TVA EMPLOYEE CONCERNS
SPECIAL PROGRAM

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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 (ECTG), 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 ECTG 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 ECTG 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.

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).

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)

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

L/R	Labor Relations Staff
M&AI	Modifications and Additions Instruction
MI	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

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

1.0 CHARACTERIZATION OF ISSUES

1.1 Introduction

The 24 concerns in the Organization Subcategory are statements by employees pointing out disadvantages in the current organizational structures and in certain reporting relations between organizations. Individual responses previously had been prepared for 9 of the 24 concerns. Most of the concerns are reactions to reorganizations that have occurred over the last couple of years. Of the 24 concerns, 20 were generic, while 4 were site specific.

These concerns raised nine issues which are evaluated in this report.

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.

1.2 Description of Issues

1.2.1 Issue 70701 - The Role and Independence of Engineering

The concerns that raised this issue are general statements that negative effects could possibly result from the (now abandoned) owner/operator philosophy that decentralized control of plant operations and made them the responsibility of each site director.

1.2.2 Issue 70702 - Redundancy in Creation of Nuclear Services Branch in Construction

The concerns that raised this issue questioned why the Nuclear Services Branch was created in the Division of Nuclear Construction (DNC) when the same work was being done by the Modifications Group that reported to the Site Director.

1.2.3 Issue 70703 - Too Many Separate Groups and Employees

One very general concern stated that fewer groups/managers/employees would make for a better organization. Two others stated that Engineering is poorly organized at Bellefonte Nuclear Plant (BLN).

1.2.4 Issue 70704 - WBN Project Control

The concerned individual (CI) contends that WBN construction is not run by the manager, but by the Project Control Group.

1.2.5 Issue 70705 - Discipline Staffing

The CI contends that morale is adversely affected by "discipline staffing," a type of matrix organization initiated in the Division of Nuclear Engineering in 1984.

1.2.6 Issue 70706 - Discretionary Safety Reviews

The two concerns (from one employee) that raised this issue suggest that underfunding of a particular department (unspecified) results in a lack of discretionary safety reviews.

1.2.7 Issue 70707 - Manager of ONP Not Independent

The concern states, "CI feels that the new nuclear manager is a front as he will not be allowed to remain independent."

1.2.8 Issue 70708 - BLN Project Management

The concern states, "No real project management for BLN. There is no single person onsite who is in charge of all site organizations."

1.2.9 Issue 70709 - Management Control of Personnel Matters

The concern states, "Management lacks control over personnel matters; merit raises, personnel policies, etc., are not under direct control of line management."

Note: <u>QA/QC Organization Issues</u>

The Quality Assurance/Quality Control (QA/QC) category group is evaluating a number of concerns that relate to the organization of the QA and QC functions. Within the QA/QC category, organizational structure is being considered in the subcategories on Quality Assurance Independence and Authority

and Quality Assurance Organizational Effectiveness. These issues are sufficiently independent of the organization issues raised in the concerns assigned to the Management and Personnel category, that it is appropriate to evaluate them separately.

2.0 SUMMARY

2.1 Summary of Issues

The issues evaluated in this report are based on statements by employees pointing out disadvantages in the current organizational structures and in certain reporting relationships between organizations. Most are reactions to reorganizations that have occurred over the past couple of years.

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.

During this evaluation, numerous documents were reviewed which describe relevant organizations, changes in them, and the reasons for the changes. The reports already prepared in response to nine of the concerns were also reviewed. Interviews were conducted with line managers and personnel specialists having knowledge of the organizational changes referred to in the concerns.

2.3 Summary of Findings

Based on the evaluation, the following conclusions were made:

A. The issue of the role and independence of Engineering identified a problem at the time the concerns were expressed. The organizational philosophy and structure were heavily weighted in favor of short-term operational decisions over engineering concerns for design integrity. This situation has since been corrected. The engineering role has been strengthened and checks and balances are in place to ensure that disagreements between engineering judgments and operational considerations are heard and properly resolved. The evaluations being conducted under the Engineering Category of the Employee Concerns Task Group will ensure that any technical problems caused by the organizational problem are properly identified and corrected.

B. There is currently no redundancy in the organization of the modifications function in the Office of Nuclear Power (ONP). At the time the employee concerns were expressed, there was duplication of functions between the modifications group under the site director and the Nuclear Services Branch in DNC. This duplication was intentionally built into the organizational structure and was consistent with the management philosophy current at that time, which stressed efficiency through selection and use of competitive resources. The recent merger of the groups eliminates the duplication and relies on cooperative decision-making by site and engineering managers to attain efficient resource use. Although these changes in organization have been made, no Organization Bulletins have been issued for Division of Nuclear Engineering (DNE) or DNC. This finding requires corrective action.

C. The concerns about too many separate engineering groups at BLN were previously evaluated and a response was prepared by line management. The report found that the concerns identified a problem. Corrective action was taken on the problem before this evaluation was done.

D. The issues pertaining to BLN project management and management control of personnel matters had been adequately addressed by previous responses. A full evaluation was not possible on the other four issues, either because no requirements or criteria could be identified or because sufficient information was not available to identify the situations referred to in the concerns.

2.4 Summary of Collective Significance

Major organizational changes during the past several years have caused confusion and uncertainty regarding responsibilities of various organizations. Recent reversals of past trends and effective implementation of the Nuclear Performance Plan should help create a stable, clearly documented, and easily understood ONP organizational structure.

2.5 Summary of Causes

The confusion cited above resulted from the lack of approved Organization Bulletins for Division of Nuclear Construction and Division of Nuclear Engineering. This deficiency was in turn caused by the relatively low priority given such documents compared to technical procedures and other documents that are reviewed by the NRC.

2.6 Summary of Corrective Action

Organization Bulletins are being developed; the final organization charts and brief organization descriptions will be highlighted in ONP's Up Front newsletter as soon as the process is complete.

