as well as to the ECP-SR. This survey will be made by the ECP Manager when the survey results relate to the ECP-SR.

3. Employees Need for Confidentiality and Employees Concern Regarding Recrimination

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

4. Trending of the Number of Employees Using the Line ECP Compared to the Inspector General System

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

In addition to evaluations performed by the ECP Manager, additional evaluation or audit of the program will be made by QA and the IG.

PART D

TRANSITION PLAN FOR COMPLETING THE SPECIAL PROGRAM AT WATTS BAR AND IMPLEMENTING THE P&E EMPLOYEE CONCERN PROGRAM AT ALL NUCLEAR LOCATIONS

I. Introduction

TVA provided NRC a description of the P&E (Nuclear) ECP on August 1, 1985. This program was in place and functioning on September 1, 1985. TVA has also implemented a special program at Watts Bar to identify and resolve employee concerns utilizing an outside contractor, QTC. That program is described in Part B of this report. Included in the August 1, 1985 transmittal to NRC was a commitment that TVA would establish an NSRS-SR at each nuclear plant site by November 15, 1985. Those representatives are now in place at each nuclear plant site. Part C of this report describes an improved and restructured ECP that has been established by TVA that will place responsibility for the ECP with the most senior individual whose full time duties are associated with the nuclear program. In order to go from the present system involving QTC, NSRS, P&E, OER, and OGC to the ECP involving P&E and IG a careful transition is necessary. The plan for completion of the special ECP at Watts Bar and the plan for transition into the permanent P&E (Nuclear) ECP at all locations are presented in the following sections.

II. Plans for Completion of the Special Program at Watts Bar

A. Completion of Initial Interview Process

The initial interview process must be completed for TVA to determine the scope of work associated with the concerns identified to QTC, to plan a thorough resolution of all issues raised, and to determine how the program may affect other nuclear facilities.

As of the second week in November, interviews had been completed for all but about 70 individuals. These individuals either have not expressed all their concerns or QTC has not obtained sufficient information to fully describe their concerns. QTC has indicated that its records include approximately 600 concerns already identified by these employees. The effort to complete these interviews, identify the concerns, and assign them for investigation is to be completed by January 1, 1986.

B. Completion of the Investigation Process

1. Transfer of Employee Concern Information to TVA Investigators

QTC's resources are being redirected to provide additional information to the TVA investigative effort. This is expected to increase the effectiveness of the TVA investigations and allow for more timely completion of TVA-conducted investigations. Redirection of the contractor's effort has been made without changing the emphasis assigned to QTC's completion of the intimidation and harassment investigations.

2. Improvements to the Investigative Process

It is important that concerns be investigated and appropriate corrective action taken in a timely manner. One method to improve the process is to investigate similar concerns involving a specific issue or activity as a single effort. Thus, in certain circumstances, concerns are being grouped into a number of specific categories such as welding, quality assurance, electrical, labor relations, veterans preference, or personnel matters. These categories are being or will then be evaluated through a team review of the entire issue in sufficient depth to be able to address all individual concerns in the category.

The reviews may be performed by selected personnel within TVA, or TVA may elect to contract with an organization outside TVA for an independent assessment. As an example, TVA is contracting with the Department of Energy to provide a team selected from its National Laboratories to perform a review of the welding program at Watts Bar, including an evaluation of the existing welds through a sampling program and an engineering analysis of the adequacy of structural components where weld deficiencies are identified.

In some cases it is not appropriate or practical to perform generic reviews; in other cases the concerns may not warrant a generic review. For instance, an intimidation and harassment or other misconduct issue where personal responsibility may be assigned to individuals will be investigated separately.

In the investigative process every effort is being made to ensure that concerns of a similar nature are investigated by the same investigator or, where this is not possible, the investigator is aware of previous investigative efforts relating to the concern. This applies not only at Watts Bar but investigative efforts at other plants.

3. Investigative Priorities

The evaluation and investigation of concerns involving Sequoyah Nuclear Plant are receiving first priority. All nuclear safety-related concerns at Sequoyah are being evaluated to determine the effect each has on the safe operation of the plant. Any that are determined to have a potential impact on safe plant operation are being thoroughly investigated, and necessary corrective action will be completed before a unit is restarted.

