

TVA EMPLOYEE CONCERNS
SPECIAL PROGRAM

REPORT NUMBER: 72000

REPORT TYPE: Management and Personnel Subcategory

REVISION NUMBER: 3

TITLE: Personnel Records

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REASON FOR REVISION: Incorporation of final evaluator comments.

PREPARATION

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March 17, 1987
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CONCURRENCE (FINAL REPORT ONLY)

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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).

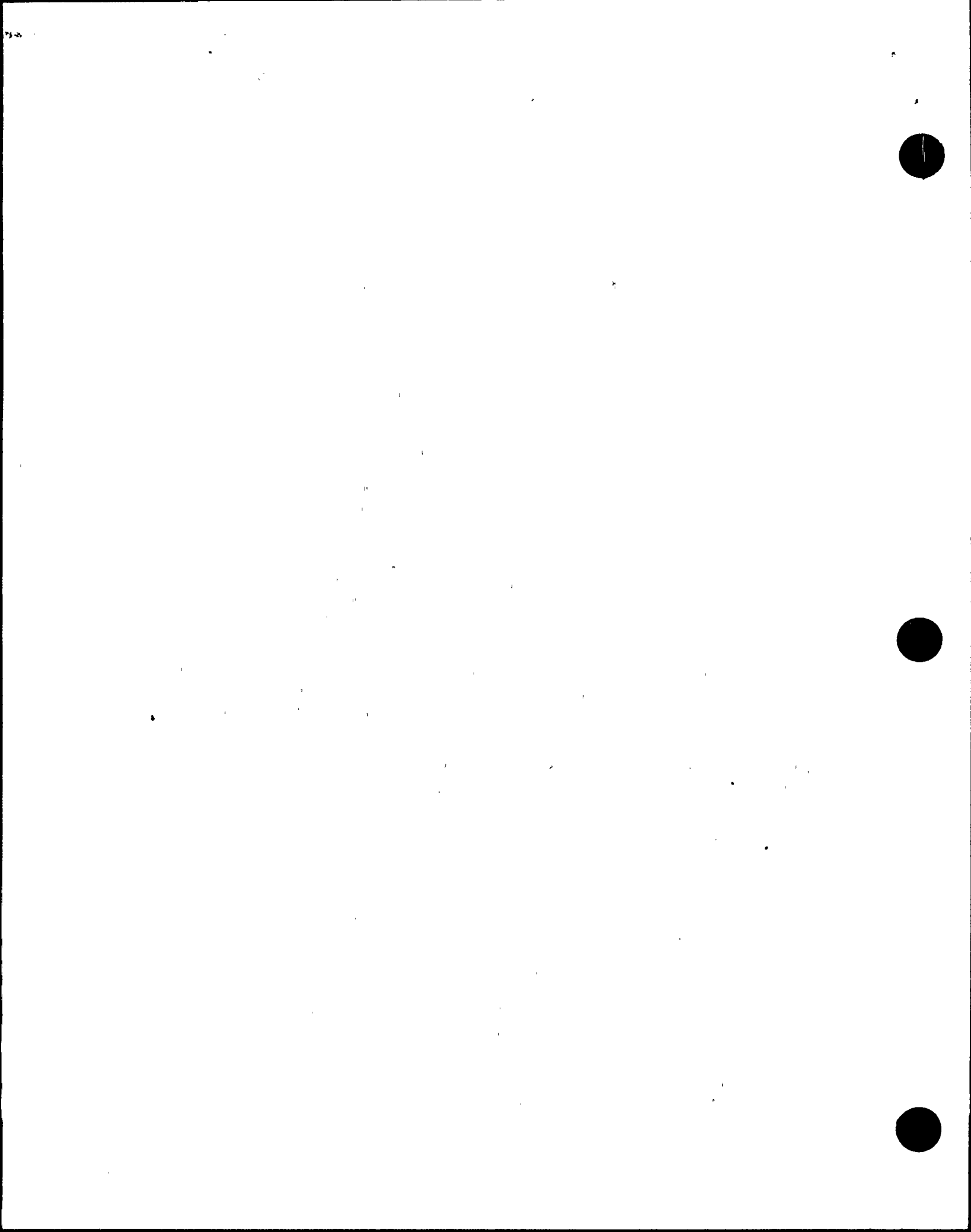
The ECSP addressed over 5800 employee concerns. Each of the concerns was a formal, written description of a circumstance or circumstances that an employee thought was unsafe, unjust, inefficient, or inappropriate. The mission of the Employee Concerns Special Program was to thoroughly investigate all 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.



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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)



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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
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
NQAH	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)
NUHARC	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



1.0 CHARACTERIZATION OF ISSUES

1.1 Introduction

This report covers the subcategory of Personnel Records. It addresses 8 issues raised about the maintenance, the accuracy, the disappearance, the misleading coding, the unauthorized access, and the falsification of TVA personnel history records (PHRs) and the access to non-PHR files by the employees. All the concerns in this subcategory are generically applicable to any TVA site.

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

To locate the issue in which a particular concern is evaluated, consult the following attachments:

Attachment A, Subcategory Summary Tables
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

There are 22 concerns in the Personnel Records subcategory report (72000). These 22 concerns are grouped into four elements addressing a total of 8 issues. Two of the issues were about management's maintenance of separate records which employees could not access. Three of the issues were about the inaccuracy of the records and the requirements of the Privacy Act. One of the issues was about the misuse of information by supervisors. One miscellaneous issue was about unauthorized access of a personnel record by another employee and one miscellaneous issue was about management falsifying personnel record documents.

