

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

May 13, 1994
ST-HL-AE-4780
File No.: G03.12
10CFR50

Mr. L. J. Callan
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498; STN 50-499
Status of Upgrades to Employee Concerns Program

Reference: Letters from W. T. Cottle (HL&P) to J. L. Milhoan (NRC) dated December 31, 1993 (ST-HL-AE-4665) and to L. J. Callan (NRC) dated February 11, 1994 (ST-HL-AE-4685)

Dear Mr. Callan:

In the two referenced letters, I expressed the fact that one of my highest priorities since coming to the South Texas Project has been to assure that there is an environment which encourages employees to bring forth their concerns and that employees who bring forth concerns are recognized as contributors to our overall vision and mission for the station. I also submitted a description of actions taken to upgrade the Employee Concerns Program at the South Texas Project. As previously mentioned, these changes are designed to ensure that sub-programs with appropriate expertise investigate various types of concerns, while at the same time providing employees with a simple, easy-to-use, single point-of-contact to assist them in raising concerns and preserving confidentiality.

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The current status of specific items discussed in the December 31, 1993 and February 11, 1994 letters is as follows:

Item No. 1:

In the February 11, 1994 letter, Houston Lighting & Power Company stated that;

"Revisions to procedures used by the employee concerns program to more completely describe the specific methods used to protect the identity of those who wish their concerns to be handled on a confidential basis have been completed. The specific methods describe who has responsibility for maintaining confidential files, process for assigning numbers to concern to protect identity and caution statement for ensuring an individual's identity does not get inadvertently linked with an investigation."

During an internal review of the Employee Concerns Program procedures on April 28, 1994, it was discovered that while the overall Employee Concerns Program procedures covered confidentiality, the specific methods described above (i.e., maintaining confidential files, assigning numbers, and a caution statement) were covered in detail only in the Nuclear Safety and Quality Concerns Program sub-program procedure. However, after review of the actual confidentiality practices being used by the three affected sub-programs, we believe that those practices were adequate to maintain confidentiality.

The NRC was notified via phone of the above on May 2, 1994. The procedures for the three sub-programs were revised by May 5, 1994 to specify the actual confidentiality practices being used by the three sub-programs.

Item No. 3:

Three Employee Concerns Oversight Group meetings have been held to review completed concern reports from each sub-program. This activity will continue for Class 1 (Nuclear Safety or Quality) Concerns.

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Item No. 4:

In addition to the training mentioned in my previous letters:

One Nuclear Safety and Quality Concerns Program evaluator completed five days of formal training regarding interviewing techniques in February 1994. In addition, twenty-six hours of formal training on investigative principles was recently completed for the following evaluators/investigators:

<u>Group</u>	<u>Number of Evaluators/Investigators</u>
Nuclear Safety and Quality Concerns Program	1
STP Investigations	1
Human Resource Services-Nuclear	4
Industrial Safety & Health	1

Items No. 5 and 6:

A dedicated exit room has been established.

An interviewer from the Nuclear Safety and Quality Concerns Program sub-program has been assigned to participate in the exit process for each person concluding a term of employment at the South Texas Project site since November 29, 1993. Documented interviews started in mid-December 1993. From that time, through April 1994 the interviewer has participated in 578 interviews, during which seventeen concerns have been received. This compares with two concerns received during the exit interview process in the six months preceding November 29, 1993.

Item No. 7:

The Nuclear Training Department has completed modifications to the General Employee Training Program to cover the revised Employee Concerns Program. General Employee Training covering the new program was initiated in February 1994. Changes to the Basic Supervisory Skills Program were completed and include material on how supervisors should address employee concerns as well as the workings of the Employee Concerns Program. This updated material will be used in base supervisor training courses as well as Supervisory Skills Continuing Training beginning this summer.

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Item No. 8:

An internal assessment of the Employee Concerns Program by the Quality Assurance Department is in progress and will be completed by May 31, 1994.

Three Employee Concerns Oversight Group meetings have been held.

An Employee Recognition Award Program is currently being established and one of the purposes of the program is "To recognize those employees who identify and bring forward significant or hard to detect nuclear or safety issues". This program has been approved and is scheduled for implementation by June 1, 1994.