The second priority is being given to the resolution of concerns at Watts Bar. Investigation of concerns at Browns Ferry will be commensurate with the availability of resources and the scheduled restart dates for the Browns Ferry units. Investigation of Bellefonte concerns will receive the lowest priority.

C. Closeout of Concerns with Employees

With the completion of the interview process, QTC resources have been directed to provide timely feedback to employees regarding their individual concerns.

III. Implementation of the P&E (Nuclear) Employee Concern Program

Transition from existing programs involving several organizations is being accomplished over a several month time period to provide assurance that transfer of responsibility will not diminish the quality of programs already established or cause confusion to employees regarding the mechanisms provided for voicing concerns. The transition initially involves the creation of the ECP organization within P&E (Nuclear), the subsequent transfer of various functions from QTC and NSRS to the ECP organization within P&E (Nuclear), and the transfer of the remaining QTC and NSRS functions to the IG.

A. Establishment of Employee Concern Program Manager and Organization

The Manager, P&E (Nuclear) has established the position, ECP Manager. The responsibilities of this position are described in Part C, Section II.A.3. The ECP Manager is responsible for implementing the transition plan in accordance with the details and schedule as described for each major location. The ECP Manager is responsible for the selection of the manager to fill each ECP-SR position (see description of this position in Part C, Section II.A.4). The manager to fill that position is to be selected and in place by December 1, 1985. The ECP-SR personnel will be selected and in place by February 1, 1986.

B. Transition Plan for Chattanooga and Knoxville P&E (Nuclear) Organizations, Browns Ferry, Sequoyah, and Bellefonte Nuclear Sites

The following actions will be taken to implement the P&E (Nuclear) ECP for the Knoxville and Chattanooga corporate offices and at BFN, SQN, and BLN.

1. Information will be disseminated by December 15, 1985 to all employees at each major location (Chattanooga, Knoxville, Browns Ferry, Sequoyah, and Bellefonte) regarding the establishment of the P&E (Nuclear) ECP, including the transition schedule.
2. Simultaneously revise administrative procedures/ instructions for the existing ECP at the P&E (Nuclear) organizations in Knoxville, Chattanooga, and at Bellefonte, Browns Ferry, and Sequoyah, and implement ECP-SR procedures for the restructured ECP. This will be accomplished by February 1, 1986. NSRS-SR procedures for conduct of exit interviews will also be cancelled effective February 1, 1986.
3. Establish presence of ECP-SR by February 1, 1986, including communications and procedures. The ECP-SR will be oriented to his or her responsibilities by the ECP Manager prior to assuming this role.

The initial procedures for the revised program will designate the QTC toll-free telephone number as a means for the employee to express concerns should the employee desire to express concerns external to the line program. When the TVA IG is in place and functioning, procedures will be revised to designate the TVA IG as the channel for expressing employee concerns external to the line. One of the functions being performed by the NSRS at nuclear sites (BFN, SQN, and BLN) is performing exit interviews. When the ECP-SR is in place and operable, the ECP-SR will replace the NSRS role of performing exit interviews. Prior to taking over this responsibility at the plant sites, the ECP-SR will conduct exit interviews with NSRS to assure consistency in the effort.

C. Transition Plan for Watts Bar Nuclear Site

The implementation of the P&E (Nuclear) ECP at Watts Bar does not change the activities associated with the receipt, investigation, or closure of employee concerns brought to QTC as a part of interviewing the employees at Watts Bar or for procedures established to interface with the special program described in Part B.

The following actions will be taken to implement the P&E (Nuclear) ECP for the Watts Bar site:

1. Information will be disseminated by December 15, 1985 to all employees at Watts Bar regarding the establishment of the P&E (Nuclear) ECP, including the transition schedule.
3. Simultaneously revise administrative procedures/ instructions for the existing ECP at the site and implement ECP-SR procedures for the restructured ECP. This will be accomplished by February 1, 1986. NSRS-SR procedures for conduct of exit interviews will also be cancelled effective February 1, 1986.
3. Establish presence of ECP-SR by February 1, 1986, including communications and procedures. The ECP-SR will be oriented to his responsibilities by the ECP Manager prior to assuming this role.

