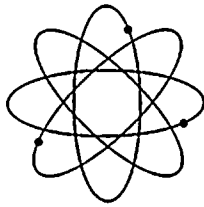
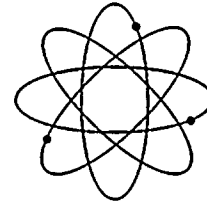


# TVA

OFFICE OF  
NUCLEAR  
POWER



TVA  
EMPLOYEE  
CONCERN  
PROGRAM



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UNITED STATES GOVERNMENT

## Memorandum

TENNESSEE VALLEY AUTHORITY

TO : Those listed

FROM : S. A. White, Manager of Nuclear Power, LP 6N 38A-C

DATE : January 30, 1986

SUBJECT: NEW TVA EMPLOYEE CONCERN PROGRAM

In order to establish high standards of quality and safety in TVA nuclear activities, it is absolutely essential that we establish and maintain a high degree of trust between TVA line managers and employees. I have taken an important first step in that direction by establishing a new Employee Concern Program (ECP). All previous programs have been consolidated into a single TVA-wide effort to refocus primary responsibility for problem communication and resolution back into the line organizations. Attachment A is the standardized procedure I am issuing for handling employee concerns throughout the Office of Nuclear Power. It is to be implemented within your organization by February 1, 1986. Except for procedures related to the Watts Bar Special Employee Concern Program, all other policies and procedures you have issued related to the handling of employee concerns within your organization are to be cancelled. If this procedure does not meet your specific needs you should contact the ECP Manager.

An Employee Concern Program Site Representative (ECP-SR) has been designated for each nuclear plant site and corporate office location. The ECP-SR will assist you in making this transition.

For the new program to be a success everyone must understand their part. Each of you, with ECP-SR assistance, should meet with the managers that report directly to you to review the policy and procedures for carrying out the program. Similar briefings should be held with supervisors under their cognizance until all employees within your organization are oriented to this program. Attachment B contains specific instructions for conducting these orientation sessions including a schedule.

TO: See list on page 2

*S. A. White*

*I consider this program to be of critical importance in regaining the trust and confidence of our people. I expect absolute compliance with the confidentiality and anonymity provisions.*





2

Those listed  
January 30, 1986

NEW TVA EMPLOYEE CONCERN PROGRAM

TO: H. L. Abercrombie, ONP, Sequoyah  
W. C. Bibb, Browns Ferry  
C. Bonine, 12-108 SB-K  
W. R. Brown, 9-169 SB-K  
R. W. Cantrell, W12 A12 C-K  
W. T. Cottle, ONP, Watts Bar  
J. P. Darling, ONP, Bellefonte  
L. L. Jackson, LP 6N 37A-C  
K. W. Whitt, E3 A8 C-K

EKS:MWA:CLB

Attachments

cc (Attachments):

RIMS, MR 4N 72A-C

M. W. Alexander, 9-164 SB-K

D. K. Baker, LP 6N 313A-C

H. S. Blackburn, 413 HIB-K

R. P. Denise, LP 6N 40A-C

T. Galbreath, ONP, Sequoyah

R. J. Griffin, ONP, Watts Bar

P. C. Mann, ONP, Bellefonte

C. C. Mason, LP 6N 37A-C

T. F. Newton, Browns Ferry

E. K. Sliger, LP 6N 48A-C



ATTACHMENT A

TVA OFFICE OF NUCLEAR POWER  
EMPLOYEE CONCERN PROGRAM  
LINE ORGANIZATION PROCEDURE





## 1.0 PURPOSE

In support of the Office of Nuclear Power (ONP) policy that safety and quality are paramount, this procedure assigns responsibility and establishes actions necessary for identifying and responding to employee concerns.

## 2.0 SCOPE

This procedure applies to all TVA nuclear activities and is in full compliance with 10 CFR 50, Section 50.7, Employee Protection, and all other applicable Federal laws and regulations.

## 3.0 DEFINITIONS

- 3.1 Employee Concern - The expression of views or opinions on matters pertaining to TVA policies, activities or conditions which the employee considers important and which may appear to differ from management positions, decisions, or practices.
- 3.2 Employee Concern Program (ECP) - The program established for receiving, evaluating, processing, and responding to employee concerns.
- 3.3 ECP - Site Representative (ECP-SR) - An individual assigned to each nuclear site and the corporate offices to receive and respond to Employee Concerns brought to his/her attention.

## 4.0 POLICY

All personnel involved in TVA nuclear activities have an obligation to protect the health and safety of the public and their fellow employees. To this end, TVA has established the following policy regarding the handling of information related to any condition, practice, or event which may adversely impact quality, deviate from technical or procedural requirements, or have the potential for degrading equipment, operating capabilities or personnel's ability to accomplish assigned responsibilities. Any such practice, condition, or event of which any TVA employee becomes aware should be brought to the attention of the employee's supervisor.

All supervisors have the additional responsibility for considering, resolving, or referring such practices, conditions, or events brought to their attention. Intimidation and harassment will not be tolerated. Intimidation (any conduct which interferes with an employee's ability to fulfill his/her assigned responsibilities) and harassment (adverse actions taken against an employee for fulfilling his/her assigned responsibilities) should also be brought to the attention of TVA management via the mechanism defined in the implementing procedures under the umbrella of the ECP.

The avenues open to TVA personnel to facilitate their obligation to report such practices, conditions, or events are:

- Contact with first-line supervision.



- Referral via first-line supervision to higher-management levels or other organizational units to which the employee will be a party.
- Direct input, or collateral input with supervision, to the ECP-SR.
- Submittal to the Inspector General.
- Direct contact with the NRC in accordance with NRC Form 3, or other direct contact with governmental agencies with jurisdictional authority, as appropriate.

## 5.0 RESPONSIBILITIES

Employees - Employees have a responsibility for reporting information regarding any condition, practice or event which may adversely impact quality, deviate from technical or procedural requirements, or have the potential for degrading equipment, operating capabilities or personnels' ability to accomplish assigned responsibilities.

Supervisors - All supervisors have the additional responsibility for considering, resolving or referring such conditions, practices, or events brought to their attention.

ECP-SR - The ECP-SR is responsible for the evaluation or investigation, and for disposition of employee concerns brought to his/her attention. The ECP-SR is responsible for maintaining the confidentiality of an employee when requested and signs a written statement with the employee to affirm the confidentiality agreement. The ECP-SR is responsible for maintaining employee concern records, performing trending of data and providing periodic status reports to the ECP Manager and site management. The ECP-SR shall monitor the effectiveness of the employee/supervisor relationship for identification and resolution of employee concerns.

ECP Manager - The ECP Manager is responsible for maintaining an ECP and for taking actions to ensure the program is understood by employees and management, has adequate resources to accomplish the goals of the program, and is achieving desired results. He is responsible for establishing and maintaining confidentiality provisions to support the goals of the ECP. He is also responsible for keeping upper management informed of program status.

Manager, ONP - The Manager, ONP, is responsible for establishing policy and general program direction for an effective ECP.

## 6.0 PROCEDURE

### 6.1 Methods for Expressing and Resolving Employee Concerns

#### 6.1.1 Discussion with Immediate Supervision

Employees are encouraged to discuss concerns with their immediate supervisors and resolve those concerns using existing problem reporting programs and procedures.



When contacted by an employee expressing a concern, the line supervisor and employee should work together to resolve that concern using systems established for identifying and resolving problems (maintenance requests, nonconforming condition reports, corrective action reports, cooperative conferences, grievance procedures, ALARA reporting, employee involvement meetings, safety suggestion reports, etc.).

If the concern is resolved using existing procedures or through verbal agreement between the supervisor and employee, no special documentation is required (other than that required by existing procedures).

#### 6.1.2 Discussion with Other Organizational Elements/Upper Management

If the concern cannot be resolved with the immediate supervisor, the supervisor will arrange a meeting through his chain of command with the appropriate level of line management or the appropriate organizational element to facilitate timely resolution. The employee will normally be requested to attend such a meeting, but in any event, will be advised of the results of the meeting.

#### 6.1.3 Documentation of Concerns

If the employee is unable to resolve his/her concern through discussions with line management or by use of existing problem reporting systems; or chooses not to express concerns to line management, the employee may document his/her concern as described on the ECP Policy and Reporting Instructions (attachment 1).

#### 6.1.4 Referral of Concerns to the ECP-SR

The employee should forward the documented concern to the ECP-SR, or may request an interview with the ECP-SR by telephone or personal contact.