3.0 EVALUATION PROCESS

3.1 General Methodology

The evaluation of this subcategory was conducted according to the Evaluation Plan for the Employee Concerns Task Group and the Evaluation Plan for the Management and Personnel Group. The concern case files were reviewed. Source documents were researched and interviews were conducted to identify the requirements and criteria applicable to the issues raised by the concerns. The concerns were grouped according to the issues they raised. The issues were evaluated against the identified requirements and criteria to determine findings. A collective significance analysis was conducted; causes were determined for negative findings; and corrective action for the negative findings was initiated or determined to have already been initiated.

3.2 Specific Methodology

Numerous documents which describe the organizations addressed in the issues, the changes in them, and the reasons for the changes were reviewed . The previous reports prepared in response to nine of the concerns were also reviewed.

Eight interviews were conducted. Project engineers were asked whether checks and balances exist to ensure that Engineering judgments are not being ignored in favor of Operations considerations. The Chief of the WBN Modifications Branch described the reorganization of the branch's function and the reasons for it. Interviews were conducted with personnel officers in Nuclear Personnel, DNE, and DNC to examine organization changes addressed in concerns.

3.3 Requirements

A. There are no regulatory requirements that set standards for organizational design in the areas referred to in the concerns in this subcategory. A requirement of 10 CFR 50, Appendix B, is that: "The authority and duties of persons and organizations performing activities affecting the safety-related functions of structures, systems, and components shall be clearly established and delineated in writing."

B. NUREG/CR-3215, Organizational Analysis and Safety for Utilities with Nuclear Power Plants, An Organizational Overview, prepared by Battelle Memorial Institute for the United States Nuclear Regulatory Commission, 1983.

This two-volume report presents the results of initial research on the feasibility of applying organizational factors in nuclear power plant assessment. While the report does not uncover any empirical analysis linking organizational factors to the safety of nuclear plants, it does offer a comprehensive literature review and does suggest some key relationships. The report emphasizes the importance of analyzing management philosophy, or what it calls organizational governance, in addition to organizational design.

The report also warns of several pitfalls to avoid when conducting an organizational analysis:

> Perhaps the most important pitfall results from the combination of three interrelated misconceptions. First, each manager logically thinks she/he has an understanding of management and organization based on experience. What has worked for them will work for all managers. Organizational analysis may be equated to management, and management may be seen as an applied art where 'good' management is simple and the same regardless of what or who is being managed.
>
> If any one finding characterizes modern organizational analysis, though, it is that a number of factors, including the goals to be sought, the environment of the system as well as its context, form of governance, and organizational design, should be considered jointly. Second, many managers see an analysis of management and organization in political terms, since much of their day-to-day experience involves organizational politics. From a purely political standpoint, independent organizational analysis may be seen as a potential threat to management prerogatives. We think it is important to distinguish management from organizational analysis, and again repeat a central theme in this report - it does not now appear appropriate for NRC or industry itself to prescribe common organizational remedies for nuclear utilities. The third misconception is the natural tendency to equate description with evaluation and then anticipate corrective action. If one presumes there is one best way of managing nuclear utilities, then descriptions are often equated with evaluations. It should be clear our review suggests quite the opposite. (Volume 1, page 56)

C. NUREG/CR-3737, An Initial Empirical Analysis of Nuclear Power Plant Organization and Its Effect on Safety Performance. Prepared by *Battelle Memorial Institute for the United States Nuclear Regulatory Commission, 1984.

One of the findings of this empirical analysis was that plants with more departments tended to have better safety performance. However, the report stresses "that these relationships are weak and suggestive at best" (page 43).

D. Institute of Nuclear Power Operations (INPO), Performance Objectives and Criteria for Corporate Evaluations, August 1985.

While INPO takes care not to recommend an organizational structure, it has established a related performance objective:

Section 1.1

A. Performance Objective

The corporate organization is established in such a manner that the functions, assignments, and responsibilities of individuals are clearly defined and understood.

E. From Tennessee Valley Authority (TVA) Code II Administrative Releases:

> Organization Bulletins define the basic organization structure of TVA and the functional areas of responsibility of the Board, the General Manager, and offices and divisions. It is supplemented by separate Organization Bulletins which describe the internal structure of offices and divisions and the kinds of functions assigned to their principal components. (page 1)
>
> Offices and divisions . . . maintain current Organization Bulletins for their activities, obtaining necessary reviews and approvals of major changes. (page 2)

4.0 FINDINGS

4.1 Issue 70701 - The Role and Independence of Engineering

Discussion

Since the beginning of its nuclear program, TVA has provided essentially all its own engineering services. Before 1984, the power operations function and the engineering design function were

in separate offices. In February 1984, the Office of Power and the Office of Engineering Design and Construction were merged into a new organization called Power and Engineering. In June 1984, in announcing the new organizational structure for the merged power and engineering program, the manager of Power and Engineering also introduced a management philosophy that he called the owner/operator concept:

> The owner/operator will have responsibility for performance of the facilities he operates. He will acquire the services necessary to carry out the owner/operator's responsibilities. He will acquire these services from TVA organizations to the extent that these organizations can provide those services at competitive costs. Otherwise services will be contracted from the most competitive outside source.
>
> This concept requires that the operator takes full responsibility for regulatory compliance, quality, performance and total cost. Service organizations, by necessity, will align themselves to perform at competitive costs.

An extensive task force study was conducted to identify the changes needed in financial, budget, cost control, and time reporting systems in order to implement the owner/operator concept. In May 1985, the owner/operator philosophy was reinforced through an employee education effort called "Getting Your Signals Straight." At the same time the use of written service agreements between the Office of Engineering and the nuclear plant sites was introduced. Engineering was explicitly told that it was a service organization whose job was to provide the service the operators requested at a reasonable cost.

The ten employee concerns about the role and independence of Engineering were submitted May through July 1985. The concerns were all worded to express a possibility of future negative effects from the owner/operator philosophy. Some were worded as questions: will the Office of Engineering still have the independence? Others spoke of what "could" happen under the new organizational arrangement. None of the individuals expressing these 10 concerns submitted other concerns at the same time or provided any specific technical problems or details.