The initial procedures for the revised program will designate a combined QTC/NSRS role as a channel for expression of employee concerns should the employee desire to express concerns external to the line program. When the TVA IG is in place and functioning, procedures will be revised to designate the TVA IG as the channel for expressing employee concerns external to the line organization. Until that time QTC will retain the toll-free telephone number. During the time period between November 15, 1985 when the NSRS established a SR at Watts Bar, and February 1, 1986 when the P&E ECP-SR is established, new employee interviews, exit interviews, and walk-in interviews will be handled as follows. QTC will continue to receive employees for walk-in interviews and will provide exit interviews until January 1, 1986. Following January 1, 1986 and until the ECP-SR is in place, an employee wanting to express a concern, either as a walk-in or exit interview, will be interviewed by NSRS. During the time period of December 1 to January 1, the NSRS-SR will participate with QTC in the interview process and exit interviews to ensure consistency in processes established by QTC. Prior to the performance of such joint interviews, employees will be notified of NSRS' involvement and that if employees wish to request confidentiality, it will be extended by NSRS. Posters, signs, etc., indicating the presence of QTC will be revised to reflect these changes. New employee interviews, involving QTC are being discontinued effective December 1, 1985.

During the time period January 1 to February 1, 1986, the ECP-SR and the NSRS-SR will coordinate efforts including the performance of exit interviews. As requested confidentiality will be extended by the ECP-SR and NSRS-SR.

PART E

SEQUOYAH EMPLOYEE CONCERN PROGRAM - DESCRIPTION AND STATUS

I. Introduction

TVA employee concerns which relate to Sequoyah Nuclear Plant are identified and addressed under two basic programs: (1) the Sequoyah employee concern program in place at the site and (2) as part of the special program at Watts Bar (as described in Part B) which addresses concerns expressed through the Watts Bar program that relate to Sequoyah.

Under the program in place at Sequoyah, employees have been informed in a number of ways how to express their concerns to supervision onsite as well as to offsite TVA organizations, NSRS or QTC. Additionally the program provides for employees to voice concerns to other agencies such as NRC and OSHA. The program clearly assigns and defines responsibilities for the handling of expressed employee concerns. A number of employees have expressed concerns under this site program.

Under the special program at Watts Bar, a number of concerns that relate to the Sequoyah plant have been identified. QTC has indicated that some of these concerns came from employees that had previously worked at the Sequoyah site and some resulted from Sequoyah employees using the hotlines providing direct access to QTC. Also, in some cases the concerns that have been identified at Watts Bar have generic implications related to TVA's overall construction program and could potentially impact Sequoyah.

This section of the report provides the status of these programs and describes the Sequoyah program for evaluating the impact of these concerns on the safe return to power of the Sequoyah Nuclear Plant. Additionally, four alleged intimidation and harassment concerns are being given high priority investigation by OGC and QTC.

II. Employee Concerns Specifically Related to Sequoyah

Table 1 in Part B provides a summary status of all concerns that have been identified to QTC through the special program at Watts Bar. This table shows the number of concerns that have been identified by category, the number that have been investigated, and the number that have been closed out as of the second week in November.

The Sequoyah line organization takes appropriate corrective action on issues raised following the receipt of a K-form or investigation reports as outlined in Part B, Section IV, paragraphs A and B. Sequoyah reviews the K-forms and investigation reports to identify any concerns that, if substantiated, could impact the safe startup or operation of Sequoyah. NSRS also independently reviews the K-forms and investigation reports to identify any concerns that, if substantiated, could impact the safe startup or operation of Sequoyah. Any concerns identified by either Sequoyah or NSRS that fall into this category are given high priority for investigation. Those concerns that had been identified as of the second week of November that are being given high priority for investigation follow:

<u>Concern No.</u>	<u>Key Words</u>
XX-85-010-001	Nuts welded to base plates
XX-85-023-001	Pull tests on hangers/anchors in the annulus
XX-85-027-X07	Sign off data sheets on defective equipment or face insubordination charges
XX-85-046-001	Instrument sensing line slope deficiencies
XX-85-049-X03	Welder certification card falsified
XX-85-068-007	TVA manufactured spool piece replaced a Dravo-ASME class spool piece
XX-85-069-X05	On-the-job training records falsified
XX-85-070-002	Quality problems intentionally closed to prevent attracting NRC attention
XX-85-001-001	Diesel generator batteries
XX-85-023-X02	Falsification of anchor pull tests
XX-85-041-001	Improper weld repairs
XX-85-049-001	Falsified welder certifications
XX-85-070-001	Drawing and document errors
XX-85-070-005	Workplan not authorized by Office of Engineering
XX-85-070-006	Falsified document closures
XX-85-070-007	Snubbers installed not per design
XX-85-100-001	Improper weld repairs
XX-85-101-006	Welding performed without certifications
XX-85-108-001	Welds in unit 1 accumulator rooms and/or fan rooms never inspected
XX-85-108-002	Weld inspection program breakdown
XX-85-033-006	Use of Non-Q material in Q systems
XX-85-077-X04	Drawings have been falsified
XX-85-065-001	Remote visual inspection of hangers by ISI personnel

