

TVA EMPLOYEE CONCERNS
SPECIAL PROGRAM

REPORT NUMBER: 70100

REPORT TYPE: Management and Personnel Subcategory

REVISION NUMBER: 3

TITLE: Subjourneymen

PAGE 1 OF 16

REASON FOR REVISION:

Incorporation of final TAS editorial comments.

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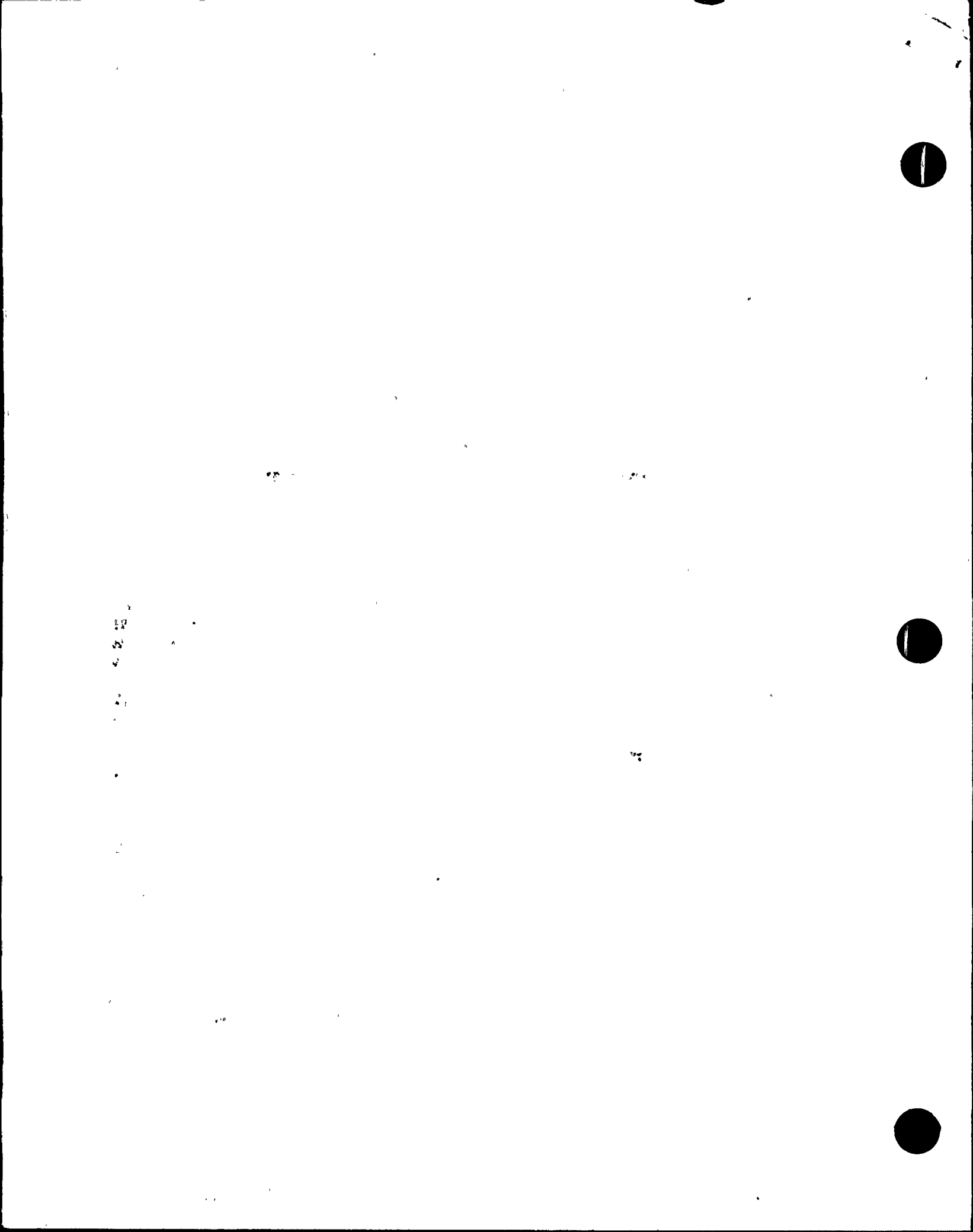
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CONCURRENCE (FINAL REPORT ONLY)

DATE

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Preface

This subcategory report is one of a series of reports prepared for the Employee Concerns Special Program (ECSP) of the Tennessee Valley Authority (TVA). The ECSP and the organization which carried out the program, the Employee Concerns Task Group (ECTIG), were established by TVA's Manager of Nuclear Power to evaluate and report on those Office of Nuclear Power (ONP) employee concerns filed before February 1, 1986. Concerns filed after that date are handled by the ongoing ONP Employee Concerns Program (ECP).

The ECSP addressed over 5800 employee concerns. Each of the concerns was a formal, written description of a circumstance or circumstances that an employee thought was unsafe, unjust, inefficient, or inappropriate. The mission of the Employee Concerns Special Program was to thoroughly investigate all issues presented in the concerns and to report the results of those investigations in a form accessible to ONP employees, the NRC, and the general public. The results of these investigations are communicated by four levels of ECSP reports: element, subcategory, category, and final.

Element reports, the lowest reporting level, will be published only for those concerns directly affecting the restart of Sequoyah Nuclear Plant's reactor unit 2. An element consists of one or more closely related issues. An issue is a potential problem identified by ECTIG during the evaluation process as having been raised in one or more concerns. For efficient handling, what appeared to be similar concerns were grouped into elements early in the program, but issue definitions emerged from the evaluation process itself. Consequently, some elements did include only one issue, but often the ECTIG evaluation found more than one issue per element.

Subcategory reports summarize the evaluation of a number of elements. However, the subcategory report does more than collect element level evaluations. The subcategory level overview of element findings leads to an integration of information that cannot take place at the element level. This integration of information reveals the extent to which problems overlap more than one element and will therefore require corrective action for underlying causes not fully apparent at the element level.

To make the subcategory reports easier to understand, three items have been placed at the front of each report: a preface, a glossary of the terminology unique to ECSP reports, and a list of acronyms (terms formed from the first letters of a series of words).

Additionally, at the end of each subcategory report the reader will find at least two attachments. The first is a Subcategory Summary Table that includes the following information: the concern number, a brief statement of the concern, and a designation of nuclear safety-related concerns. The second attachment is a listing of the concerns included in each issue evaluated in the subcategory.



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The subcategories are themselves summarized in a series of eight category reports. Each category report reviews the major findings and collective significance of the subcategory reports in one of the following areas:

- ° management and personnel relations
- ° industrial safety
- ° construction
- ° material control
- ° operations
- ° quality assurance/quality control
- ° welding
- ° engineering

A separate report on employee concerns dealing with specific contentions of intimidation, harassment, and wrongdoing will be released by the TVA Office of the Inspector General.

Just as the subcategory reports integrate the information collected at the element level, the category reports integrate the information assembled in all the subcategory reports within the category, addressing particularly the underlying causes of those problems that run across more than one subcategory.

A final report will integrate and assess the information collected by all of the lower level reports prepared for the ECSP, including the Inspector General's report.

