FORD 2

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ACCESSION NBR: 9312220325 DOC. DATE: 93/07/29 NOTARIZED: NO DOCKET # FACIL: 50-220 Nine Mile Point Nuclear Station, Unit 1, Niagara Powe 05000220 50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha 05000410 AUTH. NAME AUTHOR AFFILIATION

NICHOLSON, L. NRC - No Detailed Affiliation Given RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: Package containing Employee Concerns Program insp rept 50-220/89-21 & 50-410/89-16 dtd 930915.

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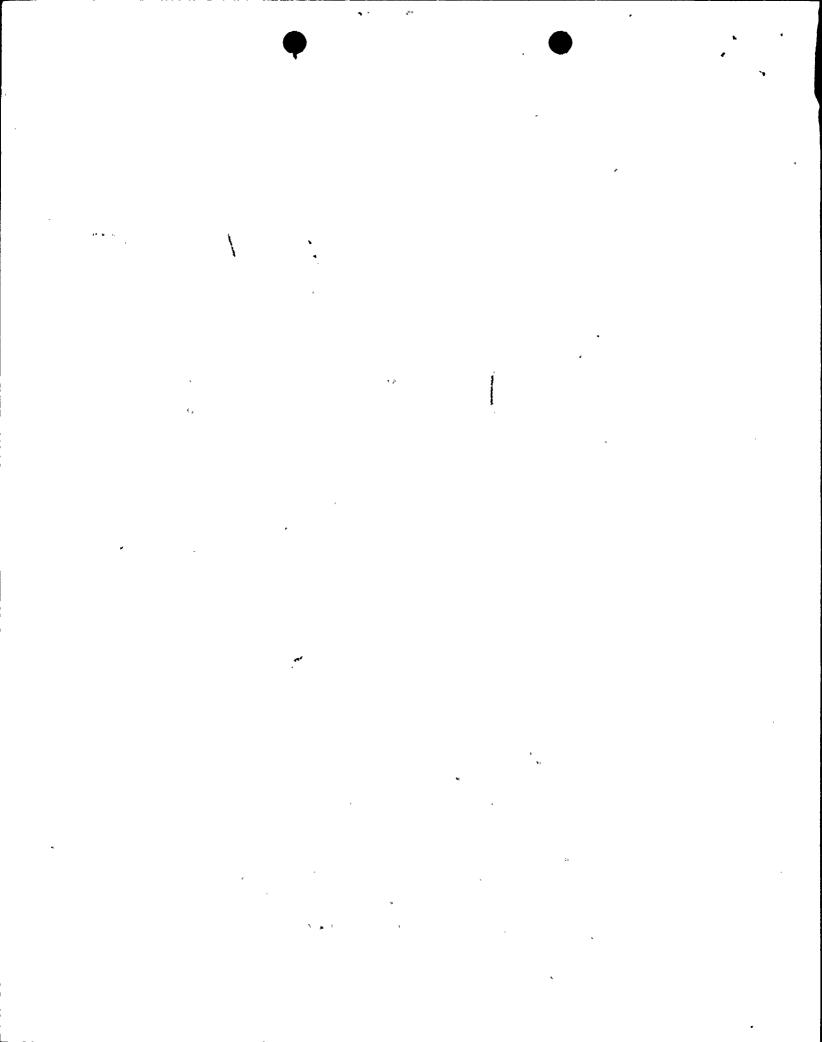
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Attachment

EMPLOYEE CONCERNS PROGRAMS

PLANT NAME: Nine Mile Point LICENSEE: Niagara Mohawk DOCKET #: 50-220/50-410

NOTE: Please circle yes or no if applicable and add comments in the space provided.

A. PROGRAM:

- 1. Does the licensee have an employee concerns program?
- 2. Has NRC inspected the program? Report #: Combined Inspection 50-220/89-21 and 50-410/89-16, dated September 15, 1989
- B. SCOPE: (Circle all that apply)
 - 1. Is it for:
 - a. Technical? Yes
 - b. Administrative? Yes
 - c. Personnel issues? No (Personnel issues referred to Human Resources Department)
 - Does it cover safety as well as non-safety issues?
 Yes
 - 3. Is it designed for:
 - a. Nuclear safety? Yes
 - b. Personal safety? Yes
 - c. Personnel issues including union grievances?
 No (Has technical aspects, personnel issues including union grievances are turned over to the Human Resources Department)
 - 4. Does the program apply to all licensee employees? Yes
 - 5. Contractors? Yes
 - 6. Does the licensee require its contractors and their subs to have a similar program?

 No (The QIP Program is discussed during GET given to the contractors.
 - 7. Does the licensee conduct an exit interview upon terminating employees asking if they have any safety concerns?

 No (Upon termination employees complete a termination checklist which gives the employees the option of completing a QIP concerns form or a personal interview.

