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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
 AUTH. NAME AUTHOR AFFILIATION
 BYRAM, R.G. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 COOPER, R.W. Region 1 (Post 820201)

SUBJECT: Forwards proprietary response to concerns in 930816 ltr.
 Response addresses six integrity policy criteria in
 Encl 1 to ltr for each concern & consists of three
 attachments. Encl withheld.

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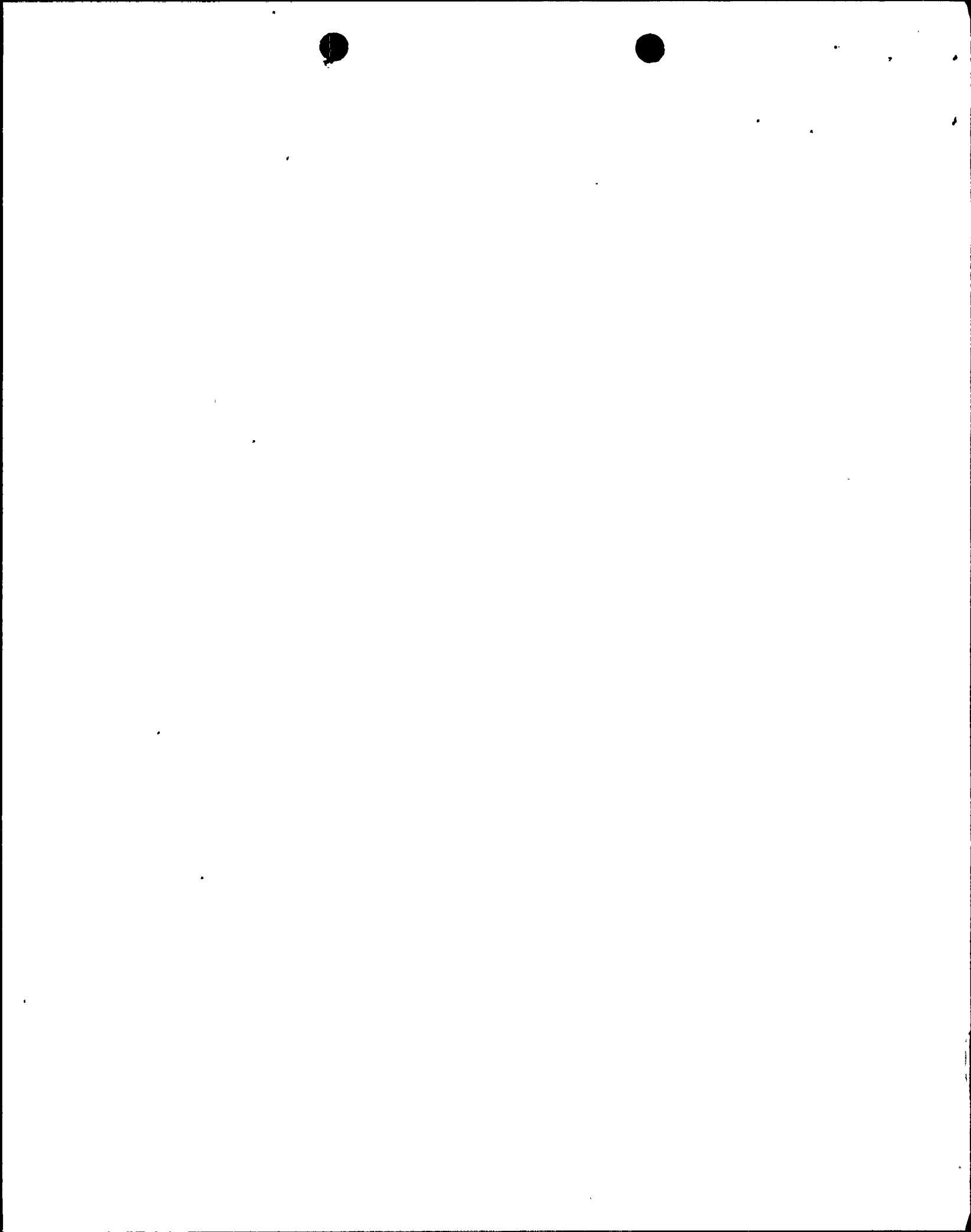
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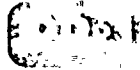
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Pennsylvania Power & Light Company

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DEC 30 1993

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

SUSQUEHANNA STEAM ELECTRIC STATION
REPLY TO NRC REQUEST FOR INFORMATION
PLA-4070 **FILES R41-2/R41-1C**


Docket Nos. 50-387
and 50-388

Dear Mr. Cooper:

Attached is Pennsylvania Power & Light Company's (PP&L) response to the two concerns identified in your letter dated 8/16/93. The response addresses the six criteria identified in Enclosure 1 to your letter for each concern and consists of three attachments. Attachments 1 and 2 contain no confidential or proprietary information. Attachment 3 contains information that should be withheld from public disclosure in accordance with 10CFR2.790.

