

# CATEGORY 1

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ACCESSION NBR: 9901290298      DOC. DATE: 99/01/21      NOTARIZED: YES      DOCKET #  
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 BYRAM, R.G.                      Pennsylvania Power & Light Co.  
 RECIP. NAME                      RECIPIENT AFFILIATION  
 BLOUGH, A.R.                      Region 1 (Post 820201)

SUBJECT: Responds to 981222 RAI, re plan to take to ensure, personnel in early 1998 did not impact ability to maintain safety conscious work environ.

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JAN 21 1999

Mr. A. Randolph Blough, Director  
Division of Reactor Projects  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406-1415

**SUSQUEHANNA STEAM ELECTRIC STATION  
RESPONSE TO 12/22/98 NRC REQUEST FOR  
INFORMATION  
PLA-5023**

Docket Nos. 50-387  
and 50-388

*Reference: 1. Letter, C.W. Hehl to R.G. Byram, dated December 22, 1998.*

Dear Mr. Blough:

This letter responds to Mr. C.W. Hehl's referenced request for information. In that letter, PP&L, Inc. (PP&L) was requested to describe the actions we have taken or plan to take to ensure that a personnel action in early 1998 did not impact our ability to maintain a safety conscious work environment.

In response, PP&L is furnishing the following information:

1. Immediate communications in response to the personnel action;
2. Ongoing efforts to foster a safety conscious work environment;
3. Evidence of the health of our work environment; and
4. Additional actions to further reinforce management standards and expectations.

This information provides a sufficient basis to conclude that PP&L has taken and continues to take appropriate actions to support the willingness of our employees to raise safety and compliance concerns.

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## **1. Immediate Communications in Response to the Personnel Action**

In order to correct any misconception that may exist from a personnel action such as the one in question, PP&L provided both general communications to department managers, and more focused communications within the affected work group, Nuclear Systems Engineering (NSE). Of specific interest are the following:

- (a) In conjunction with the personnel action, the Vice President – Nuclear Operations met with onsite managers to provide them information for their use in answering questions from employees. During this meeting, it was emphasized that the former employee was not removed for speaking out on issues and that all employees and managers should feel free to raise any concern.
- (b) Upon assuming the position, the new Manager - NSE held a series of informal meetings with the five NSE subgroups to reinforce PP&L's position that raising concerns is not only acceptable conduct, but management expects and values such conduct. The General Manager – Nuclear Engineering attended two of these meetings. During the meetings, management emphasized that the former employee was not removed for speaking out on issues and that all employees should feel free to raise any concern. The new manager stressed his personal support for any employee who wished to raise an issue. The engineers raised other technical and administrative issues and discussed where improvements were needed or changes desired within NSE. These meetings were informal and candid.

## **2. Broader Ongoing Efforts to Foster a Safety Conscious Work Environment**

As PP&L has documented in previous correspondence and meetings with the NRC, management has taken numerous and aggressive actions to ensure that the work environment at PP&L is conducive to employees being comfortable in raising potential safety-related concerns. The following pertinent facts illustrate our commitment in this area:

- (a) Standards for a Safety Conscious Work Environment Are in Place

PP&L, Inc. corporate policy regarding Employee Rights to Report Workplace Concerns is as follows:

- 1) Encourage open, honest communication of workplace concerns;
- 2) Address employee workplace concerns in a forthright manner;
- 3) Do not tolerate any form of retaliation toward employees who raise workplace concerns; and



- 4) Promptly investigate and resolve cases of alleged retaliation (including claims of harassment, intimidation or discrimination) toward employees who raise workplace concerns.

The Nuclear Department's policy is consistent with corporate policy:

- 1) Address all concerns raised by an individual in a forthright manner;
- 2) Do not tolerate any form of discrimination against individuals for having raised concerns;
- 3) Promptly investigate and resolve allegations of discrimination against individuals for having raised concerns;
- 4) Do not tolerate any knowingly false accusations made against any individual; and
- 5) Take appropriate disciplinary action for violations of this policy.

- (b) The Concept Of Safety Conscious Work Environment Is Imbedded In All Phases Of Our Nuclear Business – From Our Long Term Goals To Our Annual Direction.

A major goal in PP&L's five-year business plan is to continue to improve the Nuclear Safety Culture, which is important to our business objectives because it is a measure of the effectiveness of our policies, values, corrective action programs, concerns programs, and the actions of supervisors and management. The sponsor for this goal is PP&L's Senior Vice President Generation and Chief Nuclear Officer.

