



Pennsylvania Power & Light Company

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SEP 03 1991

Harold W. Keiser
Senior Vice President-Nuclear
215/774-4194

Mr. J.H. Joyner, Chief
Facilities Radiological Safety and
Safeguards Branch
Division of Radiation Safety and Safeguards
U.S. Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, PA 19406

**SUSQUEHANNA STEAM ELECTRIC STATION
ALARA RECOGNITION PROGRAM
PLA-3627 FILE R41-2**

Docket Nos. 50-387
and 50-388

Dear Mr. Joyner:

PP&L appreciates NRC's positive assessment of the Susquehanna ALARA program. We understand the importance of the ALARA concept and have implemented a program that assures ALARA considerations are an integral part of the design, operation and maintenance of Susquehanna. We also recognize that enhancements to the existing program are always possible, and the concerns identified in your assessment will be fully evaluated. However, I would like to take this opportunity to address an apparent NRC concern that was identified in the ALARA assessment as documented in Inspection Report 387-388/91-03. Section 12 (page 19) of this Report stated in part that "Licensee personnel indicated that upper management basically was opposed to incentive systems and that there was no mechanism to present ideas outside of the normal chain of command". This statement needs additional clarification with respect to two existing Nuclear Department recognition programs. These programs have as their purpose the rewarding of employees who achieve beyond expectations.

PP&L is strongly committed to an effective ALARA program. Additionally, employee identification and/or recommendations for improvement of ALARA concerns is highly encouraged. However, PP&L does not believe that incentives should be tied directly to ALARA improvements since this could lead to ALARA considerations overriding other important safety/scheduling considerations in the performance of a given task. This could potentially lead to a degradation of plant and/or employee safety. We have therefore chosen to integrate employee recommended ALARA improvements into two Nuclear Department Employee

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Recognition Programs to avoid potential abuses with an ALARA incentive program. These currently established programs allow for recognition of individuals who make significant dose savings inventions and/or those who make outstanding ALARA efforts which contribute to the Nuclear Department's success. I have personally issued a letter (attached) to Nuclear Department management personnel emphasizing PP&L's commitment to ALARA, and that individuals who exhibit exceptional ALARA performance should be considered under these recognition programs.

PP&L also has a corporate informational program known as "Comments and Questions" (CQ). This program is available to all employees and is designed to enhance the exchange of information through an informal confidential question and answer system. Employees are encouraged to ask questions, offer opinions or make suggestions on company related topics. Replies to all inquiries are prepared by an appropriate manager and reviewed by department upper management. CQ results are periodically communicated to management. The CQ program can be utilized by employees to identify ALARA issues when an individual wants to remain anonymous.

PP&L believes the statement in Inspection Report 387-388/91-03 concerning incentive systems needs to be addressed to reflect our established policies. We have therefore elected to respond to you on this issue. Let me reemphasize that the Nuclear Department recognition programs do consider ALARA performance as a category for consideration. PP&L is also aware that a good employee recognition program is an important element in leading the Susquehanna units to excellent performance.

Very truly yours,



H. W. Keiser

Attachment

cc: NRC Document Control Desk (original)
NRC Region I
Mr. G. S. Barber, NRC Sr. Resident Inspector
Mr. J. J. Raleigh, NRC Project Manager

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Distribution 1A - 1E

Maintaining our personnel radiation exposure as low as reasonably achievable is an important objective of the Nuclear Department and the responsibility of each person who works at SSES. Employees are encouraged to examine their work surroundings and procedures in relation to the ALARA principles and concept, and to propose recommendations for improvement. To foster employee involvement and suggestions for improvement, supervisors and peers should provide recognition of individuals and teams. The Outstanding Employee Recognition Program and Exceptional Contribution Program (Nuclear Department Personnel Administrative Handbook, PA 201 and 203) should be utilized to their fullest extent to encourage ALARA initiative.

The Recognition For Exceptional Contribution Program has as its purpose the rewarding of employees who achieve beyond expectation. This includes ALARA performance just as it includes productivity, quality, and other attributes of excellent performance. Individuals who make significant dose savings inventions, change processes to reduce exposures, or who manage a project beyond ALARA expectations should be considered for an exceptional contribution award in accordance with the program's guidelines. Similarly, the Outstanding Employee Recognition Program should also be used to recognize employees who make outstanding ALARA efforts which contribute to the Department's success.

It is also important to understand that recognition can be awarded by supervisors and peers. The exceptional contribution program is administered by supervisors and nominations are made by cost area heads/supervisors. The outstanding employee program is, however, designed for peer/team member nominations, thereby using the work group to determine if recognition is warranted.

To achieve excellence in Susquehanna operations, we need to promote and recognize superior performance in all aspects of our jobs and which reflects all of our departmental values. Please make sure you review our recognition procedures and apply the selection criteria to appropriately recognize employee performance leading us toward excellence.


H. W. Keiser