Investigation of the above concerns will be completed by December 15, 1985. Those concerns that are substantiated will be evaluated for impact on the safe startup and operation of Sequoyah. Corrective action will be completed as appropriate prior to plant startup.

III. EMPLOYEE CONCERNS WITH GENERIC IMPLICATION TO TVA'S CONSTRUCTION PROGRAM

Employee concern K-forms and investigation reports written for concerns raised at Watts Bar are reviewed by the Watts Bar Site Director's organization to identify concerns that could have generic implications to Sequoyah. In addition any NCRs written to correct construction deficiencies at Watts Bar are evaluated by TVA's Office of Engineering for generic implications at other nuclear plants as a part of the existing NCR evaluation process. The more significant generic issues that are currently being evaluated relative to safe startup and operation of Sequoyah and their status are discussed in the following paragraphs.

In examining these generic issues, certain actions have already been taken or planned by the line organization as described below. These actions have been taken prior to receiving an investigation report relating to the issue and as such any specific findings that are provided in subsequent investigation reports dealing with these issues may require additional corrective action.

A. Welding Program at Sequoyah

Issue

Based on employee concerns identified at Watts Bar involving welder qualification and continuity, and questions concerning TVA's overall welding program, determine the adequacy of Sequoyah's welding program.

Actions Taken or Planned

1. A complete review of SQN welders' files has been performed to ensure that adequate documentation of welder qualification and continuity exists. The plant performed a review of all welder qualification and continuity records. An independent overview (approximately 90%) of records was performed by the site QA staff with assistance from an offsite Division of Quality Assurance welding specialist. This review identified no programmatic deficiencies, but did reveal a number of clerical errors, which have been corrected, relating to the recording and transfer of information.

2. SQN welders who took their welder qualification test or maintained continuity at another TVA facility have been given and successfully completed a weld renewal test in accordance with applicable codes. This weld renewal test reestablishes the welder's certification and provides additional assurance of his continued ability to perform acceptable production welds.
3. A welding engineer position has been filled in the site services staff at Sequoyah. This engineer provides a general surveillance of the overall welding program and handles day-to-day welding problems.
4. In parallel with the overall effort to resolve alleged deficiencies in the implementation of TVA's welding program, the Division of Nuclear Services, and its contractor APTECH Engineering, is performing an assessment of welds currently in service on units 1 and 2 at Sequoyah. This program is being performed to determine the adequacy of TVA welded structures and components that are safety-related or structurally significant and to determine the acceptability of the overall welding program. The independent contractor assessment being performed by APTECH will be presented to TVA on December 4, 1985, and can be presented to NRC by mid-December 1985, if needed.

This effort will include the following as a minimum:

- a. An assessment of the pertinent control features of the Sequoyah construction welding program.
- b. An assessment of TVA activities since construction that relate to weld quality and suitability for service, including:
 - o System hydrostatic tests
 - o Hot functional and preoperational tests
 - o Section XI preservice examinations
 - o Section XI inservice examinations including piping volumetric and hanger visual examination
 - o Identification and tabulation of additional augmented inspections
- c. Categorization of safety-related items with respect to structural significance.
- d. Assessment of key welded structures to demonstrate conservative design margins.

B. Instrument Line Installation

Issue

Based on employee concerns identified at Watts Bar involving deficiencies in instrument line installations including slope, compression fittings, instrumentation line bending, use of teflon tape, and supports, determine the adequacy of instrument line installation at Sequoyah.