In December 1985, INPO conducted an evaluation of TVA. Findings included:

INPO Finding 1.1A-1

> Responsibility and authority for the various Office of Power and Engineering (Nuclear) organizations have not been clearly defined or sufficiently communicated. As a result, there is confusion in the organizations. . . . Examples of deficient areas included the following: a. Office of Engineering design integrity responsibility . . . .

INPO Finding 1.1A-3

> Current decentralization plans may have adverse effects on the Office of Power and Engineering (Nuclear's) stated goal of 'improved corporate oversight, direction, and support.' . . . . Examples of functional areas where decentralization presents a potential problem are as follows: a. design engineering (configuration management). . . .

INPO Finding 2.5A-7

> Communication and teamwork between the Office of Engineering and Nuclear Operations need improvement, especially at nuclear plant sites. Lack of credible long-term work priorities and schedules, not resolving misunderstandings, and not identifying resource impacts resulting from schedule changes and short-term requests have contributed to mistrust between the two organizations, and in some cases, led to duplication of effort.

In January 1986, Steven A. White became Manager of Nuclear Power. In March 1986, the new Manager of the Office of Nuclear Power (ONP) issued a revised Corporate Nuclear Performance Plan. This plan identified "uncertainty regarding lines of authority and responsibility" (page 35) as one of the major problems in TVA's nuclear program. The plan committed to the following changes in Engineering's relationship with the nuclear plant sites:

> Over a year ago, a major management decision was made to decentralize TVA's nuclear program. Site directors were created and more authority was given to the various sites with less being assumed by headquarters. I intend to alter that concept to some degree. I will continue to hold the Site director responsible for ensuring that the necessary site activities are performed in a timely manner. However, in all functional areas, such as engineering, quality assurance, licensing, and training, I will hold the headquarter's manager responsible for the technical adequacy of activities within their functional areas. (page 6)

Under this plan within the engineering organization, a project engineer was appointed for each nuclear plant. Engineering functions were transferred to the project engineer from the

Construction project manager and the site director. The design services organizations which had been established by the site directors under the owner/operator concept were dissolved, as all engineering work was consolidated in the corporate DNE. An April 8, 1986 memorandum from the Manager of ONP discontinued the use of formal service agreements between DNE.

Interviews with the WBN Project Engineer, Assistant Project Engineer for unit 1, and Assistant Project Engineer for unit 2 indicate that they have clear authority and responsibility for the technical adequacy of all engineering work. They see Engineering as an equal to Site Operations, with the independence to exercise best engineering judgments. Disagreements will naturally arise, and they are confident that the Manager of Engineering will strongly present Engineering's perspective to the Manager of ONP, who will resolve disagreements.

Although the project engineers seem clear on their authority and responsibility, no documentation of the current organization is available. Organization Bulletins, the official TVA delegation documents, are being drafted, but have not as yet been submitted for approval. However, in May 1986, TVA submitted to the NRC its Revision 9 to the QA Topical Report. That document contains a description of the new Engineering organizational structure and its relationships within the ONP. The FSAR's will be revise to reflect this new organizational arrangement by referencing the QA Topical Report in its organization chapter.

A full revision of the engineering program directives is underway. However, the regulatory-based procedures are being revised first, and the Engineering Organization Manual has been given lowest priority.

Conclusion

Based on the above evidence, the lack of Engineering independence was a problem that existed at the time the concerns were expressed. The organizational philosophy and structure were tilted in favor of short-term operational decisions despite Engineering concerns. Engineering was being told to give Operations what it requested and was discouraged from elevating disagreements between the organizations to a higher level for decision. This situation has since been corrected. Engineering's role has been strengthened and checks and balances are in place in the organization to ensure that disagreements between Engineering judgments and operational considerations are heard and properly resolved.

The employees who expressed concern about potential harm from Engineering's lack of independence did not identify any specific Engineering concerns that were ignored. However, other employees

have identified approximately 300 technical concerns that are currently being evaluated by the Engineering Category Evaluation Group of the Employee Concerns Task Group. Those evaluations will ensure that any technical problems caused by the organizational problem are properly identified and corrected.

The current Engineering organization has not been clearly documented in an approved Organization Bulletin and communicated to employees. (See TVA Code II, Administrative Releases and INPO Performance Objective 1.1.A.) This is a problem requiring corrective action.

4.2 Issue 70702 - Redundancy in Creation of Nuclear Services Branch in Construction

Discussion

The question of who should perform modifications work at TVA nuclear plants is a subject of long-standing organizational disagreement. The issue initially arose when Construction and Power Operations were in separate offices and had separate reporting channels to the General Manager. In 1981, the General Manager issued a memorandum to resolve the conflict. It stated that Construction "shall perform all major modifications work at licensed nuclear generating facilities." However, conflict continued over the definition of what was not "major" work and, therefore, could properly be done by maintenance personnel.

In February 1984, the Office of Power and the Office of Engineering Design and Construction were merged into a new organization called Power and Engineering.

In June 1984, when announcing the new organizational structure for the merged Power and Engineering Program, the manager of Power and Engineering also introduced a management philosophy that he called the owner/operator concept. This concept is described in 4.1. above.

In September 1984, Construction created the Nuclear Services Branch. Its responsibility as stated in the Organization Bulletin was:

> The Nuclear Services Branch provides support services to ONP, after construction permits expire, including approved additions and improvements to existing plants and structures. It establishes and maintains an effective client/service relationship with nuclear plant site directors. It organizes and maintains a project management, engineering, and craft supervision core capability to efficiently respond to and execute approved work programs within schedule and according to other requirements established by ONP. Site project managers perform work within the nuclear power quality assurance program, document

control procedures, plant radiological, safety, and security procedures, as well as functional and administrative control of the nuclear plant site directors.

According to Construction, the logic behind establishment of the Nuclear Services Branch was that there would be modifications and/or manpower peaks that the site organization could not handle with its in-house capability. Therefore, if the Nuclear Services Branch had a ready core of expertise, it would be able to market its services. The groups at each site were funded on a trial basis to see if they could provide enough services to pay their own way. If there was no market for their services at a particular site on a recurring basis, staff would not be permanently assigned to the site.

