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50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
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SUBJECT: Updated package consisting of attachment A to "Employee Concern Program."

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10/6 JAMS

September 7, 1993

TI 2500/028 - EMPLOYEE CONCERNS PROGRAMS

PLANT NAME: Turkey Point, Units 3 and 4

LICENSEE: Florida Power and Light

DOCKET NOS: 50-250 and 50-251

A. PROGRAM:

- 1. Does the licensee have an employee concerns program (ECP)?
Yes - The Speakout Program.
- 2. Has the NRC inspected the program?
Yes. (Refer to the special announced inspection documented in NRC Inspection Report No. 50-250,251/90-20.)

B. SCOPE:

- 1. Is it for:
 - a. Technical Issues?
Yes.
 - b. Administrative Issues?
Yes.
 - c. Personnel Issues?
Yes.
- 2. Does it cover safety as well as non-safety issues?
Yes - For non-safety issues, the cognizant department performs the investigation; however, Speakout handles all of the correspondence and interfacing with the concerne.
- 3. Is it designed for:
 - a. Nuclear Safety?
Yes.
 - b. Personal Safety?
Yes.

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c. Personnel Issues - Including Union Grievances?

No - It is designed for personnel issues with the exception of union grievances.

4. Does the program apply to all licensee employees?
Yes.
5. Contractors?
Yes.
6. Does the licensee require its contractors and their subcontractors to have a similar program?
No - The licensee requires them to exit through the Florida Power and Light Speakout Program.
7. Does the licensee conduct an exit interview upon terminating employees asking if they have any safety concerns?
Yes.

C. INDEPENDENCE:

1. What is the title of the person in charge?
Speakout Department Supervisor.
2. Who do they report to?
Director, Nuclear Safety Assessment.
3. Are they independent of line management?
Yes.
4. Does the ECP use third party consultants?
Yes, when necessary to augment the work force. The licensee has Florida Power and Light staff.
5. How is a concern about a manager or vice president followed up?
Speakout notifies the Director of Nuclear Assurance, and the Director of Nuclear Assurance notifies the Vice President of Nuclear Assurance. They then select a qualified individual to perform the investigation.



D. RESOURCES:

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

There are three staff members devoted to this program.

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

- Technical training
- Interviewing training
- Investigator training
- Human Performance Enhancement System (HPES) training

E. REFERRALS:

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

ECP staff and line management.

F. CONFIDENTIALITY:

1. Are the reports confidential?

Yes.

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

The identity of the allegor is made known to the ECP staff only on a need to know basis. The investigator file does not include the name of the concernee.

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 - A letter is written providing a summary of the concern resolution.

2. Does program reward good ideas?

No.

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

The Speakout Review Committee makes the final decision of resolution. This committee is made up of the Quality Assurance Manager, Director of Nuclear Assessment, Maintenance Manager, and Licensing Manager.

4. Are the resolutions of anonymous concerns disseminated?

No.

5. Are the 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?

Effectiveness of the program is measured via independent surveys conducted by a contractor and monthly performance reports with indicators.

2. Are concerns:

- a. Tranded?

Yes.

- b. Used?

Yes.

3. In the last three years, how many concerns were raised?

168 nuclear safety-related and quality-related
(1195 total)

Of the concerns raised, how many were closed?

163 nuclear safety-related and quality-related
(1178 total)

What percentage were substantiated?

45% nuclear safety-related and quality-related
(36% total)

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

The licensee utilizes random surveys by an independent contractor.

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

FPL Quality Manager performs internal audits of the ECP at the discretion of the Quality Assurance Vice President. The NRC also performs random inspections of this program.

I. ADMINISTRATION? TRAINING:

1. Is the ECP prescribed by a procedure?

Yes - Nuclear safety speakout procedure NSS-1.

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

Employees are made aware of the Speakout Program via the following avenues:

- Training - General Employee Training
- Newsletters
- Television Instant News
- Bulletin Boards
- Staff Plant Tours
- Speakout Appreciation Items

ADDITIONAL COMMENTS: (Including characteristics which make the program especially effective, if any.)

- There is one central focal point to resolve any type of employee/contractor concern.
- The identity of the concernee is kept confidential.
- There is high level management support and involvement with the implementation of recommendations.

- The Speakout Program is independent of line management.
- The Speakout Program provides feedback to the concernee.
- The ECP staff is respected by licensee personnel.

Tom Johnson - SRI - 305-245-7669

Reviewed by .

M V Smikala 404-331-5506

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