In support of this goal, a variety of specific initiatives that link to maintenance and improvement of a Safety Conscious Work Environment are established on an annual basis. Throughout the year, department performance is monitored regularly by management against the specific goals set in each of these areas. Examples of relevant products considered include a weekly Condition Report status report, a monthly performance indicator report, and a monthly Employee Concerns Program report.

- (c) Significant Efforts Have Been Made to Train Both Managers and Employees

The following training has been completed in support of our commitment to a safety conscious work environment:

- 1) Course MA111 (2 hours), which covers management expectations concerning encouragement of raising concerns and dealing with people who raise concerns, as well as employee protection regulations and other lessons learned was provided to over 300 onsite supervisors between 1995 and 1997.



- 2) Course MA112 (6 hours) develops the necessary behaviors to deal with conflict in the workplace and to support employees in raising concerns. It was provided to over 370 department managers and supervisors between 1996 and 1997.
  - 3) Course MA116 (4 hours), was provided to over 1,100 non-supervisory personnel between 1996 and 1997. It covers employee protection regulations in addition to the importance of raising concerns and employee avenues for doing so. This course is taught to new non-supervisory personnel
  - 4) Course MA073 (4 hours) covers PP&L's policy on Nuclear Safety Concerns. Nearly 1,500 personnel have taken this course or its predecessor, MA610, since 1994. This course is taught has part of the training program for new supervisors.
  - 5) Leadership Academy Training has been provided to nearly 200 supervisors since it began in 1996. Included in this four week supervisory course is a 7-hour module (MA106) that reinforces the importance and understanding of interactions with employees relative to their raising nuclear safety and other concerns. This module is currently taught by an external contractor with specialized experience in this area.
  - 6) General Employee Retraining (2 hours) is given annually to all employees and contractors that maintain Susquehanna access authorization. It provides an overview of the Employee Concerns Program, including PP&L's policy, contacts, how concerns are addressed and individual responsibilities.
  - 7) Finally, we have recently developed Course AD079 (4 hours) in conjunction with Penn State University. This course was designed for our Engineering staff, and its objectives include understanding, analyzing, and improving our nuclear safety culture. Approximately 175 personnel took this course as part of Continuing Engineering Training in 1998.
- (d) We Reinforce Our Training Through Regular Communication

A number of communications are utilized to reinforce the importance of raising concerns; including:

- 1) Open communication forums between work groups and senior management. These discussions are with small groups, and are directed at issues of interest to employees. Issues raised receive further analysis and action as appropriate.



- 2) Periodic written communication from senior management to all employees regarding department employee concerns policy. NDAP-00-0109 stipulates that this will be done at least annually.
- 3) Information and articles in various Department media that support the employee concerns process. These include the department newsletter and "Nuclear Safety Concern Report" forms, both of which are available in department newsstands, as well as information on the internal company website, which provides messages from senior department management, and includes an electronic employee concerns mailbox.

(e) Our Employee Concerns Program is a Long-Standing, Vital Department Function

Since its inception in 1985, PP&L's Employee Concerns Program (ECP) has evolved based on regular assessment and in response to lessons learned from specific issues. It is currently documented in procedure NDAP-00-0109, "Employee Concerns Program," which states:

"The policy of PP&L, Inc. is to address all concerns about Susquehanna Station in a forthright manner and without discrimination. If anyone working on Susquehanna has a concern, management needs to know so that it can be addressed. THE COMPANY WANTS TO HEAR YOUR CONCERNS. THE INTENTION IS TO CAPTURE AND RESOLVE CONCERNS. No one will be penalized for raising a concern to your supervisor, Employee Concerns Representatives, any level of PP&L management or to the Nuclear Regulatory Commission (NRC)."

Consistent with the importance of this policy, the procedure also requires that:

- 1) Senior Department management is kept apprised of all concerns as they are received.
- 2) Training is conducted in support of the policy outlined above.
- 3) Periodic status reviews are provided monthly to management, and are also discussed at Susquehanna Review Committee meetings.
- 4) Regular evaluations of the effectiveness of the ECP are conducted; this is primarily done via feedback surveys for individuals who have entered the program, and by the department-wide safety culture survey (see below).



- 5) Industry activities are monitored for potential improvements to the ECP. In addition to monitoring events, PP&L Employee Concerns Representatives actively attend and participate in industry meetings where information and experience is exchanged.