For more detail on the methods by which ECTG employee concerns were evaluated and reported, consult the Tennessee Valley Authority Employee Concerns Task Group Program Manual. The Manual spells out the program's objectives, scope, organization, and responsibilities. It also specifies the procedures that were followed in the investigation, reporting, and closeout of the issues raised by employee concerns.

ECSP GLOSSARY OF REPORT TERMS*

classification of evaluated issues the evaluation of an issue leads to one of the following determinations:

Class A: Issue cannot be verified as factual

Class B: Issue is factually accurate, but what is described is not a problem (i.e., not a condition requiring corrective action)

Class C: Issue is factual and identifies a problem, but corrective action for the problem was initiated before the evaluation of the issue was undertaken

Class D: Issue is factual and presents a problem for which corrective action has been, or is being, taken as a result of an evaluation

Class E: A problem, requiring corrective action, which was not identified by an employee concern, but was revealed during the ECTG evaluation of an issue raised by an employee concern.

collective significance an analysis which determines the importance and consequences of the findings in a particular ECSP report by putting those findings in the proper perspective.

concern (see "employee concern")

corrective action steps taken to fix specific deficiencies or discrepancies revealed by a negative finding and, when necessary, to correct causes in order to prevent recurrence.

criterion (plural: criteria) a basis for defining a performance, behavior, or quality which ONP imposes on itself (see also "requirement").

element or element report an optional level of ECSP report, below the subcategory level, that deals with one or more issues.

employee concern a formal, written description of a circumstance or circumstances that an employee thinks unsafe, unjust, inefficient or inappropriate; usually documented on a K-form or a form equivalent to the K-form.

evaluator(s) the individual(s) assigned the responsibility to assess a specific grouping of employee concerns.

findings includes both statements of fact and the judgments made about those facts during the evaluation process; negative findings require corrective action.

issue a potential problem, as interpreted by the ECTG during the evaluation process, raised in one or more concerns.

K-form (see "employee concern")

requirement a standard of performance, behavior, or quality on which an evaluation judgment or decision may be based.

root cause the underlying reason for a problem.

*Terms essential to the program but which require detailed definition have been defined in the ECTG Procedure Manual (e.g., generic, specific, nuclear safety-related, unreviewed safety-significant question).



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Acronyms

AI	Administrative Instruction
AISC	American Institute of Steel Construction
ALARA	As Low As Reasonably Achievable
ANS	American Nuclear Society
ANSI	American National Standards Institute
ASME	American Society of Mechanical Engineers
ASTM	American Society for Testing and Materials
AWS	American Welding Society
BFN	Browns Ferry Nuclear Plant
BLN	Bellefonte Nuclear Plant
CAQ	Condition Adverse to Quality
CAR	Corrective Action Report
CATD	Corrective Action Tracking Document
CCTS	Corporate Commitment Tracking System
CEG-H	Category Evaluation Group Head
CFR	Code of Federal Regulations
CI	Concerned Individual
CMTR	Certified Material Test Report
COC	Certificate of Conformance/Compliance
DCR	Design Change Request
DNC	Division of Nuclear Construction (see also NU CON)

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DNE Division of Nuclear Engineering
DNQA Division of Nuclear Quality Assurance
DNT Division of Nuclear Training
DOE Department of Energy
DPO Division Personnel Officer
DR Discrepancy Report or Deviation Report
ECN Engineering Change Notice
ECP Employee Concerns Program
ECP-SR Employee Concerns Program-Site Representative
ECSP Employee Concerns Special Program
ECTG Employee Concerns Task Group
EEOC Equal Employment Opportunity Commission
EQ Environmental Qualification
EMRT Emergency Medical Response Team
EN DES Engineering Design
ERT Employee Response Team or Emergency Response Team
FCR Field Change Request
FSAR Final Safety Analysis Report
FY Fiscal Year
GET General Employee Training
HCI Hazard Control Instruction
HVAC Heating, Ventilating, Air Conditioning
II Installation Instruction
INPO Institute of Nuclear Power Operations
IRN Inspection Rejection Notice

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L/R	Labor Relations Staff
M&AI	Modifications and Additions Instruction
HI	Maintenance Instruction
MSPB	Merit Systems Protection Board
MT	Magnetic Particle Testing
NCR	Nonconforming Condition Report
NDE	Nondestructive Examination
NPP	Nuclear Performance Plan
NPS	Non-plant Specific or Nuclear Procedures System
NQAM	Nuclear Quality Assurance Manual
NRC	Nuclear Regulatory Commission
NSB	Nuclear Services Branch
NSRS	Nuclear Safety Review Staff
NU CON	Division of Nuclear Construction (obsolete abbreviation, see DNC)
NUMARC	Nuclear Utility Management and Resources Committee
OSHA	Occupational Safety and Health Administration (or Act)
ONP	Office of Nuclear Power
OWCP	Office of Workers Compensation Program
PHR	Personal History Record
PT	Liquid Penetrant Testing
QA	Quality Assurance
QAP	Quality Assurance Procedures
QC	Quality Control
QCI	Quality Control Instruction



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QCP	Quality Control Procedure
QTC	Quality Technology Company
RIF	Reduction in Force
RT	Radiographic Testing
SQN	Sequoyah Nuclear Plant
SI	Surveillance Instruction
SOP	Standard Operating Procedure
SRP	Senior Review Panel
SWEC	Stone and Webster Engineering Corporation
TAS	Technical Assistance Staff
T&L	Trades and Labor
TVA	Tennessee Valley Authority
TVTLC	Tennessee Valley Trades and Labor Council
UT	Ultrasonic Testing
VT	Visual Testing
WBECSP	Watts Bar Employee Concern Special Program
WBN	Watts Bar Nuclear Plant
WR	Work Request or Work Rules
WP	Workplans

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1.0 CHARACTERIZATION OF ISSUES

1.1 Introduction

This report covers the subcategory of Subjourneymen. It addresses 8 issues raised about the utilization, qualifications, and retention of craft employees working for the Division of Nuclear Construction (DNC) at the Watts Bar Nuclear Plant (WBN) within the occupational classification of subjourneyman. With the exception of three concerns which are site specific, the concerns in this subcategory are generically applicable to any TVA construction project employing subjourneymen.

The subjourneyman job classification was initially created for use within TVA's Office of Construction in 1982 and subsequently by the Office of Power in early 1983. Employees hired for this position typically performed the unskilled work of a craft (e.g., steamfitter, electrician, sheetmetal worker, etc.). Those employed by DNC were not permitted to use power tools.

In addition to the Employee Concern Task Group (ECTG) evaluation, this subcategory report includes a review of the results of the Employee Response Team (ERT) Investigation Report "Subjourneymen Concerns" and line management's responses to that report. The comments from the ERT investigation have been incorporated into the Findings section (4.0).

Note: Employee concerns relating to the use of subjourneymen within TVA Office of Power (Maintenance) will not be evaluated in this report but will be addressed in Subcategory 30800, Subjourneymen in the Operations Concerns Evaluation Category.