At the time the Nuclear Services Branch was created, the site directors had reporting to them an organization called "Modifications." Its responsibility, as stated in the Organization Bulletin, was described as follows:

> Modifications implements all plant modifications. It provides onsite personnel and other resources necessary to accomplish the Modifications workload through utilization of its own resources, other TVA organizations, or outside contractors.

As noted earlier in January 1986, Steven A. White was appointed as Manager of Nuclear Power. Along with numerous other changes, the Manager of ONP discontinued the use of service agreements between ONP organizations and generally reversed the trend toward decentralization under the owner/operator philosophy.

On June 9, 1986, the Modifications Groups that reported to the site directors were merged with the Nuclear Services Branch in Nuclear Construction. The merger created three branches in Nuclear Construction - the WBN Modifications Branch, the Sequoyah Modifications Branch, and the Browns Ferry Modifications Branch. According to Mr. White, "This will consolidate all the units performing modifications work under one division management to ensure continuity of modifications services among the three plant sites. This will also give us flexibility to use the modifications resources where they are needed, when they are needed, such as during outages."

Information on the reorganization was widely distributed to employees through employee meetings and office-wide publications, such as the Nuclear Dispatch and Upfront. A comprehensive operations plan for reorganizing the modifications unit and Nuclear Services Branch was prepared and widely distributed. However, the new Modifications Branches have not as yet been documented in formal Organization Bulletins.

Conclusion

A. Based on the evidence presented above, the issue was factual but has since been resolved. There is currently no redundancy in the organization of the modifications function in ONP. At the time the issue was raised, there was duplication of functions between the Modifications Group under the site director and the Nuclear Services Branch in Construction. This duplication was intentionally built into the organizational structure and was consistent with the management philosophy current at that time which stressed efficiency through marketing and competition. Accounting procedures were in place to determine over a period of time whether or not the organization was paying for itself through service agreements.

   That time of reckoning never arrived, however, because top managers and management philosophy for the entire ONP changed. The recent merger of modifications functions is consistent with the current philosophy of centralized control of functional areas and eliminates any question of duplication.

B. The reorganization of the modifications functions has not been documented in an approved Organization Bulletin. (See TVA Code II, Administrative Releases and INPO Performance Objective 1.1.A.) This problem requires corrective action.

4.3 Issue 70703 - Too Many Separate Groups And Employees

Discussion

Two of the concerns that raised this issue were expressed by the same person and contend that Engineering is poorly organized at the BLN site. Specifically, the concerned individual believed that "one single engineering group is needed onsite to do everything, instead of separate engineering groups such as Preop, Maintenance, Engineering Test, Site Services, Design Services, etc." The concerned individual believed that combining these groups would reduce the total number of engineers.

These concerns were evaluated by the line organization and a report was sent to the concerned individual on February 5, 1986. The report found the concerns valid and reported that corrective action had been taken. BLN consolidated all site engineers into a single organization. This consolidation eliminated redundancy while providing an improved method for coordination of activities. The total number of engineers in this organization is significantly less than the number previously employed.

The other concern in this issue states, "Construction and operation of the facility could be more economically accomplished with fewer separate groups/managers/employees and less competition between groups." This concern is so general and broad that no baseline can be established against which to do an evaluation. In fact, one empirical study cited in Section 3.1 suggests (but does not prove) that nuclear power plants with more departments have better safety performance. Specific examples of redundancy were given in the BLN engineering concerns and the modifications/construction concerns addressed in Section 4.2. These specifics have been evaluated and corrective action taken.

Conclusion

This issue was factual but corrective action had been taken prior to this evaluation.

4.4. Issue 70704 - WBN Project Control

Discussion

The CI contends that WBN Construction is not run by the Manager, but by the Project Control Group.

The Project Control Group reports to Project Management Services which reports to the WBN Project Manager. This reporting relationship existed at the time the concern was expressed and has not changed. This concern appears to address the extent of personal influence the Project Control Group had with the Project Manager, rather than the reporting relationship itself.

Conclusion

No baseline can be established against which to judge the proper extent of influence a project control group should have on a construction project. The individual who was Project Manager at the time the concern was expressed has since retired and been replaced. Therefore, this issue cannot be verified as factual.

4.5 Issue 70705 - Discipline Staffing

Discussion

The CI contends that morale is adversely affected by "discipline staffing," a type of matrix organization initiated in the DNE in 1984. This is the only concern that addresses discipline staffing. Under discipline staffing, engineers administratively report to discipline branches: Mechanical Engineering, Civil Engineering, Nuclear Engineering, etc. They are then assigned to project managers who are not within the branches and report separately to the Manager of Nuclear Engineering. The individual engineer is responsible both to his or her discipline branch chief and to the project manager. This "two-boss" relationship is the distinguishing feature of a matrix organization. According to organization experts, matrix organizations take several years to mature. Different behaviors are required and it takes time for individuals to adjust. During this time of adjustment the morale of some employees may be affected, even though the organizational design is itself sound.

Conclusion

The long term morale effects of discipline staffing cannot be determined until the period of transition is over. Other aspects of the engineering organization are being evaluated as a separate element within this subcategory. Consequently, this issue cannot be verified as factual.

4.6 Issue 70706 - Discretionary Safety Reviews

Discussion

These two concerns from one employee suggest that underfunding of a particular department results in a lack of discretionary safety reviews.

Conclusion

Insufficient information is available from the K-forms to determine what organization the employee is referring to. Both QTC and NRC masked the information to protect confidentiality. Since no further information is available, further evaluation of the concerns is not possible. If this situation still exists, the employee is encouraged to repeat the concern to the permanent Employee Concern Program.

4.7 Issue 70707 - Manager of ONP Not Independent

Discussion

"CI feels that the new nuclear manager is a front as he will not be allowed to remain independent."

Although no baseline can be established on how "independent" a top executive should be from the Board of Directors that hired him, public statements were made by both the Board and Mr. White when he was hired concerning his independence.