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Issue Date: 07/29/93

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C. INDEPENDENCE:

- 1. What is the title of the person in charge? Q1P Program Director
- 2. Who do they report to?
 Branch Manager Licensing
- 3. Are they independent of line management?
 Yes (They report to the General Manager of Safety Assessment, Licensing, and Training)
- 4. Does the ECP use third party consultants?
 Yes (When applicable utilizes lawyers, QA, or different technical branches)
- 5. How is a concern about a manager or vice president followed up?
 Next higher level in chain of command (example Executive VP Nuclear resolves Q1P concerns for General Managers)

D. RESOURCES:

- 1. What is the size of the staff devoted to this program?

 One individual
- 2. What are ECP staff qualifications (technical training, interviewing training, investigator training, other)?

 Q1P Program Director experience expands over 15 years diverse management and technical positions. Various positions held include QA/QC inspector, supervisor and manager, program coordinator independent assessment group, program director INPO, Q1P executive staff, and program director INPO/Q1P licensing.

Technical Training: SNT-TC-1A and ANSI 45.2.6 Level 2 Certifications held: Radiography Examination, Magnetic Particle testing, Special Processes, Electrical, Visual Inspection 1 through 4, Liquid Penetrant Testing, Solution Film Testing, Mechanical, Receiving Inspection, Quality Control/Visual.

Interview Training: Completed management development training course "Interviewing for Fact Finding".

Investigator Training: HPES Training and Simple Root Cause Training.

E. REFERRALS:

Who has followup on concerns (ECP staff, line management, other)?
 Company lawyer for discrimination concerns.
 Technical concerns addressed by the deficiency event report system which includes onsite safety review committee review of resolutions.

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- 3. In the last three years how many concerns were raised? 26 Of the concerns raised, how many were closed? 14 What percentage were substantiated? 53%
- How are followup techniques used to measure effectiveness (random survey, 4. interviews, other)? Approximately a year and a half ago a survey was provided to the site population. ECP periodically meets in small group sessions with the plant staff. Periodic discussions at morning meetings and individual interviews.
- 5. How frequently are internal audits of the ECP conducted and by whom? Last internal audit conducted (Audit Report 91-25) during July 1991 by NMPC Internal Audits. Internal Audits reports directly to NMPC Chief Executive Officer (CEO).

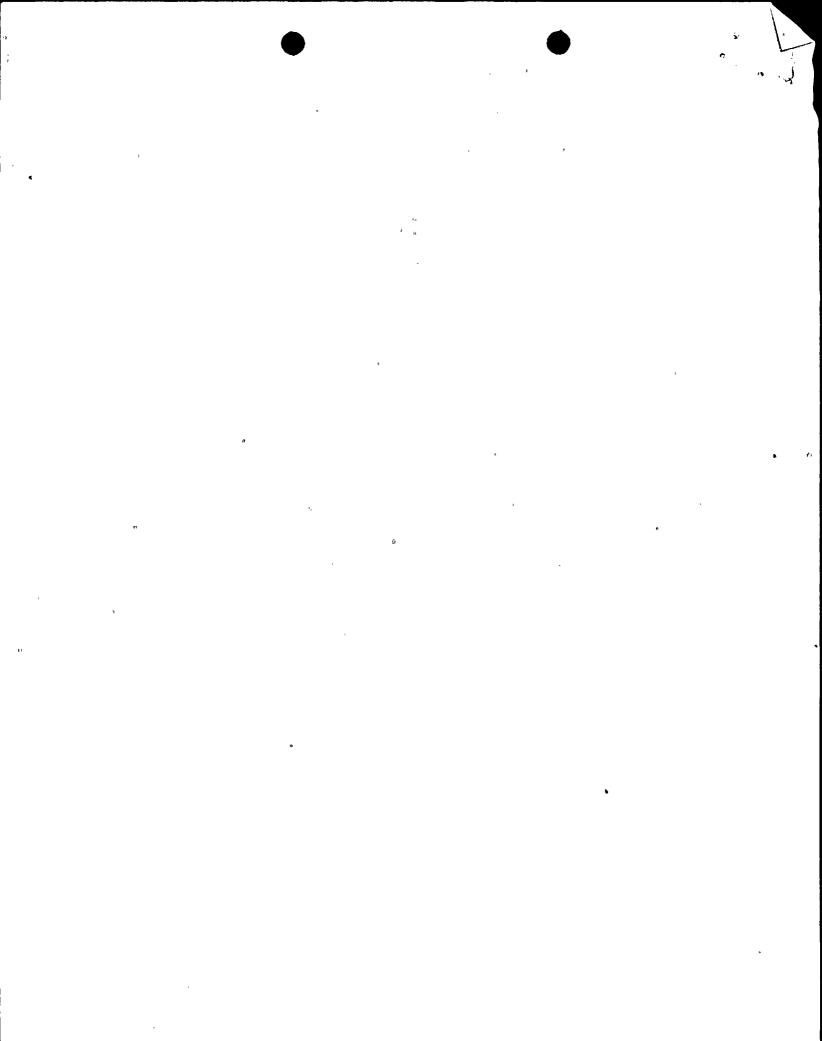
1. ADMINISTRATION/TRAINING:

- Is ECP prescribed by a procedure? Yes 1. NIP-ECA-04, Quality First Program (Q1P)
- How are employees, as well as contractors, made aware of this program (training, 2. newsletter, bulletin board, other)? General Employee Training · Bulletin Boards, conspicuous signs in plant, and in weekly newsletter

ADDITIONAL COMMENTS: (Including characteristics which make the program especially effective, if any.)