Some concerns have been evaluated in more than one issue; therefore, the total of concerns applicable to each issue is greater than the total number of concerns in this subcategory. To locate the issue in which a particular concern is evaluated, consult the following attachments:

Attachment A, Subcategory Summary Table

Attachment B, List of Concerns by Issue

All Management and Personnel Category concerns having a technical component (including all concerns designated Nuclear Safety-Related) are shared with the appropriate technical category for investigation and resolution of that technical component. Report(s) sharing a concern with this report are identified in the entry for that concern on Attachment A.

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1.2 Description of Issues

There are 23 concerns in the Subjourneymen subcategory report (70100). These 23 concerns are grouped into two elements addressing a total of 8 issues. Four of the issues were about the improper use of subjourneymen and four were about the retention of subjourneymen.

1.2.1 Improper Use of Subjourneymen

A. Issue 70101 - Subjourneymen performing journeymen work

Twelve concerned individuals (CIs) alleged that employees within the subjourneymen classification were performing journeymen-level work for which they were neither classified nor qualified to perform. Three of the 12 CIs specifically alleged that a subjourneymen had terminated electrical cables.

B. Issue 70102 - Subjourneymen supervisors allowed mis-assignment

Three CIs alleged that the above practice was occurring with the full knowledge and support of the subjourneymen's immediate supervisor and the assistant craft superintendent.

C. Issue 70103 - Subjourneymen doing substandard work

One CI alleged that performance of journeymen-level work by subjourneymen "possibly could lead to substandard work."

D. Issue 70104 - Subjourneymen replacing Apprenticeship Program

One CI alleged that the use of subjourneymen was an attempt by TVA to replace the "discontinued apprenticeship program."

1.2.2 Retention of Subjourneymen

A. Issue 70105 - Unfair to layoff all subjourneymen

Seven CIs alleged that "it is unfair to lay-off 100% of all subjourneymen."

B. Issue 70106 - Union agreements provide for subjourneymen

Three CIs alleged that the "CI was told that TVA could keep 1/3 of the work force as subjourneymen."

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C. Issue 70107 - Subjourneymen laid off to keep journeymen

One CI alleged that all subjourneymen are being laid off so TVA can keep more journeymen.

D. Issue 70108 - Journeymen laid off while subjourneymen were retained

Two CIs alleged that "CI disagrees with TVA Department policy of laying off experienced journeymen while retaining subjourneymen."

2.0 SUMMARY

2.1 Summary of Issues

This report covers the subcategory of Subjourneymen. It addresses the employee concerns about the utilization, qualifications, and retention of craft employees working for the Division of Nuclear Construction (DNC) at the Watts Bar Nuclear Plant (WBN) within the occupational classification of subjourneyman.

2.2 Summary of Evaluation Process

The evaluator has reviewed all the information available on the concerns in this subcategory. The information pertinent to the evaluation of the issues has been considered and incorporated in this report.

This evaluation looked at the historical development and implementation of the subjourneyman classification within TVA's DNC. It closely examined the job assignments that subjourneymen had performed, and compared these activities to those activities considered permissible according to established guidelines. The evaluation also reviewed the reasons why DNC management discontinued the use of the subjourneymen classification at WBN.

Thirty-six interviews were conducted to verify and support data presented in the Findings Section (4.0).

2.3 Summary of Findings

The following are the major findings on the subjourneymen issues:

- ° Employees classified as subjourneymen were permitted by some supervisors to use power tools, contrary to negotiated guidelines.

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- ° At least one subjourneyman did perform journeyman-level work involving the termination of electrical cable, and did so under the direction of his immediate supervisor and his assistant craft superintendent, contrary to negotiated guidelines.
- ° TVA did lay off or RIF all subjourneymen in order to retain more journeymen.
- ° The subjourneyman classification was not established to replace the apprenticeship program.
- ° TVA was not bound by negotiated agreement to use subjourneymen employees; therefore, the layoffs and RIFs were in accordance with Federal laws and TVA policy.

2.4 Summary of Collective Significance

Collectively, the findings in this report indicate that the subjourneyman classification as negotiated was very restrictive, and did not fully accomplish its intended goal of providing a semi-skilled craft work force at less than premium wage.

2.5 Summary of Causes

Both craft managers and labor representatives alike failed to adequately support the classification, and viewed the discontinued use of the classification favorably.

2.6 Summary of Corrective Action

Before reintroducing subjourneyman employees into the construction work force, TVA should attempt to negotiate out of the classification guidelines those restrictive provisions which have hampered its acceptance and growth.

3.0 EVALUATION PROCESS

3.1 Description of Methodology

The evaluation of this subcategory was conducted in accordance with the "Evaluation Plan for the Management and Personnel Group" and the "Subjourneymen Subcategory Evaluation Plan."

The documents listed in the Source Document Section (3.2), were reviewed to establish the requirements and criteria for evaluating the issues in this subcategory.

An analysis of the concerns was conducted to determine if the circumstances and timeframe under which they were submitted was significant to the evaluation process. A total of thirty-six

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interviews were conducted. Those interviewed included TVA corporate and line managers, Labor Relations staff members, craft union representatives, foremen, journeymen, and subjourneymen.

Review of the Labor Relations staff's general correspondence negotiation files, along with the interviews with corporate personnel in the Division of Nuclear Construction, the Office of Nuclear Power, and the Labor Relations Staff, provided the historical background information presented at the beginning of the Findings Section (4.0).

The issues were evaluated against the identified requirements and criteria to determine the findings.

A collective significance analysis was performed on the findings to determine the meaningful patterns or problem areas in the subcategory as a whole. Causes were sought for the negative findings presented in section 4.0. Corrective action for the negative findings was either initiated or determined to have already been initiated.

3.2 SOURCE DOCUMENTS

1. Employee Response Team (ERT) Investigation Report, "Subjourneymen Concerns," prepared by Ray Chappell, February 11, 1986
2. Memorandum to W. H. Thompson from K. W. Whitt dated February 18, 1986, concerning Quality Technology Corporation (QTC) comments on issued reports
3. Meeting Minutes of the Tennessee Valley Authority and the Tennessee Valley Trades & Labor Council (TVA-TVT&LC) Joint Classification Subcommittee regarding subjourneyman proposal, dated February 11, 1982
4. Job descriptions established for TVA operating and maintenance employees at the TVA-TVT&LC Joint Classification Committee meeting in 1983
5. Layoff and reduction-in-force procedures for temporary hourly trades and labor employees, and the TVA Personnel Manual
6. Excerpts of general agreements covering construction and operating and maintenance employment
7. Memorandum dated March 26, 1986, from Horace H. Mull, Manager of Construction, addressing the subject: "T&L Craft - Unskilled Worker Classification"

1944-1945

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8. Division of Construction employee force reports for the time period of May 24, 1985, through January 9, 1986

4.0 FINDINGS

4.1 Background

4.1.1 Subjourneymen as a Job Classification

To understand the concerns on subjourneymen requires a knowledge of the following sequence of events:

- A. In the early 1980s, TVA saw a need for "semi-skilled" craft employees in the construction work force. Such employees would be utilized to perform the lower-skilled portion of work thus allowing the journeymen craftsmen more time to use their special skills. In 1981 division managers discussed the subject with TVA's Corporate Labor Relations Staff who were responsible for the preparation of the annual wage and contract negotiations. They also reviewed union agreements outside TVA, studied provisions of the Davis-Bacon Act governing workforce make-up on Federal construction projects, discussed the Act's impact with other Federal agencies affected by it, and reviewed the findings of the Construction Industry Cost Effectiveness Project conducted by the Business Round Table in 1979-1980.
- B. Based on this information, TVA prepared a proposed job classification of "subjourneyman" for use on Agency construction projects and introduced it to the 15 unions comprising the Tennessee Valley Trades and Labor Council (TVT&LC) at the 47th annual wage negotiations in December 1981. A modified version of TVA's original request was agreed to by both parties in February 1982, and became effective in the Division of Construction in March 1982. This agreement established the following guidelines:
1. Subjourneymen will perform the unskilled work of the craft.
 2. Subjourneymen will not use power tools.
 3. Subjourneymen will not progress to more skilled positions.
 4. Subjourneymen will be compensated at 60 percent of the craft journeyman rate.