When a documented concern is received from an employee, the ECP-SR will evaluate, process, track, and ensure disposition in accordance with ECP-SR procedures. The confidentiality of the employee will be maintained when requested.

#### 6.1.5 Referral of Concerns Outside the ONP

The employee may express his/her concern with TVA management outside the ONP by reporting the concern to the Inspector General. The confidentiality of the employee will be maintained when requested.



#### 6.1.6 Referral of Concerns Outside TVA

In addition, the employee may contact NRC as defined on NRC Form 3 located on bulletin boards in employee work areas or other government agencies with jurisdictional authority. The confidentiality of the employee will be handled in accordance with respective agency policies.

#### 6.2 Posting of Instructions and Employee Concern Forms

6.2.1 Copies of attachment 1 to this procedure will be posted at designated work locations within the facilities occupied by ONP and affiliated contractor personnel. As a minimum, this attachment will be posted at the same locations where NRC Forms 3 are posted.

6.2.2 Each primary organization shall designate a responsible individual for maintaining proper and sufficient posting of attachment 1.

#### 6.3 Training

The basic concepts of the TVA ECP will be disseminated to TVA personnel as follows:

##### 1. General Employee Training (GET)

All personnel requiring unescorted access at TVA's nuclear facilities shall be provided with information on the TVA employee concern reporting requirements and mechanisms.

##### 2. New Employee Orientation

New employees or contractor personnel affiliated with the TVA nuclear program will be provided a written statement of their responsibility for reporting conditions adverse to safety, quality, or well being of the public and fellow employees. This action will be a part of the documented check-in process.

##### 3. Paycheck Flyers

All TVA personnel affiliated with the TVA nuclear program shall receive a periodic flyer that reviews and highlights the basic concepts of the ECP every six months. This flyer shall accompany the paycheck and/or stub sent to the employee.

#### 6.4 Confidentiality

An employee requesting confidentiality will be required to read and sign a confidentiality agreement which specifies the terms of providing confidentiality. The agreement indicates that the ECP staff will not identify the individual by name or personal identifier in any document,





conversation, or communication released to the public, with specified restrictions. The agreement also indicates that confidentiality will be waived subject to certain actions by the employee, including providing false information to TVA or information connected to misconduct on the part of the employee.

6.5 Anonymous Concerns

Concerns identified through anonymous sources will be evaluated and/or investigated by the ECP-SR. However, anonymous concerns will not be provided feedback and resolution will be affected by the detail of information provided.



ATTACHMENT 1

EMPLOYEE CONCERN PROGRAM POLICY AND REPORTING INSTRUCTION

Policy

All personnel involved in TVA nuclear activities have an obligation to protect the health and safety of the public and their fellow employees. To this end, TVA has established the following policy regarding the handling of information related to any condition, practice, or event which may adversely impact quality, deviate from technical or procedural requirements, or have the potential for degrading equipment, operating capabilities or personnel's ability to accomplish assigned responsibilities. Any such practice, condition, or event of which any TVA employee becomes aware should be brought to the attention of the employee's supervisor.

All supervisors have the additional responsibility for considering, resolving, or referring such practices, conditions, or events brought to their attention. Intimidation and harassment will not be tolerated. Intimidation (any conduct which interferes with an employee's ability to fulfill his/her assigned responsibilities) and harassment (adverse actions taken against an employee for fulfilling his/her assigned responsibilities) should also be brought to the attention of TVA management via the mechanism defined in the implementing procedures under the umbrella of the Employee Concern Program

The avenues open to TVA personnel to facilitate their obligation to report such practices, conditions, or events are:

- Contact with first-line supervision.
- Referral via first-line supervision to higher management levels or other organizational units to which the employee will be a party.
- Direct input, or collateral input with supervision, to the Employee Concern Program Site Representative.
- Submittal to the Inspector General.
- Direct contact with the NRC in accordance with NRC Form 3, or other direct contact with governmental agencies with jurisdictional authority, as appropriate.

Instructions

1. You are encouraged to discuss issues and concerns with your immediate supervisors, using existing problem reporting systems, as appropriate.
2. You and your supervisors may involve other organizational units, as appropriate, in achieving resolution of issues or concerns.
3. You may express issues or concerns to the Employee Concern Program Site Representative should the above efforts fail. You may schedule an interview, call, or mail information related to the issue or concern. The back side of these instructions provides a means for you to document the issue or concern and provide back-up information related to it. Your Site Representative for           (plant)           is

(Name)  
(Address)  
(Telephone #)

4. You also have the option of providing documented information via this form to the TVA Inspector General for consideration. Information should be addressed to

TVA Inspector General  
(Address)

5. Means for expression of concerns to NRC or other governmental agencies are found on Official TVA Bulletin Boards.



Documentation

A. Statement of Concern \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(Attach additional sheets if necessary.)

B. Specifics

1. Plant(s), facility(s), or units(s) affected: \_\_\_\_\_  
\_\_\_\_\_

2. Date and time of occurrence or condition: \_\_\_\_\_ / \_\_\_\_\_  
Date / Time

3. Specific location of occurrence or condition: \_\_\_\_\_  
\_\_\_\_\_

4. Systems, equipment, structures, or personnel affected: \_\_\_\_\_  
\_\_\_\_\_

5. Identify any Federal, State, or TVA requirements that were violated: \_\_\_\_\_  
\_\_\_\_\_

6. Names, job titles, and locations of other individuals who may be able to provide additional or supporting information relating to this concern: \_\_\_\_\_  
\_\_\_\_\_

7. What do you think might be the effect on the nuclear plant, site personnel, or general public if this concern is not corrected? \_\_\_\_\_  
\_\_\_\_\_

C. Employee/Supervisor Interface

1. Did you discuss this concern with your supervisor or other line supervision? \_\_\_\_\_

2. Explain what actions were taken to resolve your concern or why you believe no action was taken. \_\_\_\_\_  
\_\_\_\_\_

3. Did you obtain assistance from your supervisor or other line supervision in documenting your concern on this form? \_\_\_\_\_ If yes, describe any further action taken towards resolving your concern. \_\_\_\_\_  
\_\_\_\_\_

D. Feedback

Do you desire feedback on the disposition of your concern? \_\_\_\_\_  
Address \_\_\_\_\_

E. Confidentiality

Do you wish your identify to remain in confidence with the ECP-SR? \_\_\_\_\_  
You may also omit your name from this information and remain anonymous. However, feedback cannot be given and resolution will be affected by the detail of the information given.

\_\_\_\_\_  
Name / Job Title / Organization / Phone No.  
(Work or Home)

\_\_\_\_\_  
Employee Signature / Date

\_\_\_\_\_  
Supervisor Signature / Date  
(if assisted in completion)



ATTACHMENT B

NEW TVA EMPLOYEE  
CONCERN PROGRAM  
ORIENTATION  
PACKAGE

## ORIENTATION INSTRUCTIONS

---

For the new Employee Concern Program to be a success, everyone must clearly understand the program and its objectives and there must be consistent application throughout the Office of Nuclear Power. To accomplish this objective the following orientation plan will be carried out:

A. Office Managers/Site Directors

By February 7 - Office Managers and Site Directors hold orientation sessions with the managers that report to them. ECP-SR will participate. Instruct them to hold further briefing sessions with the managers that report to them. These should be scheduled in order to allow ECP-SR participation also. These orientation sessions are to be documented.

B. Other Supervisors and Employees

By February 14 - Complete orientation sessions with supervisors and employees until all employees have attended at least one orientation session. These orientation sessions are to be documented.

C. Orientation Session Content

- o Hand out new ECP orientation package (ECP-SR will provide).
- o Discuss program fundamentals.
- o Discuss line organization procedure.
- o Emphasize obligations and responsibilities of supervisors and employees.
- o Discuss role of the ECP-SR.
- o Explain bulletin board posters.
- o Explain ECP Policy and Instructions.
- o Personal emphasis for your organization.
- o Questions and Answers.

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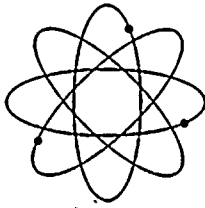
## PROGRAM FUNDAMENTALS

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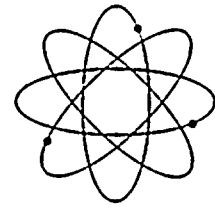
- o Emphasizes early problem identification and resolution utilizing existing procedures within the line organization.
  
- o Emphasizes employee's obligation to bring concerns to the attention of supervision.
  