Actions Taken or Planned

1. During the preoperational test phase problems were encountered with air entrainment in instrument lines particularly on the ERCW, AFW, and component cooling water systems. These problems were resolved prior to completing preoperational testing and included actions such as:

Installation of high-point vents

Rerouting of instrument lines

Relocation of instruments closer to the process sense point

Backfilling of instrument lines when returning a system or portion of a system to service

The corrective action taken was determined on a case-by-case basis. Acceptable performance was verified during preoperational testing.

2. During initial plant operation, problems were encountered with air entrainment in instrument lines on the main feedwater system. These problems were addressed by the development of a revised instrument line backfilling procedure and the installation of high-point vents. In addition, some of these instrument lines were rerouted. Resolution of these problems was confirmed by test data.
3. Air entrainment in instrument lines typically manifests itself as an erratic signal on differential pressure measurements such as flow and level. These process measurements are the most susceptible due to the typically low pressure applied to the transmitter. An erratic signal resulting from air entrainment in an instrument line is easily detected. Such problems would be addressed and resolved under the plant's maintenance program. A complete review of instrument maintenance records on the reactor coolant system flow transmitters has been completed. Only one confirmed case of air entrainment was identified and the problem was readily detected by the unit operators and was resolved.

4. The Office of Engineering will perform an evaluation of instrument line adequacy by examining previous design, operating experience, and present maintenance practices. The evaluation will be complete by December 23, 1985.

C. Anchor Bolts

Based on employee concerns identified at Watts Bar relating to three issues involving base plate anchorages, determine the adequacy of Sequoyah's anchor bolts.

1. Rusty Anchor Bolts

An employee concern stated that rust was observed on the anchor bolts for the ventilation ducts attached to the floor of the annulus at Watts Bar and an NCR was written for Watts Bar. Sequoyah has a similar configuration and those anchor bolts might have a similar condition.

Actions Taken or Planned

A field survey in both units 1 and 2 at Sequoyah has been performed observing for rust on the ductwork attachments to the floor of the annulus. The exposed anchorage on the outside of the arc of the ductwork was observed and, where access permitted, attachments on the inside of the arc were observed.

The survey revealed that the exposed portions of the anchorage are painted, and that the coating is free of irregularities, indicating there is no pitting of the steel or corrosion taking place.

2. Fake Anchorages

An employee concern stated that nuts had been welded to the back side of base plates to fake the anchorages.

Actions Taken or Planned

An investigation including a field survey has been made. A sampling plan was utilized in which the bolts in 111 base plates were measured ultrasonically to detect differences in bolt lengths which might indicate fake anchorage. Suspect bolts were removed from 26 base plates to observe for welded nuts behind the base plates. The sampling plan has been completed with no such fake anchors being found. However, some nuts, apparently used to level the plates for grouting, were found. The configurations found do not appear to be in

accordance with drawings received to date. Disposition of that condition is in progress. Some bolts were determined to have less than one bolt diameter of thread engagement with the anchor and were replaced with bolts of sufficient length. This finding will be reviewed for consideration of additional actions.

3. Pull Tests for Anchors Bypassed or Falsified

An employee concern stated that pull tests performed to verify satisfactory installation of shell type, self-drilling (SSD) anchors had been bypassed or falsified in the unit 2 annulus during mid-1977. While the expressed concern relates to a specific area of unit 2 at Sequoyah, the broader concern of anchorage to the shield building wall has been assessed.

Actions Taken or Planned

Documentation searches and field surveys have been, and are being, conducted regarding the concern for anchorage on the shield building wall. Documentation searches revealed that pull tests had been performed to verify satisfactory installation of SSD anchors during mid-1977. The documentation search further revealed that frequent failure of the SSDs to pass the pull tests resulted in issuing NCR 72D in December 1977. Investigations conducted in 1978 revealed that the surface concrete of the unit 2 shield building vertical walls was understrength for use with the shallow-setting SSDs. Thus another type of expansion anchors, wedge bolts, which have a deeper setting depth, were specified to be used in place of the SSD except for lightly loaded anchorages. A field survey in the unit 2 annulus was conducted by QTC during September 1985 to determine if SSDs were replaced, as required, and to examine for proper installation of the wedge bolts. Extensive field surveys of anchorage to the interior (annulus side) and the exterior of the wall have been conducted by site employees. A survey of electrical conduit supports is continuing and instrumentation supports are still under review.