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5. The total number of craft trainees, apprentices, and subjourneymen will not exceed 33-1/3 of the number of journeymen in craft.
6. Subjourneymen will not perform duties presently assigned members of Laborers International Union.
7. Journeymen will not be laid off and replaced with subjourneymen.
8. Each union may select alternate titles for these classifications other than that of subjourneyman.
9. Subjourneymen will be employed on temporary appointments not to extend past 11 months and 29 days.

TVA also agreed to permit the craft unions to select or "refer from the local union hall" the applicants that would fill the subjourneyman positions.

- C. On February 25, 1982, the Director of Construction discussed the future use of the new classification with TVA's construction managers. The Division Director's expectations for the classification were also expressed in the March 26, 1982 memorandum to construction managers. Meanwhile, the Manager of Labor Relations for the Office of Power and a member of TVA's negotiating team in 1981, began an effort to obtain a subjourneyman classification for operating and maintenance employees in mid-1982. By early 1983, the use of the classification was given interim approval from the majority of the TVT&LC members through the TVA-TVT&LC Joint Classification Committee. This classification, still continuing under interim approval, differed from that negotiated for the Division of Construction in the following manner:

1. Employees can perform semi-skilled work of the craft.
2. Employees can use power tools.
3. Employees will be compensated at 70 percent of journeyman rate.

An analysis of WBN's construction manpower force reports indicates that only the following crafts used subjourneymen: steamfitters, electricians, sheetmetal workers, asbestos workers, and painters. Unions which had approved the classification but did not work subjourneymen were boilermakers, cement masons, carpenters, millwrights, ironworkers, and machinists.

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For those unions which did work subjourneymen, usage figures never approached the allowable percentage (33-1/3 percent) per craft (e.g., Construction, during its peak usage, employed 72 subjourneymen within the steamfitter craft which was only 7.2 percent of the journeyman work force).

4.1.2 Subjourneymen and the WBN Workforce Reduction

The total construction force employment at WBN from June 6, 1985, to January 9, 1986, decreased by 1,345 employees as a result of substantial construction completion. The largest reduction occurred in the last three months of 1985 when 1,083 employees were either laid off or reduced in force. Although often referred to synonymously the terms, "lay off" and "reduction in force" are distinctive administrative actions. Generally, a RIF is the employment termination procedure applied to employees who have more than one year of current continuous TVA service; a lay off, which may precede a RIF, is the employment termination procedure applied to employees who have been employed at TVA for one year or less since their last appointment. Sixty-eight percent of the employees terminated were hourly craftsmen. By January 9, 1986, all DNC employees in the subjourneyman classification at WBN had been laid off/RIFed. (Note: At this point no craft subjourneyman remained employed by the Division of Nuclear Construction within the entire TVA system.)

Only two grievance complaints involving subjourneymen were filed with TVA's corporate Labor Relations Staff for 1985-1986. Neither dealt with retention or qualification issues as outlined by the employee concerns in this subcategory. They were termination issues.

4.2 Findings

4.2.1 Improper Use of Subjourneymen

4.2.1.1 Issue 70101-Subjourneymen performed journeymen work

Discussion

There were occasions when employees classified as subjourneymen used power tools such as grinders, drills, and pneumatic tools. The known incidences of subjourneymen doing journeymen's work were isolated cases which were immediately stopped when brought to management's attention.



Conclusion

Although this issue is factually accurate what is described is not a problem at this time. As explained in 4.1.2 (Findings) subjourneymen are no longer employed by DNC. If subjourneymen are employed in the future, corrective action has been prescribed to prevent reoccurrence.

- 4.2.1.2 Issue 70102-Subjourneymen supervisors allowed mis-assignment

Discussion

In the specific case of the subjourneymen who terminated cable, a problem is verified to have existed because this employee was not qualified to perform the work (according to his employment application), and his immediate supervisors (foreman and general foreman) incorrectly sanctioned the work assignment.

Such work activities were in violation of the negotiated classification agreement governing the use of subjourneymen and the Divisions Director's memorandum dated March 26, 1982, which states, "employees in this classification will perform the unskilled duties of the craft" and "will not use power tools."

Conclusion

The issue is factually accurate, but corrective action for the problem was initiated before the evaluation of the issue was undertaken.

- 4.2.1.3 Issue 70103-Subjourneymen doing substandard work

Discussion and Conclusion

In view of the minimum experience requirements necessary for selection of craft subjourneymen (Attachment C), this evaluation found as factual an issue that "using subjourneymen to do journeymen work possibly could lead to substandard work." It should be noted, however, that neither this evaluation nor Quality Technology Company's previous investigation identified any improper work performed by subjourneymen. Therefore, while the issue is factual it does not identify a problem requiring corrective action.

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4.2.1.4 Issue 70104-Subjourneymen replacing the Apprentice Program

Discussion

The subjourneymen program was not established to replace the apprenticeship program(s), although some employees believed that it did. Specific agreement language exists which prohibits advancement opportunities for subjourneymen.

Conclusion

This issue is determined to be not factually accurate.

4.2.2 Retention of Subjourneymen

4.2.2.1 Issue 70105-Unfair layoff of all subjourneymen

Discussion and Conclusion

The evaluation showed that the layoff or reduction in force of all employees in the subjourneymen classification in DNC at WBN was procedurally proper. This issue is not factually accurate.

4.2.2.2 Issue 70106-Union agreements provide for subjourneymen

Discussion and Conclusion

That reduction violated no contractual obligations or applicable Federal laws or regulations. The agreement establishing the subjourneyman classification does not require the use of subjourneymen but simply provides guidelines for their use. This issue is not factually accurate.

4.2.2.3 Issue 70107-Subjourneymen laid off to keep journeymen

Discussion

During the work force reductions at WBN in late 1985, labor unions "lobbied" heavily with construction line and corporate managers in an effort to convince them that craft subjourneymen should be terminated before the journeyman employees. It is apparent that management was made

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aware that labor problems caused by retaining sub journeymen while reducing journeymen were developing. Their decision to terminate all construction sub journeymen by early 1986 was certainly made with these potential problems in mind.

Management contends that these reductions were made due to very restrictive manpower ceilings and to ensure that fully qualified individuals remained on the job to accomplish the remaining work. The present evaluation has found nothing that disproves this contention.