A review of documents and statements made by Mr. White after six months as TVA's Manager of Nuclear Power result in the following findings:

A. The legally binding Memorandum of Understanding between Steven A. White and the Board of Directors of the Tennessee Valley Authority states in part:

> The Manager of Nuclear Power will have direct authority and responsibility for the management, control and supervision of TVA's entire nuclear power program, including but not limited to, the design, construction, maintenance and operation of all existing or planned TVA nuclear power plants. The Manager of Nuclear Power shall have the authority to establish management and operating policies and procedures related to TVA's nuclear power program. The Manager of Nuclear Power shall also have the authority to hire, remove, assign, reassign, or direct any personnel supplied by outside contractors, and subject to the approval of the Board of Directors with respect to senior level TVA managers in accordance with existing reservation of authorities by the TVA Board, any TVA personnel engaged in nuclear power program activities as he may deem necessary or desirable to implement such policies or procedures.

B. On June 12, 1986, Mr. White gave the following testimony before a committee of the United States Congress:

> Mr. Shelby: The Board has not tried to intimidate you yet, have they?
>
> Mr. White: No sir, they have not.
>
> Mr. Shelby: And if they did, would you leave?
>
> Mr. White: In a second.

Mr. Shelby: Do you need more latitude from the Board?

Mr. White: No I do not, Mr. Shelby. I have the authority and the responsibility that goes with it and that was one of the several conditions that I made sure of before I took the job.

C. It is difficult to establish baseline criteria to judge the amount of independence the Manager of Nuclear Power needs or actually has. However, the Memorandum of Understanding appears to give Mr. White a wide scope for independent action.

Conclusion

Based upon the evidence presented above, this issue could not be verified as factual.

4.8 Issue 70708 - BLN Project Management

Discussion

"No real project management for BLN. There is no single person onsite who is in charge of all site organizations."

This concern was evaluated by the line organization and a report was sent to the concerned individual on February 5, 1986. The response states that the ONP management also recognized this problem and corrected the situation by appointing James P. Darling as Site Director for BLN. Mr. Darling is now responsible for all activities associated with the design, construction, and operation of the Bellefonte facility. Mr. Darling's appointment to this position was effective October 7, 1985.

Conclusion

The concern identified a problem that existed when the concern was filed. Corrective action has been taken.

4.9 Issue 70709 - Management Control of Personnel Matters

Discussion

"Management lacks control over personnel matters; merit raises, personnel policies, etc., are not under direct control of line management."

This concern was evaluated by the line organization and a report was sent to the concerned individual on February 5, 1986. This response acknowledges that in many cases line management has very little flexibility in personnel matters. Line managers as well as personnel managers are controlled by TVA regulations and the General Agreement and Articles of Agreement negotiated with recognized labor organizations. In many cases these regulations are designed to ensure fairness for individual employees and consistency across organizations. Numerous employees have expressed concerns about favoritism in personnel matters which indicates a need for some controls on a line manager's flexibility in personnel matters. Those concerns are being evaluated in other Management and Personnel subcategories.

Conclusion

No baseline requirements can be identified for determining the correct balance between control and flexibility in personnel matters. Therefore, this concern is factually accurate, but it does not identify a problem requiring corrective action.

5.0 COLLECTIVE SIGNIFICANCE

TVA's nuclear power program has undergone numerous major organization changes during the last several years. This organizational instability has caused many employees confusion which was made worse by the lack of clear statements of the responsibilities of the new organizations. The major decentralization move in 1985, in particular, created most of the concerns evaluated in this subcategory. The most recent organization changes have reversed the move toward decentralization and corrected the specific concerns. The general concerns about organization can only be put to rest by effective implementation of the Nuclear Performance Plan. The intent of that plan is to create a stable, clearly documented, and easily understood ONP organizational structure.

6.0 CAUSES

The confusion about organization resulted from the failure to have approved Organization Bulletins for DNC and DNE. The cause of this failure to document organization changes as they occur is that, while generally accepted as useful, such documents receive a lower priority than the revision of technical procedures. In addition, organization descriptions for use within TVA are given lower priority than updating the descriptions in documents, such as Technical Specifications, that are reviewed by NRC. The negative result of this delay is that employees are left insecure and confused about organization changes and the reasons for them. It is the responsibility of the Manager of ONP to have Organization Bulletins prepared for each of the divisions within the ONP.

7.0 CORRECTIVE ACTION AS A RESULT OF THIS EVALUATION

The Nuclear Procedures Staff and the Nuclear Personnel Staff are jointly implementing an action plan which will develop approved organization charters. Once the charter statements are approved, they will be converted to Organization Bulletins and forwarded to Knoxville. In addition, the finalized organization will be highlighted in ONP's Up Front newsletter with pictorial organization charts and brief organization synopses (CATD No. 707-NPS-01).

8.0 ATTACHMENTS

Attachment A, Subcategory Summary Table
Attachment B, List of Concerns by Issue

FERENCE - ECPS132J-ECPS132C
EQUENCY - REQUEST
> - ISSS - RHM

EGORY: MP MGT. & PERS. ISSUES

ATT[illegible]ENT A
TENNESSEE [illegible]LEY AUTHORITY
OFFICE OF NUCLEAR POWER
EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS)
EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY
SUBCATEGORY: 707 BLN PROJECT MANAGEMENT

