

Attachment A

EMPLOYEE CONCERNS PROGRAMS

PLANT NAME: Beaver Valley 1&2 - LICENSEE: Duquesne Light Company
DOCKET #: 50-334; 50-412

NOTE: Please circle yes or no if applicable and add comments in the space provided.

A. PROGRAM:

1. Does the licensee have an employee concerns program?
(Yes or No/Comments)

Yes.
2. Has NRC inspected the program? Report # 92-20/20; 90-06/07

B. SCOPE: (Circle all that apply)

1. Is it for:
 - a. Technical? (Yes, No/Comments)

Yes.
 - b. Administrative? (Yes, No/Comments)

Activities including but not limited to quality assurance, safety related, security, or personnel/management issues.
 - c. Personnel issues? (Yes, No/Comments)

Yes.
2. Does it cover safety as well as non-safety issues?
(Yes or No/Comments)

Yes.

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3. Is it designed for:
- a. Nuclear safety? (Yes, No/Comments)
Yes.
 - b. Personal safety? (Yes, No/Comments)
No, licensee maintains a separate program for industrial safety concerns.
 - c. Personnel issues - including union grievances? (Yes or No/Comments)
Yes, the assistance of human resources personnel may be solicited.
4. Does the program apply to all licensee employees? (Yes or No/Comments)
Yes, including past employees.
5. Contractors? (Yes or No/Comments)
Yes.
6. Does the licensee require its contractors and their subs to have a similar program? (Yes or No/Comments)
No.
7. Does the licensee conduct an exit interview upon terminating employees asking if they have any safety concerns? (Yes or No/Comments)
No, exit interviews are conducted through the human resources department.

C. INDEPENDENCE:

1. What is the title of the person in charge?

Manager, Quality Services Unit is designated as the program sponsor.

2. Who do they report to?

Senior Vice President and Chief Nuclear Officer of the Nuclear Power Division

3. Are they independent of line management?

Yes.

4. Does the ECP use third party consultants?

Funding is budgeted for this contingency; however, this has not been necessary to date.

5. How is a concern about a manager or vice president followed up?

Investigation may be completed by the licensee's Independent Safety Evaluation Group (ISEG), Duquesne Light personnel outside the Nuclear Power Division, or third party consultants (non-Duquesne Light employees).

D. RESOURCES:

1. What is the size of the staff devoted to this program?

Two cognizant individuals who report to the Manager, Quality Services Unit. However, any member of the Quality Services Unit may be called upon to conduct an investigation.

2. What are ECP staff qualifications (technical training, interviewing training, investigator training, other)?

Since any Quality Services individual may be involved, a wide range of expertise/qualifications are available to choose from. This includes personnel with technical backgrounds and personnel who have received interview training.

E. REFERRALS:

1. Who has followup on concerns (ECP staff, line management, other)?

ECP staff; the allegations are not closed out until all corrective actions regarding the concern are completed.

F. CONFIDENTIALITY:

1. Are the reports confidential?
(Yes or No/Comments)

Yes, also all records are considered proprietary.

2. Who is the identity of the alleged made known to (senior management, ECP staff, line management, other)?
(Circle, if other explain)

ECP staff and Manager Quality Services.

3. Can employees be:

- a. Anonymous? (Yes, No/Comments)

Yes.

- b. Report by phone? (Yes, No/Comments)

Yes, licensee maintains a 24-hour hotline. Mail-in forms are also posted in nine locations throughout the plant.

G. FEEDBACK:

1. Is feedback given to the alleged upon completion of the followup? (Yes or No - If so, how?)

The investigative report, as well as final disposition of the concern, are forwarded to the alleged and Senior Vice President.

2. Does program reward good ideas?

No, this is not the purpose of the licensee's ECP program. A separate employee suggestion program is in place.

3. Who, or at what level, makes the final decision of resolution?

The program sponsor, Manager, Quality Services Unit. However, the Senior Vice President may override the final decision of resolution.

4. Are the resolutions of anonymous concerns disseminated?

The final report is forward to the Senior Vice President.

5. Are resolutions of valid concerns publicized (newsletter, bulletin board, all hands meeting, other)?

No.

H. EFFECTIVENESS:

1. How does the licensee measure the effectiveness of the program?

There is no formal mechanism for this; however, the ISEG has recently performed an independent review of the program at the request of the Senior Vice President.

2. Are concerns:

- a. Trended? (Yes or No/Comments)

No.

- b. Used? (Yes or No/Comments)

Corrective action is taken in response to substantiated concerns.

3. In the last three years how many concerns were raised? 7
Of the concerns raised, how many were closed? 7 What percentage were substantiated? 43% (3/7)

4. How are followup techniques used to measure effectiveness (random survey, interviews, other)?

The Manager, Quality Services Unit, has conducted an anonymous survey regarding the reporting of plant related safety concerns (with respect to having no reservations of reporting).

5. How frequently are internal audits of the ECP conducted and by whom?

Internal Audits are not conducted.

I. ADMINISTRATION/TRAINING:

1. Is ECP prescribed by a procedure? (Yes or No/Comments)

Yes; Nuclear Power Division Administrative Procedure 8.14 and Quality Services Procedure 16.4.