Conclusion

Therefore, the evaluation finds that the concern that "all steamfitter sub journeymen are being laid off at WBN so TVA can keep more steamfitter journeymen" is factual. However, since that action violated no requirement it does not constitute a problem requiring corrective action.

4.2.2.4 Issue 70108-Journeymen laid off while sub journeymen retained

Discussion

These concerns appear to have been made early in 1985 during the work force reduction at WBN when journeymen were being laid off and prior to management's decision to replace the sub journeymen work force.

As indicated in issue 70105, the evaluation concluded that the work force reduction of 1985 violated no contractual obligation or applicable federal laws or regulations.

The issue that TVA should not lay off experienced journeymen while retaining sub journeymen with a small nuclear experience was not overlooked by management and was a factor in the decision to eliminate the sub journeymen classification from the construction work force (see issue 70107).

Conclusion

Consequently, this issue cannot be determined to be factually accurate.

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5.0 COLLECTIVE SIGNIFICANCE

All 23 employee concerns in this subcategory were submitted during the period June 1985 through December 1985. This was a period of radical change in the trades and labor employment level at WBN. The mere presence of QTC on the project to record concerns at a time when employee anxiety levels were high was an invitation and inducement to the generation of the concerns in this subcategory.

Although concerns in this subcategory dealing with improper use of subjourneymen were determined to be factual, if dissension existed at WBN concerning this classification before June 1985, it was not widespread as can be seen by the absence of grievances or a large number of employee concerns. Differences of opinion concerning the use of subjourneymen were handled informally between union representatives and management, apparently to the satisfaction of both parties. One may assume that before any employment reductions, the journeyman craftsmen did not openly disagree with the way subjourneymen were being used.

However, the background recounted in the Findings Section makes the failure of the subjourneyman classification in DNC workforce less than surprising. The operations and maintenance subjourneymen classification, because it has fewer restrictions, has fared better.

Nevertheless, the introduction of a new semiskilled job classification that impacts existing jobs is unlikely to be successful unless the following have been provided for:

1. A very specific definition of the type of work allowed in the new assignment.
2. A procedure for measuring the effectiveness of the new job classification.
3. Credit for on-the-job training that can be applied to advancement opportunity.
4. Providing training so that all involved personnel have the best opportunity to make the new job in the overall system work.

Project line and corporate TVA managers interviewed agreed that the "subjourneyman" classification as negotiated by TVA's Labor Relations Staff for use within construction was very restricted and lost its potential effectiveness because TVA agreed that subjourneymen would not be permitted to use power tools, would not be performing work duties traditionally performed by the laborers, and conceded in negotiations other key factors necessary for the effective use of the classification.

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6.0 CAUSES

6.1 Lack of Clear Definition of Subjourneyman Duties

Instructions issued to the employees were general, and consequently, differences of opinion existed as to what types of work assignments needed to be performed exclusively by journeymen. While the use of power tools was strictly prohibited by agreement, hand tool usage was determined by some crafts (electrical and sheetmetal) to be permissible, yet other crafts (steamfitters and painters) strongly disapproved of both hand and power tool usage by subjourneymen.

No system was established to monitor use of the classification or evaluate its effectiveness. Consequently, how subjourneymen were worked depended upon the strength or weakness of the craft manager, his interpretation of the general guidelines and his personal commitment to the success of the program. For the most part subjourneymen were worked within the negotiated classification; but sometimes they were permitted to perform work beyond the classification limitations; and sometimes were simply used as "glorified laborers." Contributing to this erratic use of subjourneymen was the considerable difference in work experience among the people in this classification. Some subjourneymen were as experienced as journeymen; others barely met the minimum requirements (see attachment C).

6.2 Manpower Reduction Affecting Subjourneymen

The majority of concerns dealing with the use of subjourneymen were submitted from June through October 1985, when journeymen and subjourneymen were being affected by manpower reductions. In November 1985, after project subjourneymen learned they were to be reduced and journeymen retained, concerns over the use of subjourneymen ceased and those involving retention began to be submitted. In support of this observation, 9 of 10 employee concerns dealing with subjourneymen retention were recorded during employee exit interviews. Had the manpower reductions of June through December 1985 never occurred at WBN, employee concerns in this subcategory most likely would not have been submitted.

6.3 Resentment Over the Use of Subjourneyman on the Part of Craft Managers

Although adopted for use and supported by corporate management as a cost-saving initiative, the subjourneyman classification never gained acceptance by WBN craft managers. Interviews revealed that resentment over the use of subjourneymen by craft managers (foremen, general foremen) existed. There was an obvious belief that from a managerial standpoint it was easier to supervise a work force of fully qualified employees from both a safety and a productivity standpoint.

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NOTE: This attitude on the part of line managers may say more about inadequate managerial training than it does about the safety or productivity of subjourneymen. The subcategory report on Management Technique (70600) evaluates concerns about the need for more managerial skills training. The report notes the corrective action already taken or planned as a part of ONPs Nuclear Performance Plan to improve a managers ability, such as managing a subjourneymen type situation.

6.4 Resentment Against the Use of Subjourneyman by Craft Unions

Resentment toward the use of subjourneymen by craft unions existed because they saw the hiring of subjourneymen as a replacing of journeymen. Similar views were shared by a number of construction managers. Some individuals employed in this classification experienced union problems and chose to cancel their union memberships. Among subjourneymen, much resentment was shared at the total restrictions on advancement or training.

