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 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530
 AUTH. NAME AUTHOR AFFILIATION
 CONWAY, W.F. Arizona Public Service Co. (formerly Arizona Nuclear Power
 RECIP. NAME RECIPIENT AFFILIATION
 MARTIN, J.B. Region 5 (Post 820201)

SUBJECT: Forwards DOL000483, "Employee Concerns Program," detailing steps taken by util to assure that employees & contractors know that mgt supports identification & resolution of safety concerns. Rev 0 to 01PR-0QQ02 also encl.

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NOTES: STANDARDIZED PLANT 05000528
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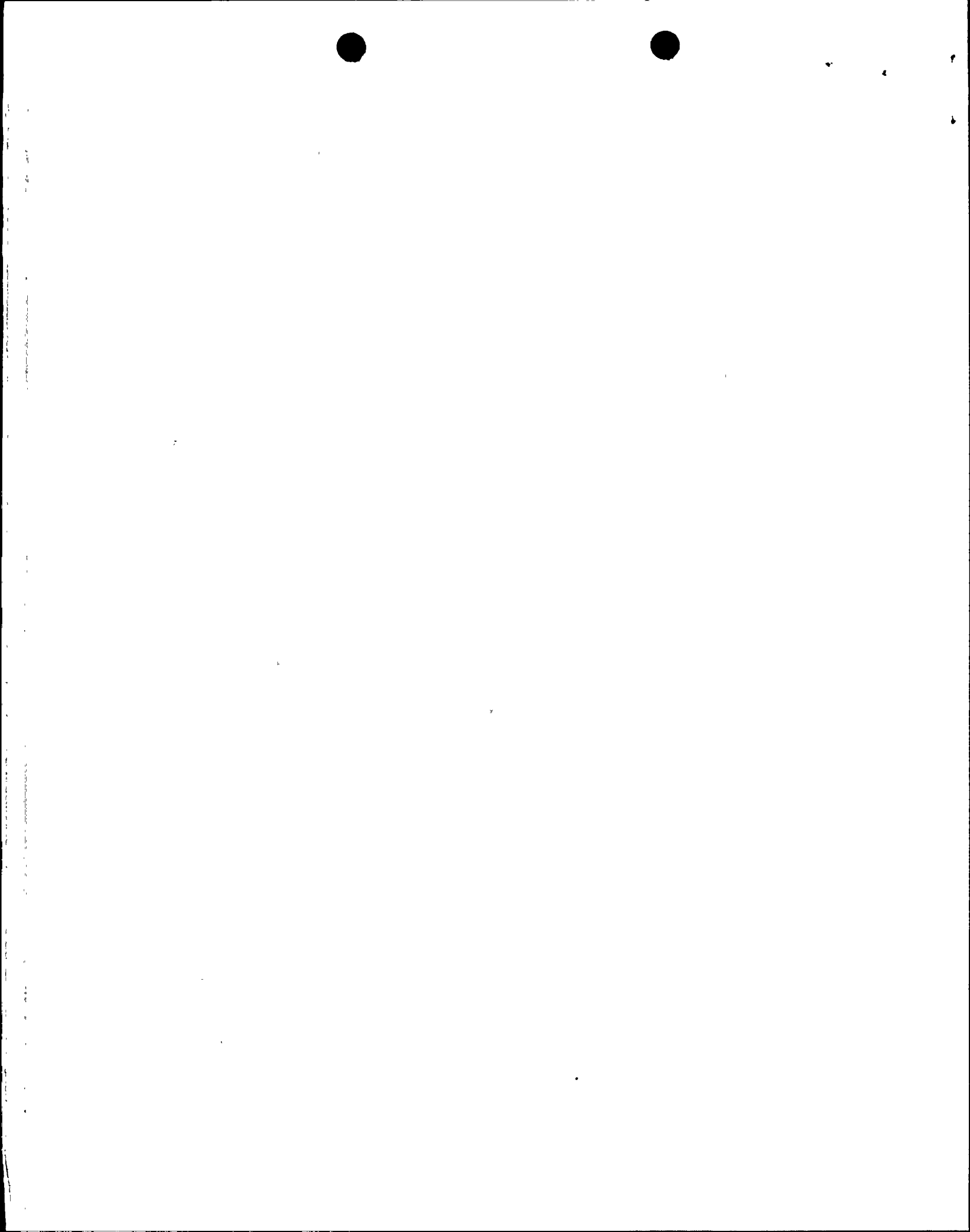
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	<u>REG FILE</u>	02	1	1	RGN5 FILE 01		1	1
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Arizona Public Service Company

P.O. BOX 53999 • PHOENIX, ARIZONA 85072-3999

WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-02116-WFC/TRB/KR
February 25, 1992

1992 FEB 28 AM 11:10

RECEIVED
HRC
REGION V

Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Reference: Letter dated January 31, 1992, from Roy P. Zimmerman, Director, Division of Reactor Safety and Projects, NRC Region V, to Mr. William F. Conway, Executive Vice President, Nuclear, Arizona Public Service Company

Dear Mr. Martin:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
RESPONSE TO NRC CONCERN
File: 92-019-026

The purpose of this letter is to describe steps taken by Arizona Public Service Company to assure that employees and contractors know that management supports the identification and resolution of safety concerns.

