

Indian Point 3
Nuclear Power Plant
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New York Power Authority

John H. Garrity
Resident Manager

October 15, 1993
IPN-93-125

Mr. Richard W. Cooper, II, Director
Division of Reactor Projects
US Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Employee Safety Concerns

Reference: Letter from Richard W. Cooper to John H. Garrity "Employee Safety
Concerns," dated September 16, 1993.

Dear Mr. Cooper:

In your letter dated September 16, 1993 (Reference), you advised me of a concern expressed by a New York State Representative at a public meeting held on August 18, 1993. Your letter stated that the Representative was concerned that Indian Point 3 workers may fear they will jeopardize their jobs if they bring safety concerns to the attention of their management or the NRC.

You expressed concern that there may be a perception among plant workers that retaliation could result from raising safety issues. You asked me to advise you whether I felt the perception was valid and the basis for my conclusion. Further, you asked me to describe the programs and practices at Indian Point 3 that are intended to foster an atmosphere in which workers feel free to raise concerns without fear of retaliation and with confidence that appropriate consideration will be given to their concerns. This letter addresses the Representative's concern as related in your letter and responds to your request.

Prompt and effective response to potential safety issues is an essential element in the proper operation of a power plant, particularly in a commercial nuclear plant, with its attendant responsibilities for the safety and welfare of the general public. Concerns such as those raised by the Representative, even when not accompanied by specific examples or information, deserve careful consideration. The referenced questions have received exactly that careful attention.

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I have concluded that Indian Point 3 workers do not perceive that retaliation could result from raising safety issues. My conclusion is based on my own interaction with plant personnel, on the results of inquiries and evaluations, and on the results of a survey specifically commissioned to address the Representative's concern.

The recent months at Indian Point 3 have been particularly demanding, as the staff works to return the plant to operation. During this period, I have endeavored to ensure that plant workers at Indian Point 3 feel free to bring all problems to the fore. At executive staff meetings, and at broader station meetings attended by a majority of plant personnel, I have explicitly encouraged all members of the plant staff to look for safety problems and concerns and to bring them to management's attention.

At one of these meetings, attended by management personnel, I talked extensively to this issue. I stated that I expected my management team to address all employee safety concerns expeditiously and effectively. I directed anyone who did not feel satisfied that his or her concern was properly addressed to move the concern up the management chain until it got properly addressed, or to bring the issue directly to me if it did not. During this meeting I notified my staff that I would not tolerate retaliation against any individuals bringing up safety concerns.

On several occasions, I have addressed my position on this topic on a one to one basis. Each of these discussions served to confirm that my message was being received and was understood. Further, I have instructed my staff to aggressively investigate all actual or hinted allegations of retaliation. In all but one instance where we have pursued these inquiries, the investigations concluded that the rumors were unfounded. Prior to receiving your letter, I referred one remaining report of a possible retaliation issue to the Authority's Law Department to ensure an independent, external evaluation.

In addition to these actions, several means have existed at the Authority and Indian Point 3 to promote the communication of safety concerns. The required postings, (NRC Form 3) advising plant staff of their obligation and right to report safety concerns to plant management or the NRC without fear of retaliation, are available at several locations throughout the plant. This information is also provided to all workers through General Employee Training. Indian Point 3 has an employee feedback program that employees can use to anonymously report safety and other concerns. Another means available is an answering machine in the corporate office that anyone can use to leave a message for the Executive Vice-President Nuclear Generation regarding their concern.

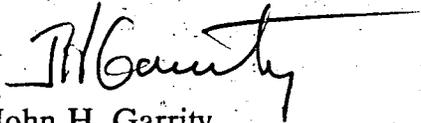
Further, the Authority is looking into additional ways to address the handling of employee safety concerns on a Nuclear Generation Department or Company-wide basis. An interdepartmental group is studying various additional mechanisms which may be utilized. The group is gathering information from other nuclear utilities which have employee concerns/resolution programs in place, in order to assess which aspects of these programs are suitable for the Authority and its employees.

As I indicated, I am convinced that the general perception of the Indian Point 3 staff is that management wants to be notified of any safety concerns and that retaliation would not result from such notifications. Recognizing, however, how difficult it is to evaluate perceptions, I asked my staff to conduct a focused, though unbiased, survey. Randomly selected people were asked to read the Reference and a draft of this letter and to give their impressions. Additionally, they were asked if they would be reluctant to report a safety concern because of fear of retaliation. The sample size was approximately 40 people and the interviews were conducted one-on-one. The sample includes a spectrum of job positions and departments and includes managers, technicians, supervisors, clerks and security guards. The results indicate that the people surveyed do not feel that they will be retaliated against for voicing safety concerns, and that they would not hesitate to report safety concerns to management. To the contrary, they are aware that they are expected to make their concerns known.

In summary, I feel that Indian Point 3 has fostered an environment wherein plant personnel are expected to make any safety concerns known to management without fear of retaliation.

If you have further questions on this subject please contact me.

Very truly yours,



John H. Garrity
Resident Manager
Indian Point 3 Nuclear Power Plant

JHG/JC/jc

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