1.2.1 Secret Records

About one half of the concerns in this element specifically mentioned the Construction Office or the Division of Nuclear Construction (DNC) Superintendent; three mention



Office of Nuclear Power (ONP) plant operations organizations: two at Watts Bar Nuclear Site (WBN) and one at Sequoyah Nuclear Site (SQN). Two were not specific about the organizational group.

A. Issue 72001 - T&L Files and "Secret" Records

This issue contains eight concerns addressing the possible maintenance of personnel files other than the official TVA PHRs. Most of the concerns in this element stated that employees cannot review these non-PHR personnel files; thus employees have no knowledge of the file contents and no opportunity to contest information in the files.

B. Issue 72002 - Personnel Notes Kept by Supervisor

One concern raises an issue about misuse of personnel notes made by supervisors.

1.2.2 Flawed Records

The issues in this element address Privacy Act requirements that records on individuals be maintained with such accuracy, completeness, relevance, and timeliness as to ensure fairness to the individual in any determinations made on the basis of those records. Ten of these eleven concerns were from DNC at WBN. The source of the other concern was unspecified.

A. Issue 72003 - Inaccurate or Out-of-Date Personnel Record Documents

Most of the concerns in this issue contend that personnel record documents are inaccurate or out of date; therefore, determinations made on the basis of such records would not be fair to the individual.

B. Issue 72004 - Disappearance of Trades and Labor (T&L) Files

This issue addresses the disappearance of personnel files kept in the Construction Superintendent's office.



C. Issue 72005 - Eligibility Codes for Re-employment

This issue contends that personnel files contain a code on eligibility for rehire which is often in conflict with the evaluation of the employee.

1.2.3 Misuse of Records

The two concerns in this element were from DNC at WBN.

A. Issue 72006 - Supervisors Misused Information in Personnel Records

One concerned individual (CI) suggests that information in field files was used to keep supervisors informed on "whistle blowers."

The other CI contends that social security numbers were used without the employees' authorization to monitor and track employee activities such as training.

1.2.4 Miscellaneous

Three concerns in this element were from DNC at WBN. The other concern was from ONP at SQN.

A. Issue 72007 - Unauthorized Access to Personnel Records

This issue contends that there was unauthorized access to the personnel records of another employee.

B. Issue 72008 - Falsification of Personnel Records

This issue contains two contentions that management has falsified documents in personnel records.

2.0 SUMMARY

2.1 Summary of Issues

This subcategory report examined the issues stemming from employee concerns about the personnel records kept on them.

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.



The evaluation of these issues involved research into ONP, and particularly WBN, personnel recordkeeping system; inspection of personnel files; and the conducting of interviews.

2.3 Summary of Findings

The issues concentrated on trades and labor (T&L) field files rather than the employee's permanent file, the Personal History Record, which is usually referred to as the PHR.

One specific finding was that the procedure used elsewhere for removing outdated warning letters from the personnel files was not used for T&L files in the Office of the Construction Superintendent.

2.4 Summary of Collective Significance

The major problem in this subcategory was that during the time period when these issues were raised, neither employees nor construction management recordkeepers seemed to be aware of employees' rights to review the personnel records kept on them.

2.5 Summary of Causes

The cause was seen as the lack of instruction for both supervisors and employees on employee rights under the Privacy Act of 1974.

2.6 Summary of Corrective Action

Corrective action includes a presentation in the new Supervisors' Handbook of information on the requirements of the Privacy Act and an article in Inside TVA informing employees of their right of access to their personnel records.

3.0 EVALUATION PROCESS

3.1 General Methodology

The evaluation of this subcategory was conducted according to the Evaluation Plan for the ECTG and the Evaluation Plan for the Management and Personnel Group. The concern case files were reviewed. Source documents were researched and interviews conducted in order to identify the requirements and criteria which applied to the issues addressed in the concerns. The concerns were



grouped into four elements; the elements were subdivided into issues. The issues were evaluated against the identified requirements and criteria to determine findings. A collective significance analysis was conducted; causes were indicated for negative findings; and corrective actions for the negative findings were initiated or determined to have already been initiated.

3.2 Specific Methodology

The documents reviewed included the Privacy Act of 1974, the Office of Management and Budget Guidelines which implement the Act, the TVA Code and Instructions, TVA's last two annual Privacy Act reports to the Office of Management and Budget, TVA Instructions on employee records, TVA manuals on two automated systems relevant to employee records, and two earlier responses to employee concerns.

A review was made of investigations and responses developed by the Project Manager's Office (PHO), and the Office of Employee Relations. Information from these investigations was used in the development of this report. In addition, the "Sensitive Files" from Quality Technology Company (QTC) were also reviewed.

Nine interviews were held. They included lead personnel officers for DNC, for WBN Project Personnel Office; and WBN Plant Personnel Office; a WBN Construction Management Assistant (CMA); and managers in TVA's Labor Relations Staff.

Two telephone interviews were held: one with the CMA at Bellefonte Nuclear Project (BLN) and one with a personnel officer at SQN Personnel Office.

Records inspected included the grievance log in the CMA's office; logs of warning letters issued to Salary Policy and to T&L employees; T&L personnel files and notebooks of forms TVA 77 in the Construction Superintendent's office; paper copy personnel files in WBN Project Personnel Office; and microfiche PHRs in WBN Project Personnel Office and the Division of Construction Personnel Office.

Files for inspection were identified primarily from the various logs. All entries that involved the concerns in this subcategory were selected from the T&L grievance log for January 1984 through December 1985, the salary policy log for January 1982 through June 1983, and the T&L warning letter log from January through May 1984. T&L files were also randomly selected by retrieving one



file from a position twelve inches from the front of each of the first 19 file drawers. For T&L files that were inspected and found to contain documents related to the issues in this subcategory, the corresponding personnel records were inspected in WBN Project Personnel Office.