- o Emphasizes supervisor's responsibility to listen, understand the nature of the concern, evaluate and provide feedback.
  
- o Supervisors will be held accountable for responsibly handling employee concerns brought to their attention.
  
- o Intimidation or harassment of any employee will not be tolerated. Those who cannot comply will be subject to discharge.
  
- o Establishes the Employee Concern Program Site Representative at each plant site and corporate office to assist in program implementation and to independently hear employee concerns.
  
- o TVA is committed to the successful implementation of this program and will assure that appropriate resources are available.

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# TVA EMPLOYEE CONCERN PROGRAM



"SAFETY & QUALITY ARE PARAMOUNT"

S. A. White

*YOU* have an obligation to protect the health & safety of the general public and your fellow employees.

*REPORT* any conditions that you believe could adversely affect safety & quality:

- To your supervisor
- To other responsible line management
- To your Employee Concern Program - Site Representative

You may also contact the TVA-Inspector General.

Copies of Employee Concern Program Policy & Reporting Instructions are provided on Official TVA Bulletin Boards.

*Steve White*

TVA NUCLEAR





EMPLOYEE CONCERN PROGRAM  
INSTRUCTION 1

TITLE EMPLOYEE CONCERN PROGRAM -  
SITE REPRESENTATIVE PROCEDURE

CURRENT REVISION LEVEL 3

Prepared by *A. K. Baker*

Approved by *Eric K. Lutz*

Date Approved 5/30/86





# EMPLOYEE CONCERN PROGRAM

Instruction 1

## REVISION LOG

VISION DATE	PAGES AFFECTED	DESCRIPTION OF CHANGE
0 1/30/86	All	Initial issue. See RIMS L12 860130 801.
1 2/18/86	All (1-18)	Reformatted instruction. Revised generic applicability notification and work history statement on employee profile.
2 3/6/86	All (1-19)	General revision to improve readability. Categorizations expanded to be consistent with ECP special project. Added detail to the report approval and disposition section.
3 5/30/86	All (1-31)	General revision to sections 6.2 and 6.4. Deletion of attachment 2. Addition of attachments 2-7. Other minor editorial changes. (L65 860527 697)







Title: EMPLOYEE CONCERN PROGRAM -  
SITE REPRESENTATIVE PROCEDURE

PAGE 1  
INSTRUCTION NO. 1  
REVISION 3

#### 1.0 PURPOSE

This procedure describes the process for receiving, evaluating, processing, and responding to employee concerns identified to the Employee Concern Program - Site Representative at the TVA nuclear sites and corporate offices.

#### 2.0 SCOPE

This procedure applies to all TVA nuclear activities and is in full compliance with 10 CFR 50, Section 50.7, Employee Protection, and all other applicable Federal and NRC laws and regulations.

#### 3.0 DEFINITIONS

- 3.1 Employee Concern - The expression of views or opinions on matters pertaining to TVA policies, activities, or conditions which the employee considers important and which may appear to differ from management positions, decisions, or practices.
- 3.2 Employee Concern Program (ECP) - The program established for receiving, evaluating, processing, and responding to employee concerns.
- 3.3 Employee Concern Program - Site Representative (ECP-SR) - An individual assigned to each nuclear site and the corporate offices to receive and ensure resolution of employee concerns brought to his attention.
- 3.4 Employee Interview Record (EIR) - Documentation utilized by the ECP-SR during employee interviews, etc., which identifies and discusses the employee concern.

#### 4.0 POLICY

All employees involved in TVA nuclear activities have an obligation to protect the health and safety of the public and their fellow employees. To this end, TVA has established the following policy regarding the handling of information related to any condition, practice, or event which may adversely impact quality, deviate from technical or procedural requirements, or have the potential for degrading equipment, operating capabilities, or the employee's ability to accomplish assigned responsibilities. Any such practice, condition, or event of which any TVA employee becomes aware should be brought to the attention of the employee's supervisor.





Title: EMPLOYEE CONCERN PROGRAM -  
SITE REPRESENTATIVE PROCEDURE

PAGE 2  
INSTRUCTION NO. 1  
REVISION 3

All supervisors have the additional responsibility for considering, resolving, or referring to appropriate management such practices, conditions, or events brought to their attention. Intimidation and harassment will not be tolerated. Intimidation (any conduct which interferes with an employee's ability to fulfill assigned responsibilities) and harassment (adverse actions taken against an employee for fulfilling assigned responsibilities) should also be brought to the attention of TVA management in accordance with the implementing procedures of the ECP.

The avenues open to TVA employees to fulfill their obligation to report such practices, conditions, or events are:

- Reporting to first-line supervision.
- Referral via first-line supervision to higher management levels or other organizational units to which the employee will be a party.
- Direct input, or collateral input with supervision, to the ECP-SR.
- Submittal to the Inspector General.
- Direct reporting to NRC in accordance with NRC Form 3, or other direct reporting to governmental agencies with jurisdictional authority, as appropriate.

## 5.0 RESPONSIBILITIES

- 5.1 Employees - Employees have a responsibility for reporting information regarding any condition, practice or event which may adversely impact quality, deviate from technical or procedural requirements, or have the potential for degrading equipment, operating capabilities, or personnel ability to accomplish assigned responsibilities.
- 5.2 Supervisors - All supervisors have the additional responsibility for considering, resolving, or referring such conditions, practices, or events brought to their attention.
- 5.3 ECP-SR - The ECP-SR is responsible for the evaluation or investigation and for the disposition of employee concerns brought to his/her attention. The ECP-SR is responsible for maintaining the confidentiality of an employee when requested, and signs a written statement with the employee to affirm the confidentiality agreement. The ECP-SR is responsible for maintaining employee concern records, performing trending of data, and providing periodic status reports to the ECP manager and site management. The ECP-SR shall monitor the effectiveness of the employee-supervisor relationship for identification and resolution of employee concerns.





Title: EMPLOYEE CONCERN PROGRAM -  
SITE REPRESENTATIVE PROCEDURE

PAGE 3  
INSTRUCTION NO. 1  
REVISION 3

- 5.4 ECP Manager (ECP MGR) - The ECP manager is responsible for maintaining an ECP and for taking actions to ensure the program is understood by employees and management, has adequate resources to accomplish the goals of the program, and is achieving desired results. He is responsible for establishing and maintaining confidentiality provisions to support the goals of the ECP. He is also responsible for keeping upper management informed of program status.
- 5.5 Manager, Office of Nuclear Power (MGR-ONP) - The Manager, Office of Nuclear Power is responsible for establishing policy and general program direction for an effective ECP.

## 6.0 PROCEDURE

### 6.1 Sources of Employee Concerns

#### 6.1.1 ECP-SR Site Telephone Line

Each ECP-SR site location will be provided with a dedicated telephone line to receive employee concerns. The ECP-SR telephone number will be made available to all site employees.

Incoming calls will be handled by the ECP-SR. Calls placed when the ECP-SR is unavailable, after working hours, weekends, or holidays will be recorded by an answering machine. On weekends or during holiday periods, the ECP-SR will periodically monitor the recording machine.

The ECP-SR receiving the call or monitoring the answering machine shall initiate an EIR (attachment 1) to document the telephone call and provide information for conducting further followup if an employee concern is identified.

#### 6.1.2 Exit Interviews

All employees terminating or transferring to another job site will be interviewed by the ECP-SR who will document the exit interview on an EIR (attachment 1). During this interview an employee may identify any employee concern related to safety of design, construction, operations, or supporting activities, or any other concern not related to safety.

Those employees who do not state a concern (item I.A checked on attachment 1) will be asked to sign attachment 1 documenting that they have no concern.





Title: EMPLOYEE CONCERN PROGRAM -  
SITE REPRESENTATIVE PROCEDURE

PAGE 4  
INSTRUCTION NO. 1  
REVISION 3

Employees who may indicate a concern(s) (item I.C checked on attachment 1) will be interviewed by the ECP-SR to establish the specific details of the concern(s) and the EIR will be completed.

For each employee expressing a concern(s), a unique file number shall be assigned as follows:

ECP-WW-XX-YYY-ZZ

Where

WW = calendar year

XX = site identifier (KX, CH, SQ, BF, BL, WB)

YYY = sequential employee number for the site location

A unique concern number will be added to the file number for each identified concern.

ZZ = sequential employee concern number for an employee

#### 6.1.3 Alternatives for Exit Interviews

Individuals who terminate their employment or are transferred to another TVA job site without being interviewed by the ECP-SR will be interviewed later by telephone or mailed the EIR for completion.