We trust that the Commission will find the attached response acceptable.

Very truly yours,



R. G. Byram

Enclosures

cc: NRC Document Control Desk (Original)
Mr. R. J. Clark - NRC Sr. Project Manager
Mr. G. S. Barber - NRC Sr. Resident Inspector (SSES)

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ATTACHMENT 1

REPLY TO NRC REQUEST FOR INFORMATION

Background

Early this summer, PP&L management received information which, if substantiated, would violate our Corporate standards of integrity policy. Upon the receipt of this information, an investigation was initiated to determine the validity of the issues. The information received in the NRC letter supported this investigation and provided additional insights into the scope of issues to be addressed. The issues identified in Enclosure 3 of your letter are similar to those involved in our internal investigation. In order to determine an accurate root cause of the concerns, determine any generic implications and develop corrective actions, investigation results of both your issues and our internal issues need to be considered together. All the issues were thoroughly investigated by individuals that are not in the direct organizations in which the concerns took place. The two individuals performing this investigation were from Nuclear Security and Nuclear Plant Services (Site Support). In addition, a team of five (5) individuals from Nuclear Plant Services, Nuclear Procurement, Nuclear Regulatory Affairs and Nuclear Safety Assessment was formed to evaluate and recommend corrective actions.

The initial investigation has been completed and the results can be found in Attachments 2 and 3. Other internal issues were identified and are currently being investigated by our Corporate Auditing department. The team's evaluation identified major issues related to all the investigations. A discussion of the major issues is found below.

Major Issues

- The leadership style of the supervisor in charge of the work group associated with these issues did not meet our standards. This conclusion was the result of both the investigation into the NRC concerns, as well as investigation into other reported improprieties associated with violations of PP&L Standards of Integrity. This leadership style did not create the proper atmosphere of openness. We determined through interviews that some contractor employees would be reluctant to report mistakes. We were, however, encouraged to find that all contractor employees stated that they could freely report safety concerns.

As a result of our investigations, corrective actions have been defined and personnel changes have been made. The supervisor in charge of the work group associated with these issues has resigned as has another PP&L supervisor and the contractor supervisor. Our investigations by our Corporate Auditing department are continuing which may result in additional actions.

Although our current indications are that this issue is isolated to a particular work group, we expanded our corrective actions to include all Nuclear Department employees, including contractors.

These corrective actions are:

- A. A letter to Nuclear Department supervisors and managers clearly identifying what occurred, what behavior is expected and the consequences of failing to meet these expectations.
 - B. A letter to Nuclear Department and contract employees to clearly communicate our expectations regarding contract administration, Standards of Integrity and reporting safety concerns or mistakes.
 - C. Our standards, expectations and the consequences of failing to meet our expectations will be incorporated into supervisory training.
- Our review and evaluation identified the need to improve Management oversight of PP&L supervision who had direct responsibilities for contractors. The Nuclear Department has an organizational vision stated in our 1994 Strategic Plan "to make the Nuclear Department a viable team with everyone performing to his or her maximum potential, respected for doing that job by an organization that recognizes and values the need for that job." We need to address how this vision applies to contractors. To improve our performance in this area, we will:
 - A. Develop clear standards and expectations for management oversight of contractors and train managers on the resulting standards and expectations.
 - B. Identify a central point of contact to clarify contract administration issues.
 - The Fitness for Duty program does not provide clear guidance on what actions are to be taken when the odor of alcohol is the only indicator of a Fitness for Duty concern.

The corrective action is to clarify the action expected and revise the Fitness for Duty program as appropriate.

ATTACHMENT 2

REPLY TO NRC REQUEST FOR INFORMATION

Issue 1 (Enclosure 2)

The concern expressed in this issue is that there was an atmosphere of not reporting safety issues or mistakes due to intimidation and discouragement, especially with contractor personnel.

Our investigation into the issue identified in this enclosure revealed that two (2) contractor employees were given disciplinary action consisting of three (3) days off without pay for inattention to detail, since this lack of detail was associated with a half scram. The contractor employees claimed that they had not touched any equipment on the instrument racks; however, they both stated that they may have inadvertently jarred or touched something during the course of their work. As a result of the half scram, an investigation into the event was initiated. That investigation revealed that the contractor personnel had caused the half scram. Our investigation further revealed that PP&L I&C Technicians were not present at the instrument racks when the half scram occurred. Also, the investigation revealed there was no discussion or warning that took place between PP&L's Health Physics and I&C groups, contrary to what was stated in this enclosure.