4.0 FINDINGS

Overview of TVA's Personnel Record System

TVA's official record on employees is the PHR that is maintained in Knoxville in the TVA Division of Personnel. PHR "field files" are maintained in the office of the employee's division personnel officer or, in the case of construction T&L employees, in the office of the employee's project personnel officer or area employment officer. Other files on employees are maintained by supervisors or by administrative officers acting for a group of supervisors. These files are referred to as "supervisor's files" or "S/A files." Supervisors also have the option of maintaining personal notes to serve as memory joggers.

The basic structure of TVA's personnel record system predates WBN construction project. However, other aspects of the system have been changed since the beginning of that project through implementation of the Privacy Act of 1974 and conversion of PHRs and field files to microform in 1980. The Privacy Act imposes requirements for the protection of information on individuals. It also gives individuals the right to review certain information maintained about them and the right to request corrections and amendments in that information.

Conversion of PHRs to microform included the replacement of most "paper copy" field files with microfiche copies of the PHR, thus eliminating discrepancies in contents of these two files. Supervisors, particularly those who did not have ready accessibility to the microfiche PHR, continued to maintain paper-form S/A files.

4.1 Secret Records

4.1.1 Issues 72001 - T&L Files and "Secret" Records

This issue addresses the contention that management keeps "secret" personnel records (non-PHR files which employees cannot review). This would be a violation of the Privacy Act.



Discussions

Personnel records called "T&L files" are maintained in the Office of the Construction Superintendent at WBN and other nuclear construction sites. Their use is governed by the Privacy Act of 1974. The Privacy Act prohibition of "secret" records on individuals is reflected in the TVA Code under II PRIVACY:

TVA permits an individual, except as authorized by law, to ascertain what records pertaining to that individual are maintained in TVA systems of records, to gain access to and to request correction or amendment of such records.

A "system of records" is a set of records from which personal information about an individual can be retrieved by use of the individual's name or other personal identifier such as social security number, badge number, etc. Thus, T&L files, as well as other S/A files, TVA PHR, and PHR field files, are a system of records under the Privacy Act and are subject to the Act's requirements.

One WBN management employee who shares the responsibility for maintaining the T&L files said that if an employee so requests, he may see his T&L file without the file being prescreened. A follow-up interview with the same individual reaffirmed that employees can review their T&L files on request and have been able to do so since at least 1977. However, another WBN management representative (who also assists in maintaining these files) stated the following in an earlier response to one of the concerns in this group:

Employees would not see these documents unless an adverse personnel action resulted. If an adverse personnel action does result, the employee has an opportunity to review any documents upon which the action was based.

A management representative responsible for maintaining T&L files at BLN reported that employees may review specific documents from their T&L file if the superintendent approved the employee's request. Employees are not permitted to review the entire file.



A management employee responsible for maintaining personnel files on Operations personnel at SQN reported that those employees may access their PHRs but may not access the paper field file. When employee inquires about information in the paper field file, a clerk checks the file and relays information to the employee.

Conclusion

No evidence was found of "secret" personnel records in the DNC Personnel Office (Salary Policy employees), WBN Project Personnel Office (T&L employees), or WBN Site Personnel Office. However, while this issue is not technically accurate, it has revealed a problem: T&L records in the Construction Superintendent's office and some other paper field files were not consistently made available to employees to the extent required by the Privacy Act.

4.1.2 Issue 72002 - Personal Notes Kept by Supervisors

This issue which contains one concern addresses the misuse of personnel notes kept by supervisors.

Discussion

Maintenance of personal notes is not prohibited by the Privacy Act but under some circumstances the notes are subject to its provisions. More specifically, Office of Management and Budget guidelines provide that uncirculated personal notes, paper, and records which are retained or discarded at the author's discretion and over which the agency exercises no control or dominion (e.g., personal telephone lists) are not considered to be agency records within the meaning of the Privacy Act. However, the courts have ruled that when personal notes have been circulated or used to bear negatively on worker's employment status or situation, they must be handled in a manner consistent with the letter and spirit of the Privacy Act.

Information from interviews indicated that some supervisors keep personal notes. Supervisors are taught in training courses, and are encouraged by management, to keep personal notes on employees to serve as memory joggers. Supervisors are told also that their personal notes are not subject to review by employees.

Conclusion

The advice to supervisors that the notes are not subject to review by the employee is accurate only as far as the notes are not circulated or used to support a personnel action. However, mere maintenance of personal notes by TVA supervisors is not a violation of the Privacy Act and is within TVA recommended practice. Therefore, this issue is factually accurate, but does not constitute a problem requiring corrective action.

4.2 Flawed Records

4.2.1 Issue 72003 - Inaccurate or Out-of-Date Personnel Record Documents

This issue addresses inaccurate or out-of-date personnel record documents. Determinations using such documents would be unfair to an individual.

Discussion

Based upon requirements of the Privacy Act, the implementing TVA instruction states:

TVA maintains all records used in making determinations about an individual with such accuracy, relevance, timeliness, and completeness to ensure fairness to the individual in any determination which may be made on the basis of that record.

The instruction on employee records provides that the PHR contain information officially recognized and pertinent to personnel actions and record requirements. All information proposed for filing in the PHR is submitted to the division personnel officer who screens it according to guidelines for authenticity and appropriateness.