RUN TIME - 10:04:39
RUN DATE - 03/10/87

REF. SECTION #
CAT - MP
SUBCAT - 707

CONCERN NUMBER	CAT	SUB CAT	SHRD	PLT LOC	1 REPORT APPL / 2 SAF RELATED BF BL SQ WB	HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION
NONPEC002	01	MP 70708	N	BLN	1 N N N N 2 NA NA NA NA		OECP	NO REAL PROJECT MANAGEMENT FOR BLN. THERE IS NO ON-SITE SINGLE PERSON WHO IS TOTALLY IN CHARGE OF ALL SITE ORGANIZATIONS.
NONPEC004	01	MP 70709	N	BLN	1 N N N N 2 NA NA NA NA		OECP	LACK OF CONTROL OVER PERSONNEL MATTERS - MERIT RAISES, PERSONNEL POLICIES, ETC. ARE NOT UNDER DIRECT CONTROL OF LINE MANAGEMENT.
NONPEC009	01	MP 70703	N	BLN	1 N N N N 2 NA NA NA NA		OECP	POOR ORGANIZATION OF ENGINEERING RESOURCES - ONE SINGLE ENGINEERING GROUP IS NEEDED ON SITE TO DO EVERYTHING .
NONPEC010	01	MP 70703	N	BLN	1 N N N N 2 NA NA NA NA		OECP	TOO MANY ENGINEERS - COMBINING GROUPS NOTED IN BLNONPEC009 WOULD REDUCE TOTAL NUMBERS.
-85-119-00301 T50195		MP 70702	S	WBN	1 N N N N 2 NA NA NA NA		QTC	NUCLEAR SERVICES BRANCH SERVES NO PURPOSE WHICH COULD NOT BE PERFORMED BY CONSTRUCTION CRAFT OR MODIFICATIONS BRANCH. FAVORITISM, NEPOTISM IS BEING PRACTICED IN THE HIRING PRACTICES OF NSB. CI HAS NO FURTHER INFORMATION. CONSTRUCTION DEPT. CONCERN.
	02	MP 71813	S	WBN	1 N N N N 2 NA NA NA NA			
-85-030-00101 T50004		MP 70701	N	WBN	1 N N N N 2 NA NA NA NA		QTC	THE UNIFICATION OF ENGINEERING AND SITE OPERATIONS COULD LEAD TO A CONDITION WHERE ECONOMIC DECISIONS COULD PREVAIL OVER ENGINEERING REQUIREMENTS.
-85-071-00101 T50078		MP 70701	N	WBN	1 N N N N 2 NA NA NA NA	IN-85-071-001	QTC	CI IS CONCERNED WITH MANAGEMENT POLICY OF THE SITE DIRECTOR BEING RESPONSIBLE FOR BOTH THE OPERATION AND ENGINEERING ON SITE. OE PERSONNEL ARE BEING TOLD THAT NUCLEAR POWER IS THE CLIENT AND CONTROLS THE 'PURSE STRINGS' AND OE IS TO PLEASE THEM, IF OE DOESN'T, THEY (NUCLEAR POWER) HAVE THE OPTION TO CONTRACT OUT THE WORK TO OUTSIDE ENGINEERING FIRMS.

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.

FERENCE - ECPS132J-ECPS132C
EQUENCY - REQUEST
? - ISSS - RWM

TENNESSEE VALLEY AUTHORITY
OFFICE OF NUCLEAR POWER
EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS)
EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY

RUN TIME - 10:04:39
RUN DATE - 03/10/87

EGORY: MP MGT. & PERS. ISSUES
SUBCATEGORY: 707 ROLE AND INDEPENDENCE OF ENGINEERING

REF. SECTION 1
CAT - MP
SUBCAT - 707

CONCERN NUMBER	CAT	SUB CAT	SHRD	PLT LOC	1 REPORT APPL 2 SAF RELATED BF BL SQ WB	HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION
-85-072-00101 T50082	MP	70701	N	WBN	1 N N N N 2 NA NA NA NA	IN-85-072-001	QTC	NUCLEAR POWER OFFICE IN CHATTANOOGA DOES NOT HAVE TO HAVE THE OFFICE OF ENGINEERING DO ITS DESIGN WORK, WHIC H MEANS THAT IF AN OUTSIDE A/E FIRM DOES BAD WORK, THEN IT WOULD RUIN OE 'S REPUTATION. C/I HAD NO FURTHER I NFORMATION.
-85-074-00101 T50066	MP	70701	N	WBN	1 N N N N 2 NA NA NA NA	IN-85-074-001	QTC	WILL THE OFFICE OF ENGINEERING (OE) PERSONNEL ASSIGNED TO AND WORKING AT WATTS BAR BE INDEPENDENT FROM DIVIS ION OF POWER PRODUCTIONS (DPP) SCHED ULES AND OVERALL INFLUENCE? CI IS C ONCERNED THAT DPP WILL PRESSURE SITE OE PERSONNEL INTO MAKING UNSOUND EN GINEERING DECISIONS DUE TO DPP'S SCH EDULE CONSTRAINTS. CI COULD NOT PRO VIDE ANY SPECIFICS/DETAILS.
-85-076-00101 T50066	MP	70701	N	WBN	1 N N N N 2 NA NA NA NA	IN-85-076-001	QTC	WITH THE NEW OWNER-OPERATOR CONCEPT AND OFFICE OF ENGINEERING (OE) PERSO NNEL LOCATED AT THE SITE, WILL THE O FFICE OF ENGINEERING STILL HAVE THE TECHNICAL EXPERTISE AND INDEPENDENCE TO ACCOMPLISH THEIR REQUIRED WORK L OAD IN A TIMELY MANNER? CI FEELS TH AT OE PERSONNEL SHOULD NOT BE UNDER AND REPORT TO NUCLEAR POWER PRODUCTI ON AT WATTS BAR OR OTHER TVA SITES. NO SPECIFIC PROBLEMS/DETAILS WERE P ROVIDED BY THE CI.

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.

EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY
EGORY: MP MGT. & PERS. ISSUES
SUBCATEGORY: 707 ROLE AND INDEPENDENCE OF ENGINEERING

REF. SECTION 8
CAT - MP
SUBCAT - 707

ONCERN 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
-85-077-00101 T50078	MP	70701	N	WBN	1 N N N N 2 NA NA NA NA	IN-85-077-001	QTC	UNDER THE NEW ORGANIZATION, OFFICE O F ENGINEERING IS BEING TREATED AS A CLIENT OF NUCLEAR POWER. TVA UPPER MANAGEMENT HAS SAID THAT NUCLEAR POW ER HAS THE "PURSE STRINGS" AND WHAT NUCLEAR POWER WANTS IS WHAT OE WILL DO. IF AN OE STUDY FINDS A PROBLEM, THEN VERY POSSIBLY THE FUNDS TO OE WILL BE CUT OFF. THIS MAY CAUSE LOS S OF CHECK AND BALANCES BETWEEN NUCL EAR POWER AND OE DEPARTMENT. C/I CO ULD NOT PROVIDE ANY SPECIFIC PROBLEM S OR EXAMPLES.
-85-097-01601 T50223	MP	70702	N	WBN	1 N N N N 2 NA NA NA NA	IN-85-097-016	QTC	TVA'S EXECUTIVE-LEVEL MANAGERS ENGAG E IN INTER-DIVISIONAL POWER STRUGGLE S RATHER THAN WORK FOR THE BEST OUTC OME FOR TVA. EXAMPLE: DEPARTMENT (K NOWN) WAS CREATED TO MAINTAIN UNIT 1 UNTIL IT WENT OPERATIONAL, BUT NOW THE DEPARTMENT DOES CONSTRUCTION WOR K AND IS REDUNDANT TO THE CONSTRUCTI ON DEPARTMENT. THE DEPARTMENT IS NO T NEEDED, BUT IS NOT DISBANDED BECAU SE DOING SO WOULD REDUCE AN EXECUTIV E-LEVEL MANAGER'S (KNOWN) POWER BASE . CI HAS NO MORE INFORMATION. CONS TRUCTION DEPARTMENT CONCERN.
-85-101-00101 T50004	MP	70701	N	WBN	1 N N N N 2 NA NA NA NA		QTC	MOVING OE TO NUCLEAR PLANT SITES COU LD RESULT IN SOME LOSS OF INDEPENDEN CE AND SINCE OE WORKS DIRECTLY UNDER THE ORGANIZATION OPERATING THE PLAN T, PRESSURE COULD BE BROUGHT TO BEAR TO OVERLOOK SAFETY PROBLEMS. OE SH OULD REMAIN INDEPENDENT FROM NUCLEAR POWER
-85-105-00101 T50004	MP	70701	N	WBN	1 N N N N 2 NA NA NA NA		QTC	NUCLEAR OPERATIONS MAY BE ABLE TO EA SILY COMPROMISE DESIGN ENGINEERS WHO ARE LOCATED ON-SITE AT WBNP FOR SAK E OF THEIR EXPEDIENCIES OF OPERATION S

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.

FERENCE - ECPS132J-ECPS132C
EQUENCY - REQUEST
P - ISSS - RWM

TENNESSEE VALLEY AUTHORITY
OFFICE OF NUCLEAR POWER
EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS)
EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY

RUN TIME - 10:04:39
RUN DATE - 03/10/87

EGORY: MP MGT. & PERS. ISSUES
SUBCATEGORY: 707 WBN PROJECT CONTROL

REF. SECTION
CAT - MP
SUBCAT - 707

CONCERN NUMBER	CAT	SUB CAT	SHRD	PLT LOC	1 REPORT APPL 2 SAF RELATED BF BL SQ WB	HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION
-85-293-02401 T50267	MP	70704	N	WBN	1 N N N N 2 NA NA NA NA		QTC	THE WATTS BAR NUCLEAR PLANT IS NOT R UN BY THE MANAGER BUT BY THE PROJECT CONTROL GROUP. NAMES/DETAILS KNOWN TO QTC, WITHHELD TO MAINTAIN CONFID ENTIALITY. NO FURTHER INFORMATION M AY BE RELEASED. CONSTRUCTION DEPART MENT CONCERN. CI HAS NO FURTHER DET AILS.
-85-799-00201 T50071	MP	70702	N	WBN	1 N N N N 2 NA NA NA NA		QTC	THE CREATION OF ORGANIZATIONS WITHIN TVA (WBNP) TO EITHER PROTECT OR EST ABLISH NEW POSITIONS IS QUESTIONABLE . EXAMPLE: OUTAGE GROUP TO FIELD S ERVICE TO MODIFICATION TO NSB. NO A DDITIONAL INFORMATION AVAILABLE.
-85-992-00301 T50101	MP	70702	N	WBN	1 N N N N 2 NA NA NA NA	IN-85-992-003	QTC	DEPARTMENT (KNOWN) WAS FORMED TO FIL L A FUNCTIONAL AREA IN WHICH TVA HAD ALREADY ESTABLISHED ADEQUATE COVERA GE. CI EXPRESSED THAT THIS DEPARTME NT WAS ACTUALLY FORMED TO EXTEND THE EMPLOYMENT OF SOME CONSTRUCTION PER SONNEL AND MANAGEMENT INDIVIDUALS (N AMES NOT KNOWN). CI STATED THAT THI S TYPE OF INCIDENT IS SELF DEFEATING TO TVA'S POLICY OF STREAMLINING". DETAILS KNOWN TO QTC. CI HAS NO FUR THER INFORMATION. NO FOLLOW UP REQU IRED.
-86-009-00201 T50108	MP	70601	S	WBN	1 N N N N 2 NA NA NA NA	IN-86-009-002	QTC	CONSTRUCTION AND OPERATION OF THE FA CILITY COULD BE MORE ECONOMICALLY AC COMPLISHED WITH FEWER SEPARATE GROUP S/MANAGERS/EMPLOYEES, AND LESS "COMP ETIION" BETWEEN GROUPS. CI HAS NO F URTHER INFORMATION NO FOLLOW UP REQU IRED
02	MP	70703	S	WBN	1 N N N N 2 NA NA NA NA			

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.