### **3. Evidence Of The Health Of Our Work Environment Based on Ongoing Assessments**

The activities described above have resulted in improvements in the work environment at Susquehanna. This is demonstrated by results from: relevant annual department goals, periodic independent safety culture surveys, which PP&L initiated in 1993, and an annual ECP customer survey. More specifically:

- (a) The Nuclear Department attained each 1998 goal related to the Safety Culture Survey, the Employee Concerns Program, and improved communications. In addition, a number of other goals related to improving our corrective action activities were attained.
- (b) Responses to Safety Culture Survey questions have consistently reflected a high employee confidence in the program. From the inception of these surveys in 1993, employees have communicated that nuclear safety is the highest priority, that they take their own responsibilities very seriously, and that they perceive an open environment for pursuing potential nuclear safety issues and concerns. Over 1300 employees, representing approximately 83% of the workforce, participated in the 1998 survey; this was up from approximately 70% in 1997.

From data collected in the 1997 and 1998 surveys, an independent assessor concluded that a large majority of employees:

- 1) Feel a responsibility to identify potential nuclear safety issues / concerns and to write Condition Reports, and believe that actual performance in identifying and resolving such issues / concerns has been effective. Employees also feel that there is an "open door" to pursue resolution through the management chain.
- 2) Believe that peoples' behaviors and practices consistently reflect nuclear safety as PP&L's top priority and the Nuclear Department generally holds itself accountable to high standards in the conduct of work.

- 3) Believe that the plant environment positively affects employee willingness and likelihood of reporting potential nuclear safety issues. They also feel comfortable in approaching their supervision with problems, without concern of harassment, intimidation or discrimination by their supervision or management.
- 4) Feel that if one needed an alternative avenue, the Employee Concerns Program represents an acceptable path to pursue resolution and generally feel confident about the Program.
- 5) Feel their supervision has improved in their skills, behaviors and relationships with employees as reflected through more effective communications, valuing employee contributions and being involved sufficiently to be knowledgeable of employee performance.

PP&L has also reviewed the results based on NSE data alone, and has concluded that these results are consistent with the department-wide results presented above.

- (c) A confidential survey of employees who have utilized the ECP is conducted on an annual basis, and reflects a high level of satisfaction with the program. Based on responses received in 1998, overall satisfaction with the direct interaction on customer concerns was rated highly, and had improved over 1997.

Further detail in support of the above conclusions is available onsite. These results provide strong evidence that the actions described earlier have been effective in supporting a safety conscious work environment within the Nuclear Department.

#### **4. Additional Actions to Further Enhance the Work Environment**

PP&L recognizes that enhancing the work environment requires an ongoing effort. Accordingly, the following additional actions have been or will be taken:

- (a) A letter describing management expectations for raising and responding to safety concerns will be drafted by senior department management and sent to each employee's home. It will review each employee's responsibility to identify safety and compliance issues, and communicate support for their various options of doing so.
- (b) At the upcoming quarterly meeting of approximately 120 department managers and supervisors, senior department management will make a presentation reinforcing line management's responsibilities to implement the concerns program, and to support it through their direct interactions with employees.

- (c) We will continue to self-assess and adjust our actions as results dictate. To that end, we will continue to re-survey the workforce on a periodic basis to measure progress and identify further actions. The next safety culture survey is currently planned for September 1999.
- (d) Finally, based on the recent decision by DOL/OSHA, Nuclear Department management has provided pertinent facts regarding the status of the case to functional unit managers in order to prepare them for potential employee questions.

### Conclusion

As requested by the NRC, this submittal provides a record of actions that PP&L, Inc. has already taken or plans to take to assure that the personnel action in question has not impacted the willingness of PP&L Nuclear Department employees to raise safety and compliance concerns within our organization. Information has also been provided that attests to the effectiveness of these actions.

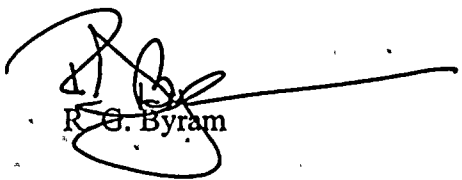
### Regulatory Commitments

PLA-5023-01: A letter describing management expectations for raising and responding to safety concerns will be drafted by senior department management and sent to each employee's home. It will review each employee's responsibility to identify safety and compliance issues, and communicate support for their various options of doing so.

PLA-5023-02: At the upcoming quarterly meeting of approximately 120 department managers and supervisors, senior department management will make a presentation reinforcing line management's responsibilities to implement the concerns program, and to support it through their direct interactions with employees.

PLA-5023-03: PP&L will continue to re-survey the workforce on a periodic basis to measure progress and identify further actions. The next safety culture survey is currently planned for September, 1999.