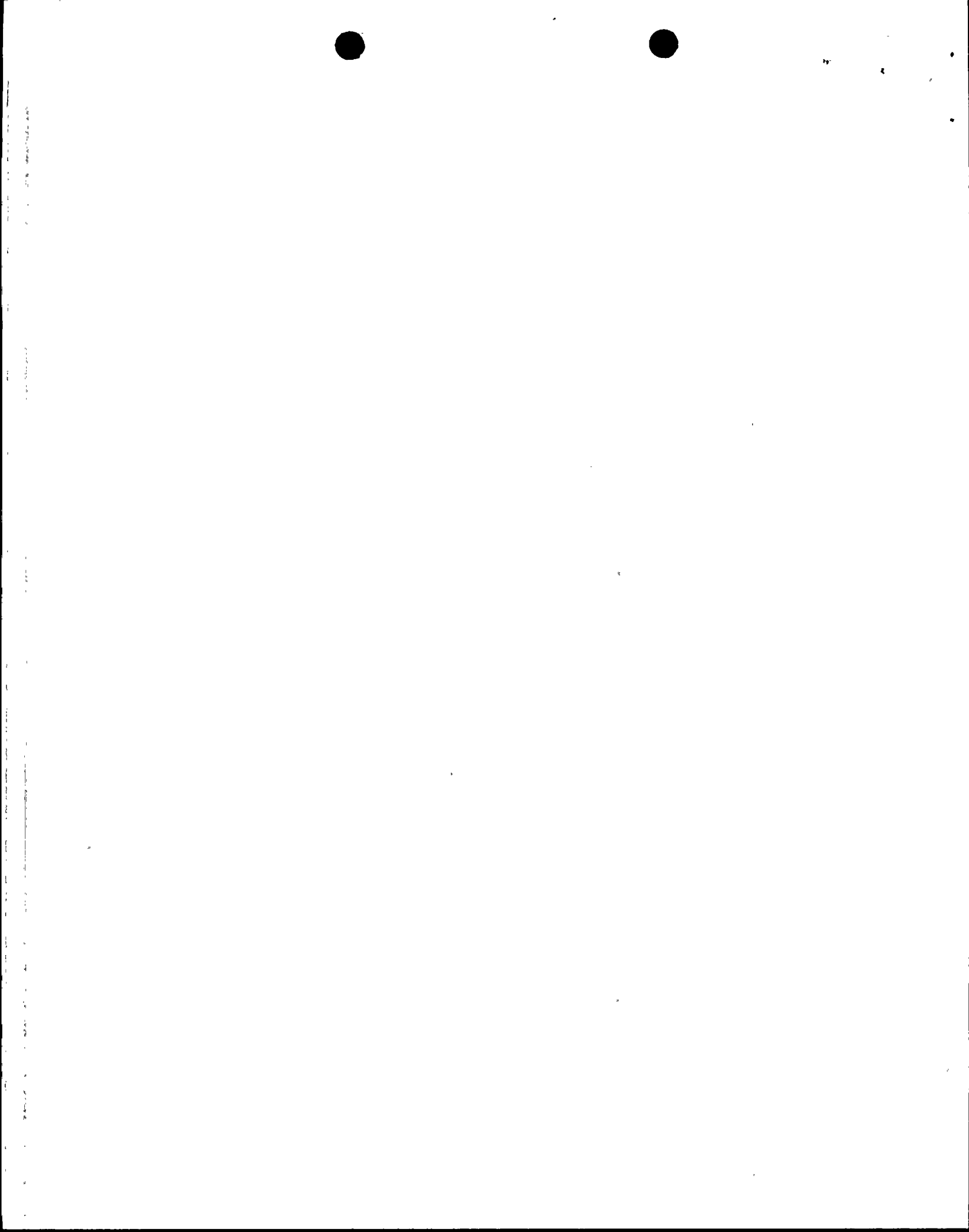
Employees at Palo Verde have the responsibility to report problems or abnormal conditions that come to their attention to their supervisor or foreman. Equally, they have the freedom to bring their concerns to the NRC without fear of negative repercussion. These two means of problem identification are essential aspects of the operation of Palo Verde.

From initial orientation training to annual site access retraining, Palo Verde employees and contractors are apprised of their responsibility to identify problems to their supervisors and are reminded of their freedom to discuss their concerns with the NRC without fear of retribution, retaliation, or termination. Our STANDARDS & EXPECTATIONS, selected orientation and training material, and past memoranda which convey this message are provided in Attachment 1.

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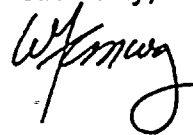
IE-01



I have taken additional steps to ensure that employees and contractors at Palo Verde do not have the misperception that we discourage problem identification or that they are not free to speak openly or privately with the NRC. I have issued two memoranda, one to Palo Verde employees and contract personnel, and the other to supervisors and managers, reminding them of my expectations concerning problem identification, problem resolution, regulatory interface, and the sensitivity that management and supervision should have to potential employee perceptions. These memoranda are provided in Attachment 2.

Should you have any questions regarding this matter, please contact me.

Sincerely,



WFC/TRB/KR

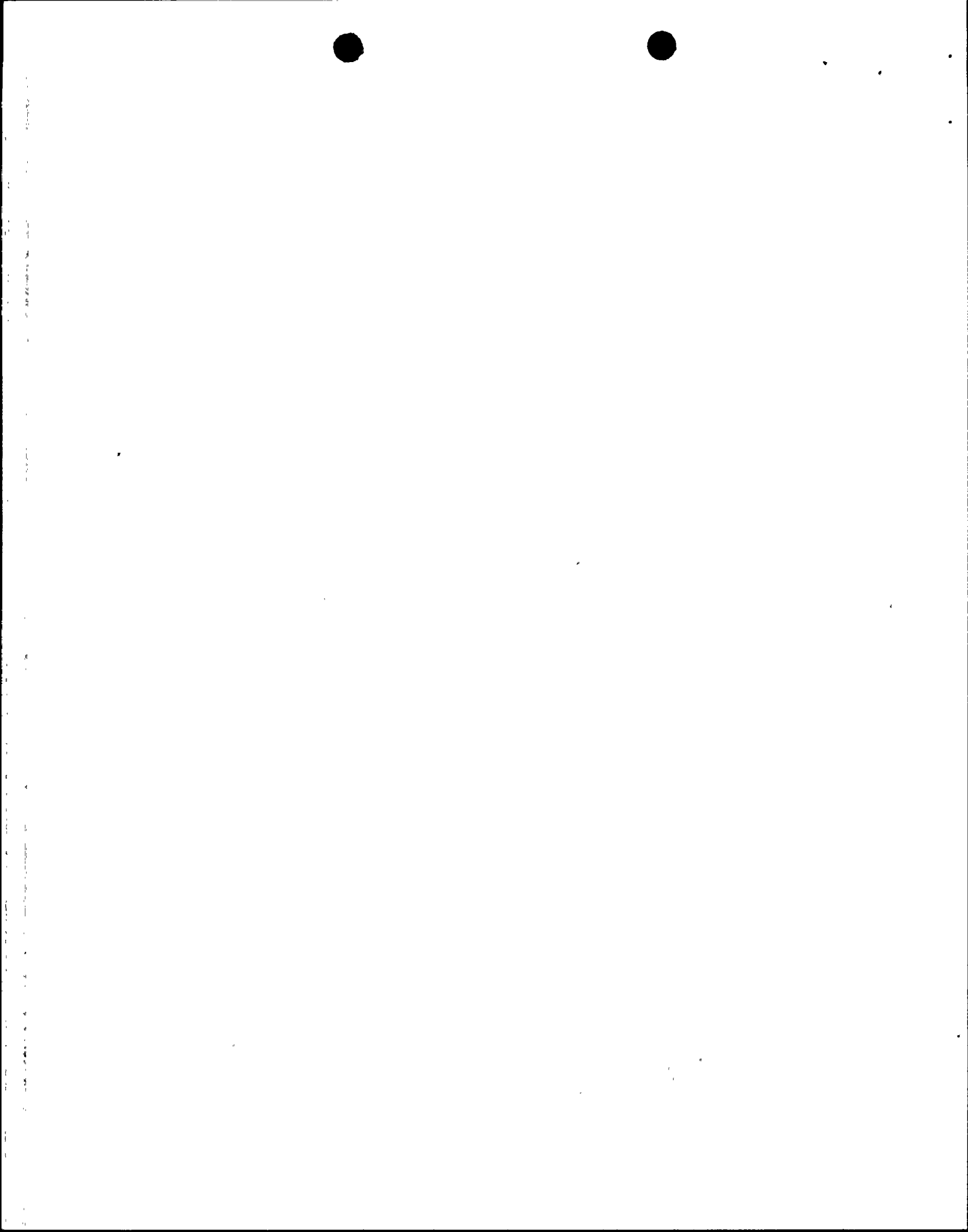
Attachments:

1. STANDARDS & EXPECTATIONS, selected orientation and training material, and past memoranda
2. Two memoranda issued to Palo Verde employees and contract personnel and to supervisors and managers

cc: D. H. Coe

ATTACHMENT 1

**STANDARDS & EXPECTATIONS,
SELECTED ORIENTATION AND
TRAINING MATERIAL, AND PAST MEMORANDA**



ATTACHMENT 1

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PALO VERDE'S NEW ERA - SEPTEMBER 1990

STANDARDS AND EXPECTATIONS - APRIL 9, 1991

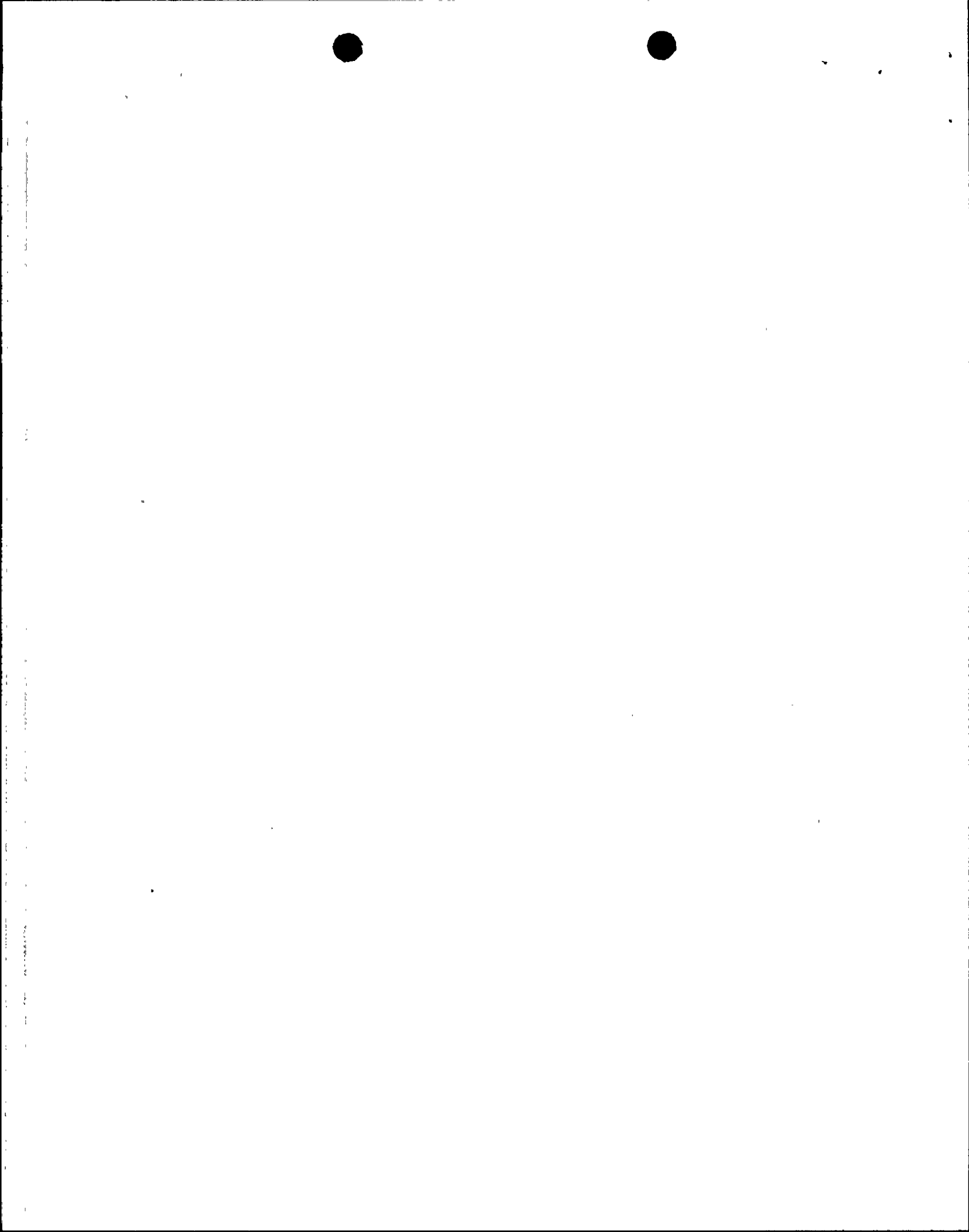
YOU AND YOUR COMPANY HANDBOOK - AUGUST 1991

EMPLOYEE CONCERNS PROGRAM PAMPHLET

**EMPLOYEE CONCERNS PROGRAM POSTER
POSTED THROUGHOUT PVNGS**

**SITE ACCESS TRAINING HANDOUT
SECTION C: QUALITY ASSURANCE**

**SITE ACCESS TRAINING LESSON PLANS
NGA01-04-RC-003-02 - QUALITY ASSURANCE
NGA01-04-RC-008-02 - RADIATION PROTECTION
NGA02-09-RC-001-03 - SITE ACCESS RETRAINING**