#### 6.1.4 Scheduled Interviews

The ECP-SR may interview employees and/or managers to obtain feedback regarding the ECP or as part of an investigation. Scheduled interviews may include a few employees from different organizational units or may include all employees from selected organizational units depending on the objectives of the interview process. These interviews will be conducted and documented in the same manner as exit interviews in 6.1.2.

#### 6.1.5 Walk-in Interviews

Any TVA employee may "walk-in" to the ECP site office to discuss concerns with the ECP-SR.

"Walk-in" interviews will be conducted and documented in the same manner as exit interviews in 6.1.2.







6.1.6 Referral from Line Organizations

An employee concern may be brought to the attention of the ECP-SR from the line supervisor of the employee or other line managers receiving a concern from an employee. Such a referral may be made because the supervisor was unable to resolve the issue or because the supervisor determined that the issue or concern could more appropriately be resolved by the ECP-SR. These interviews will be conducted and documented in the same manner as exit interviews in 6.1.2.

6.1.7 Employee Concern Forms

An employee concern may be brought to the attention of the ECP-SR through the receipt of employee concern forms mailed in or delivered by employees. These will be documented in the same manner as exit interviews in 6.1.2.

6.1.8 Confidentiality

An employee requesting confidentiality will be required to read and sign a confidentiality understanding which specifies the terms of providing confidentiality. The agreement indicates that the ECP staff will not identify the individual by name or personal identifier in any document, conversation, or communication released to the public, with specified restrictions. The understanding also indicates that confidentiality will be waived subject to certain actions by the employee, including providing false information to TVA or information connected to misconduct on the part of the employee.

6.2 Classification of Concerns

Upon receipt of an employee concern, the ECP-SR will perform the following classifications:

6.2.1 Concern Categorization

Each concern will be categorized into one of nine categories as defined in attachment 2.





#### 6.2.2 Determination of Safety Classification

Each concern will be classified in one of four classifications as defined below:

- Nuclear Safety Related - Refer to Attachment 3 for criteria.
- Safety Significant - Refer to Attachment 4 for criteria.
- Industrial Safety Related - If the concern could endanger the health and safety of employees or the general public but is not a nuclear safety-related problem, the concern should be classified as industrial safety related.
- Nonsafety Related - Concerns which the above classifications do not apply.

If a concern is determined to be one of the first three classifications above, attachment 5 will be completed documenting the basis for the determination and becomes part of the EIR.

#### 6.2.3 Determination of Generic Applicability

If a concern is classified as nuclear safety related, safety signification, or industrial safety related, a determination of generic applicability will be performed in accordance with attachment 6. The generic applicability determination documentation (attachment 7) will be completed and become part of the EIR. This documentation includes a record of the site representative notifying the other affected site(s). Each site representative is responsible for the notification of his appropriate site management. The site representative shall document the notification and include it in the appropriate concern or file documentation.

#### 6.2.4 Special Handling of I&H Concerns

If a concern is categorized as an I&H concern, special handling is required as follows:

- Notify the ECP-MGR of the concern as soon as practical.
- Do not begin an investigation, but as necessary perform a pre-evaluation to determine the scope of the concern.
- Transmit to the ECP-MGR a short summary (equivalent to 1/3- to 1/2-typed page) of the pre-evaluation.





Title: EMPLOYEE CONCERN PROGRAM -  
SITE REPRESENTATIVE PROCEDURE

PAGE 7  
INSTRUCTION NO. 1  
REVISION 3

- If possible determine if CI has contacted the OIG. If the CI indicated he/she has, determine if the CI has a preference of who performs the investigation.
- The ECP-MGR and the MGR-ONP will determine whether to refer to OIG or perform the investigation by the ECP staff. This determination will be made based on such factors as the nature of the concern, the complexity, the degree of ONP management involvement in the concern, and the investigation experience or expertise required. The determination may also involve discussions with the OIG.
- If the concern is referred to the OIG, the ECP-SR will transmit a copy of the complete concern file to the OIG. The ECP-SR will notify the CI of the referral of the concern to the OIG and will explain and/or clarify any confidentiality provisions as necessary.
- If an I&H concern is being referred to the OIG, the ECP-SR will review the concern and determine if the concern contains issues outside the scope of the OIG. For example, an I&H concern centered around a supervisor/employee relationship could also contain problems related to nuclear safety. Before this concern is transmitted to the OIG, these other issues will be identified by the ECP-SR and handled as separate concerns. The transmittal to the OIG will identify any parts of the concern which will be investigated by the ECP. Applicable reports issued by the ECP will reference the concern transmitted to the OIG.
- The ECP-SR will document in the EIR the date the summary is transmitted to the ECP-MGR, the date the ECP-MGR and MGR-ONP provide a decision on who performs the investigation and other key milestones.

#### 6.2.5 Alleged Violations of Criminal Law

If during the receipt or pre-evaluation of a concern it appears that criminal laws may have been violated, the ECP-SR shall notify the ECP-MGR as soon as practical. These will be handled in the same general manner as I&H concerns and in most cases will be referred to the Office of Inspector General (OIG) for investigation.





#### 6.2.6 Differing Professional Opinions (DPO)

The following definition will be used in classifying a concern as a DPO.

A professional opinion that (1) differs from a TVA management decision, stated position, or established agency practice or policy; (2) which, in the opinion of the employee, has not been adequately considered; and (3) which, in the employee's opinion, if not adopted, may adversely affect the safe operation of one or more of TVA's nuclear plants.

When an ECP-SR receives an employee concern that is a DPO, the ECP-SR will notify the ECP-MGR as soon as practical. The ECP-SR will also inform the CI of his/her right to make his/her views known formally to his/her division director and the MGR-ONP.

The ECP-SR and the ECP-MGR will discuss how the DPO can best be resolved. The ECP-MGR ensures that appropriate measures are taken for resolution and that the existence of the issue is brought to the attention of the MGR-ONP and any other individuals designated by him.

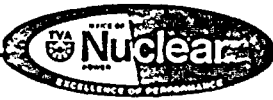
#### 6.2.7 Off-Shoot Concerns

If during the course of an evaluation/investigation of a concern, the ECP-SR or evaluator becomes aware of other unidentified concerns outside the scope of the one being investigated, the following action is taken.

- The ECP-SR makes a determination if the concern has the potential to be nuclear safety related, safety significant, industrial safety related, I&H, or a criminal activity. If it does not fit the above categories it may be presented to site management informally. Otherwise, it will be handled as follows.
- The ECP-SR documents the concern and presents it to the appropriate management of affected site.
- The ECP-SR will keep a tickler on the concern to ensure that it is appropriately addressed by line management (i.e., an open file).
- If the identified concern requires protection of an individual's identity, the ECP will handle the concern in a manner consistent with confidential concerns submitted by others.







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- If the identified problem falls under controls imposed by the Nuclear Quality Assurance Program and was identified by the evaluator/investigator, initiate the applicable quality assurance deficiency document(s) to ensure proper disposition and tracking.

#### 6.2.8 Evaluating the Need to Immediately Stop Work

The decision to stop work is at the discretion of the site director or other functional TVA manager. The evaluation to recommend a stop work order should be based primarily on the following criteria.

1. Is there an immediate threat to the health and safety of the public or to TVA employees?
2. Can corrections be expected such that further work can continue without adversely affecting the quality of the plant?
3. Do the investigation results indicate a willful failure to comply with the Atomic Energy Act of 1954 as amended (i.e., a conscious attempt to circumvent known rules, regulations, or laws)?

If the ECP-SR determines during the course of an interview or investigation that there is a potential that a stop work order is appropriate, he will contact the site director or senior shift manager as soon as possible, not to exceed 24 hours. The ECP-SR will discuss his findings and recommendation. He will inform the ECP-MGR of his actions as soon as practical. The notification should be verbal with written followup documentation.

#### 6.2.9 Determination of Priority Investigation

Preliminary review of the EIR for priority investigation will focus on the significance of the potential effects which would come about if the employee concern were substantiated. This review will include factors of cost, delay, violation of NRC regulations, potential generic applicability, reportability, etc. Notification should be made verbally to the ECP-MGR within 24 hours.





6.2.10 Potential Reportability Determination

Preliminary review the EIR for CAQ documentation should consider the possible implications associated with the condition being substantiated as nuclear safety related and reportable to NRC in accordance with 10 CFR 50.55(e), 10 CFR 21 and Licensee Event Report. The potential for the alleged condition to meet these criteria should require the ECP-SR to take prompt action to initiate line documentation of the condition. The notification to line management is based on substantiated evidence (probable cause) that a CAQ exists, such as physical examination or documentation/procedure review.