Removal of Out-of-Date Warning Letters

The TVA instruction on employee records provides:

Letters of reprimand, admonishment, caution, or warning are retained until recalled by a written request from the personnel officer of the issuing division. When a reprimand, admonishment, caution, or warning is included in or used in support of a notice of adverse,

disciplinary, or other personnel action, the letter cannot be recalled unless the action in the notice is cancelled. Otherwise, the recall is made at the end of three years or earlier at the option of employee's division.

This evaluation found that temporary warning letters that include a six-month limit (a) are not removed from the T&L files in the office of the Construction Superintendent, (b) are, except when inadvertently overlooked, removed from the paper field file in the project personnel office and from the nuclear plant site personnel office, and (c) are not submitted to the PHR and thus are not in either the microfilm PHR or the microfiche PHR field file.

Other "disciplinary" letters which are removed from the PHR because the passage of time are not removed from the T&L files in the Construction Superintendent's office.

The accuracy and completeness of a document is situation specific and cannot be determined on a general basis. However, information from interviews showed that records maintained in personal files are checked for accuracy and completeness by those who prepared the record and the superiors and personnel officers who also sign them.

Job relatedness of information is situation specific and cannot be determined on a general basis. However, documents filed in the PHR are those that the division personnel officer has determined are officially recognized and pertinent to personnel actions and record requirements. Although "job relatedness" is not a controlling factor, it is one of the factors the personnel officer looks at and makes a judgment determination on appropriateness for filing in the PHR.

Changes in T&L files

No documented guidance on notifying employees of changes in the record was found. However, the employee is given a copy of most personnel forms that are prepared. The reason for a record change is not always explained to the employee. The issuing personnel officer decides, based on the nature of the change, whether a specific explanation is indicated and, if so, notifies the employee of the reason for the change.



Conclusion

A number of safeguards protect against the transfer of outdated or faulty data from the T&L files to the permanent PHRs. However, employees are not always informed of changes to their personnel files and temporary letters of reprimand are not removed from T&L files in the Office of the Construction Superintendent. Therefore, the failure to remove temporary letters of reference does constitute a problem, but corrective action was initiated before the evaluation of this issue was completed.

4.2.2 Issue 72004 - Disappearance of T&L Files

This issue contains one concern which addresses the disappearance of personnel files from the Construction Superintendent's office.

Discussion

The TVA instruction on employee records provides:

Individual documents in the S/A file are destroyed when superseded or earlier if no longer needed for reference. The entire S/A file is destroyed when the employee leaves the organization component where the file is maintained.

Conclusion

No evidence was found to indicate that T&L files disappear. The routine DNC practice is to maintain T&L files for at least as long as the construction project continues. Therefore, this issue is not factually accurate.

4.2.3 Issue 72005 - Eligibility Codes for Re-employment

This issue contains one concern which addresses the contention that personnel files contain an eligibility code which could conflict with the evaluation of the employee for rehire.

Discussion

All TVA employees must meet basic security and suitability criteria. Employees who leave TVA under conditions listed below are subject to re-evaluation for compliance with the



security and suitability criteria before they are re-employed. Such employees include those who are discharged for, or resigned following notice of discharge for the following reasons:

- security reasons
- misuse of Government property or official authority or position
- unapproved absences
- failure to satisfy training program requirements other than work performance
- unsatisfactory work
- refusal to perform work assigned
- unsatisfactory conduct in work area
- falsifying records relating to employment
- violation of article II of the General Agreement; discharge recommended by Joint Committee
- conduct off job (includes violation of political activity policy and participating in strike against TVA)

The re-employment of applicants who are subject to re-evaluation for compliance with the security and suitability criteria is delayed with a temporary restriction (which is indicated by a code) until the re-evaluation is completed.

The process of detecting re-employment applicants who are subject to re-evaluation is now automated in the Security and Suitability System. Before implementation of the Security and Suitability System, the appropriate restriction code was placed in the automated Employee Information System. Employment restriction codes are used in the automated personnel data systems to ensure that applicants meet the security and suitability requirements for TVA employment. Employment restrictions may stem from statutory, negotiated, or other requirements, as well as from ratings on employee evaluations and, therefore, are at times inconsistent with conclusions drawn from the performance ratings.



Conclusion

This issue is factually accurate, but what is described is not a problem. The codes do not serve the same purpose as performance ratings. Therefore, differences between them do not constitute inconsistencies in the system.

4.3 Misuse of Records

4.3.1 Issue 72006 - Supervisors Misused Information in Personnel Records

This issue contains two concerns which contend that supervisors misuse information in personnel records.

Discussion

Based on requirements in the Privacy Act, TVA policy is that "TVA ... uses ... records of identifiable personnel information in a manner that ensures that such action is for a necessary and lawful purpose; . . ."

Conclusion

No evidence was revealed in interviews with management representatives to support allegations of use of personnel record information to keep supervisors informed on "whistle blowers" or to track employee activities. Therefore, this issue could not be verified as factually accurate.

4.4 Miscellaneous

4.4.1 Issue 72007 - Unauthorized Access to Personnel Records

This issue contained one concern which contends unauthorized access to the personnel records of another employee was permitted.

Discussion

Based on requirements in the Privacy Act, TVA Instruction II PRIVACY, Procedures, Provides: "Records maintained in a TVA system of records are not disclosed except pursuant to a written request by or prior written consent of the individual unless disclosure is permitted by TVA policy in TVA Code under II PRIVACY."



Conclusion

This issue contends a single instance of unauthorized access to personnel records of another employee. Information on the K-form is insufficient to permit investigation of this contention. No additional information is available. Therefore, this issue could not be verified as factually accurate.

4.4.2 Issue 72008 - Falsification of Personnel Record Documents

This issue addresses two concerns which contend that management falsified documents in personnel records.