- 1. Senior Management Endorsement of the Program.
- 2. Accountability and resolution of concerns is the responsibility of the organization that the concern effects.

NAME: TITLE: PHONE #: Richard Plasse/Resident Inspector/(315)342-4042 DATE COMPLETED: 8/26/93



CONFIDENTIALITY:

- 1. Are the reports confidential? Yes
- 2. Who is the identity of the alleger made known to? **ECP staff**
- 3. Can employees be:
 - a. Anonymous? Yes
 - b. Report by phone? Yes (Site phone number 343-1172 and 1-800 phone number listed in city telephone book for Q1P Program)

G. FEEDBACK:

- 1. Is feedback given to the alleger upon completion of the followup? Yes (Discussed openly person-to-person)
- 2. Does program reward good ideas?

 By nature of concern, can't reward individual without jeopardizing confidentiality. Licensee has an Employee Recognition Program, however, no example, where Q1P concerns have been advertised for recognition.
- 3. Who, or at what level, makes the final decision of resolution? ECP validates corrective actions, Branch Manager is responsible for DER resolutions, Executive VP Nuclear Generation is responsible for resolution of concerns specific to the Q1P Program.
- 4. Are the resolutions of anonymous concerns disseminated?

 To the Senior Management Team which includes the Executive VP, Plant Managers and General Manager Site Support and Safety Assessment, Licensing and Training.
- 5. Are resolutions of valid concerns publicized (newsletter, all hands meeting, other)?

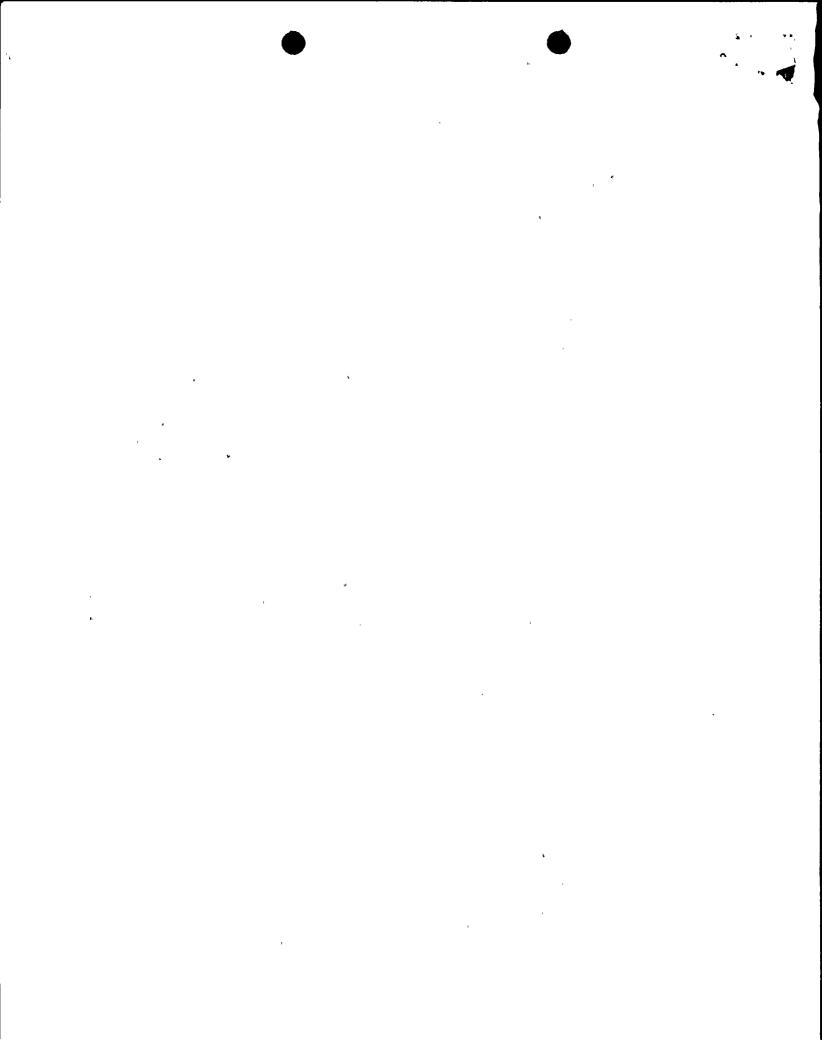
 Examples of concerns and management buy-in for the program publicized periodically in weekly newsletter.

II. EFFECTIVENESS:

1. How does the licensee measure the effectiveness of the program?

1) Compares ratio of NRC concerns/Q1P concerns.

- 2) Benchmark other utilities.
- 3) Monitor plant areas which identify concerns (throughout the plant is effective, localized would mean not all departments utilize the process).
- 2. Are concerns:
 - a. Trended? Yes
 - b. Used? No (There have been no specific trends identified)



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