The initial field survey by QTC revealed some apparent discrepancies both in the completion of the NCR 72D work and the installation of wedge bolts. Some instrument line supports have SSDs, but a revision of the construction inspection instruction permits the use of SSDs in some instrument supports with lightly loaded anchors. Some documentation work and possibly a field survey remain to verify instrument line support adequacy. Some conduit supports are outside the exception of the NCR 72D replacement program and the field survey designed to observe for all such supports

is expected to be completed by November 29, 1985. Any unacceptable SSDs on the conduit or unit 2 shield building wall will be replaced before restart of unit 2. Surveys of selected piping systems, HVAC, and cable trays did not reveal any SSDs in use. Any other anchorage discrepancies found will be dispositioned before restart of unit 2.

IV. Line Employee Concern Program at Sequoyah Nuclear Plant

In response to commitments made to NRC, the existing employee concern program within the line organization was emphasized and enhanced. An enhanced Sequoyah employee concern program was initiated in June 1985.

A. Description of the Line Employee Concern Program at Sequoyah

1. Management Involvement and Support

In meetings with managers reporting to him the Site Director discussed and endorsed TVA's policy in the reporting of safety concerns and their resolution. In turn, these managers held similar discussions with their supervisors and this process was continued down to the foreman level to ensure that site managers and supervisors understood and support the employee concern program. These meetings, as well as meetings with employees (including hourly employees), were completed within a month of establishment of the Sequoyah employee concern program. In addition to discussion of the program at various times during the year, the Site Director will periodically reemphasize in meetings with his managers their continuing responsibility to encourage employee safety views and to promptly respond to them.

2. Methods Used to Inform Employees How to Express Their Concerns and That Expression of Employee Concerns is Encouraged

By June 1985, signs encouraging employees to express their safety concerns and providing names and phone numbers of NSRS and NRC representatives were prominently displayed in six locations onsite: employee gatehouse, turbine building entrance, entrance to plant service building, O&PS building, design services building, and the modifications building.

The employee response team sign providing the toll-free QTC telephone number was also posted in those locations in the same time frame. In addition, pre-addressed envelopes will be provided at these locations so that employees may submit concerns directly to QTC in writing. These envelopes will also be provided to employees during exit interviews performed at the site.

"Safety Notices" which encourage the expression of employee concerns to management onsite as well as to NSRS, NRC, OSHA, and various offsite TVA organizations were distributed to each employee at the first of August 1985 and are being provided to new employees at check-in. Notices will be distributed annually to employees to reemphasize this.

Wallet-sized cards with information similar to that discussed above were distributed to employees on site in August 1985 and are provided to all new employees at check-in.

In addition to the methods discussed above used to inform employees of the site's employee concern program, a General Employee Training module has been developed and was implemented in June 1985 for this purpose.

Employees who terminate or transfer out of the site organization receive an exit interview with the site personnel staff during which they are given an opportunity to express their safety concerns. These employees are encouraged to express any concerns they may have and are informed that no recrimination will result because of information which they provide. Safety concerns identified in these exit interviews are referred to the Site Director for his action.

3. How Safety Concerns are Addressed by Supervisors and Managers at Sequoyah

Principal line managers are required to document each employee safety concern and their disposition of it by use of a personal record book established specifically for this purpose. The manager to whom the concern is reported initiates any reporting or other action required by plant procedures within the time frame required by these procedures. After evaluation of the concern and determination of appropriate corrective action, the manager discusses with the employee whether the concern was substantiated and, if so, what corrective action will be taken. Employees who submit a concern in writing are provided a written response to their concern.

Sequoyah has placed emphasis on line supervisors dealing directly with employees who express a concern. This involvement is essential to maintaining open communications and trust between employees and management.

B. Status of Sequoyah Onsite Employee Concern Program

Sequoyah's onsite employee concern program is based on interaction between the supervisor to whom the concern is reported and the employee raising the concern. Responsibility for effective evaluation of the concern and implementation of appropriate corrective action for concerns which are substantiated is placed squarely on line management. To provide an indication of what has come out of this program, a summary status of employee concerns reported to managers at Sequoyah during the past three to four months is presented later in this section.