Discussion

Information on the K-forms is insufficient to permit investigation of this contention. No additional information is available.

Conclusion

This issue could not be verified as factually accurate.

5.0 COLLECTIVE SIGNIFICANCE

The issues in this subcategory do not, by themselves, require sweeping corrective action. During the period when these issues were raised, both management and employees at WBN seemed confused about employees' rights to review their personnel field files. Additionally, DNC was not ensuring a systematic purging of the outdated warning letters in its files at WBN. Action has been taken to correct both situations.

However, suspicion of management's motives is evident in almost all of the concerns in this category. That suspicion does form a small part of a much larger problem. The employees who raised these concerns did not perceive their managers as trustworthy: whenever the concerned individuals (CIs) had doubts about what was being done with or to their records, they assumed the worst.

The corrective action spelled out in section 7.0 of this report is intended to not just correct specific shortcomings, but to restore employee confidence that their records are correct and accurate. However, an overall employee perception of management untrustworthiness is not a problem which can be dealt conclusively at the subcategory level. It will require comprehensive corrective action at the category and final report levels.

6.0 CAUSE

- 6.1 The effort taken to purge all PHRs and most T&L files of outdated warning letters was not taken by the Office of the Construction Superintendent.
- 6.2 Neither supervisors nor employees were adequately informed of employee rights under the Privacy Act of 1974.

7.0 CORRECTIVE ACTION

7.1 Corrective Action Already Taken

- ° WBN management has initiated a project to remove from the T&L files the six-month warning letters issued from the beginning of WBN Project to July 1983.
- ° The Division of Personnel has included in the new Supervisors' Handbook information about the requirements of the Privacy Act and information on maintaining employee records and personal notes in compliance with the Act. The handbook is now in reproduction. It is intended for distribution to all TVA supervisors.

7.2 Corrective Action Initiated as a Result of This Evaluation

- ° An article was published in the January 6, 1987 issue of Inside TVA (Volume 8, No. 1) providing a detailed explanation of employees' rights to examine their personnel records. (CATD No. 720-NPS-01)

8.0 ATTACHMENTS

Attachment A - Subcategory Summary Table

Attachment B - List of Concerns by Issue



ATTACHMENT A

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

TENNESSEE VALLEY AUTHORITY
 OFFICE OF NUCLEAR POWER
 EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS)
 EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY
 SUBCATEGORY: 720 INACCURATE AND OUT-OF-DATE RECORDS

PAGE - 1
 RUN TIME - 14:00:19
 RUN DATE - 03/19/87

EGORY: 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 - 720
-85-080-00101 T50184	MP	72003	N	WBN	1 N N N N 2 NA NA NA NA		QTC	CI'S PERSONNEL RECORDS WERE CHANGED SIGNIFICANTLY WITHOUT INFORMING CI AS TO WHY. (NAMES/DETAILS TO THE SPECIFIC CASE ARE KNOWN TO QTC AND WITH HELD TO MAINTAIN CONFIDENTIALITY.) CONSTRUCTION DEPT. CONCERN. CI HAS NO FURTHER INFORMATION.	
86-239-SQN 01	MP	72001	N	SQN	1 N N N N 2 NA NA NA NA		NSRS	AN ANONYMOUS INDIVIDUAL MAILED IN A SAFETY CONCERN TO NSRS STATING THAT MANAGEMENT KEEPS A SECRET FILE SEPARATE FROM PERSONNEL FILE ON ALL OPERATIONS PERSONNEL.	
-85-045-00301 T50261	MP	72003	N	WBN	1 N N N N 2 NA NA NA NA		QTC	EMPLOYEE SERVICE REVIEWS DO NOT CONTAIN COMPLETE INFORMATION. DETAILS KNOWN TO QTC, WITHHELD DUE TO CONFIDENTIALITY. NO FURTHER INFORMATION MAY BE RELEASED. CONSTRUCTION DEPARTMENT CONCERN.	
-85-172-00301 T50088	MP	72001	N	WBN	1 N N N N 2 NA NA NA NA		QTC	CMA OFFICE NOT COOPERATING WITH CRAFT (INSULATORS) REGARDING PERSONAL MATTERS AND ACCESS TO PERSONNEL FILES. ADDITIONAL DETAILS IN FILE. RELEASE OF DETAILS COULD COMPROMISE CI'S CONFIDENTIALITY.	
-85-241-00601 T50153	MP	72001	S	WBN	1 N N N N 2 NA NA NA NA	IN-85-241-006	QTC	TWO SETS OF PERSONNEL RECORDS EXIST: ONE AT PERSONNEL OFFICE AND ONE AT SUPERINTENDENT'S (NAME GIVEN) OFFICE. THE PERSONNEL FILE KEPT IN THE SUPERINTENDENT'S OFFICE CANNOT BE VIEWED BY INDIVIDUALS AND OFTEN DISAPPEARS. CI GAVE EXAMPLES OF INDIVIDUALS (NAME KNOWN) WHOSE FILES HAVE DISAPPEARED. CONSTRUCTION DEPT. CONCERN. CI HAS NO MORE INFORMATION. NO FOLLOWUP REQUIRED.	
	02	MP	72004	S	WBN	1 N N N N 2 NA NA NA NA			

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.