7.0 CORRECTIVE ACTIONS

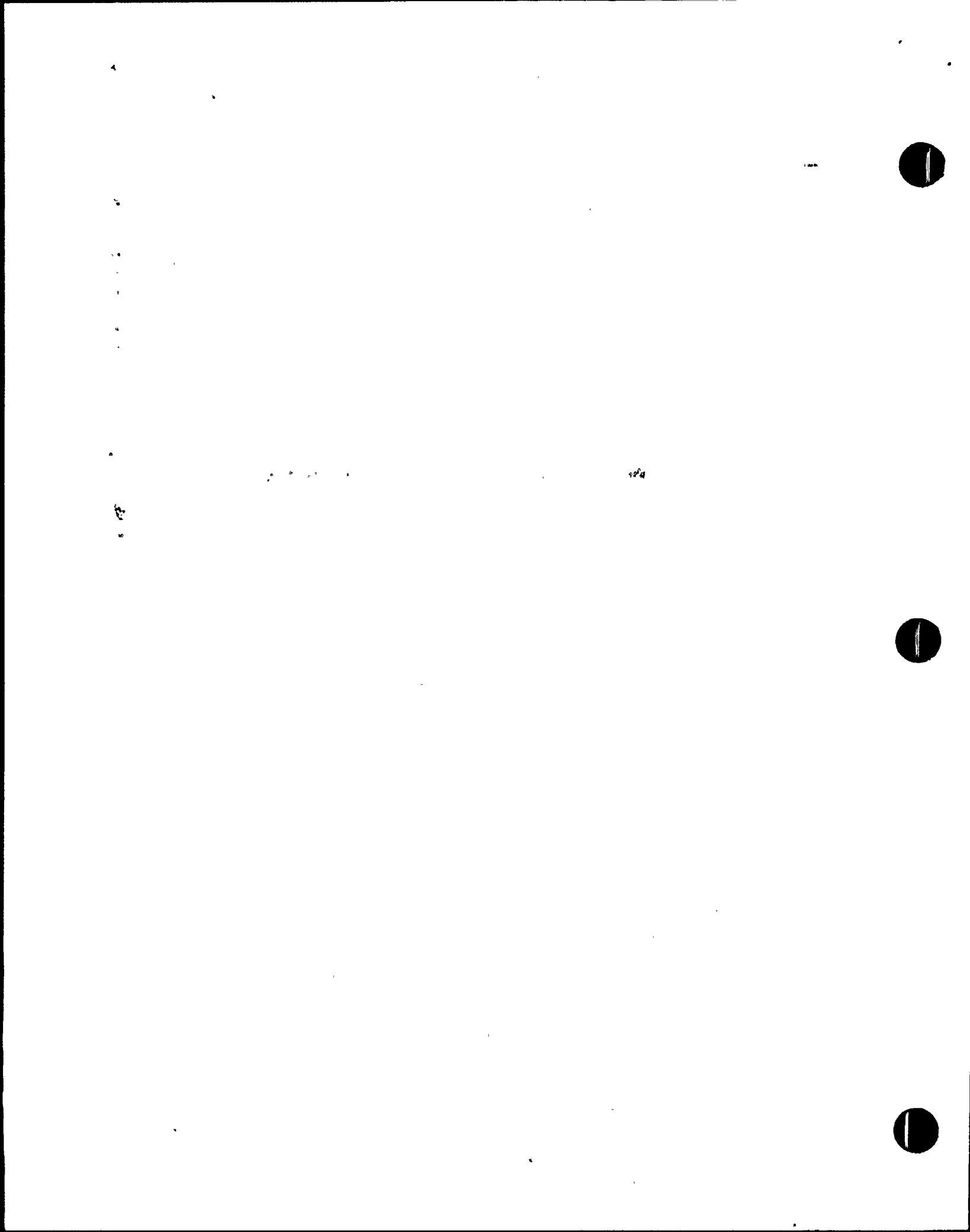
7.1 Previously Initiated Corrective Action

As explained in the Findings Section (4.1.2), the use of subjourneyman by DNC ceased as of January 1986. Subsequently, ERT, issued an investigative report on the use of subjourneyman at WBN to which project management committed to the following corrective action:

". . . future employment of subjourneymen will be preceded by instructions from the project manager to all involved managers and supervisors on the proper job requirements and responsibilities of a subjourneyman. Additionally, at the point of hiring, each subjourneyman will sign a document, stating that they have been properly instructed by project management on their job requirements, safety, and QA responsibilities and that they agree to work under those instructions or otherwise forfeit their employment.

The Project Manager's office will evaluate what type of safety and QA indoctrination is needed for all new employees who are unfamiliar with a construction work site and begin development of that program.

The use of subjourneymen in the future will be done in a safe, quality assured, and efficient manner. Their work will be monitored by management more closely to ensure proper work assignments. Anyone with knowledge of the belief that a subjourneyman is performing work outside his classification is encouraged to make his supervisor aware of it."



7.2 Corrective Action as a Result of This Evaluation

The Director of Nuclear Construction has agreed to the corrective action indicated in 7.1 adding that procedures for implementation of the Corrective Action will be issued prior to the re-employment of any subjourneyman in DNC. Also, DNC will arrange with ONP Personnel to reopen negotiations relative to the use of subjourneymen aimed at bringing construction provisions in line with maintenance provisions (CATD No. 701-NPS-01).

8.0 ATTACHMENTS

Attachment A Subcategory Summary Table

Attachment B List of Concerns by Issue

Attachment C Guidelines for Selection of Craft Subjourneymen, effective
March 15, 1982



:EINCE - ECPS132J-ECPS132C
 :EINCY - REQUEST
 - ISSS - RWM

TENNESSEE VALLEY AUTHORITY
 OFFICE OF NUCLEAR POWER
 EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS)
 EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY
 SUBCATEGORY: 701 SUBJOURNEYMEN PERFORMED JOURNEYMEN WORK

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DRY: MP MGT. & PERS. ISSUES

CERN NUMBER	CAT	SUB CAT	S H R PLT D LOC	1 REPORT APPL				HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION	REF. SECTION # CAT - MP SUBCAT - 701
				2	SAF	RELATED					
				BF	DL	SQ	WB				
86-238-00101 50262	CO	10900	S WBN	1 N	N	N	Y	IN-85-627-002	QTC	A SUB-JOURNEYMAN WAS STOPPED WHEN IN THE PROCESS OF TERMINATING ELECTRICAL CABLES BY THE UNION JOB STEWARD. THE SUB-JOURNEYMAN WAS TERMINATING CABLES IN A JUNCTION BOX, LOCATED IN THE ADDITION EQUIPMENT BUILDING. THE SUB-JOURNEYMAN WAS WORKING UNDER THE DIRECTION OF A JOURNEYMAN ELECTRICIAN. THE SUB-JOURNEYMAN WAS INSTRUCTED TO PERFORM JOURNEYMAN WORK BY THE ASSISTANT ELECTRICAL SUPERINTENDENT. NAMES AND DETAILS KNOWN TO QTC, BUT WITHHELD TO MAINTAIN CONFIDENTIALITY. NO FURTHER INFORMATION	
02	MP	70101	S WBN	1 N	N	N	N				
03	MP	70102	S WBN	1 N	N	N	N				
-85-102-00101 T50204	MP	70105	N WBN	1 N	N	N	N		QTC	TVA IS DISCRIMINATING WHEN DETERMINING WHICH SUB-JOURNEYMEN TO LAY OFF, E.G. THE LAST CLASS DATE HAS BEEN MOVED UP FOR SOME SO AS THEY COULD BE EXEMPT FROM THE LAY OFF. (NAMES/DETAILS TO THE SPECIFIC CASE ARE KNOWN TO QTC AND WITHHELD TO MAINTAIN CONFIDENTIALITY). CONSTRUCTION DEPT. CONCERN. CI HAS NO FURTHER INFORMATION.	

23 CONCERNS FOR CATEGORY MP SUBCATEGORY 701

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.