Arizona Public Service Company
COMPANY CORRESPONDENCE

ID# 102-01295-WFC/TDS/PJC

DATE: June 8, 1989

TO: Palo Verde Employees

Sta #
Ext #

FROM: W. F. Conway
Sta # 9012
Ext # 81-3900

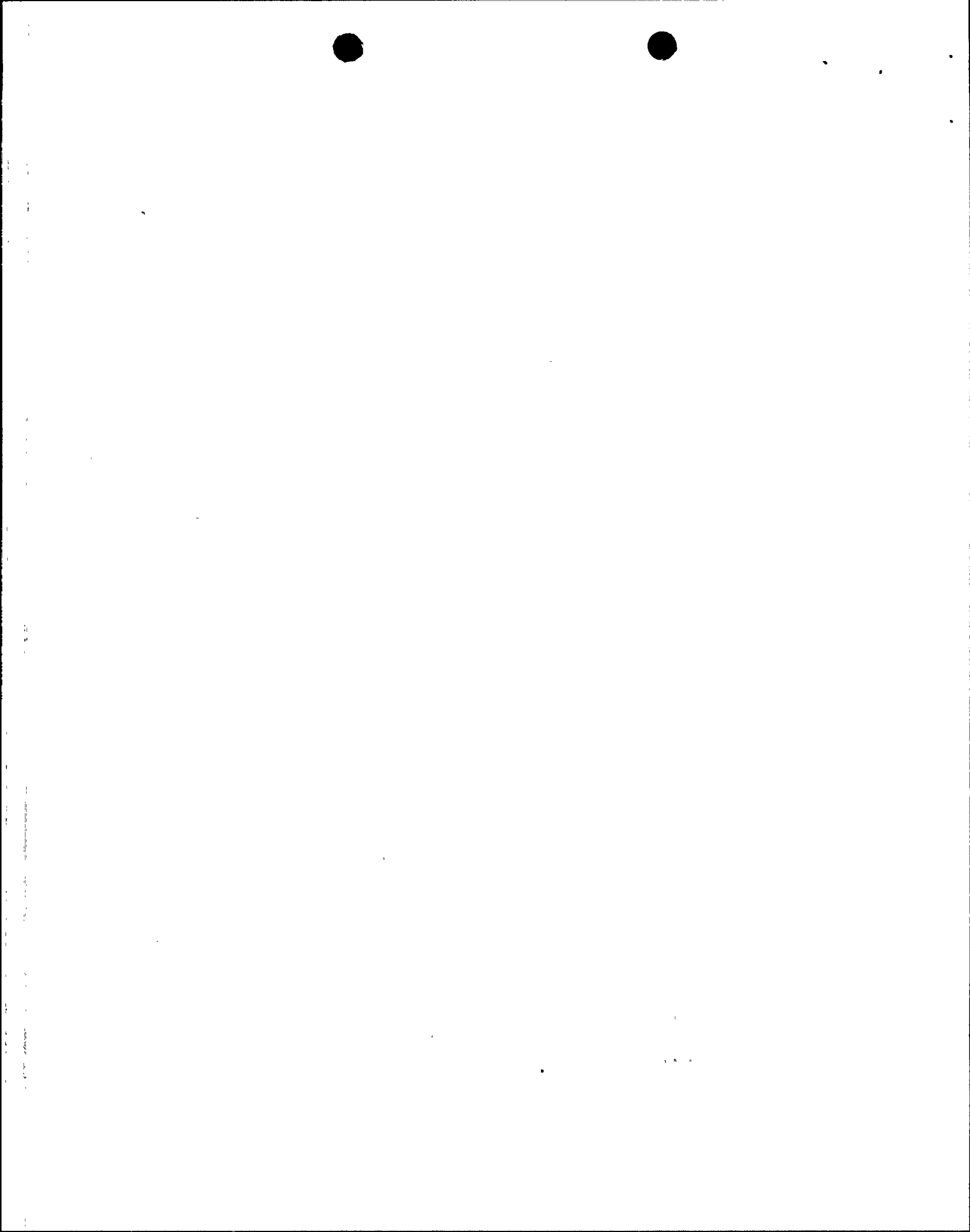
FILE: 89-003-726
SUBJECT: Notice on Employee Nuclear Safety Concerns

Nuclear safety is our foremost concern at Palo Verde. Each employee is responsible to maintain nuclear safety and to immediately report safety concerns. To assist us in raising, addressing, and resolving nuclear safety concerns, I have established the policy delineated in the attached notice.

This policy applies to management, supervisory, and working-level personnel, including contract employees. Harassment, intimidation, discrimination, or any other form of retaliation against persons who raise safety concerns will not be tolerated.

WFC/TDS/PJC/kj

Attachment



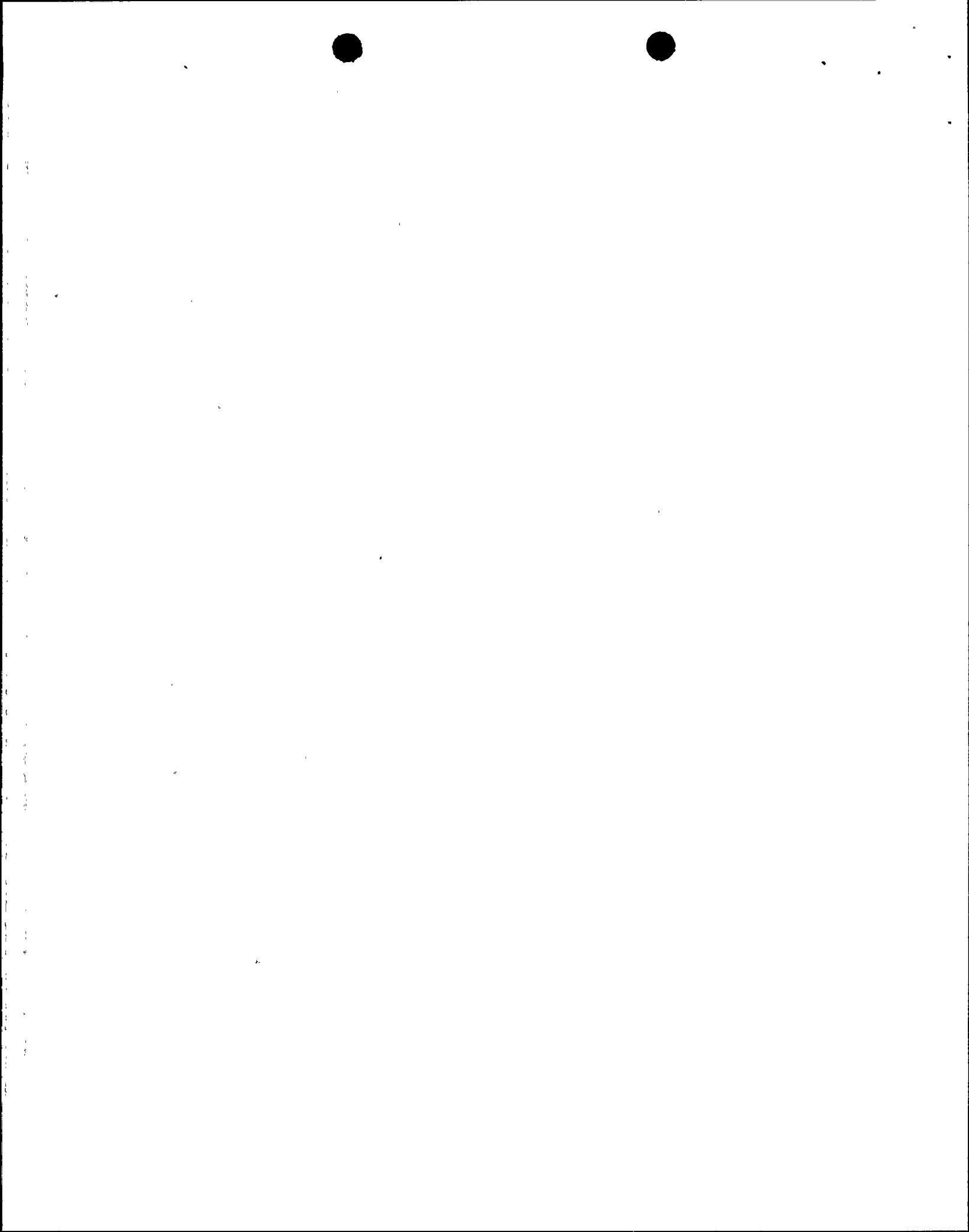
NOTICE ON EMPLOYEE NUCLEAR SAFETY CONCERNS

Arizona Public Service Company (APS) is committed to nuclear safety at Palo Verde Nuclear Generating Station and throughout the corporate nuclear energy program. APS as a whole and each employee are responsible for maintaining nuclear safety. This policy applies to management, supervisory, and working-level personnel, including contractors and their employees.