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

TENNESSEE VALLEY AUTHORITY
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 SUBCATEGORY: 720 T&L FILES AND "SECRET RECORDS"

PAGE - 2
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 RUN DATE - 03/19/87

CATEGORY: MP MGT. & PERS. ISSUES

CONCERN NUMBER	CAT	SUB CAT	S R PLT D LOC	1 REPORT APPL				HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION	REF. SECTION # CAT - MP SUBCAT - 720
				2	SAF	RELATED	BF				
-85-453-00201 T50033	MP	72001	N WBN	1	N	N	N	N		QTC	IT IS POSSIBLE THAT "LETTERS" CALLED FILE NOTES ARE IN A PERSON'S FILE IN THE CONSTRUCTION OFFICE THAT COULD BE VERY DISCRIMINATING AND THE EMPLOYEE IS NEVER GIVEN AN OPPORTUNITY TO CONTEST THE ALLEGATIONS OR MAY NOT EVEN KNOW THEY EXIST.
-85-480-00801 T50137	MP	72005	N WBN	1	N	N	N	N	IN-85-480-008	QTC	PERSONNEL RECORDS CONTAIN A "CODE" AT THE TOP OF A SHEET THAT IS OFTEN IN CONFLICT WITH THE EVALUATIONS SHOWN ON THE BODY OF THE SHEET, I.E. NOT ELIGIBLE FOR REHIRE, YET EVERYTHING WRITTEN ON THE SHEET INDICATES THE PERSON SHOULD BE ELIGIBLE FOR REHIRE. THIS IS UNFAIR TO EMPLOYEES. CONSTRUCTION DEPT. CONCERN. CI HAS NO MORE INFORMATION. NO FOLLOW-UP REQUIRED.
-85-612-00301 T50058	MP	72001	N WBN	1	N	N	N	N	IN-85-612-003	QTC	MANAGEMENT WRITES AND INSERTS FILE NOTES IN EMPLOYEE'S PERSONNEL FILE WITHOUT EMPLOYEE'S KNOWLEDGE AND OPPORTUNITY TO PRESENT DEFENSE.
-85-612-00401 T50058	MP	72003	N WBN	1	N	N	N	N		QTC	TVA'S POLICY IS TO REMOVE A "LETTER" FROM AN EMPLOYEE'S PERSONNEL FILE AFTER SIX MONTHS IF NO OTHER LETTER IS RECEIVED, YET LETTERS ARE NOT BEING REMOVED.
-85-631-X0201 T50140	IH	60300	S WBN	1	N	N	N	Y		QTC	SUPERVISORS FALSIFIED CI'S "77" FORM . (DETAILS TO THE SPECIFIC CASE ARE KNOWN TO QTC AND WITHHELD TO MAINTAIN CONFIDENTIALITY). CONSTRUCTION DEPT. CONCERN. CI HAS NO MORE INFORMATION.
	02	MP	72008	S WBN	1	N	N	N			

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.



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

TENNESSEE VALLEY AUTHORITY
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 EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY
 SUBCATEGORY: 720 INACCURATE AND OUT-OF-DATE RECORDS

PAGE - 3
 RUN TIME - 14:00:19
 RUN DATE - 03/19/87

EGORY: MP MGT. & PERS. ISSUES

CONCERN NUMBER	CAT	SUB CAT	S H R D	PLT LOC	1 REPORT APPL 2 SAF RELATED					HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION	REF. SECTION CAT - MP SUBCAT - 720
					BF	BL	SQ	WB	Y				
-85-631-00101 T50137	IH	60300	S	WBN	1	H	N	N	Y		QTC	CI "77" FORM CONTAINS INCORRECT DATA . (DETAILS TO THE SPECIFIC CASE ARE KNOWN TO QTC AND WITHELD TO MAINTAIN CONFIDENTIALITY). CONST. DEPT. CONCERN. CI HAS NO MORE INFORMATION. THIS CONCERN HAS BEEN REVISED TO DELETE AN ADDITIONAL CONCERN WHICH HAS BEE N ADDRESSED. THIS CONCERN WAS ASSIGN ED TO OGC TO INVESTIGATE ON 7-4-85. NO FOLLOW-UP REQUIRED.	
02	MP	72003	S	WBN	2	NA	NA	NA	NO				
-85-913-00501 T50092	MP	72006	N	WBN	1	H	H	H	H		QTC	TVA USES SOCIAL SECURITY NUMBERS FOR THE MONITORING AND TRACKING OF EMPL OYEES ACTIVITIES (TRAINING, ERT, ETC .) WITHOUT THE EMPLOYEE'S AUTHORIZAT ION. DOES THIS ACTIVITY VIOLATE FED ERAL LAW? C/I HAS NO FURTHER INFORM ATION. NO FOLLOW UP REQUIRED.	
2	MP	72006	S	WBN	2	NA	NA	NA	NA				
-85-002-02001 T50166	MP	72001	S	WBN	1	H	N	N	N		QTC	TWO SETS OF PERSONNEL FILES EXIST, O NE AT KNOXVILLE (THE OFFICIAL FILE) AND ONE AT WBHP, WHICH IS USED TO KE EP SUPERVISION INFORMED ON "WHISTLE BLOWERS". CONST. DEPT. CONCERN. C/ I HAS NO FURTHER INFORMATION. NO FO LLOW-UP REQUIRED.	
02	MP	72006	S	WBN	2	NA	NA	NA	NA				
-85-003-03001 T50228	MP	72003	N	WBN	1	H	N	N	N		QTC	CI EXPRESSED A CONCERN REGARDING A M EMORANDUM WRITTEN BY A TVA MANAGER P LACED IN CI'S PERSONNEL FILE. CI CL AIMS THE MEMORANDUM DOCUMENTS SEVERA L FACTS BUT ALLOWS THE READER TO FOR M THE WRONG IMPRESSION. CI STATED T HE MEMORANDUM STATED THE AUTHOR'S OP INION RATHER THAN PROVEN FACTS IN TW O PARAGRAPHS. (NAMES/DETAILS KNOWN TO QTC AND WITHELD TO MAINTAIN CON FIDENTIALITY. NO FURTHER INFORMATIO N MAY BE RELEASED.) CONSTRUCTION DE PT. CONCERN. CI HAS NO FURTHER INFO RMATION.	
2	MP	72003	N	WBN	2	NA	NA	NA	NA				

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.