REFERENCE - ECPS132J-ECPS132C
 FREQUENCY - REQUEST
 IP - ISSS - RWM

TENNESSEE VALLEY AUTHORITY
 OFFICE OF NUCLEAR POWER
 EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS)
 EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY
 SUBCATEGORY: 701 SUBJOURNEYMEN PERFORMED JOURNEYMEN WORK

PAGE - 4.
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CATEGORY: MP MGT. & PERS. ISSUES

CONCERN NUMBER	CAT	SUB CAT	S H R D	PLT LOC	1 REPORT APPL				HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION	REF. SECTION CAT - MP SUBCAT - 701
					2	SAF	RELATED	BF				
IN-85-627-00201 T50209	MP	70101	N	WBN	1	N	N	N	N	IN-85-627-002	QTC	SUB-JOURNEYMEN PERFORMING CRAFTS WORK. (NAMES/DETAILS TO THE SPECIFIC CASE ARE KNOWN TO QTC AND WITHHELD TO MAINTAIN CONFIDENTIALITY). CONSTRUCTION DEPT. CONCERN. CI HAS NO FURTHER INFORMATION.
IN-85-705-00101 T50064	CO	10900	S	WBN	1	N	N	N	Y	EX-85-010-002	QTC	UNQUALIFIED PERSONNEL (SUBJOURNEYMEN) PERFORMING JOURNEYMAN'S WORK (TERMINATIONS) IN THE CONTROL ROOM, UNIT 1. CI HAS NO MORE DETAIL.
	02	MP	70101	S	WBN	1	N	N	N			
IN-85-916-00201 T50094	MP	70101	N	WBN	1	N	N	N	N		QTC	TVA FIGHTS THE UNIONS AND TRIES TO BREAK THEM DOWN BY HIRING INDIVIDUALS OUTSIDE THEIR CLASSIFICATION AND BY HIRING SUBJOURNEYMAN. THESE PEOPLE ARE NOT QUALIFIED TO PERFORM WORK TO WHICH THEY ARE ASSIGNED. NO SPECIFICS AVAILABLE. C/I HAS NO FURTHER INFORMATION. NO FOLLOW UP REQUIRED.
IN-85-944-00101 T50095	MP	70101	N	WBN	1	N	N	N	N		QTC	SUBJOURNEYMEN (CRAFT KNOWN) PERFORMING JOURNEYMAN LEVEL WORK CI HAS NO FURTHER INFORMATION. NO FOLLOW UP REQUIRED.
IN-85-979-00201 T50112	MP	70101	N	WBN	1	N	N	N	N	EX-85-010-002	QTC	UTILIZING SUB-JOURNEYMAN TO PERFORM JOURNEYMAN TASKS (CRAFT KNOWN) WHILE KNOWING THEY ARE NOT QUALIFIED. CI HAS NO ADDITIONAL NO FOLLOW UP REQUIRED.

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.



REFERENCE - ECPS132J-ECPS132C
 FREQUENCY - REQUEST
 IP - ISSS - RWM

TENNESSEE VALLEY AUTHORITY
 OFFICE OF NUCLEAR POWER
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CONCERN NUMBER	CAT	SUB CAT	S H R D	PLT LOC	1 REPORT 2 SAF RELATED	APPL BF BL SQ WD	HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION	REF. SECTION CAT - MP SUBCAT - 701
< -85-148-00101 T50207	CO	10900	S	WBN	1 N N N Y 2 NA NA NA SR		EX-85-010-002	QTC	SUB-JOURNEYMEN ARE TERMINATING QA AND NON-QA CABLES IN JUNCTIONS BOXES PER DIRECTION OF FOREMAN (NAME KNOWN). DETAILS KNOWN TO QTC, WITHHELD DUE TO CONFIDENTIALITY. CI HAS NO FURTHER INFORMATION. CONSTRUCTION DEPT. CONCERN.	
02	MP	70101	S	WBN	1 N N N N 2 NA NA NA NA					
03	MP	70102	S	WBN	1 N N N N 2 NA NA NA NA					
< -85-159-00101 T50205	MP	70105	S	WBN	1 N N N N 2 NA NA NA NA		EX-85-159-001	QTC	CI STATES THAT TVA'S DECISION TO ABOLISH THE SUB-JOURNEYMAN POSITION WILL VIOLATE THEIR CONTRACT TO HAVE A SPECIFIC RATIO OF SUB-JOURNEYMEN PER JOURNEYMEN. CONSTRUCTION DEPT. CONCERN. CI HAS NO FURTHER INFORMATION.	
02	MP	70106	S	WBN	1 N N N N 2 NA NA NA NA					
< -85-159-00201 T50205	MP	70105	N	WBN	1 N N N N 2 NA NA NA NA		EX-85-159-002	QTC	TVA'S DECISION TO ABOLISH THE SUB-JOURNEYMEN'S POSITION WAS IN RESPONSE TO THE DESIRES OF ONLY ONE CRAFT (NOT KNOWN) AND THE OTHER CRAFTS WERE NOT CONSIDERED. CONSTRUCTION DEPT. CONCERN. CI HAS NO FURTHER INFORMATION.	
< -85-444-00201 T50035	MP	70104	N	WBN	1 N N N N 2 NA NA NA NA			QTC	THE DISCONTINUED APPRENTICESHIP PROGRAM HAS BEEN SUBSTITUTED WITH "HELPERS" AND COSTS MORE AND DOES NOT KEEP A STEADY SUPPLY OF TRAINED CRAFT COMING TO REPLACE RETIREES.	
N -85-556-00101 T50051	MP	70101	N	WBN	1 N N N N 2 NA NA NA NA		EX-85-010-002	QTC	SUBJOURNEYMEN ALLOWED TO GRIND, FIT, WELD, DISASSEMBLE VALVES; USED BASICALLY AS JOURNEYMEN.	
N -85-556-00201 T50051	MP	70101	N	WBN	1 N N N N 2 NA NA NA NA			QTC	SUBJOURNEYMAN GIVEN MORE AUTHORITY THAN JOURNEYMAN. (DETAILS KNOWN TO ERT)	

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.



REFERENCE - ECPS132J-ECPS132C
 FREQUENCY - REQUEST
 IP - ISSS - RWM

TENNESSEE VALLEY AUTHORITY
 OFFICE OF NUCLEAR POWER
 EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS)
 EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY
 SUBCATEGORY: 701 JOURNEYMEN LAID OFF WHILE SUBJOURNEYMEN RETAINED

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CONCERN NUMBER	CAT	SUB CAT	S H R D	PLT LOC	1 REPORT APPL 2 SAF RELATED BF BL SQ WB	HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION	REF. SECTION CAT - MP SUBCAT - 701
< -85-095-00101 T50190	MP	70108	N	WBN	1 N N N N 2 NA NA NA NA		QTC	TVA DOES NOT ABIDE BY THE TRADES AND LABOR AGREEMENT, ARTICLE 30, WHICH PROHIBITS LAYOFF OF JOURNEYMAN AND APPRENTICES. IN A RECENT LAYOFF, JOURNEYMEN (CRAFT KNOWN) WERE LAID OFF, AND 3 SUBJOURNEYMEN WERE RETAINED. CONSTRUCTION DEPT. CONCERN. CI HAS NO FURTHER INFORMATION.	
< -85-103-00101 T50191	MP	70105	S	WBN	1 N N N N 2 NA NA NA NA	EX-85-103-001	QTC	ALL STEAMFITTER SUBJOURNEYMEN BEING LAID OFF, WHEN THE UNION AGREEMENT CALLS FOR 1/3 OF THE REMAINING STEAMFITTER PERSONNEL TO BE SUBJOURNEYMEN. CI HAS NO FURTHER INFORMATION. CONSTRUCTION DEPARTMENT CONCERN.	
02	MP	70106	S	WBN	1 N N N N 2 NA NA NA NA				
< -85-122-00101 T50195	MP	70105	S	WBN	1 N N N N 2 NA NA NA NA	EX-85-122-001	QTC	THE LAYOFF IS UNFAIR TO SUB-JOURNEYMEN. CI WAS TOLD THAT TVA COULD KEEP 1/3 OF THE WORK FORCE AS SUB-JOURNEYMEN BUT IS NOT DOING SO. CONSTRUCTION CONCERN. UNIT 2. JOURNEYMEN WILL NOW BE DOING WORK OUTSIDE THEIR CLASSIFICATION. CI HAS NO ADDITIONAL INFORMATION.	
02	MP	70106	S	WBN	1 N N N N 2 NA NA NA NA				
X -85-123-00101 T50195	MP	70105	N	WBN	1 N N N N 2 NA NA NA NA	EX-85-123-001	QTC	IT IS UNFAIR TO LAY-OFF 100% OF ALL SUB-JOURNEYMEN. SUB-JOURNEYMEN ONLY CARRY MATERIAL AND THEREFORE ARE NOT TAKING JOURNEYMAN'S POSITIONS. CI HAS NO ADDITIONAL INFORMATION. CONSTRUCTION DEPT. CONCERN.	
X -85-124-00101 T50195	MP	70107	N	WBN	1 N N N N 2 NA NA NA NA	EX-85-124-001	QTC	ALL STEAMFITTER SUB-JOURNEYMEN ARE BEING LAID OFF AT WBNP SO TVA CAN KEEP MORE STEAMFITTER JOURNEYMEN AND THIS IS UNFAIR. CONSTRUCTION DEPT. CONCERN. CI HAS NO FURTHER INFORMATION.	