It should be recognized that Sequoyah's employee concern program is by no means the only mechanism through which employees express their concerns and through which concerns and questions are addressed and resolved. The most common method of resolving concerns is through daily interaction between employees and supervisors on the job. Concerns documented under the employee concern program do not include the daily concerns and problems raised by employees in crew safety meetings, section safety meetings, and foremen's meetings which are either resolved in the meetings or are documented, tracked, and dealt with as a part of the supervisor's regular duties. In the day-to-day work of the site's compliance staff and industrial safety staff, many nuclear and industrial safety-related questions, concerns, and suggestions are routinely identified and documented, tracked, and resolved. Sequoyah's employee concern program does not duplicate or take the place of these established channels of communication for problems, questions, and concerns from employees. The employee concern program is intended to meet the need of those employees who might not normally have access to these routine mechanisms, do not choose to use them, or have used them and not been satisfied with the results.

A summary of employee concerns reported to principal line managers over the past three to four months under the Sequoyah employee concern program is provided in the numbered paragraphs which follow:

1. Site Director

A total of three employee concerns have been received from employees onsite. Two of those concerns were related to personnel/industrial safety and one related to both nuclear and industrial safety. The concern related to both nuclear and industrial safety is still under evaluation. Corrective action has been taken for the two personnel/industrial safety concerns and these concerns have been closed.

2. Personnel Services Staff

A total of four employee concerns have been submitted to the personnel services staff. Two regarded promotion policies, one regarded terminations, and one regarded criticisms of management. Of the four concerns, two were unsubstantiated and two are still being evaluated.

3. Financial Planning Staff

None

4. Assistant to the Site Director

None

5. Plant Manager

None

6. Administrative Services Unit

None

7. Industrial Safety Staff

A total of 10 employee concerns have been submitted to the plant industrial safety staff. All of these employee concerns were related to industrial safety and none had nuclear safety implications. Of these 10 concerns, 9 were substantiated to a degree to warrant some measure of corrective or preventative action. Three of these concerns have been resolved. Corrective actions on five others are still in progress. The remaining unresolved concern is still being evaluated to determine an adequate resolution. Of the ten concerns reported to the industrial safety staff, one was initially not substantiated but subsequently readdressed by the health and safety committee as a result of an industrial safety incident which occurred at a non-TVA nuclear plant under construction. This concern is still being evaluated to determine the appropriate corrective action.

8. Planning and Scheduling

One employee concern has been submitted by a planning and scheduling section employee. The concern was nuclear safety related, has been substantiated, and corrective action is in progress.

9. Operations and Engineering Superintendent

Two non-safety concerns were expressed to the operations and engineering superintendent. Both were substantiated. One concern has been resolved and the second concern is under evaluation to determine the appropriate corrective action.

10. Public Safety

None

11. Engineering Group Supervisor

A total of three employee concerns have been submitted to the engineering group supervisor. Two were classified as both nuclear safety and industrial safety and are still being evaluated. The other concern involves the management decision to shutdown Sequoyah over environmental qualification issues. Several discussions have been held between the employee concerned with plant shutdown and site management to explain the basis for the action taken.

12. Engineering Section Supervisor

Two employee concerns have been expressed to the supervisor of the plant engineering section. One was related to personnel safety and the other concern had to do with an employee being concerned with the removal of both Sequoyah units from service in August of this year. For the personnel safety concern, action was taken. In the case of the employee concerned with plant shutdown, several discussions between the employee and site management were held to explain the basis for the actions taken.

13. Reactor Engineering Unit

None

14. Chemical Unit

None

15. Mechanical Test Unit

A total of two employee concerns have been submitted to the supervisor of the mechanical test unit. Both were related to personnel safety. Of the two concerns, one has been resolved by the corrective action taken and the other is still being evaluated.

16. Systems Engineering Section

A total of six employee concerns have been submitted to the supervisor of the systems engineering section. All of these were industrial safety concerns which were resolved by providing more information or training to section employees.

17. Health Physics Section

None

18. Operations Group

Three employee concerns have been expressed to supervisors in the plant operations group. Two were nuclear safety-related and the other concern was related to personnel safety. None of these three concerns were substantiated.

19. Maintenance Superintendent

The maintenance superintendent has been notified of three employee concerns. One concern was an industrial safety concern addressed to the electrical maintenance section supervisor. The maintenance superintendent substantiated this concern and corrective action is in progress. The second concern which was also raised in the electrical maintenance section was related to nuclear safety. The maintenance superintendent approved corrective action which has subsequently been completed. The third concern is related to personnel selection and is presently being evaluated.