Random interviews of site personnel to solicit feedback on the new Employee Concerns Program were started in February 1994. The random interview includes questions that determine the person's knowledge of the program, whether they would use the program if they had a concern, and whether they thought an identified concern would be resolved. The results of these interviews have been positive except that a minority of personnel indicated reluctance to use the Human Resource Services - Nuclear sub-program. Actions have been taken to address this feedback. Houston Lighting & Power believes that the reluctance of personnel to identify concerns to this one particular sub-program has not adversely affected the Employee Concerns Program because of the ability to report concerns by other methods such as other sub-programs, the employee advocate, and drop boxes. The random interviews have been a useful tool for confirming our progress in improving employee confidence in the Employee Concerns Program and for identifying opportunities for improvement.

In addition, an Organizational Interface Assessment was conducted in April, 1994, that included questions regarding employee confidence in the Employee Concerns Program, and how employees would raise safety concerns. The results of this assessment have just recently been received and are being evaluated. A preliminary review of the data suggests that significantly more employees are willing to raise concerns to their supervisor than a year ago. The data also show a small increase in the number of people who would use the Employee Concerns Program. This may be the first indication of the impact of the recent improvements in the program. These survey results also confirm Houston Lighting & Power Company's expectation that sustained effort to continue the improvement in the employee confidence in the program is warranted.

In the December 31, 1993 letter, Houston Lighting & Power Company stated that steps had been taken to improve employee confidence in the Employee Concerns Program. One of the steps was to discontinue tape recordings and affirmation statements, except in certain investigations performed by the STP Investigations sub-program. Quality Assurance has recently identified that the Human Resource Services-Nuclear sub-program is also using an affirmation

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statement. However, Human Resource Services-Nuclear only uses affirmation statements when performing formal investigations in accordance with Corporate Policy and only for personnel interviewed as part of the formal investigation, which does not normally include the concernee. In addition, the affirmation statement is routinely used by the STP Investigations sub-program due to the nature of the concerns they investigate, but as in the case of the Human Resource Services-Nuclear sub-program, the STP Investigations sub-program would not normally require the concernee to sign an affirmation statement. Houston Lighting & Power Company believes that the use of affirmation statements by the STP Investigations and Human Resource Services-Nuclear sub-programs for the situations described above, does not adversely affect employee confidence in the Employee Concerns Program.

Item No. 11:

Three Employee Concerns Oversight Group meetings have been held. Both concern reports and responses to concernees are being reviewed by this group.

Item No. 13:

A dedicated exit interview room has been established.

Item No. 14:

A videotape, which details the workings of the new Employee Concerns Program and describes the methods for raising concerns, was mailed to Houston Lighting & Power Company South Texas Project employees in March 1994. This videotape was also distributed to baseline contractors.

The Nuclear Safety and Quality Concerns Program Manager has addressed approximately 1700 South Texas Project employees (Houston Lighting & Power Company and contractors) in group settings to explain the Employee Concerns Program and answer questions. Additional presentations are planned.

A pamphlet titled "Employee Concern Program - Questions and Answers" was distributed to South Texas Project employees (Houston Lighting & Power Company and contractors) in April 1994. This pamphlet is also being given to new South Texas Project employees (Houston Lighting & Power and contractors) at General Employee Training.

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In addition to the actions described above, the following actions have been taken or are planned:

- a. New Employee Concerns Program performance indicators have been established and are being presented to the South Texas Project Group Vice-President, Nuclear, his direct reports, the Employee Concerns Program Employee Concerns Oversight Group members, and selected other personnel.
- b. An external assessment of the Employee Concerns Program will be scheduled for July - August 1994

All major actions to change and implement the revised Employee Concerns Program have been completed. Future actions will concentrate on implementation of the program and assessing program effectiveness.

If you need further information please do not hesitate to call me or Mr. Robert Englmeier, Manager of the Nuclear Safety and Quality Concerns Program.

Sincerely,



W. T. Cottle
Group Vice President, Nuclear

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