2. How are employees, as well as contractors, made aware of this program (training, newsletter, bulletin board, other)?

- Initial site access
- Annual refresher training
- Posted bulletin boards
- Memos from the Senior Vice President and Quality Services Manager to all employees and contractors
- Closed circuit TV

ADDITIONAL COMMENTS:

(Including characteristics which make the program especially effective, if any.)

NAME:

TITLE:

PHONE #:

Pete Sena / Resident Inspector / (412) 643-2000

DATE COMPLETED: 8/20/93

50-334/412/92-20

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The above LERs were reviewed with respect to the requirements of 10 CFR 50.73 and the guidance provided in NUREG 1022. Generally, the LERs were found to be of high quality with good documentation of event analyses, root cause determinations, and corrective actions.

8.2 Quality Concern Resolution Program

The inspector performed a review of the licensee's Quality Concern Resolution Program (QCRP) to determine if the program is adequately addressing employee concerns and whether corrective actions, when required, are adequately implemented. The purpose of the QCRP is to provide a means for an individual (Duquesne Light employee, contractor, or vendor) to express an allegation or concern about a quality assurance or safety related matter.

The QCRP is administered in accordance with Nuclear Group Administrative Procedure 8.14 and has been in place for about 5 years. The licensee has several methods to ensure that all individuals are aware of the program function. The purpose and employee use of the QCRP is reviewed during annual general employee refresher training. Quality concern reporting forms, as well as placards explaining the program, are posted in nine different locations throughout the facility. Additionally, the Vice President of the Nuclear Group recently issued a memorandum to all employees reiterating Duquesne Light's practices and policies regarding an individual's right to contact the NRC, prohibition against the intimidation of personnel who perform verification inspections, and the use of the QCRP. Several methods are also available for individuals to report their concerns. These include the use of a 24-hour "hot line," walk-in interviews, or mail-in concern report forms. Confidentiality may also be granted to the concerned individual or the concerns may be reported anonymously.

The inspector performed a review of the licensee's QCRP investigations over the past several years. All concerns are initially brought to the attention of the manager of the Quality Services Unit (QCRP sponsor) for initial disposition. The inspector noted that each concern was inspected by the QCRP staff and several did result in concerns being substantiated. Corrective actions were assigned and were completed prior to concern close out. Copies of the investigation report and final disposition of the concern were also forwarded to the concerned individual and Vice President. The inspector did note, however, that the number of concerns has decreased slightly since 1989 to the present. The inspector questioned this slight decrease and was informed that in 1989 and 1990 the licensee required all quality control contractors to conduct an exit interview with the QCRP staff prior to the termination of their employment. This afforded the contractors a final opportunity to express any quality or safety concerns. However, in 1991 the licensee discontinued this practice because only minor administrative concerns were being received, which accounts for the decrease in the number of concerns. The inspector noted that 58% of the 1989 concerns and 50% of the 1990 concerns were reported through QCRP exit interviews with the contractors and were minor administrative concerns. The quality control contractors still have the opportunity to report any concerns prior to their employment terminations.

The inspector concluded that the purpose and availability of the QCRP is well communicated to all individuals on site. The Vice President has taken effective action to communicate Duquesne Light expectations in regard to fostering an open atmosphere for identifying, communicating, and correcting safety concerns. The investigations performed by the QCRP staff were thorough and well documented. Appropriate safeguards are in place to ensure that the confidentiality of individuals is protected. Discounting the concerns raised through the quality control contractor exit interviews, the number of concerns raised by workers has remained consistent over the last 4 years.

8.3 Offsite Review Committee

The inspector attended the October 8, 1992, bimonthly Offsite Review Committee (ORC) meeting and performed a review of previous meeting minutes to assess the ORC's oversight effectiveness. Meetings were thoroughly documented and the minutes were useful in ascertaining the topics discussed and the basis for conclusions. Minority opinions regarding technical specification amendment approval were appropriately documented. The inspector noted that the depth of discussions were appropriate for the safety significance of the issues. The discussions were open and candid and not dominated by one group or individual. The ORC membership is diverse and the active participation of senior managers from other utilities and experienced consultants is considered a strength. Committee action items regarding open issues were properly tracked and resolved in subsequent meetings. Subcommittees, such as the Audits and Inspection and the Maintenance and Operations Subcommittees are extensively used to identify potential safety concerns or trends for ORC review. Overall, the inspector concluded that the ORC has provided effective oversight of plant operations and licensing issues.

8.4 10CFR21 Notification

During maintenance activities on the Unit 1 emergency diesel generators, the licensee identified a potential 10CFR21 finding. The licensee was in the process of replacing filters on the starting air piping to the solenoid operated start valves (SOV-EE-101, 102, 103, and 104) when maintenance personnel noticed that the automatic drain float within the filter bowl had disintegrated. Pieces of the neoprene float were found in the bottom of the filter housing. This condition was found on three of the four filter assemblies for the two diesels. Although no diesel starting problems were identified during monthly testing, this material had the potential to cause the air start SOVs to remain open following a diesel start signal and thus maintain the air start motors engaged with the diesel after initial cranking. This in turn would burn out the air start motors as the diesel comes up to full speed. Each diesel has two independent air start systems.

The licensee subsequently performed an inspection of the air start system downstream of the filter assemblies. The licensee confirmed that the float particles were isolated within the filter housing and did not get within the air piping. As a precaution, the licensee replaced the solenoid operated valves that were associated with the degraded filter assemblies. These filter