With respect to the letter of reprimand in the contractor employees' files, the contractor supervisor indicated that he was not directed by PP&L to remove the letter of reprimand from his employees' files. The contractual relationship between PP&L and its contractors is such that PP&L does not intervene in the disciplinary actions against contractor employees.

There was a concern that actions of contractor supervision promoted an atmosphere in which the contract workers were intimidated and discouraged from coming forth with information or admitting mistakes. A survey was taken of nineteen percent (19%) of the contractor's employees in this work group. The group consisted of the two contractor employees involved in the event and seven (7) additional employees. The results indicated that all of the employees felt free to report safety concerns. However, one (1) indicated he would not report an incident/mistake if he were responsible and one (1) indicated he would be hesitant.

In addition, the attitude that personnel will report safety issues is further supported by the Nuclear Department's wide effort during the past year to understand the perceptions and attitudes about our employee concerns program. An independent consultant interviewed a representative cross section of 70 people that included PP&L employees as well as contractor employees. The results of the interviews revealed that although there was 100% familiarity with the policy on nuclear safety and employee concerns, contractor employees were not sufficiently knowledgeable of the Employee Concern program to assure achievement of the goal. The following actions resulted to address this item.

1. Conduct training for all Nuclear Department employees and contractors to insure that they know how to report safety concerns and that supervisors and managers know how to receive safety concerns.
2. Revise the current Employee Concern program to lower the point of contact from a senior vice president of corporate manager level to a working level or senior engineer level.
3. Improve feedback to concerned individuals for in-process concerns.

The actions described above are being implemented at this time. Training of personnel remains to be completed by the end of the second quarter of 1994.

With respect to contractor employees not reporting mistakes, an investigation revealed that a certain PP&L supervisor did contribute to the reluctance of contractor employees to report mistakes. This type of behavior is not in keeping with our standards and values.

Based upon observation and interactions of the leadership style of other PP&L supervisors assigned to Susquehanna, this occurrence in behavior is an isolated incident. The individual PP&L supervisor has subsequently resigned.

In order to preclude this issue in the future, the following specific actions will be taken:

1. All Functional Unit Managers and contractor supervision will be made aware of this issue and the consequences of inappropriate behavior.
2. A clear policy will be written describing the PP&L expectations as it applies to our conduct with contractors.
3. This policy will be communicated to all PP&L and contractor employees.
4. This policy will be integrated into our training program.

These corrective actions will be completed by June 30, 1994.

Issue 2 (Enclosure 3)

The three concerns addressed in this issue are:

- A) the possibility that fitness for duty requirements were overlooked,
- B) intimidation of contractor, and
- C) termination of people because they raise issues.

- A. With respect to fitness for duty requirements being overlooked, the investigation substantiated that on 10/3/92 the subject did have an odor of alcohol on his breath while performing duties at the Susquehanna Steam Electric Station. This is based upon the interviews of three (3) witnesses and the subject. The investigation could not substantiate the second incident identified in this issue. Also, the investigation did not confirm that the subject was not fit for duty.

The PP&L supervisor may not have acted in accordance with PP&L's expectation on how to handle the situation. As a minimum, he should have inquired if the individual had consumed alcoholic beverages within the five hour period prior to reporting for duty. PP&L believes that there have been differences in interpretation among its supervisors regarding what actions are expected when the odor of alcohol is the only indicator of a fitness for duty concern. Some PP&L supervisors understand the need for other substantive actions by the subject, in addition to the detection of alcohol on the breath. Other supervisors consider the detection of alcohol on the breath to be a basis for action.

In order to clear up any ambiguities in the Fitness for Duty program, the following actions will be taken:

1. PP&L will develop clear guidance on the actions to be taken when the odor of alcohol is the only indicator of a fitness for duty concern.
2. The Fitness for Duty manual and training lesson plan will be reviewed and revised as appropriate to ensure that clear guidance is provided when the odor of alcohol is the only indicator of a fitness for duty concern.
3. A station document will be distributed to all PP&L and Contractor Supervisors and above in the Nuclear Department which clearly identifies the required supervisory actions when alcohol is detected on an employee's breath.

These corrective actions will be completed by March 31, 1994.

- B. The concern for intimidation of contractors as described by the event regarding work in a fan room and the threat to have the supervisors phone removed is a symptom of an unacceptable management style and is addressed in Issue 1.
- C. PP&L's Corporate Legal Department is pursuing the litigation and complaint made by a previously employed contractor to the Pennsylvania Human Relations Commission alleging he was fired for reporting sexual harassment incidents to PP&L supervision.