This substantiation of a CAQ and subsequent notification should be performed independent of the overall investigation process. The notification will be made verbally to the appropriate senior manager within 48 hours and followed with documentation describing the condition.

6.2.11 Review of ECP Computer Data Base

A search of the ECP computer data base may be used to determine if the concern has previously been identified or investigated. Such information may be utilized to either immediately respond to the employee or determine what additional information is needed and the extent of investigative activity.

6.3 Evaluation/Investigation of Concerns

The ECP-SR is responsible for the evaluation and/or investigation of all concerns brought to the attention of the ECP organization to which he/she is assigned.

6.3.1 Assignment of Nuclear Safety-Related Concerns for Investigation

Based on the preliminary evaluation of the concern, the ECP-SR will either resolve the concern by completing any needed investigation or establish an appropriate team for the investigation. Team organization, with appropriate technical expertise, will be consistent with ensuring an adequate degree of independence, a lack of involvement with the concern, and requirements associated with confidentiality. The commitment of resources for this support will be closely coordinated with affected TVA management as appropriate.



6.3.2 Assignment of Other Concerns for Evaluation/Resolution

The ECP-SR may assign nonnuclear safety-related concerns to various responsible organizations for resolution. The ECP-SR retains overall responsibility for ensuring acceptable completion of all actions to resolve the identified concern.

6.3.3 Disposition of Concerns with Insufficient Information

Concerns which are obtained by the ECP-SR and do not contain sufficient information to accomplish a valid evaluation/investigation will require follow-up interviews with the employee. If pertinent/factual information cannot be obtained from the employee to support generalized concerns, they will not be pursued for evaluation/investigation and will be closed and filed for future reference.

6.3.4 Conduct of Investigation

Before beginning an investigation, the scope of the investigation should be formalized by determining:

- The objective
- Appropriate data to be obtained
- Applicable requirements to be reviewed and verified
- Facts requiring substantiation
- Personnel to be interviewed

Interviews should be performed with personnel directly and indirectly involved in the concern. Concentrate on obtaining facts rather than opinions. Each person interviewed should be provided with a brief explanation of the reason for the interview. A record of persons contacted and interview notes should be retained in the EIR file.

Written documentation pertaining to the subject of the concern should be reviewed as required to establish conclusions and recommendations.

Hardware should be examined, as applicable, to determine the exact condition relative to the described concern.

Field notes should be generated and maintained to eliminate discrepancies that may arise during the course of an evaluation/investigation.



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#### 6.4 ECP Evaluation/Investigation Reports

##### 6.4.1 ECP Report Content

The results of the evaluation/investigation will be included in an ECP report. The report will include, as a minimum, the following information:

Report Number--A unique, sequential identification number for each report at each location, i.e., ECP-86-WB-001-01.

Background--A description of the employee concern(s) drawn from the EIR including a summary of the classifications made in accordance with section 6.2 of this procedure.

Scope--Defines the specific issues addressed, the methods used, and the units and/or plants involved.

Findings--A summary of the pertinent information gathered during the evaluation/investigation.

Conclusions--Statements which reveal whether or not the concern(s) was substantiated. The basis for a conclusion is the information contained in the findings.

Recommendations--A specific corrective action for each adverse finding. The recommendation has a unique identifier consisting of the investigation report number plus a sequential recommendation number.

Documents Reviewed--A listing of all documents used to support the findings and conclusions.

Reference to Individuals--Individuals will generally not be identified in investigation reports but referred to by letter, i.e., employee X. The key to these employees' identity will be maintained by the site representative in the EIR file.

##### 6.4.2 Report Approval and Disposition of Findings

The final report will be submitted by the ECP-SR to the program manager by a formal transmittal. With this transmittal, the ECP-SR will also provide recommendations regarding what level of line management should receive the report for action. The ECP manager will make the final determination and transmit the report under his signature. The site representative may discuss the general content of the report with the appropriate site management prior to its transmittal to the ECP-MGR for final approval, dependent upon the nature of the concern and findings.





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#### 6.4.3 Escalation

If any recommendation proposed in a report is rejected by line management and a resolution between the appropriate line manager and the ECP-MGR cannot be reached, the ECP-MGR will refer the issue to MGR-ONP for final resolution.

#### 6.4.4 Employee Notification

If desired by the employee, the ECP-SR will notify the concerned employee of the results of the evaluation/investigation and any corrective actions taken or planned. Each current TVA employee who has submitted a concern will be contacted at least once in every 2-week period and provided an accurate status of investigation progress of his/her concern. The results of evaluations/investigations of significant concerns will also be published periodically.

#### 6.4.5 Closure

Once corrective actions have been agreed to, or if no corrective actions are identified, the ECP Investigation Report shall be logged as closed. (The employee will then be notified as described in 6.4.4.) Any corrective action required but not completed will be tracked by a tracking system until all corrective action is completed. The employee will also be notified of completion of corrective action, as appropriate.

#### 6.5 Management Reports

The ECP-SR will compile employee concern data for his site and prepare a periodic status report to the ECP-MGR.

The ECP-MGR will assemble site-specific employee concern data received from the ECP-SRs and prepare periodic ECP program status reports to the MGR-ONP.

The ECP-MGR is also responsible for preparing any other ECP program reports that may be required by the MGR-ONP.

#### 6.6 Records and Storage

The ECP-SR will be responsible for maintaining records of the entire activity involving resolution of a concern. This will include the identification of the concern, the evaluation/investigation report, the designation of corrective action by the line organization, any correspondence relative to the specific concern, the closure process with the employee, any transfer of information to the ECP data base, and records of employee exit interviews.





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In addition to maintaining these records, specific information regarding individual concerns will be input into a computer data base. The ECP-SR may use the data base to determine if the concern has already been raised and, if so, the findings and the corrective action. If the concern was similar to a concern previously investigated, the ECP-SR may utilize previous investigations to supplement any new investigative activity. At a specific site, if a concern is identical to one raised previously, the ECP-SR may utilize earlier investigative efforts and designated corrective action to resolve subsequent concerns.

The EIR will be the only document which relates concerned employee identification to the concern whether or not confidentiality has been requested. Neither the computer data base nor the investigation reports will directly contain the concerned individual's identity or the identity of individuals being investigated.

The ECP files are not considered quality records and as such are not public documents. However, due to the nature and guarded importance of the files, every attempt will be made to organize, control, and protect the records. Therefore, ANSI N45.2.9 will be used as a guide to assemble, control, and store these files.

The contents of the completed file should be indexed, segregated, total pages numbered, and maintained in a folder. The files shall be maintained by the ECP-SR in lockable fire-rated file cabinets.



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Attachment 1

CONFIDENTIAL INFORMATION

TENNESSEE VALLEY AUTHORITY  
OFFICE OF NUCLEAR POWER  
EMPLOYEE CONCERN PROGRAM

EMPLOYEE INTERVIEW RECORD  
COVERSHEET

FILE NO. ECP- - -

RECORDED CONCERNS

Concern #	Category	NSR Yes/No	Keyword Summary
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

INTERVIEW  
METHODOLOGY:

- Telephone
- Answering Machine
- Exit Interview
- Scheduled Interview
- Interview Contact (Walk-in, etc.)
- Referral From Line Organization
- Allegation received from the NRC
- Mail-in

INTERVIEWER \_\_\_\_\_

Sign Full Name

\_\_\_\_\_ Date

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Attachment 1 (Cont'd)

DISCLOSURE STATEMENT

I, \_\_\_\_\_ ]  
Print Full Name Soc. Sec. No.

Acknowledge that:

I have this opportunity to express any concern I may have regarding the design, construction, or operation of any TVA nuclear plant(s) (or associated activity) which may affect the ability of that plant(s) to operate safely and/or affect the health/safety of site personnel or the general public. I also have this opportunity to express any concern not related to safety that warrants consideration. I understand that I can express my knowledge and concern to TVA without fear of reprisal or retribution for doing so.

(Please check the appropriate box.)

- A.  No, I do not have a concern or knowledge regarding nuclear safety problems affecting TVA nuclear plants, site personnel, or the general public, or other concern(s) not related to safety.

\_\_\_\_\_/\_\_\_\_\_  
Employee Signature Date

- B.  Yes, I do have a concern(s) or knowledge regarding nuclear safety problems affecting TVA nuclear plants, site personnel, or the general public, or other concern(s) not related to safety, but decline to discuss the concern with TVA.