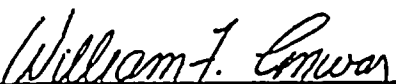
1. It is the policy of APS to encourage employees with nuclear safety concerns to bring them forward so that they can be investigated and addressed. It is the duty of any employee who has a safety concern to report it immediately. You should ordinarily report nuclear safety concerns to your supervisor, who will assist you in selecting and preparing the most effective method for getting your concern resolved, such as preparation of a Nonconformance Report (NCR), Procedure Change Request (PCR), or other appropriate documents.
2. If you are uncertain where to report a concern, or do not feel that your concern will be adequately resolved through ordinary channels, APS has established nuclear safety concern programs to assure that your concerns will be addressed. Under these programs, you may report nuclear safety concerns directly to the Quality Assurance Hot Line Program (944-5444).

It is important that you provide sufficient information so that your concern can be clearly identified and investigated. If you have a nuclear safety concern but desire to have your identity kept confidential, your identity will be protected. Although employees have a duty to report their safety concerns to APS, concerns may also be brought directly to the Nuclear Regulation Commission.

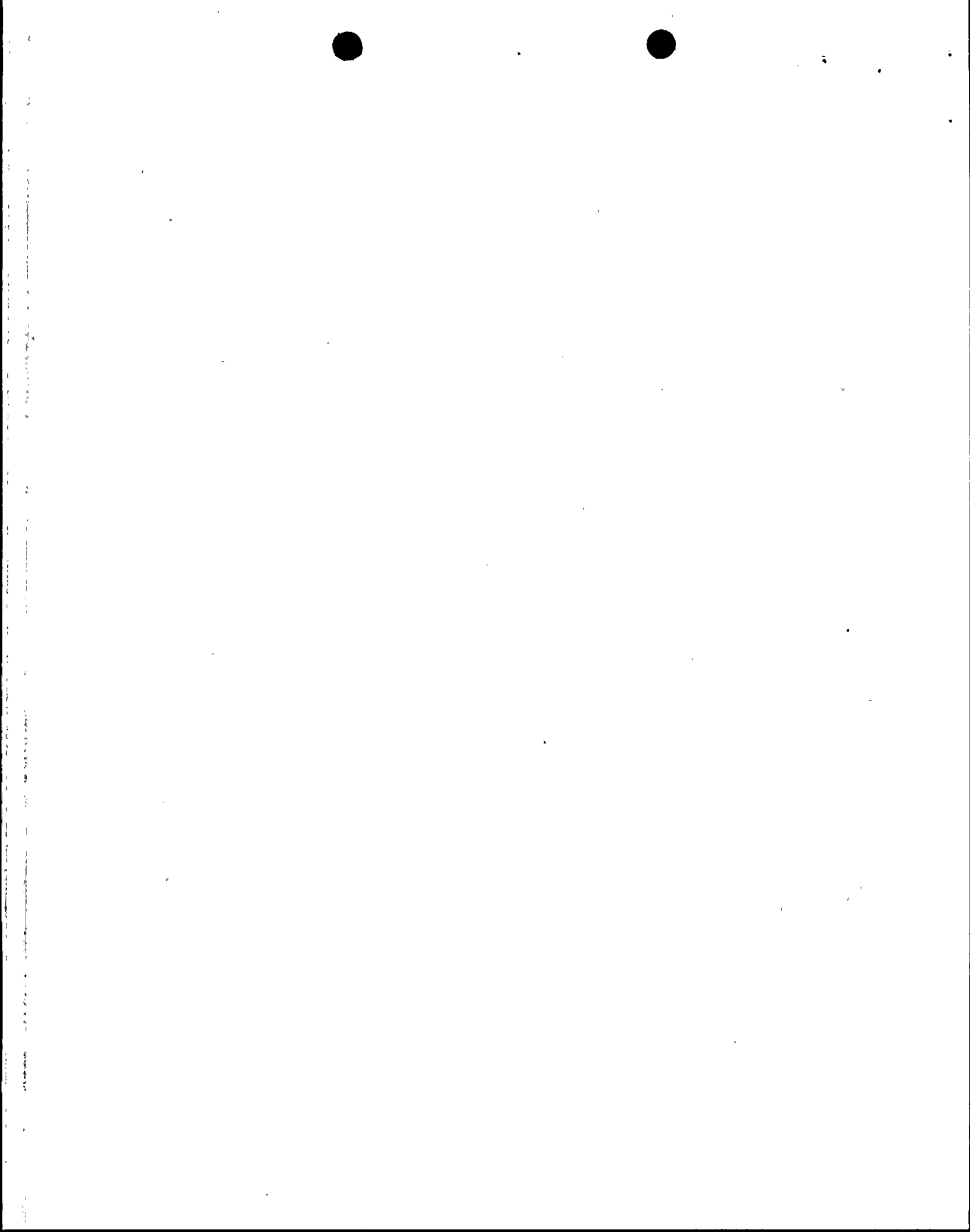
3. Concerns reported under nuclear safety concerns programs will be investigated, resolved and documented. In cases where action is required to correct a reported condition, the completion of that action will be verified. A description of the actions taken to address the concern will be available to the individual who raised the concern.



4. Employee reporting of nuclear safety concerns is important to the safe and reliable operation of Palo Verde Nuclear Generating Station. Only if these concerns are known can they be investigated and corrected. Accordingly, APS seeks to maintain an environment in which those having nuclear safety concerns will report them without fear of any retaliation. Arizona Public Service Company will not tolerate harassment, intimidation, discrimination, or any other retaliation against persons raising safety concerns. If you believe that you have been discriminated or retaliated against because of safety concerns, you should immediately report this fact directly to the appropriate site personnel (listed above).



William F. Conway
Executive Vice President - Nuclear



Arizona Public Service Company

PALO VERDE NUCLEAR GENERATING STATION
P.O. BOX 82004 • PHOENIX, ARIZONA 85072-2004

QUALITY TALKS

QA Hot Line
Hotline: 944-5444

July 14, 1989
Week # 27 & 28

The Quality Investigations Section has the responsibility for implementing and documenting the QA Hot Line Program. This Program includes administering the QA Hot Line telephone, conducting quality interviews, and investigation concerns entered into the QA Hot Line by APS employees, plant management, or agencies such as the NRC.

Concerns identified via the above mentioned methods are documented and entered into the QA Hot Line Program for tracking. In some cases, the concern may be resolved by referring a concerned individual to other established channels (e.g., chain of command), if agreed upon.

