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EMPLOYEE CONCERNS PROGRAMS

PLANT NAME: Palo Verde LICENSEE: Arizona Public Service (APS)  
DOCKET #: 50-528, 529, 530

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?

Yes

2. Has NRC inspected the program?

Yes Although a formal evaluation of the program has not been conducted, several reviews of Employee Concerns Program (ECP) files have occurred during allegation inspection activities. In general, these reviews were not formally documented to protect the identity of allegers. In one case, the NRC conducted a survey to evaluate employee willingness to go to the ECP with safety concerns. This survey was documented in NRC Inspection Report 50-528/92-33.

B. SCOPE:

1. Is it for:

a. Technical? Yes

b. Administrative? Yes

c. Personnel issues? Yes

2. 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? Yes

4. Does the program apply to all licensee employees? Yes

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5. Contractors? Yes
6. Does the licensee require its contractors and their subs to have a similar program?  
No However, APS requires contractors comply with the APS ECP program.
7. Does the licensee conduct an exit interview upon terminating employees asking if they have any safety concerns?  
Yes Direct employees have a face-to-face interview; contractors fill out a form and may request a face-to-face interview.

**C. INDEPENDENCE:**

1. What is the title of the person in charge?  
Manager, Employee Concerns Program
2. Who do they report to?  
Director, Quality Assurance (QA)
3. Are they independent of line management? Yes
4. Does the ECP use third party consultants?  
No The ECP occasionally may use a law firm to investigate legal matters.
5. How is a concern about a manager or vice president followed up?

In general, these types of concerns are processed similar to other concerns regarding avoiding a conflict of interest. That is, if the line organization evaluates the concern, the ECP staff will try to have the evaluation performed by someone at least two levels above the person involved. This may require going all the way up to the Board of Directors. The ECP staff also has the option of performing the evaluation themselves or have a different organization evaluate the concern.

**D. RESOURCES:**

1. What is the size of staff devoted to this program?  
5 investigators (APS is in the process of hiring one more investigator), a manager, and one secretary.

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

Technical training - varies based on previous experience. The ECP staff has experience in the areas of human resources, nuclear engineering, quality assurance, systems engineering, and police investigation. No formal technical training is required for investigators once they are on the ECP staff. The program relies on the expertise within the ECP staff and on other Palo Verde organizations.

Baseline training - report writing, fraud seminar, investigation seminar, legal issues seminar, interviewing skills seminar. This training is not currently required for investigators, but may be given depending on the background of the individual. However, there is not a formal qualification card or certification to conduct investigations.

E. REFERRALS:

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

In general, the concern is given to line management if the ECP staff feels there is not a possibility of revealing the concerned person's identity or if there is not a conflict of interest within line management. If these conditions can not be met, the ECP staff will process the concern. Occasionally, the ECP staff will use a third person outside of line management.

F. CONFIDENTIALITY:

1. Are the reports confidential?

Yes Reports and names of people are handled on a "need to know" basis. If the concern is substantiated the report is submitted to the QA director for approval. If the report is unsubstantiated, the report remains in ECP. Additionally, all records are retained in the ECP office.

2. Who is the identity of the allegor made known to (senior management, ECP staff, line management, other)?

The identity of the person is revealed on a "need to know" basis and depends on the issue and the organization performing the evaluation. The evaluation is to focus on the issue and not the person; therefore, the allegor's name is not considered to be important. If there is a strict personnel issue, the



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person's name could be important and usually needs to be revealed.

3. Can employees be:
  - a. Anonymous? Yes
  - b. Report by phone? Yes

## G. FEEDBACK:

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

Yes The ECP staff attempts to perform a face-to-face interview. If this is not practical, a letter is sent to the concerned individual.

2. Does program reward good ideas?

No Concerns provided to the ECP, even if determined to be good ideas, are not publicized. Individuals can be rewarded for good ideas provided through other licensee programs.

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

The QA Director.

4. Are the resolutions of anonymous concerns disseminated?

No Concern resolutions, regardless of the source, are not disseminated. However, an anonymous caller is given a file number so they can call and determine the resolution of their concern.

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?

There is no formal mechanism or performance indicators used to measure effectiveness. The ECP manager uses informal indicators such as the number of repeat customers and



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referrals, although this information has not been recorded. The ECP staff attempted to survey a limited number of past customers, but the response to the survey was poor.

2. Are concerns:

a. Trended?

Yes Trending is conducted by the type of concern (management/human resources, industrial safety, and nuclear safety/quality), how the concern was received, age of the concern, whether substantiated or unsubstantiated, and the number of concerns for the various departments.

b. Used?

Yes Trending reports are issued to the managers of the major organizations. There is no formal program for use of the data.

3. In the last three years how many concerns were raised? 537  
Closed? 444. What percentage were substantiated? 18%

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

The ECP staff recently attempted to conduct a random survey of previous customers. The staff did not obtain good response to the survey and were unable to draw any major conclusions from data. Informal interviews with customers are performed but are not documented.

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

They are not conducted.

**I. ADMINISTRATION/TRAINING:**

1. Is ECP prescribed by a procedure? Yes

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

General employee training, posters. APS will initiate some new efforts in this area such as an advertising campaign (possibly using coffee cups) and a formal presentation to new hires.

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ADDITIONAL COMMENTS: None.

NAME: Albert E. MacDougall TITLE: Resident Inspector

PHONE #: (602) 386-3638 DATE COMPLETED: 08/18/93

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