TENNESSEE VALLEY AUTHORITY
OFFICE OF NUCLEAR POWER
EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS)
EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY

EGORY: MP MGT. & PERS. ISSUES
SUBCATEGORY: 707 ROLE AND INDEPENDENCE OF ENGINEERING

REF. SECTION 5
CAT - MP
SUBCAT - 707

ONCERN NUMBER	CAT	SUB CAT	S H R D	PLT LOC	1 REPORT APPL 2 SAF RELATED BF BL SQ NB	HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION
-85-030-00101 T50091	MP	70701	N	WBN	1 N N N N 2 NA NA NA NA		QTC	SINCE THE TVA REORGANIZATION A YEAR AGO, OE HAS NOT HAD THE ORGANIZATIONAL FREEDOM AND INDEPENDENCE TO EXPRESS CONCERNS OR TO IDENTIFY AND RESOLVE ENGINEERING PROBLEMS AT TVA NUCLEAR PLANTS (INCLUDING WATTS BAR). OE IS NOW FUNCTIONING AS A CONTRACTOR TO THE NUCLEAR PLANTS AND ONLY RESPONDS TO DIRECTIONS PROVIDED BY THE PLANTS. OE IS NO LONGER ALLOWED TO INDEPENDENTLY IDENTIFY AND RESOLVE ENGINEERING PROBLEMS AS THEY COULD PREVIOUSLY. FEWER PROBLEMS WILL BE IDENTIFIED AND RESOLVED. ANONYMOUS-
M-86-006-00201 T50264	MP	70705	N	WBN	1 N N N N 2 NA NA NA NA		QTC	MORALE IS ADVERSELY AFFECTED BY "DISCIPLINE STAFFING", WHICH CAUSES AN EMPLOYEE TO FEEL LIKE AN OBJECT OR A NUMBER INSTEAD OF A PERSON. CI STATED THAT THEY HAVE NEVER SEEN AN EMPLOYEE YIELD TOTAL ALLEGIANCE TO TWO BOSSES. AS A SOLUTION, CI SUGGESTED DOING AWAY WITH "DISCIPLINE STAFFING" AND ADOPT DISCIPLINE, BUT WITH A RESPECT FOR THE PERSONAL TOUCH AND SELF WORTH OF THE INDIVIDUAL. NO FURTHER INFORMATION IN FILE. ANONYMOUS CONCERN.
P-86-020-00101 T50264	MP	70706	N	WBN	1 N N N N 2 NA NA NA NA		QTC	FUNDING FOR A DEPARTMENT (KNOWN) IS APPROVED/CONTROLLED BY (DEPARTMENT KNOWN). EXTRAORDINARY EFFORT IS REQUIRED TO GET MAN-HOURS APPROVED TO INVESTIGATE SAFETY CONCERNS OUTSIDE THE ORIGINAL DEPARTMENT SCOPE OF WORK, THEREFORE, SIGNIFICANT SAFETY ISSUES COULD BE LEFT UNEVALUATED. NUCLEAR POWER DEPARTMENT CONCERN. NUCLEAR POWER DEPARTMENT CONCERN. NO ADDITIONAL INFORMATION AVAILABLE IN FILE.

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.

:GORY: MP MGT. & PERS. ISSUES
SUBCATEGORY: 707 DISCRETIONARY SAFETY REVIEWS

REF. SECTION &
CAT - MP
SUBCAT - 707

ONCERN 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
-86-020-00301 T50264	MP	70706	N	WBN	1 N N N N 2 NA NA NA NA		QTC	DEPARTMENT (KNOWN) IS NOT CONDUCTING DISCRETIONARY SAFETY REVIEWS AS PER THEIR CHARTER DUE TO A LACK OF BUDGET. A SAFETY REVIEW SECTION WAS CREATED, HOWEVER, NO BUDGET WAS ALLOCATED FOR A STAFF. SO EVEN WITH AN ATTEMPT AT CORRECTIVE ACTION, AN EFFECTIVE INDEPENDENT SAFETY REVIEW PROGRAM HAS NOT BEEN ESTABLISHED AND IMPLEMENTED. DETAILS KNOWN TO QTC, WITHHELD DUE TO CONFIDENTIALITY. NO FURTHER INFORMATION MAY BE RELEASED.
-86-022-01901 T50269	MP	70707	N	WBN	1 N N N N 2 NA NA NA NA		QTC	CI FEELS THAT THE NEW NUCLEAR MANAGER IS A "FRONT" AS HE WILL NOT BE ALLOWED TO REMAIN INDEPENDENT. CONSTRUCTION DEPARTMENT CONCERN. CI HAS NO FURTHER INFORMATION.
-85-047-00101 T50070	MP	70701	N	BFN	1 N N N N 2 NA NA NA NA	XX-85-047-001	QTC	GENERAL CONCERN WHETHER OPERATION ENGINEER OR NUCLEAR POWER SHOULD HAVE RESPONSIBILITY FOR DESIGN INTEGRITY OF BROWN'S FERRY THROUGH THE LIFE OF THE PLANT. C/I QUESTIONS NUCLEAR POWER'S ABILITY AND COMPETENCE TO DETERMINE WHAT DESIGN ISSUES ARE CRITICAL TO PLANT SAFETY.

24 CONCERNS FOR CATEGORY MP SUBCATEGORY 707

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.

ATTACHMENT B

ORGANIZATION

List of Concerns by Element/Issue

The Organization Subcategory (70700) is comprised of 24 concerns which were evaluated as nine issues.

70701 - Role and Independence of Engineering

IN-85-030-001
IN-85-071-001
IN-85-072-001
IN-85-074-001
IN-85-076-001
IN-85-077-001
IN-85-101-001
IN-85-105-001
PH-85-030-001
XX-85-047-001

70702 - Redundancy in Creation of Nuclear Services Branch

EX-85-119-003
IN-85-097-016
IN-85-799-002
IN-85-992-003

70703 - Too many Separate Groups and Employees

BLN-ONP-EC009
BLN-ONP-EC010
IN-86-009-002

70704 - WBN Project Control

IN-85-293-024

70705 - Discipline Staffing

WBM-86-006-002

70706 - Discretionary Safety Reviews

WBP-86-020-001
WBP-86-020-003

70707 - Manager of ONP Not Independent

WBP-86-022-019

70708 - BLN Project Management

BLN-ONP-EC002

70709 - Management Control of Personnel Matters

BLN-ONP-EC004