Sincerely,

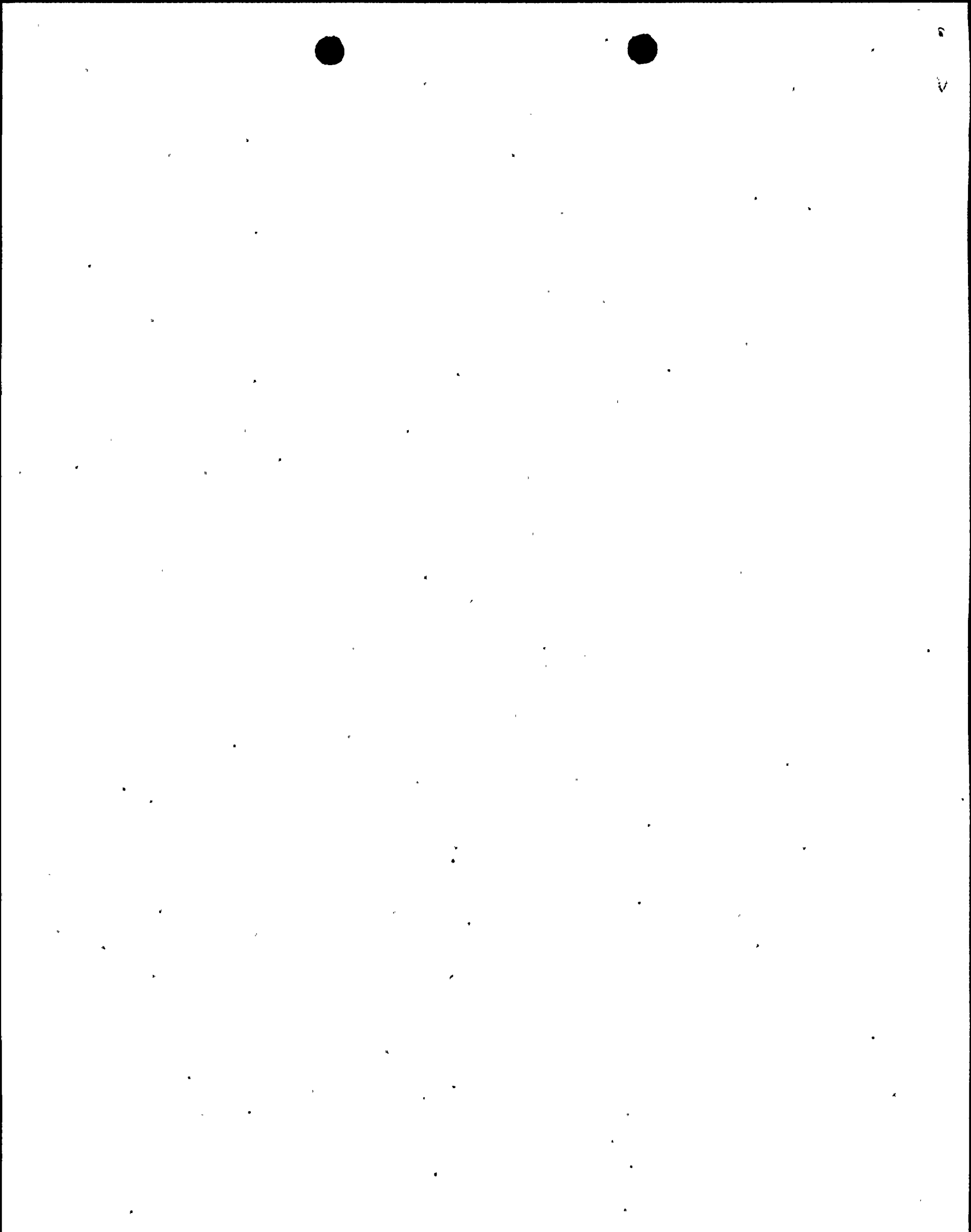


R. G. Byram

Affidavit



Copy: NRC Region I  
Mr. V. Nerses, NRC Sr. Project Manager – OWFN  
Mr. S. L. Hansell Jr., NRC Acting Sr. Resident Inspector – SSES





# AFFIDAVIT

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COMMONWEALTH OF PENNSYLVANIA )  
: SS  
COUNTY OF LEHIGH )

I, ROBERT G. BYRAM, being duly sworn according to law, state that I am Senior Vice President - Generation and Chief Nuclear Officer of PP&L, Inc. and that the facts set forth on the attached request for information per NRC letter dated December 22, 1998, "Potential Chilling Effect" are true and correct to the best of my knowledge, information and belief.



Robert G. Byram  
Senior Vice President  
Generation and Chief Nuclear Officer

Sworn to and subscribed  
before me this *21<sup>st</sup>* day  
of *January*, 1999.

*Janice M. Reese*  
Notary Public

NOTARIAL SEAL  
JANICE M. REESE, Notary Public  
City of Allentown, Lehigh County, PA  
My Commission Expires June 11, 2001



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