Through the Hot Line Program, individuals can talk directly with an APS Corporate Quality Assurance Engineer to explain concerns and ask for assistance. The Hot Line is specifically designed to help solve safety and quality problems at the Palo Verde Nuclear Generating Station. A concerned individual should use established procedures to bring potential problems to light. The individual should notify their supervisor or foreman of safety/quality problems. If the normal channels have been tried and they don't work, you should use the Hot Line Program. To use the Hot Line, call 944-5444 anytime.

When a concerned individual contact the Quality Investigations Section through any of the aforementioned Hot Line Program methods, the concerned individual needs to give a complete description of the problem. The Quality Investigations Section needs to know, as much as possible, the following:

- Unit Number
- Specific Location
- System or Procedure
- Activity in Process
- Construction - Startup - or Operations
- How QA Investigations Can Learn More about the Problem
- Whether You Have Notified Your Supervisor or Foreman

Quality and/or safety concerns are reviewed and analyzed so that potential problems are identified, dispositioned, and resolved. Investigations are based on objective evidence gathered through methods such as personnel interviews, reviews of plant design, construction, startup or operations documentation, engineering analysis, and determination of pertinent regulatory requirements.

The QA Investigations Section takes every action possible to maintain confidentiality of individuals who present concerns.



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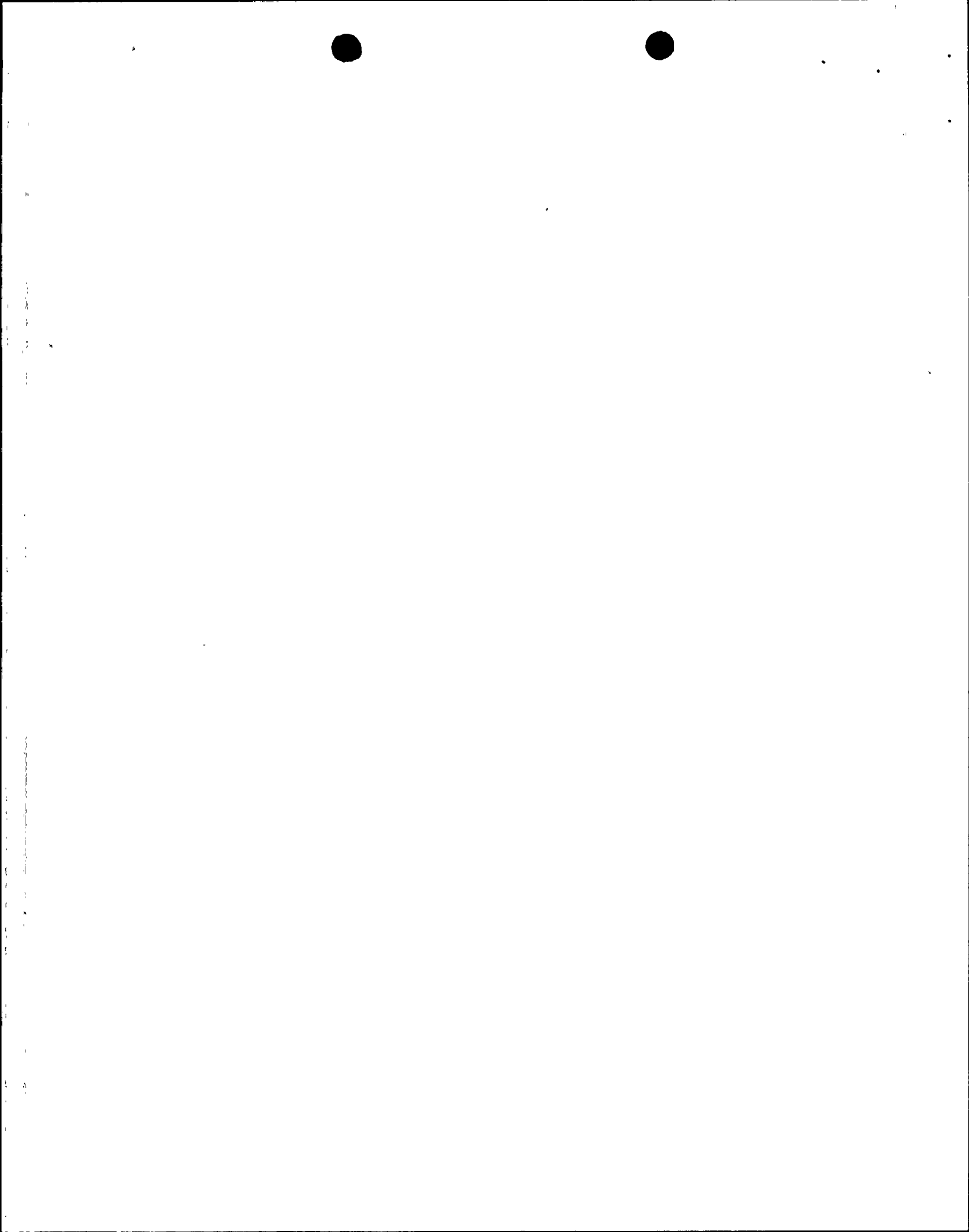
It is important that the concerned individual lets the Quality Investigations Section know how to report results back to them. If you choose to remain totally anonymous you can call back to check on the status of the concern (e.g., via Hot Line Telephone).

Investigations are documented in a Quality Investigation Report. The concerned individual will be notified, when possible, in writing as to results of the investigation.

The Quality Investigations Section maintains independence by direct reportability to E. E. Ballard, Director, Corporate QA/QC. All Quality Investigations Reports are submitted to the Director, Corporate QA/QC for review and concurrence.

A quarterly report will normally be provided to summarize the status of QA Hot Line concerns, Quality Interview activities, and investigation results. This report is issued to the Director, Corporate QA/QC with minimum distribution of the report to the Executive Vice President, W. F. Conway, APE.

All concerns brought to the attention of the Hot Line Program will be pursued. The Quality Investigations section will make every effort to resolve issues as quickly and thoroughly as possible. If you have a quality or safety concern first tell your supervisor or foreman. If the problem is not resolved, contact the Hot Line at 944-5444.