Please explain why: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_/\_\_\_\_\_  
Employee Signature Date

- C.  Yes, I do have a concern(s) or knowledge regarding nuclear safety problems affecting TVA nuclear plants, site personnel, or the general public, or other concern(s) not related to safety, and I am willing to discuss that concern(s) or knowledge with the Employee Concern Program (ECP) interviewer(s).



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TVA EMPLOYEE CONCERN PROGRAM

CONFIDENTIALITY UNDERSTANDING

I have information that I wish to provide in confidence to the TVA Employee Concern Program. I am providing this information in accordance with the understandings below.

It is my understanding that the TVA Employee Concern Program staff will not identify me by name or personal identifier in any document, conversation, or communication released to the public which relates to the information provided by me, subject to the restrictions below. I understand the term "released to the public" to encompass any distribution outside of TVA with the exception of other public agencies, such as the Nuclear Regulatory Commission, which may require this information in furtherance of their responsibilities under law or public trust.

The TVA Employee Concern Program staff will disclose my identity within TVA only to those employees of the Office of the General Counsel or the Office of the Inspector General who have a need to know the information for the performance of their duties.

During the course of the investigation of my information, the Employee Concern Program staff will make every effort consistent with investigative needs to avoid actions which would clearly be expected to result in the disclosure of my identity to persons or organizations with which the Employee Concern Program staff subsequently communicates. I understand that at a later stage, even though TVA will make every reasonable effort to protect my identity, my identification could be compelled by orders or subpoenas issued by courts of law, hearing boards, or similar legal entities. In such cases, TVA will attempt to maintain my confidentiality by notifying the authority ordering disclosure of the existence of this confidentiality understanding and any other relevant facts. If this effort by TVA is unsuccessful, a representative of TVA will attempt to inform me of any such action before disclosing my identity.

I also understand that TVA will consider me to have waived my confidentiality understanding if I should take any action that may be reasonably expected to disclose my identity. I further understand that TVA will also consider me to have waived my confidentiality understanding if I provide (or have previously provided) information to any other party that contradicts the information I provide to TVA, if circumstances indicate that I am intentionally providing false information to TVA, or if the information I provide is connected with misconduct on my part.

I have read and fully understand the contents of this confidentiality understanding. I agree with its provisions.

Name (print) \_\_\_\_\_ Address \_\_\_\_\_

Date \_\_\_\_\_ Signature \_\_\_\_\_

Employee Concern Program Witness \_\_\_\_\_











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CONCERN SUMMARY

Concern # \_\_\_\_\_

A. Related Specifics:

1. Plant, facility, or location affected: \_\_\_\_\_

2. Unit(s) affected: \_\_\_\_\_

3. Date and time of occurrence or condition: \_\_\_\_\_  
Date } Time

4. Specific location of occurrence or condition: \_\_\_\_\_

5. Equipment, structures, or personnel affected: \_\_\_\_\_

6. System(s) affected: \_\_\_\_\_

7. In your opinion could the condition or occurrence violate Federal, State, or TVA requirements?

- Yes       No       Do Not Know

If checked "Yes," please identify requirements (be as specific as possible) and explain to the best of your ability:

\_\_\_\_\_  
\_\_\_\_\_







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EMPLOYEE PROFILE

A. Work History

Please briefly describe your work history as it relates to the concern:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

B. Feedback

Do you desire feedback from the investigation of your concern(s)?

Yes                       No

If "Yes," please provide the following information:

1. Present address and telephone number.

\_\_\_\_\_ ] \_\_\_\_\_ ] \_\_\_\_\_ ] \_\_\_\_\_ ]  
Street or Road                      City                      State                      Zip Code

\_\_\_\_\_ ( )  
Telephone No.                      (Area Code)

2. Future address and telephone number.

\_\_\_\_\_ ] \_\_\_\_\_ ] \_\_\_\_\_ ] \_\_\_\_\_ ]  
Street or Road                      City                      State                      Zip Code

\_\_\_\_\_ ( )  
Telephone No.                      (Area Code)

Expected date of future address: \_\_\_\_\_





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Attachment 2

### CONCERN CATEGORIZATION DEFINITIONS

1. Quality Assurance/Quality Control (QA) - Concerns related to the adequacy of QA/QC programs and procedures (e.g., document control, records, deficiency reporting and corrective action, inspection except NDE and weld inspection, auditing, etc.) and the training, qualification, and certification of QA/QC personnel.
2. Material Control (MC) - Concerns related to the adequacy of materials including their procurement, receiving, handling, and storage and to the controlling procedures.
3. Management and Personnel (MP) - Concerns related to the adequacy of policies, management attitude and effectiveness, organization structures, personnel management, and personnel training and qualification, except those covered by the QA/QC category.
4. Intimidation, Harassment, and Wrongdoing (IH) - Concerns related to personnel conduct that interferes with employees' ability to fulfill their assigned responsibility, unauthorized actions taken against employees for fulfilling their assigned responsibility, and illegal activities or violations of TVA policies and regulations.
5. Operations (OP) - Concerns related to operational activities including operator qualifications, maintenance or equipment maintenance needs, security, Health Physics, ALARA implementation, and to preoperational and surveillance testing.
6. Welding (WE) - Concerns related to any aspect of welding including welder or weld procedure qualification, weld inspection/Nondestructive Examination (NDE), heat treatment, weld quality, filler material quality, and weld documentation. Welding QA/QC programmatic concerns shall be addressed in the QA/QC category.
7. Construction (CO) - Concerns related to the adequacy of construction practices, the quality of as-constructed facilities (excluding welding and as-designed features), in-storage and installed maintenance prior to turn-over to operations, measuring test and handling equipment used during construction, and construction testing activities.
8. Industrial Safety (SF) - Concerns related to the working environment and controls which protect the health and safety of employees in the workplace (excluding Health Physics and ALARA).
9. Engineering (EN) - Concerns related to the adequacy of the design process and the as-designed plant features. The design process is the technical and management processes that commence with the identification of design inputs and lead to and include the issuance of all design output documents.

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ECP INSTRUCTION 1





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Attachment 3

CRITERIA FOR EVALUATING CONCERNS TO DETERMINE THOSE THAT ARE NUCLEAR  
SAFETY-RELATED AS APPLIES TO EMPLOYEE CONCERNS

A. General Guidance

The evaluation to determine whether a concern is safety related must always be resolved in a conservative direction to ensure that nuclear safety is the priority consideration. Consideration of plant capacity factor, economics, and the effects of plant unavailability are not to be taken into account when performing this evaluation.

In general, concerns that could reduce the effectiveness of or eliminate the function performed by "safety-related items" are considered nuclear safety-related concerns. "Safety-related items" are defined as those critical systems, structures, and components (CSSC) necessary to ensure:

- The integrity of the reactor coolant pressure boundary.
- The capability to shut down the reactor and maintain it in a safe shutdown condition.
- The capability to prevent or mitigate the consequences of an accident which could result in potential offsite exposures comparable to those specified in 10 CFR Part 100.
- The physical security of CSSC (see note).
- Conformance with the ALARA concept (see note).
- An adequate fire protection program (see note).

NOTE: These items are being treated as nuclear safety-related for purposes of generic applicability applications.

The CSSC items could be affected by any concern related to:

- The CSSC item itself (i.e., its design, operation, maintenance, material or any other hardware deficiency).
- Activities related to any portion of the process necessary to achieve a final operational configuration of safety-related items.
- Activities related to any portion of the process which could result in failure of a CSSC.
- Commitments TVA made to regulatory agencies.







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A concern in any of the above areas could affect adversely the ability of the CSSC items to perform their intended function or to meet requirements established by regulatory agencies necessary to assure the safe operation of the plant and to protect the health and safety of the nuclear plant employees and the public and therefore, should be categorized as nuclear safety related. These areas are discussed in more detail below.

#### B. Specific Guidance

Concerns about safety-related items (i.e., CSSC items) are to be designated as nuclear safety related as specified above. Any item (including instruments and controls) should be considered CSSC if it performs (or if its failure would degrade) any of the following specific safety-related functions:

1. Maintains core reactivity control under emergency conditions including those covered by anticipated transients without scram (e.g., reactivity control systems).
2. Provides a barrier for containing reactor coolant within the reactor coolant pressure boundary (e.g., reactor coolant piping, valves, and fittings).
3. Cools the reactor core under emergency conditions (e.g., residual core heat removal systems).
4. Maintains fuel clad integrity (e.g., fuel clad, core power monitoring systems).
5. Provides power, control, logic, indication, and protection to systems or components to enable them to accomplish their safety function (e.g., diesel generators, vital ac and dc power).
6. Supports or houses equipment that performs a safety function or protects that safety-related equipment from potential natural phenomena, equipment failure, and man-made hazards (e.g., Seismic Class I containment and structures, fire protection systems).
7. Maintains specified environment (e.g., temperature, pressure, humidity, radiation) as required in vital areas to maintain equipment operability and personnel access (e.g., control room habitability systems).