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.

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REFERENCE - ECPS132J-ECPS132C
 FREQUENCY - REQUEST
 MP - ISSS - RHM

ATTACHMENT A
 TENNESSEE VALLEY AUTHORITY
 OFFICE OF NUCLEAR POWER
 EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS)
 EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY
 SUBCATEGORY: 701 SUBJOURNEYMEN PERFORMED JOURNEYMEN WORK

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CATEGORY: MP MGT. & PERS. ISSUES

CONCERN NUMBER	CAT	SUB CAT	S H R D	PLT LOC	1 REPORT APPL 2 SAF RELATED BF BL SQ WB	HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION	REF. SECTION CAT - MP SUBCAT - 701
< -85-009-00101 T50051	MP	70101	S	WBN	1 N N N N 2 NA NA NA NA	EX-85-010-002	QTC	USING SUBJOURNEYMAN TO DO JOURNEYMAN WORK IN SEVERAL DIFFERENT AREAS ON THE JOB POSSIBLY COULD LEAD TO SUBSTANDARD WORK ALL OVER THE JOB.	
02	MP	70103	S	WBN	1 N N N N 2 NA NA NA NA				
X -85-010-00201 T50052	MP	70101	S	WBN	1 N N N N 2 NA NA NA NA	EX-85-010-002	QTC	SUBJOURNEYMEN (NAMES GIVEN) ARE PERFORMING JOURNEYMAN'S WORK TO INCLUDE (RUNNING PIPE, REBUILDING VALVES, OPERATING & POWER EQUIPMENT). FOREMAN (NAME GIVEN) SAID THAT SUBJOURNEYMEN COULD DO ANYTHING THE FOREMAN FEELS HE/SHE IS QUALIFIED TO DO.	
02	MP	70102	S	WBN	1 N N N N 2 NA NA NA NA				
X -85-016-00101 T50059	MP	70101	N	WBN	1 N N N N 2 NA NA NA NA	EX-85-016-001	QTC	NON-SKILLED LABOR (SUB-JOURNEYMEN) PERFORMING WORK OF STFTF CRAFTSMEN. CI WITNESSED THE FOLLOWING EXAMPLE: SUB-JOURNEYMAN (NAME KNOWN) PERFORMING FIT-UPS ON 1/4" DRAIN LINE OFF LEVEL INDICATORS ON HEATERS IN TURBINE BUILDING DURING MAY 1985. ANOTHER JOURNEYMAN (NAME KNOWN) TORQUING FLANGE BOLTS/NUTS ON HIGH & LOW PRESSURE STEAMLINES IN SYSTEM G, UNIT 1. THIS OCCURED DURING FEB. 1985. STFTF FOREMAN (NAME KNOWN), WHEN QUESTIONED ABOUT THIS PRACTICE, STATED THAT "THE SUB-JOURNEYMAN COULD DO WH	
X -85-049-00201 T50163	MP	70108	N	WBN	1 N N N N 2 NA NA NA NA		QTC	CI DISAREES WITH TVA DEPARTMENT (KNOWN) POLICY OF LAYING OFF EXPERIENCED JOURNEYMEN (CRAFT KNOWN) WHILE RETAINING SUBJOURNEYMEN WITH LITTLE OR NO NUCLEAR EXPERIENCE. NUCLEAR POWER DEPT CONCERN. CI HAS NO FURTHER INFORMATION. NO FOLLOWUP REQUIRED.	
X -85-049-00401 T50163	MP	70105	N	WBN	1 N N N N 2 NA NA NA NA		QTC	CI EXPRESSED THAT MOST OF THE SUBJOURNEYMAN HIRED BY TVA, AND RETAINED AT LAYOFFS, ARE FRIENDS OR RELATIVES OF OTHER TVA EMPLOYEES. NUCLEAR POWER DEPT CONCERN. CI HAS NO FURTHER INFORMATION. NO FOLLOWUP REQUIRED.	

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.

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ATTACHMENT B

SUBJOURNEYMEN

List of Concerns by Element/Issue

The Subjourneymen Subcategory (70100) is comprised of 23 employee concerns which are grouped into two elements addressing eight issues.

Improper Use of Subjourneymen

70101 - Subjourneymen performed journeymen work

EX-85-009-001*	IN-85-705-001
EX-85-010-002*	IN-85-916-002
EX-85-016-001	IN-85-944-001
EX-85-148-001*	IN-85-979-002
IN-85-556-001	IN-86-238-001*
IN-85-556-002	
IN-85-627-002	

70102 - Subjourneymen supervisors allowed mis-assignment

EX-85-010-002*
EX-85-148-001*
IN-86-238-001*

70103 - Subjourneymen doing substandard work

EX-85-009-001*

70104 - Subjourneymen replacing Apprentice Program

IN-85-444-002

Retention of Subjourneymen

70105 - Unfair to layoff all subjourneymen

EX-85-049-004	
EX-85-103-001*	EX-85-159-001*
EX-85-122-001*	EX-85-159-002
EX-85-123-001	WI-85-102-001

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ATTACHMENT B (Continued)

70106 - Union agreements provide for subjourneymen

EX-85-103-001*

EX-85-122-001*

EX-85-159-001*

70107 - S/F Subjourneymen laid off to keep journeymen

EX-85-124-001

70108 - Journeymen laid off while subjourneymen retained

EX-85-049-002

EX-85-095-001

*Concern listed in more than one issue

ATTACHMENT C

Guidelines for Selection of Craft Subjourneymen

Effective March 15, 1982

Candidates for subjourneymen positions shall have at least three months experience in commercial, industrial, or construction type work or have equivalent vocational or technical training. Subjourneymen must be capable of performing safely and competently a wide variety of unskilled duties of the craft.