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

TENNESSEE VALLEY AUTHORITY
 OFFICE OF NUCLEAR POWER
 EMPLOYEE CONCERN PROGRAM SYSTEM (EPCS)
 EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY
 SUBCATEGORY: 720 T&L FILES AND "SECRET RECORDS"

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 RUN DATE - 03/19/87

CATEGORY: MP MGT. & PERS. ISSUES

CONCERN NUMBER	CAT	SUB CAT	S R D	PLT LOC	1 REPORT APPL				HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION	REF. SECTION CAT - MP SUBCAT - 720
					2	SAF	RELATED	BF				
-85-008-00401 T50031	MP	72001	S	WBN	1	N	N	N	N		QTC	PERSONNEL FILES EXIST IN TWO FORMS; THE OFFICIAL FILE IN KNOXVILLE, AND A SEPERATE FILE MAINTAINED BY THE SUPERVISOR. ITEMS SUCH AS DISCIPLINARY LETTERS, WHICH ARE REMOVED FROM THE KNOXVILLE FILE DUE TO THE PASSAGE OF TIME, ARE NEVER REMOVED FROM THE SITE FILE. CONVERSELY, ITEMS ARE ADDED TO THE SITE FILE WHICH ARE NEVER ADDED TO THE KNOXVILLE FILE.
02	MP	72003	S	WBN	2	NA	NA	NA	NA			
-85-045-00301 T50257	IH	60300	S	WBN	1	N	N	H	Y		QTC	TVA MANAGEMENT FALSIFIED EMPLOYEE'S PERSONNEL RECORDS. (NAMES/DETAILS TO THE SPECIFIC CASE ARE KNOWN TO QTC AND WITHHELD TO MAINTAIN CONFIDENTIALITY). CI HAS NO FURTHER INFORMATION. NO FURTHER INFORMATION MAY BE RELEASED.
02	MP	72008	S	WBN	2	NA	NA	NA	NA			
M-86-004-00801 T50263	IH	60400	S	SQN	1	N	N	Y	N		QTC	AN EMPLOYEE GAINED UNAUTHORIZED ACCESS TO RECORDS PERTINENT TO ANOTHER EMPLOYEE. (NAMES/DETAILS KNOWN TO QTC, WITHHELD TO MAINTAIN CONFIDENTIALITY). NO FURTHER INFORMATION MAY BE RELEASED. NUCLEAR POWER CONCERN. CI HAS NO FURTHER INFORMATION.
02	MP	72007	S	SQN	2	NA	NA	NA	NA			
P-86-003-00101 T50244	MP	72003	N	WBN	1	N	N	N	N		QTC	CI FEELS HE IS BEING TREATED UNJUSTLY IN THAT TVA IS USING DOCUMENTS AGAINST HIM THAT ARE INACCURATE. (NAME S/DETAILS KNOWN TO QTC AND WITHHELD TO MAINTAIN CONFIDENTIALITY). NO FURTHER INFORMATION MAY BE RELEASED. CONSTRUCTION DEPARTMENT CONCERN. CI HAS NO FURTHER INFORMATION.
					2	NA	NA	NA	NA			
-85-043-00101 T50100	MP	72003	N	WBN	1	N	N	N	N		QTC	PLACEMENT OF NON-JOB RELATED MATERIAL IN CI'S PERSONNEL FILE. DETAILS KNOWN TO QTC, WITHHELD DUE TO CONFIDENTIALITY. CI HAS NO FURTHER INFORMATION. NO FOLLOW UP REQUIRED.

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.



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

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PAGE - 5
 RUN TIME - 14:00:19
 RUN DATE - 03/19/87

EGORY: 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 - 720
					2	SAF	BL	SQ				
-85-046-01101 T50250	MP	72003	N	WBN	1	H	H	H	N	QTC	CI IS CONCERNED OVER A MEMO ISSUED BY A SUPERVISOR (NAME AND DEPT. KNOWN) DATED 4/20/85 WHICH DEALS WITH BORROWED PERSONNEL; SPECIFICALLY, REPORTING WHETHER A BORROWED EMPLOYEE IS A PROBLEM EMPLOYEE. CONSTRUCTION DEPARTMENT CONCERN. NO FURTHER INFORMATION IS AVAILABLE IN THE FILE. NO FOLLOW UP REQUIRED.	
-85-046-01201 T50139	MP	72002	N	WBN	1	H	H	N	N	QTC	SUPERVISOR (NAME AND DEPT. KNOWN) KEEPS A BOOK WHERE THIS SUPERVISOR MAKES ENTRIES AND PLACES COMMENTS MADE BY OR ABOUT EMPLOYEES UNDER HIS SUPERVISION. THIS SUPERVISOR DOES NOT ALLOW THE EMPLOYEES TO READ OR MAKE ENTRIES INTO THIS BOOK. CI STATES THIS VIOLATES THE 1974 PRIVACY ACT AND INFORMATION ISSUED BY THE ENGINEERING ASSOCIATION STATING THAT THIS TYPE OF ACCESS DENIAL IS IMPROPER. NUCLEAR POWER DEPT. CONCERN. CI COULD NOT PROVIDE ANY ADDITIONAL INFORMATION. NO FOLLOW UP REQUIRED.	
-85-075-00201 T50176	IH	60400	S	WBN	1	H	N	N	Y	QTC	THERE ARE TWO SETS OF PERSONNEL FILES: ADMINISTRATIVE CONFIDENTIAL PERSONNEL FILE AND REGULAR PERSONNEL FILE. THE EMPLOYEES ARE ONLY PERMITTED TO SEE THE REGULAR PERSONNEL FILE AND THE ADMINISTRATIVE CONFIDENTIAL PERSONNEL FILE CONTAINS DATA THAT IS WITHHELD FROM THE EMPLOYEES, I.E., TV A REFUSING TO RELEASE AN APPLICANT FOR AN ANNOUNCED JOB OPENING THAT CONSTITUTES ADVANCEMENT FOR THE EMPLOYEES' PROFESSIONAL CAREER. (NAMES/DETAILS TO THE SPECIFIC CASE ARE KNOWN TO QTC AND WITHHELD TO MAINTAIN	
	02	MP	72001	S	WBN	1	H	N	N			
					2	HA	NA	NA	NA			

