

From: Mary L. McCormick-Barger (MLM2)
To: WN6(RFR)
Date: Friday, October 1, 1993 4:23 pm
Subject: TI2500/028 Employee Concerns

Dick,

Bill Campbell asked for some additional information pertaining to the TI 2500/028 survey. The additional information is provided below.

For the Commonwealth Edison plants (Byron, Braidwood, Zion, Dresden, LaSalle, and Quad Cities):

Survey Item D.1. There is only one person assigned to Commonwealth Edison's Quality First (employee concerns) program. This person is responsible for all six plants.

Survey Item H.3. The number of concerns raised at each plant exactly equals the number of concerns closed. (In otherwords all concerns that were raised have been closed). Additionally, there was an error in the percent substantiated column for Quad Cities: all three of the concerns raised were substantiated so the percentage should have been 100%.

If you have any further questions, please let me know.

Mary Mc-B

CC: WN6(WEC)

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Attachment

EMPLOYEE CONCERNS PROGRAMS

PLANT NAME:	<u>LaSalle</u>	Licensee:	<u>CECO</u>	DOCKET #:	<u>50-373;374</u>
	<u>-Dresden</u>		<u>CECO</u>		<u>50-237;249</u>
	<u>Quad Cities</u>		<u>CECO</u>		<u>50-254;265</u>
	<u>-Byron</u>		<u>CECO</u>		<u>50-454;455</u>
	<u>-Braidwood</u>		<u>CECO</u>		<u>50-456/457</u>
	<u>Zion</u>		<u>CECO</u>		<u>50-295/304</u>

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

A. PROGRAM:

1. Does the licensee have an employee concerns program?
(Yes or No/Comments)

The licensee conducts a Quality First program to identify and address employee concerns. Other programs such as the vision through quality (VQ) search for opportunity (SFO) exist. The VQ SFO program is more oriented toward identifying and developing improvement initiatives versus a formal program for raising specific safety issues. Therefore, the completion of this form will deal only with the QF program.

2. Has NRC inspected the program? Report # _____

The NRC had not recently inspected this program.

B. SCOPE: (Circle all that apply)

1. Is it for:
 - a. Technical? (Yes, No/Comments)
 - b. Administrative? (Yes, No/Comments)
 - c. Personnel issues? (Yes, No/Comments)

The concerns are categorized as security, quality, and management but may, in fact, involve any of the above.

2. Does it cover safety as well as non-safety issues?
(Yes or No/Comments)
3. Is it designed for:
 - a. Nuclear safety? (Yes, No/Comments)
 - b. Personal safety? (Yes, No/Comments)

- c. Personnel issues - including union grievances?
(Yes or No/Comments)

Although it can involve personnel issues, it does not deal with union grievances.

4. Does the program apply to all licensee employees?
(Yes or No/Comments)
5. Contractors?
(Yes or No/Comments)

This program is not necessarily stressed to contract employees the licensee believes are not in a position to identify Quality First issues such as parking lot pavers.

6. Does the licensee require its contractors and their subs to have a similar program?
(Yes or No/Comments)

CECo administers the entire program.

7. Does the licensee conduct an exit interview upon terminating employees asking if they have any safety concerns?
(Yes or No/Comments)

Upon termination, employees are given concern disclosure statements to complete. Exit interviews are given. The percentage of terminating employees receiving them is drastically reduced due to a reduction in program manpower since the beginning of the year.

C. INDEPENDENCE:

1. What is the title of the person in charge?

Quality First Administrator (QFA)

2. Who do they report to?

Director of Station Quality Verification

3. Are they independent of line management?

Yes-Reports through offsite quality verification organization

4. Does the ECP use third party consultants?

No-However, quality verification personnel have been utilized to do interviews. The QFA determines the appropriate group to do the investigation.

5. How is a concern about a manager or vice president followed up?

This would be decided on a case by case basis.

D. RESOURCES:

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

Since the beginning of the year, staff has been cut to one individual for all six CECo plants.