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8. Supplies cooling water for the purpose of heat removal from the systems and components that provide a safety function (e.g., essential component cooling and service water systems).
9. Contains radioactive waste such that its failure could result in the uncontrolled release of radioactive waste to the offsite environments (e.g., low-level radioactive waste discharge isolation valves).
10. Controls fuel storage to prevent inadvertent criticality (e.g., fuel storage racks).
11. Ensures adequate cooling for irradiated fuel in spent fuel storage (e.g., spent fuel cooling system).
12. Minimizes the probability of dropping objects on stored fuel (e.g., overhead crane).
13. Maintains primary containment as required by the FSAR to meet General Design Criteria (GDC) 54, 55, 56, 57 (e.g., containment penetrations and associated isolation and boundary valves).
14. Doors and hatches that serve one or more of the following functions for safety-related equipment areas: (1) pressure confinement, (2) leakage confinement, (3) missile protection, (4) pipe whip and jet impingement barrier, (5) equipment rupture flood protection, (6) natural flood protection, or (7) fire protection.
15. Any other function required by 10 CFR 50, Appendix A (the GDC).
16. Any activities that may directly or indirectly affect the ability of CSSC to perform their safety-related functions. These include, but are not limited, to the following:
  - 16.1 Designing
  - 16.2 Purchasing
  - 16.3 Fabricating
  - 16.4 Handling
  - 16.5 Shipping
  - 16.6 Storing



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- 16.7 Erecting or Constructing
- 16.8 Cleaning
- 16.9 Inspecting
- 16.10 Testing
- 16.11 Operating
- 16.12 Maintaining
- 16.13 Repairing
- 16.14 Modifying
- 16.15 Auditing
- 16.16 Fire protection
- 17. Any concern expressed by an employee, an interested individual, or a group that relates in a negative manner to the ability of CSSCs to perform their intended function, to safety-related activities, or to a violation or deviation from TVA commitments should be classified as nuclear safety related.
- 18. Any concern expressed by an employee involving those activities regulated by 10 CFR 20, "Standard for Protection Against Radiation."
- 19. Any concern expressed by an employee about the physical security aspects of safety-related systems.
- 20. Any concern expressed by an employee that impacts a technical specification operability requirement.





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Attachment 4

CRITERIA FOR EVALUATING SAFETY-RELATED EMPLOYEE CONCERNS TO DETERMINE IF AN UNREVIEWED SAFETY-SIGNIFICANT QUESTION OR SAFETY HAZARD EXISTS

A. General Guidance

1. The safety evaluation may be based on engineering judgments to the extent deemed necessary to the individuals involved in the review, but questions that result in significant doubt must always be resolved in favor of a nuclear safety finding.
2. Consideration of plant capacity factor, economics, and the effects of plant unavailability are not to be taken into account when performing this evaluation.

B. Specific Guidance

Safety Significant Criteria are those criteria used to analyze a potential safety-related concern that if validated could:

1. Result in potential offsite exposure exceeding those limits specified in the technical specifications or 10 CFR 100. -
2. Increase the probability of an occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report.
3. Create the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report.
4. Reduce the margin of safety as defined in the basis of any technical specification.

If any of the above criteria are met, a safety-significant question or safety hazard may be involved.











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Attachment 6

INSTRUCTIONS FOR REVIEW OF EMPLOYEE CONCERNS FOR GENERIC APPLICABILITY

Expressed concerns may have implications or applicability beyond the identified circumstances. The generic implications/applicability may involve additional structures, components, systems, features, or processes at the plant where the concern has been identified or may involve other TVA plants. In order to determine whether a concern has potential or actual generic applicability, the information available is to be reviewed for this specific purpose using the elements and considerations set forth in this attachment. The objectives of the review are to: (1) identify those concerns with generic implications, (2) identify which plants are implicated, (3) provide advance notification to organizations responsible for the areas implicated, and (4) ensure that all implications of the concern are evaluated.

Determinations of generic applicability should be approached on a conservative, yet reasonable basis. The determination is to have a reasonable factual basis (not merely speculation). It is acceptable to base the generic determination on the evaluator's knowledge or experience. The explanation on attachment 7 shall provide enough detail to clearly communicate the basis or reasoning for drawing the conclusion. For instance, the reason "if it happened at Watts Bar, it could happen at Sequoyah," is insufficient reason to determine an item generic. There must be some reasonable factual basis presented which explains why that is the case, e.g., ". . . this concern appears to have resulted from a deficiency in G-39 (upper-tier document that applies to all plants), therefore, it is generic . . ." is an adequate and reasonable, factual basis for concluding that the concern is generic. In other words, you must be able to define in writing some reasonable common link between the concern and other plants or plant features which indicates that those other plants or features (which are beyond the scope of the concern) could be similarly affected. When there is not enough definitive information to identify (or eliminate) a generic issue, it is acceptable to say so.



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SITE REPRESENTATIVE PROCEDURE

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Attachment 7

GENERIC APPLICABILITY DETERMINATION

Concern Number

- A. Meaningful Evaluation Possible  Yes  No
- B. Generic Implications  Yes  No; if Yes,  Same Plant?  Other Locations?
- C. Location Affected and Notification Record

<u>Site</u>	<u>Generic Applicability</u>	<u>Date &amp; Time Notified</u>	<u>Initials</u>
BEN	<input type="checkbox"/>		
BLN	<input type="checkbox"/>		
SQN	<input type="checkbox"/>		
WBN	<input type="checkbox"/>		
CH	<input type="checkbox"/>		
KX	<input type="checkbox"/>		

D. Explanation/Justification \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Performed by \_\_\_\_\_ / \_\_\_\_\_

The following provides clarifying instructions and guidance for completing this form.

- I. Evaluation - Assume the concern, as stated, is true.
  - A. In order to conclude that a concern is generic, you must be able to define (in writing) some reasonable common link between the concern and other plants and TVA locations or between the concern and other plant features or processes of the same plant which indicates that those other plants or features could be similarly affected. If there is not enough information to identify and define (or else eliminate) such a common link, then there is not enough information to perform a meaningful preliminary evaluation, so part A should be answered "No". In this case, parts B and C need not be completed. Part D should provide the justification for the "No" answer.



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Attachment 7 (Cont'd)

- B. A concern has generic implications if an approved code, standard, procedure, specification, process, etc., is deficient, is implied to be deficient, or is being improperly implemented in other than an isolated case. Generic applicability is not restricted to the items listed above. Any other programmatic deficiencies, common problems, etc., should also be considered in the review.
- C. Self-explanatory
- D. Provide enough detail to clearly communicate the basis or reasoning for drawing the conclusion that was arrived at.

Miscellaneous Instructions

- Be sure to record concern number in top, right-hand corner.
- Answer all questions and fill in all blanks except as noted.
- Date your signature.
- Explanation/justification may be continued on an attached blank sheet, as long as the applicable section is clearly identified.





**EMPLOYEE CONCERN PROGRAM  
INSTRUCTION 2**

**TITLE** EMPLOYEE CONCERN PROGRAM - REPORTING

**CURRENT REVISION LEVEL** 0

**Prepared by** *A. K. Baker*

**Approved by** *Eric K. Steyer*

**Date Approved** 2/28/86



# EMPLOYEE CONCERN PROGRAM

## REVISION LOG

Instruction 2

REVISION DATE	PAGES AFFECTED	DESCRIPTION OF CHANGE
0 2/28/86	All (1-4)	Initial issue.







Title: EMPLOYEE CONCERN PROGRAM -  
REPORTING

PAGE 1  
INSTRUCTION NO. 2  
REVISION 0

### 1.0 PURPOSE

This procedure describes the reporting requirements for the Employee Concern Program - Site Representative (ECP-SR).

### 2.0 RESPONSIBILITIES

Each ECP-SR is responsible for completing the described weekly report and transmitting it to the Employee Concern Program Manager.