20. Mechanical Maintenance Group

None

21. Building Services Section

None

22. Plant Electrical Maintenance Section

A total of five employee concerns have been submitted to supervisors in the electrical maintenance section. Three were nuclear safety related and two were related to personnel safety. Of the five concerns, three were not substantiated, one was substantiated and corrective action taken, and one is still being evaluated.

23. Plant Instrument Maintenance Group Supervisor

One personnel safety concern was expressed to the instrument maintenance group supervisor. This concern was substantiated and corrective action is in progress.

24. Instrument Maintenance Engineering Section

The instrument maintenance engineering section supervisor has received one safety-related employee concern. This concern is currently under evaluation.

25. Instrument Maintenance Craft Section

A total of six employee concerns have been expressed to the supervisor of the instrument maintenance craft section. All of these concerns were related to industrial/personnel safety. One concern was not substantiated and five concerns were substantiated. Of these five, two have had corrective action taken, two have corrective action in progress, and one is under evaluation.

26. Plant Compliance Staff

None

27. Plant Quality Assurance Staff

A total of five employee concerns, all of which were considered nuclear safety related, have been submitted to supervisors in the QA staff. Three of these concerns have been evaluated and corrective action is underway while the other two are still under evaluation.

28. Site Services Branch

None

29. Design Services/OE Project

None

30. Modifications Branch Manager

None

31. Mechanical Modifications Section

One employee concern has been expressed to the mechanical modifications section supervisor and it was related to personnel safety. The concern was evaluated and was not substantiated.

32. Supplemented Resource Manager

None

33. Electrical Modifications Section

There have been five employee concerns expressed to the section supervisor. Four of these concerns were related to personnel/industrial safety. Of these four concerns, one was not substantiated, two were substantiated and corrective actions taken to resolve the concerns, and one is under evaluation by site management. The other concern was related to the amount of paperwork and procedures which the employee stated was placed ahead of the quality of work. This concern is under review by site management.

34. Employee Concerns Expressed in Exit Interviews by Employees Who are Terminating or Transferring

Since August 1, 1985, 36 exit interviews have been conducted by the personnel services staff with employees who were resigning from TVA or transferring to positions with other TVA organizations..

In these interviews, eight safety related concerns were raised. One was nuclear safety-related, and seven were related to personnel safety. Of the eight concerns, two were unsubstantiated and one of these was resolved with the employee during the exit interview; three involved general housekeeping conditions and are being referred to the appropriate section; and the other three concerns are under evaluation. Each is being summarized and will be forwarded to the site director for his review.

Seventeen employees took the opportunity during the exit interviews to make suggestions toward increased efficiency. These suggestions included more personal contact between managers and employees, increased public relations activity on the part of TVA, decreased paperwork, etc. These discussions often centered on concerns about pay scales for salary policy, craft, and management employees; the merit pay plan and the management appraisal system; and advancement opportunities for clerical and engineering aide schedule employees. These personnel-related concerns are addressed by the personnel services staff in the course of their regular activities and are brought to the attention of appropriate management.

C. Effectiveness of Site Employee Concern Program

In the conduct of this program, emphasis is placed on the involved supervisor personally responding to the employee to provide the results of the evaluation and disposition of the concern. Supervisors to whom concerns are expressed frequently review these concerns with their supervisors and other management in the course of evaluating them and developing and implementing corrective actions for those concerns which are substantiated.

As indicated in the previous section, about 70 concerns have been raised through this program. This provides evidence that Sequoyah management has established a good working relationship with their employees and that the program is effective and responsive to employees who raise concerns to their supervisors.

ACRONYMS

BLN	Bellefonte Nuclear Plant
BFN	Browns Ferry Nuclear Plant
DCR	Design Change Request
ECP	Employee Concern Program
ECP-SR	Employee Concern Program Site Representative
IG	Inspector General
NCR	Nonconformance Report
NSRS	Nuclear Safety Review Staff
NSRS-SR	Nuclear Safety Review Staff Site Representative
OER	Office of Employee Relations
OGC	Office of General Counsel
OSHA	Occupational Safety and Health Administration
P&E	Power and Engineering
QTC	Quality Technology Company
SQN	Sequoyah Nuclear Plant
WBN	Watts Bar Nuclear Plant
QA	Quality Assurance
DOL	Department of Labor