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

No specific qualifications exist for the QFA, who has been involved in the program a number of years. Guidelines for interviewers are available but there are no specific qualifications.

E. REFERRALS:

1. Who has followup on concerns (ECP staff, line management, other)?

The QFA may do the followup himself or assign it to another group including line management.

F. CONFIDENTIALITY:

1. Are the reports confidential?
(Yes or No/Comments)
2. Who is the identity of the allegor made known to
(senior management, ECP staff, line management, other)?

Information on the allegor identity remains with QFA.

3. Can employees be:
 - a. Anonymous? (Yes/No Comments)
 - b. Report by phone? (Yes, No/Comments)

A toll free number is available.

G. FEEDBACK:

1. Is feedback given to the allegor upon completion of the followup?

(Yes or No - If so, how?)

Feedback is given by mail or telephone.

2. Does program reward good ideas?

No

3. Who, or at what level, makes the final decision of resolution?

This is determined by QFA in conjunction with line management.

4. Are the resolutions of anonymous concerns disseminated?

No

5. Are resolutions of valid concerns publicized (newsletter, bulletin board, all hands meeting, other)?

No

H. EFFECTIVENESS:

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

Not measured

2. Are concerns:

- a. Trended? (Yes or No/Comments)

There are too few official "Records of Concern" (ROC) to warrant trending. The QFA does informally look for common concerns on items which do not warrant official ROCs.

- b. Used? (Yes or No/Comments)

Corrective actions are addressed in the program.

3. In the last three years how many concerns were raised? Closed? What percentage were substantiated?

The QAF screens comments and identifies those to be handled as official Records of Concern" (ROC).

The following data is for ROCs from 1990 through August 1993. No formal ROCs have been initiated thus far in 1993.

	<u>#Closed</u>	<u>%Substantiated</u>
LaSalle	2	100
Byron	9	22
Braidwood	6	33
Quad Cities	3	3
Dresden	4	25
Zion	1	0

Comments received during or after a refuel outage that the QAF determines do not warrant an official ROC are compiled and transmitted to plant management for information. This occurs several months after the outage.

4. How are followup techniques used to measure effectiveness (random survey, interviews, other)?

No followup techniques utilized except perhaps for contractors they see multiple times at different CECO sites.

5. How frequently are internal audits of the ECP conducted and by whom?

There are no audits of this area. The onsite quality verification superintendent is responsible for reviewing information copies of quality ROCs to determine if additional QA reviews are warranted.

I. ADMINISTRATIVE/TRAINING:

1. Is ECP prescribed by a procedure? (Yes or No/Comments)

Nuclear Operations Directive (NOD)-OA.12, "Quality First Program Directive"

2. How are employees, as well as contractors, made aware of this program (training, newsletter, bulletin board, other)?

The program is briefly described in Nuclear General Employee Training (NGET). It may also be mentioned in occasional safety meetings or departmental tailgates.

ADDITIONAL COMMENTS:

(Including characteristics which make the program especially effective or ineffective.)

In viewing the number of official "Records of Concerns (ROC)," that are formally tracked, investigated, and resolved, the effectiveness of the program is questionable. No ROCs have been generated thus far for 1993. This may be

partially related to the staff reduction and availability of personnel to conduct exit interviews. Due to the lack of resources, some concerns which would have been handled as official ROCs in previous years are now being handled more informally.

The person completing this form please provide the following information to the Regional Office Allegations Coordinator and fax it to Richard Rosano at 301-504-3431.

NAME: TITLE: PHONE #:

David E. Hills/Senior Resident Inspector/815-357-8611

DATE COMPLETED: 9-6-93

To: Richard Rosano

From: Mary McCormick-Barger, Region III
(708) 790-5151

Date: 9/9/93

All of the TI 2500/028 surveys for Region III sites, with the exception of D.C. Cook are enclosed. I will fax DC Cook's survey to you tomorrow (9/10/93).

If you have any questions, please call me at the number given above.

(Note: All 6 Commonwealth Edison sites were combined in one survey.)

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