Arizona Public Service Company
COMPANY CORRESPONDENCE

ID #: 022-01266/WFC/BEB/TCS/CWJ

DATE: September 21, 1989

TO: All Palo Verde Employees
Sta. #: Various
Ext.: Various

FROM: W. F. Conway *W.F. Conway*
Sta. # 9012
Ext. 81-3900

'89 OCT 27 A9:24

FILE: 89-003-726 ; 89-009-201
SUBJECT: NOTICE ON PALO VERDE EMPLOYEE CONCERNS
(Replaces Memo #102-01295-WFC/TDS/PJC)

AK
10/27/89

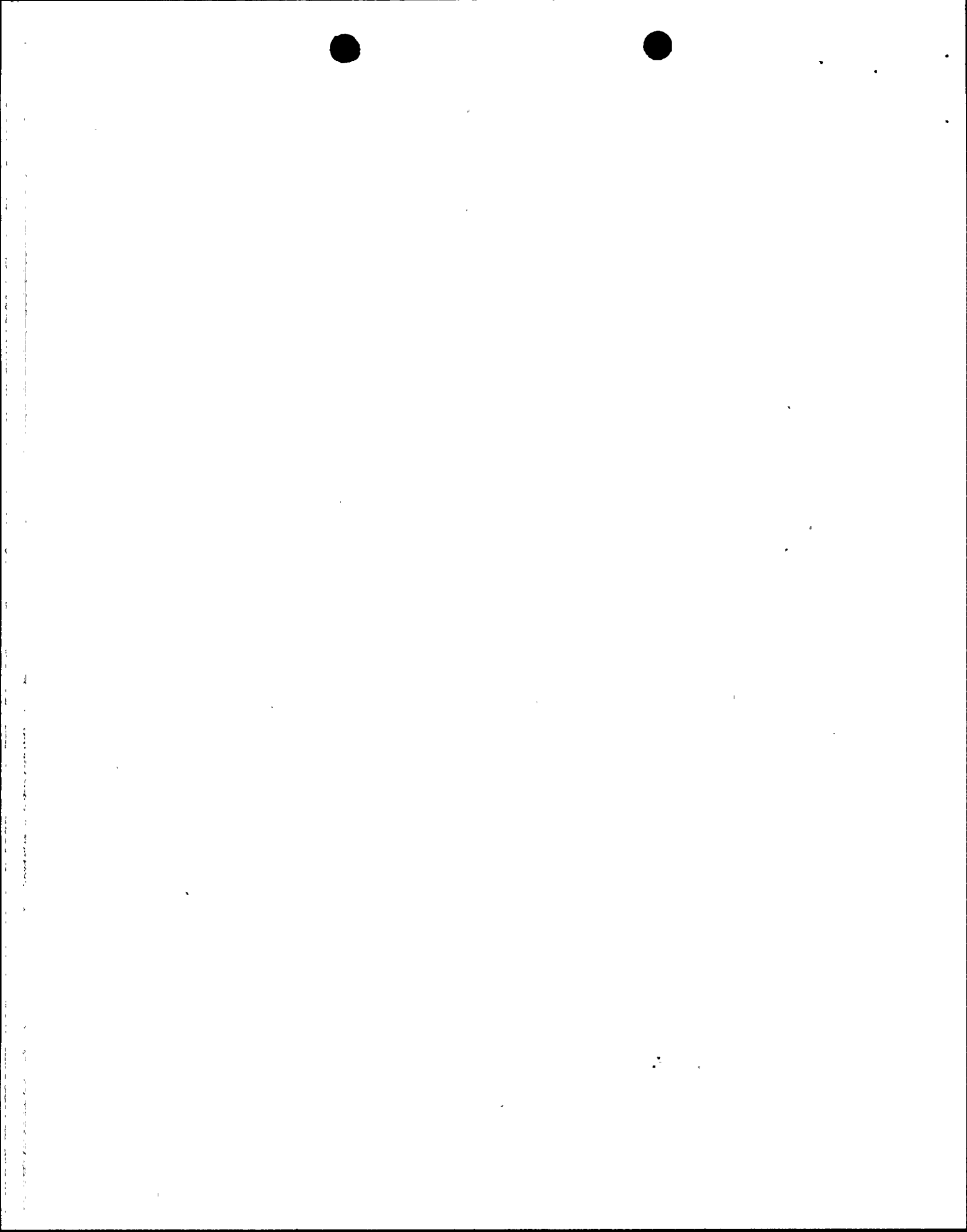
Quality and safety are our primary concerns at Palo Verde. Each employee is responsible to maintain quality and safety and to immediately report concerns which could have an effect on the safe and reliable operation of the Station. Moreover, we solicit the identification of any concern which may adversely affect the performance of our operations so that they may be resolved promptly.

To assist us in identifying, addressing, and resolving these concerns, I have established the policy delineated in the attached notice.

WFC/BEB/TCS/CWJ:kld

Attachment





PVNGS POLICY ON EMPLOYEE COMMUNICATIONS & CONCERNS

APS PERSONNEL AT ALL LEVELS ARE ENCOURAGED AND EXPECTED TO COMMUNICATE IN AN ACTIVE AND OPEN MANNER SUCH THAT KNOWN PROBLEMS WHICH MAY AFFECT ANY ASPECT OF OUR PERFORMANCE ARE QUICKLY IDENTIFIED AND SATISFACTORILY RESOLVED.

THIS POLICY APPLIES TO ALL EMPLOYEES INCLUDING MANAGEMENT AND SUPERVISION, CONTRACTORS, AND THEIR EMPLOYEES.

ARIZONA PUBLIC SERVICE COMPANY (APS) IS COMMITTED TO QUALITY AND SAFETY IN THE OPERATION OF THE PALO VERDE NUCLEAR GENERATING STATION AND THROUGHOUT THE APS NUCLEAR GENERATING PROGRAM. APS AS A WHOLE, AND EACH EMPLOYEE, IS RESPONSIBLE FOR ASSURING THAT THIS COMMITMENT IS MET. CONCERNS WHICH COULD HAVE AN ADVERSE IMPACT ON THE SAFE AND RELIABLE OPERATION OF THE STATION OR WHICH MAY ADVERSELY AFFECT OUR NUCLEAR OPERATIONS MUST BE REPORTED PROMPTLY AND BE ADEQUATELY RESOLVED.

EACH SUPERVISOR AND MANAGER SHOULD ACTIVELY SOLICIT FROM THEIR EMPLOYEES ANY KNOWN SAFETY CONCERN AND PROBLEM. SUPERVISORS AND MANAGERS ARE RESPONSIBLE TO THOROUGHLY REVIEW IDENTIFIED SAFETY CONCERNS AND EMPLOYEE PROBLEMS, OBTAIN EFFECTIVE CORRECTIVE ACTION WHERE APPROPRIATE, AND FEEDBACK TO THE EMPLOYEE THE RESULTS OF THEIR ACTIONS. IF THE EMPLOYEE IS NOT SATISFIED WITH THE RESULTS PRESENTED, SUPERVISION SHOULD ENCOURAGE AND, IF REQUESTED, ASSIST THE EMPLOYEE IN ESCALATING HIS CONCERN OR PROBLEM TO THE NEXT HIGHER LEVEL OF APS SUPERVISION.