### 3.0 PROCEDURE

3.1 The format of attachments 1 and 2 will be completed each week covering information through Friday of the reporting week. The contact summary will include numeric information on the types of contacts made during the week. The comment section should be used to comment on weekly events not described in attachment 3 but which are considered noteworthy. The concerns summary will be completed to provide a numeric status of concerns and files opened, closed, carried over, or being actively investigated during the week. The comments section should be used to include noteworthy activities not described in attachment 3.

3.2 The format of attachment 3 should be used to document the identification of a new concern, the closure of a concern, and a status update of all concerns.

3.3 The report should be handled as administratively confidential.

3.4 This report should be received by the Employee Concern Program Manager no later than noon of each Monday.

3.5 The program manager will provide each site representative with a copy of the other sites' reports. Site representatives should review these to identify any common areas of concern.

3.6 Each concern identified will be categorized into one of the following categories:

- QC/QA
- Material Control
- Management and Personnel Issues
- Intimidation, Harrassment, and Misconduct
- Operations
- Welding
- Construction
- Industrial Safety
- Engineering



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REPORTING

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ATTACHMENT 1

TO: Eric K. Sliger, Employee Concern Program Manager, LP 6N 48A-C.

FROM: \_\_\_\_\_, Employee Concern Program-Site Representative, \_\_\_\_\_

DATE: \_\_\_\_\_

SUBJECT: WEEKLY REPORTING

Attached is the weekly report for \_\_\_\_\_, for the week of \_\_\_\_\_.

ECP - Site Representative

Attachments

ECP INSTRUCTION - 2





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REPORTING

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ATTACHMENT 2

Site \_\_\_\_\_ Week of \_\_\_\_\_

Site Representative \_\_\_\_\_

CONTACT SUMMARY FOR WEEK

Walk-ins _____	Scheduled interviews _____
Phone-ins _____	Exit interviews _____
Mail-ins _____	Field Contacts _____
Referrals from line organization _____	Inquiries _____

Comments:

ACTIVITY SUMMARY

	<u>Files</u>	<u>Concerns</u>
Beginning of week	_____	_____
New	_____	_____
Closed	_____	_____
End of Week	_____	_____

No. of concerns with active investigations \_\_\_\_\_

Comments:



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ATTACHMENT 3

Site \_\_\_\_\_ Week of \_\_\_\_\_  
Site Representative \_\_\_\_\_

Concern No. \_\_\_\_\_ Receipt mode \_\_\_\_\_ Category \_\_\_\_\_  
New \_\_\_\_\_ Update \_\_\_\_\_ Closure \_\_\_\_\_ No Change \_\_\_\_\_  
Date received \_\_\_\_\_ Date closed \_\_\_\_\_ Nuclear Safety Related \_\_\_\_\_

Summary \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Status \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Concern No. \_\_\_\_\_ Receipt mode \_\_\_\_\_ Category \_\_\_\_\_  
New \_\_\_\_\_ Update \_\_\_\_\_ Closure \_\_\_\_\_ No Change \_\_\_\_\_  
Date received \_\_\_\_\_ Date closed \_\_\_\_\_ Nuclear Safety Related \_\_\_\_\_

Summary \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Status \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Concern No. \_\_\_\_\_ Receipt mode \_\_\_\_\_ Category \_\_\_\_\_  
New \_\_\_\_\_ Update \_\_\_\_\_ Closure \_\_\_\_\_ No Change \_\_\_\_\_  
Date received \_\_\_\_\_ Date closed \_\_\_\_\_ Nuclear Safety Related \_\_\_\_\_

Summary \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Status \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



EMPLOYEE CONCERN PROGRAM  
INSTRUCTION 3

TITLE EMPLOYEE CONCERN PROGRAM -  
FILE STORAGE

CURRENT REVISION LEVEL 0

Prepared by *A. K. Baker*

Approved by *E. K. Sly*

Date Approved 05/06/86



# EMPLOYEE CONCERN PROGRAM

## REVISION LOG

Instruction 3

REVISION DATE	PAGES AFFECTED	DESCRIPTION OF CHANGE
0 05/06/86	All (1-4)	Initial issue.







Title: EMPLOYEE CONCERN PROGRAM -  
FILE STORAGE

PAGE 1  
INSTRUCTION NO. 3  
REVISION 0

1.0 PURPOSE

This procedure identifies requirements for the storage, maintenance, and disposition of Employee Concern Program (ECP) records.

2.0 SCOPE

This procedure defines the records system, documents general operational guidelines, and provides technical assistance to facilitate the control and operation of the ECP records.

3.0. RESPONSIBILITIES

Each Employee Concern Program Site Representative (ECP-SR) is responsible for maintaining all records created as part of the program in an orderly and easily retrievable manner.

4.0 PROCEDURES

The ECP records system is an alphanumeric system using the unique file number that is assigned to each case.

4.1 Arrangement In Folders

The ECP records will be maintained in file folders and organized in chronological order using the drop-file method.

4.2 Identification of Files

The unique file number will be on the folder label, and the label will include other identifiers describing the type information contained in the file.  
The label will be formatted as follows.

ECP-WW-XX-YYY			
<u>ZZ</u> of <u>AA</u>	CONF	NSR	TYPE

0002k





Title: EMPLOYEE CONCERN PROGRAM -  
FILE STORAGE

PAGE 2  
INSTRUCTION NO. 3  
REVISION 0

#### 4.2 Identification of Files (Cont'd)

WW = Calendar year

XX = Site identifier

YYY = Sequential employer number for the site location

ZZ = Sequential employee concern number for an employee

AA = Total concerns expressed under the unique file number

Note: ZZ and AA are left blank if file does not contain a concern.

TYPE = If the file contains a concern, a yellow, 1/4-inch round, self-adhesive coding label will be placed in this position. For files which require them to be open for some action, a blue label will be placed in this position.

NSR = If the file contains a concern that is determined to be nuclear safety related, a yellow, 1/4-inch round, self-adhesive coding label will be placed in this position.

CONF = If the file contains a concern for which the concerned individual has requested confidentiality, a yellow, 1/4-inch round, self-adhesive coding label will be placed in this position.

#### 4.3 File Folder Arrangement

The files are to be arranged in alphanumeric order using the unique file number. For example:

ECP-86-WB-001  
ECP-86-WB-002  
ECP-86-WB-003

All files will be stored in one location in a contiguous manner.

#### 4.4 Filing of Open Files and Concerns

Open concerns and files may be filed in working files using the following criteria:

0002k

10



10



Title:

EMPLOYEE CONCERN PROGRAM -  
FILE STORAGE

PAGE 3  
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#### 4.4 Filing of Open Files and Concerns (Cont'd)

The permanent file folder using the preprinted label will remain in its permanent file space. A substitution card will be placed in the file indicating that the information for this file is stored in a temporary working file space. These cards will be coded to indicate whether a file or concern is in working storage. The file folders used for working storage will be color coded using blue folders for open files and gray folders for open concerns. Working files should follow the same general filing criteria as the permanent files. When the working files or concern is closed, the content of the working file will be placed in permanent storage and the substitution card removed from the file.

#### 4.5 File Folders and Labels

Third-cut folders, will be used. Each Site representative will use a single position, that is all right, center, or left cut.

The folder label is white, 1- x 3-1/2-inch, computer printed. The 1/4-inch round coding labels are standard, TVA warehouse-stocked items.

#### 4.6 Storage Criteria

All files, both permanent and working, will be filed in locked, fire-rated file cabinets. These files will not be left unattended while the cabinet is unlocked. When these files are removed from the filing cabinet the ECP-SR or his designee will provide continuous accountability of the files.

#### 4.7 Index Requirements

In order to provide accountability for all records, an index of the files will be maintained. This index will remain in a location outside the file cabinet. In order to maintain the confidentiality of the file, the index will contain no sensitive information. Attachment 1 provides the recommended format for the index.

#### 4.8 Records Disposition

The ECP records will be scheduled in compliance with the TVA Code VI RECORDS and with the 36 CFR Chapter XII. Disposition shall not be applied until approval of the Archivist of the United States has been acquired.

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Title:

EMPLOYEE CONCERN PROGRAM -  
FILE STORAGE

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ATTACHMENT 1  
EMPLOYEE CONCERN PROGRAM  
FILE INDEX

DATE FILE NO.	DATE RECEIVED	DATE CLOSED	CONCERN NO.	NSR	CONF	CATEGORY	SOURCE	KEYWORD SUMMARY

0083b

0002k

TVA 7929C (ONP-1-85)





EMPLOYEE CONCERN PROGRAM  
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