22 CONCERNS FOR CATEGORY MP SUBCATEGORY 720

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.



ATTACHMENT B
PERSONNEL RECORDS

List of Concerns by Element/Issue

The Personnel Records Subcategory (72000) is comprised of 22 concerns which are grouped into four elements addressing eight issues.

"Secret Records"

72001 - T&L files and "Secret Records"

I-86-239-SQN	IN-85-612-003
IN-85-172-003	PH-85-002-020*
IN-85-241-006*	PH-85-008-004*
IN-85-453-002	WI-85-075-002

72002 - Personnel notes kept by supervisors

WI-85-046-012

Flawed Records

72003 - Inaccurate or out-of-date personnel record documents

EX-85-080-001	PH-85-008-004*
IN-85-045-003	WBP-86-003-001
IN-85-612-004	WI-85-043-001
IN-85-631-001	WI-85-046-011
PH-85-003-030	

72004 - Disappearance of T&L files

IN-85-241-006*

72005 - Eligibility codes for re-employment

IN-85-480-008

Misuse of Records

72006 - Supervisors misused information in personnel records

IN-85-913-005	PH-85-002-020*
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ATTACHMENT B (continued)

Miscellaneous

72007 - Unauthorized access to personnel records

SQH-86-004-008

72008 - Falsification of personnel records

IN-85-631-X02

PH-85-045-003

* Concern addressed in more than one issue.



ECSP Corrective
Action Tracking Document
(CATD)

INITIATION Applicable ECSP Report No.: 72000

1. Immediate Corrective Action Required: Yes No
2. Stop Work Recommended: Yes No
3. CATD No. 720-NPS-01 4. INITIATION DATE 01-21-87
5. RESPONSIBLE ORGANIZATION: TVA Division of Personnel
6. PROBLEM DESCRIPTION: QR NQR TVA management and employees are not adequately informed of employee rights under the Privacy Act of 1974.

ATTACHMENTS

7. PREPARED BY: NAME John Long DATE: 01-21-1987
8. CONCURRENCE: CEG-H Lyndal B Whitaker DATE: 21 Jan 87
9. APPROVAL: ECTG PROGRAM MGR. [Signature] DATE: 21 Jan 87

CORRECTIVE ACTION

10. PROPOSED CORRECTIVE ACTION PLAN: An article will be distributed in TVA's publication for employees, Inside TVA, providing a detailed explanation of employees' rights to access their personnel records.

NOTE: The above article appeared in the January 6, 1987 issue of Inside TVA (Volume 8, No. 1).

This CATD was subsequently issued in accordance with ECTG Policy Statement No. 9 to document corrective action.

ATTACHMENTS

11. PROPOSED BY: DIRECTOR/MGR: N/A DATE: _____
12. CONCURRENCE: CEG-H: Lyndal B Whitaker DATE: 21 Jan 87
- SRP: _____ DATE: _____
- _____ DATE: _____
- _____ DATE: _____
- _____ DATE: _____
- _____ DATE: _____
- ECTG PROGRAM MGR: _____ DATE: _____

VERIFICATION AND CLOSEOUT

13. Approved corrective actions have been verified as satisfactorily implemented.

SIGNATURE

TITLE

DATE



ATTACHMENT B

PERSONNEL RECORDS

List of Concerns by Element/Issue

The Personnel Records Subcategory (72000) is comprised of 22 concerns which are grouped into four elements addressing eight issues.

"Secret Records"

72001 - T&L files and "Secret Records"

I-86-239-SQN	IN-85-612-003
IN-85-172-003	PH-85-002-020*
IN-85-241-006*	PH-85-008-004*
IN-85-453-002	WI-85-075-002

72002 - Personnel notes kept by supervisors

WI-85-046-012

Flawed Records

72003 - Inaccurate or out-of-date personnel record documents

EX-85-080-001	PH-85-008-004*
IN-85-045-003	WBP-86-003-001
IN-85-612-004	WI-85-043-001
IN-85-631-001	WI-85-046-011
PH-85-003-030	

72004 - Disappearance of T&L files

IN-85-241-006*

72005 - Eligibility codes for re-employment

IN-85-480-008

Misuse of Records

72006 - Supervisors misused information in personnel records

IN-85-913-005	PH-85-002-020*
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ATTACHMENT B (continued)

Miscellaneous

72007 - Unauthorized access to personnel records

SQM-86-004-008

72008 - Falsification of personnel records

IN-85-631-X02

PH-85-045-003

* Concern addressed in more than one issue.