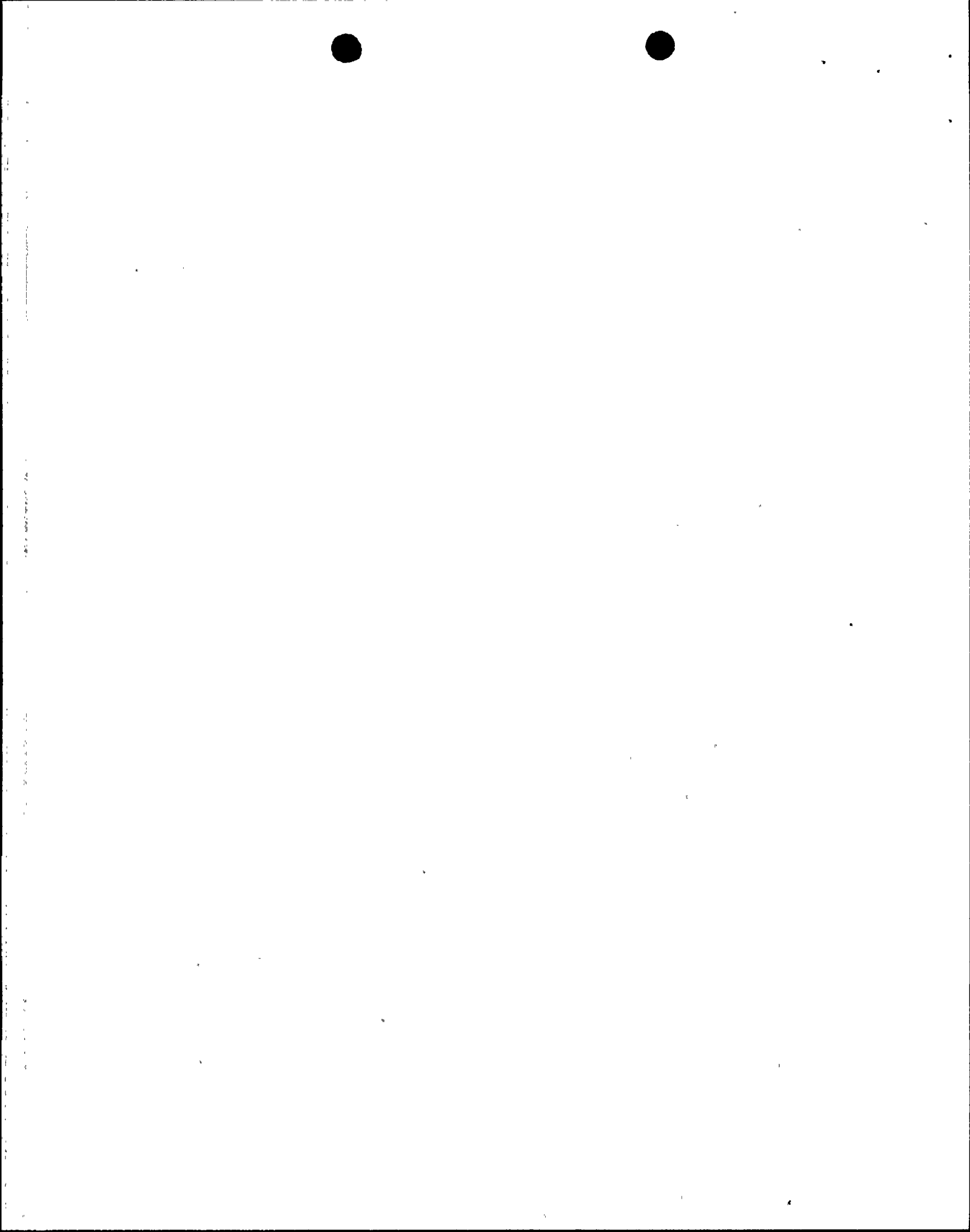
EACH EMPLOYEE IS EXPECTED TO BRING THEIR SAFETY CONCERNS AND PROBLEMS TO THE ATTENTION OF THEIR IMMEDIATE SUPERVISOR. SHOULD EMPLOYEES HAVE A REASON TO FEEL THAT THEIR SAFETY CONCERNS OR PROBLEMS HAVE NOT BEEN OR WILL NOT BE ADEQUATELY ADDRESSED THROUGH THE USE OF THESE NORMAL CHANNELS, THEY SHOULD REPORT THEIR CONCERN OR PROBLEM TO THE EMPLOYEE CONCERNS PROGRAM. THERE ARE SEVERAL WAYS TO DO THIS:

1. CALL THE EMPLOYEE CONCERNS OFFICE - EXTENSION 6701;
2. VISIT THE EMPLOYEE CONCERNS OFFICE - NORTH ANNEX (ROOM 227);
3. CALL THE EMPLOYEE CONCERNS DIRECT LINE - 944-5444;
4. COMPLETE AN EMPLOYEE CONCERN DISCLOSURE FORM WHEN EXITING;
5. HAVE A PERSONAL INTERVIEW WHEN EXITING.

WHEN REPORTING A CONCERN TO THE EMPLOYEE CONCERNS PROGRAM, EMPLOYEES MAY REQUEST CONFIDENTIALITY, EVERY EFFORT WILL BE MADE NOT TO DISCLOSE THEIR IDENTITY OUTSIDE THE EMPLOYEE CONCERNS PROGRAM.

CONCERNS REPORTED UNDER THE EMPLOYEE CONCERNS PROGRAM WILL BE INVESTIGATED, RESOLVED, AND DOCUMENTED. IN CASES WHERE ACTION IS REQUIRED TO CORRECT A REPORTED CONDITION, THE COMPLETION OF THE ACTION WILL BE VERIFIED. A DESCRIPTION OF THE ACTIONS TAKEN TO ADDRESS THE CONCERN WILL BE AVAILABLE TO THE EMPLOYEE WHO RAISED THE CONCERN.

ALTHOUGH EMPLOYEES HAVE A DUTY TO REPORT THEIR CONCERNS TO APS, CONCERNS MAY ALSO BE IDENTIFIED DIRECTLY TO THE NUCLEAR REGULATORY COMMISSION, REGION V (415) 943-3700, OR SITE RESIDENT (602) 393-3737.



EMPLOYEES ARE PROTECTED BY LAW AGAINST HARASSMENT, INTIMIDATION OR RETALIATION FOR IDENTIFYING NUCLEAR SAFETY CONCERNS. THEIR RIGHTS IN THIS REGARD AS WELL AS OTHER RELEVANT INFORMATION ARE SUMMARIZED IN NRC FORM 3 WHICH IS POSTED WIDELY THROUGHOUT PVNGS AND OTHER FACILITIES SUPPORTING OUR NUCLEAR OPERATIONS.

MOREOVER, ARIZONA PUBLIC SERVICE COMPANY WILL NOT TOLERATE HARASSMENT, INTIMIDATION, DISCRIMINATION OR OTHER ACTS OF RETALIATION AGAINST ANY EMPLOYEE FOR IDENTIFYING ANY CONCERN TO EITHER SUPERVISION, MANAGEMENT, THE EMPLOYEE CONCERNS PROGRAM, OR THE NRC. IF AN EMPLOYEE BELIEVES THEY HAVE BEEN OR ARE BEING, DISCRIMINATED AGAINST BECAUSE OF IDENTIFYING A CONCERN, THEY SHOULD IMMEDIATELY REPORT THIS DIRECTLY TO THE EMPLOYEE CONCERNS PROGRAM ON SITE.



W. F. CONWAY
EXECUTIVE VICE PRESIDENT - NUCLEAR

